

FORMER WHITEWEBBS PARK GOLF COURSE

ENFIELD, LONDON

PLANNING STATEMENT

MARCH 2024





Quod

Planning Statement

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Golf Course,
Enfield

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Q200053

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Executive Summary

1. This application seeks full planning permission for the following:
 - A new professional Training Centre for use by Tottenham Hotspur Football Club's ("the Club") Women and Girls' Teams, along with managed community access to the facilities.
 - Restoration of the historic parkland, and regeneration of the existing Southern Clubhouse building for café, community and park warden use.
2. Along with this planning application, a separate application for non-material amendments to the (extant) planning permission for the Western Field proposals (to the east of the proposed new Women's and Girls' Training Centre) to create a functional link between the Women's and Men's Training Centres.
3. The site is a former golf course, which closed in 2021, and includes an area (east) of the Whitewebbs Wood.
4. The site is to be leased by the Club from the London Borough of Enfield ("LBE") who awarded an agreement to lease to the Club following a competitive tender, which involved the Club engaging with the Council's Planning Department through the pre-application process in 2020.
5. The scheme presented in that pre-application was received favourably by LBE's Planning Department and the scheme submitted under this application reflects that in the competitive tender.
6. Prior to the submission of this planning application, the Club have engaged in consultation (via various mediums, including website, meetings, public event, leaflet drops) with various parties, including the community, statutory consultees, and the Government Office for London. The scheme has developed, in response to matters raised through that consultation.

Scheme Principles

7. The Training Centre will provide both indoor and outdoor facilities for the Club's Women's professional and academy teams. It will provide accommodation and facilities that set new standards in women's training and are benchmarked against the facilities that have been developed for the Men's Teams on the adjoining site.
8. The training facilities will be made available to the community through a managed programme and, as part of the proposals, the Club will be promoting a wider community outreach programme aimed at developing women and girls' football which will improve the physical, mental and educational wellbeing of the users of that programme.
9. There is a demonstrable need for new training facilities for the Club's Women's and Girls' teams. This project will enable a more efficient and sustainable operation, helping the Club grow their involvement in the women's game, and respond to the Government's (and professional bodies) objective of growing women's football.

10. As well as providing dedicated training facilities, the scheme involves major restoration plans for the remainder of the parkland, which is a non-designated heritage asset. The improvements to the parkland will increase its attractiveness, by providing landscape improvements, improved access (removing the golf course and replacing it with a more natural recreational environment), increasing footpaths and routes through the parkland.
11. The scheme will involve a new café operation, along with a community hub and Warden's offices in a refurbishment Southern Clubhouse.
12. The existing car park will be improved, but the capacity will remain unchanged.
13. The landscape improvements are complimented by significant ecological improvements (Biodiversity Net Gain of circa 27%) and works to heritage assets aimed at both preserving and enhancing their heritage worth. Drainage improvements will be made to the site, creating a strong blue infrastructure to compliment the green infrastructure improvements.

Green Belt

14. The site falls within the Metropolitan Green Belt and the proposed use (outdoor sport and recreation) are "appropriate" use in the Green Belt, where it does not harm the openness of the Green Belt.
15. These proposals will cause no harm to the five purposes of Green Belt¹.
16. There will be a limited effect on the openness of the Green Belt but that will be of a very low impact, given the limited scale of any new build and the landscape setting, as well as there being no temporal change to this part of the Green Belt.
17. Nevertheless, the application involves a range of benefits which, individually, and together represent Very Special Circumstances ("VSC").

Key Planning Considerations

18. There will be substantial improvements to the landscape setting within the site, including restoration of the historic parkland. This will be both a landscape and heritage benefit.
19. The landscape strategy is co-ordinated with an ecological strategy, aimed at improving the biodiversity value of the site. It is demonstrated that the scheme will deliver Biodiversity Net Gain which is almost twice as much as the mandated BNG requirement of the Environment Act.

¹ Paragraph 143 of the NPPF.

20. There will be a net heritage benefit arising from this development, including improvements to the Conduit House (non-designated heritage asset), historic Whitewebbs Park (non-designated heritage asset), reinstatement of a new historic driveway to Whitewebbs House (non-designated heritage asset) would improve heritage management, the public will have a greater appreciation of the heritage assets of the site.
21. The proposals adopt high standards of sustainable construction and operation, and have been designed to minimise carbon. Whilst the scheme itself, does not achieve net zero carbon standards, it is proposed that the residual carbon from the scheme can be off set through a modest commuted sum.
22. The proposals will deliver major social and economic improvements, which will benefit the socio-economic wellbeing of local communities.
23. The community access and outreach programme (that will be secured through this planning permission) will benefit local communities, whilst also providing a training facility of national standards that will assist in growing the women's game.
24. The proposals will have a positive health impact that will be achieved through both the improved recreational and outdoor sport to be delivered through both the parkland and the Training Centre.
25. There will be no adverse consequences of the development in relation to transport, or such amenity considerations as noise, lighting or air quality.

Planning Balance

26. While the scheme can be said to be compliant with much of Green Belt Policy, there is a modest impact on the openness of the Green Belt. Consequently, there is a presumption in policy against development, unless VSC are proven. In this case, there is a need for the development, which cannot be located elsewhere due to the operational inter relationship with the Men's Training Centre. There are more over a wide range of planning benefits which together constitute VSC, including:
 - Heritage.
 - Social impacts (including supporting the growth of the women's game).
 - Economic.
 - Health and wellbeing.
 - Landscape improvements.
 - Improved access to sport and recreation, both for women specifically as well as the wider community.
 - Biodiversity.
27. These benefits, taken together, clearly outweigh any harm that may arise due to the modest effects on the openness of the Green Belt. There is thus VSC.

28. Notably, some of these benefits were deemed to be VSC at the time of the favourable determination of the neighbouring Men's Training Centre, which involved a significantly greater level of new development than this proposal.

Planning Policy

29. The proposals achieve sustainable development, satisfying the three overarching and interdependent objectives of economic, social and environmental matters.
30. The scheme accords with National Planning Policy, as well as the Development Plan. Consequently, it is sustainable development for which there is a presumption in favour.

1 Introduction

- 1.1 This Planning Statement supports a full planning application made by Tottenham Hotspur Football Co. Ltd (“the Club” or “the Applicant”).
- 1.2 Consent is sought for the redevelopment of the former Whitewebbs Golf Course (“the Site”) to deliver a new elite football training centre and Turf Academy and restored historic (public) parkland. This includes the repurposing and extension of the existing northern golf clubhouse for football-related uses and the delivery of an enhanced public café with community multi-function space and park warden’s office) and WC facilities at the southern golf clubhouse, and a major programme of enhancement (including management) of the parkland for the enjoyment and use of the public.
- 1.3 The training centre would be used by the Club’s Women’s First Team and female Academy sides. It would be a national class facility which supports the Club’s ambitions to establish their women’s teams as one of the best national (and international teams) and will enable them to attract, retain and develop female players, alongside encouraging more local people to participate in football through a range of community initiatives.
- 1.4 Alongside the football-related activities, a significant amount of the Site (equating to c. 44%) would be restored to publicly accessible parkland, with a further 22% being publicly accessible woodland and recreation areas.
- 1.5 The description of development is as follows:

“Change of use of former golf course (Use Class F2) to provide a football training centre (Sui Generis) and parkland (Use Class F2), comprising of football pitches and associated infrastructure; change of use, modification and extension of the existing Northern Clubhouse building to provide football training centre and associated uses (Sui Generis); restoration and enhancement of parkland landscape, including new footpaths; reinstatement of historic carriageway in Whitewebbs Wood; modifications of existing Southern Clubhouse to form a replacement café and public toilets, alongside a part change of use to include a flexible community space (Use Class F1/F2/Class E); demolition of existing grounds maintenance building and construction of replacement grounds maintenance building; construction of gatehouse; hard and soft landscaping works to include land reprofiling; new vehicular and pedestrian access, including formation of a link to land to the east, and modifications to existing vehicular and pedestrian access and parking; restoration of Whitewebbs Pond; and associated works.”

- 1.6 Alongside the above, a separate application for non-material amendments (NMA) is also submitted. This would modify an extant planning permission² on land adjoining the Site to the east known as the Western Field.

² LPA Ref No 17/01178/FUL.

- 1.7 The amendments will deliver an internal link on Club-operated land, connecting the operations at the proposed female training facility with the Club's existing Training Centre to the east. This is a unique opportunity because of the Site's adjacency to the Club's current Training Centre, allowing the internal movement of players, staff and visitors in a sustainable manner. It is an operational objective of this proposal for both the Men's and Women's teams to share facilities. This is both operationally efficient and means that the amount of land required as part of the development is minimised.
- 1.8 The Site is Council-owned land and the Club have been elected as the preferred bidder for its redevelopment, agreeing a 25-year lease to deliver the football and public facilities. The Club was chosen based on the strength of its bid including the significant social, economic and environmental benefits that will be delivered by the scheme.
- 1.9 The application proposals are aligned with the successful bid and importantly retains the principles which informed the Council's decision to lease the land to the Club.
- 1.10 The Applicant and their appointed design team have undertaken extensive pre-application engagement with the local planning authority, local community and key stakeholders, which dates back to the Club's initial bid submission in January 2020.
- 1.11 The remainder of this Planning Statement comprises the following:
- Section 2 provides the relevant planning background, including a description of the Site and the Club's surrounding operational assets, and an overview of the prevailing Development Plan designations.
 - Section 3 outlines the significant growth that has been experienced in women's football. It also explains how the Club's female teams currently operate and importantly how they must evolve to respond positively to this growth.
 - Section 4 summarises the pre-application engagement that has taken place.
 - Section 5 summarises the proposed development.
 - Section 6 provides an overview of the key planning policies and other relevant material considerations.
 - Section 7 demonstrates the appropriateness of the development in principle.
 - Section 8 assesses the development against Green Belt policy.
 - Section 9 provides an assessment of the proposals against other Development Plan policies and material considerations.
 - Section 10 explain how the benefits of the scheme will be delivered through planning conditions, Section 106 (S106) obligations and Community Infrastructure Levy (CIL) obligations.
 - Section 11 provides conclusions.
- 1.12 The application is supported by a full suite of supporting technical and environmental evidence which addresses the material considerations and the policies relevant to the determination of this application. This includes the documents outlined in **Table 1.1** below:

Table 1.1: Planning Submission – Scope of Supporting Information

Doc No	Document Title	Author
1	Planning Statement	Quod
2	Health Impact Assessment	Quod
3	Social and Economic Benefits Statement	Quod
4	Design and Access Statement	F3 Architects
5	Heritage Statement	Cogent
6	Landscape and Visual Impact Assessment	The Landscape Agency
7	Landscape Statement	The Landscape Agency
8	Statement of Community Involvement	LCA
9	Energy Strategy	WSP
10	BREEAM Pre-Assessment Report	WSP
11	Circular Economy Assessment	WSP
12	Whole Life Cycle Carbon Assessment	WSP
13	Ecological Impact Assessment	Logika
14	The Statutory Biodiversity Metric (Calculation Tool)	Logika
15	Arboricultural Impact Assessment	Tree and Woodland Company
16	Transport Assessment	Arup
17	Framework Travel Plan	Arup
18	Flood Risk Assessment	Logika
19	Sports Pitch Noise Assessment	Logika
20	Air Quality Assessment	Logika
21	Light Spill Assessment	WSP

Doc No	Document Title	Author
22	Archaeological Desk-Based Assessment	RPS Group
23	Phase 1 Geo-Environmental Preliminary Risk Assessment	RPS Group
24	London Planning Fire Safety Statement	BB7
25	Site Waste Management Plan	JNP Group
26	Outline Construction Logistics Plan	Arup
27	Site Construction Management Plan	Arcadis
28	Outline Parkland Management Plan	Logika / The Landscape Agency
29	Utility Statement	WSP
30	Pre-Demolition Audit	O'Connell Demolition
31	Navigating the Planning Submission	Quod

1.13 This Statement goes on to demonstrate that the proposed development is entirely appropriate in all planning respects, and Very Special Circumstances are proven which outweigh the limited harm arising to the Green Belt.

1.14 The proposals thus comply with all relevant Development Plan as a whole and other relevant material considerations, and they should be approved without delay consistent with the presumption in favour of development outlined by the National Planning Policy Framework (NPPF) (December 2023).

2 Relevant Planning Background

Site and Surroundings

- 2.1 The Site comprises the former Whitewebbs Park Golf Course, located to the south of Whitewebbs Lane in Enfield. The golf course ceased use in 2021 and has remained in an unmanaged state since, albeit this remains its lawfully established use. Section 3 clarifies the established planning use of the Site and explains the “fallback”³ that prevails as a consequence. This is addressed in **Appendix 1**.
- 2.2 The Site is broadly triangular in shape and extends to 53ha. The boundaries of the Site are heavily vegetated and include dense woodland areas.
- 2.3 Associated with the golf course are two clubhouses and areas of parking. The principal clubhouse is vacant and sits within the north of the Site, being accessible from Whitewebbs Lane. A smaller Southern Clubhouse is located at the opposite (southern) end of the Site which is adjoined by a public café. Parts of the Site are therefore previously developed land.
- 2.4 Near the Northern Clubhouse are two areas of land which are excluded from the Site – Whitewebbs House, which is currently operated by Toby Carvery; and a private residential dwelling known as The Limes.
- 2.5 Alongside the golf course, the Site includes parts of Whitewebbs Wood in its north-west corner inclusive of the Whitewebbs Forest Pond and the locally listed Conduit House. The latter is a small outbuilding adjacent to the pond which has fallen into disrepair. Additional wooded areas bound the remaining parts of the Site, including Dickenson’s Meadow and Archers Wood which sit to the east.
- 2.6 In the southern part of the Site, the New River (Old Course) and Cuffley Brook dissect the golf course in a broad east-west direction. Further wooded areas form the southern boundary beyond which is the built-up area of Enfield. Turkey Brook runs beyond the eastern boundary.
- 2.7 In the north-west corner of the Site, a pedestrian access route extends south/south-east towards Whitewebbs House. This was historically a carriageway route associated with the property.
- 2.8 Access to the north part of the Site is via an existing route from Whitewebbs Lane that is shared between Whitewebbs House, The Limes and the golf course. Access to the Southern Clubhouse is via Beggars Hollow which joins Clay Hill to the south of the Site. A pedestrian route also prevails in the north-west corner of the Site, which extends in a south-south-east direction and was historically used as a carriageway route for Whitewebbs House.

³ A fallback position is an alternative, established planning position which could realistically prevail without requiring planning consent. For a genuine fallback position to exist, there needs to be a prospect that a site would revert back to its lawfully established use.

- 2.9 Given the established golf course use, public routes within the Site are limited. A public route extends north-south through the centre of the Site, connecting the southern and Northern Clubhouses.
- 2.10 The remaining public routes are limited to the Site boundaries, including a bridleway around the east boundary and public routes along the north and west boundaries. The public can access the site via its north-west corner using both the existing vehicular access and historic carriageway, both of which allow access to Whitewebbs Forest Pond.
- 2.11 Since the closure of the golf course, the Site has been used informally for access by the public. These routes are not public rights of way, and would be prevented by the reintroduction of the golf course (including fairways, greens etc.).
- 2.12 **Figure 2.1** identifies the Site's surroundings.

Figure 2.1: Site and Surroundings



FIGURE 5. Wide Aerial Plan of Site

- Application Boundary
- Turkey Street Station
- ① Whitewebbs Wood
- ② Western Field and Existing Training Centre
- ③ Dickenson's Meadow
- ④ Northern Club House
- ⑤ Whitewebbs House - Third Party Land
- M25
- ⑥ The Limes (Private Dwelling) - Third Party Land
- ⑦ Southern Club House - Including Café, & WCs
- ⑧ Existing Grounds Maintenance Building (GMB)
- ⑨ North Lodge (Vacant Dwelling)
- ⑩ South Lodge (Private Dwelling) - Third Party Land
- ⑪ THFC/ Men's Training Centre
- ⑫ Forty Hall
- A10
- Local Roads

Relationship to Existing and Emerging Club Facilities

- 2.13 East of the Site adjoining Dickenson's Meadow is land known as the Western Field. This falls within the Applicant's ownership and is currently used as a temporary training facility for the Club's women's First Team, comprising a single pitch and single storey building (ref. 21/03694//FUL). This planning permission is only temporary until January 2025.
- 2.14 Collectively, the Western Field and Dickenson's Meadow also benefit from a separate extant planning permission (ref. 17/01178/FUL) for its permanent redevelopment for a new training pitch education and environmental centre, alongside a nature reserve.
- 2.15 Beyond the Western Field is the Club's existing Training Centre used by the Men's and academy teams, and Myddelton Lodge which provides on-site player/visitor accommodation at the Men's Training Centre.
- 2.16 The Site is therefore uniquely located adjacent to the existing and planned facilities at both the current Training Centre and Western Field.
- 2.17 The location of the Club's existing facilities is shown in **Figure 2.1** above.

Planning Designations

- 2.18 There are a number of designations of relevance to the Site, as explained below.

Adopted Local Plan

- 2.19 The adopted Policies Map for Enfield confirms the following designations:
- 2.19.1 The Site is within the Green Belt.
- 2.19.2 The Site is a designated Local Open Space.
- 2.19.3 An area of Flood Zones 2, 3 and 3b follow the Cuffley Brook, concerning southern parts of the Site only.
- 2.19.4 The Site is within the Whitewebbs & Forty Hall Area of Special Character.
- 2.19.5 Part of the Woodland within the north-west of the Site, alongside the eastern boundary, are designated as a Site of Metropolitan Importance for Nature Conservation.

Environmental

- 2.20 A small area of woodland in the southern part of the Site is subject to a Tree Protection Order (TPO), although no further TPOs prevail. These trees will not be affected by the proposals, as demonstrated in the Arboricultural Impact Assessment (Trees & Woodland) ("AIA").

- 2.21 The AIA explains that the woodland within the Site and beyond it to the west is partially Ancient Woodland and Ancient Replanted Woodland.
- 2.22 The Epping Forest Site of Special Scientific Interest (“SSSI”) and Special Area of Conservation (“SAC”) lies c.5.7km to the east. The Lee Valley Ramsar Site, Special Protection Area (“SPA”) and SSSI lies c.3.5km to the northeast. The Chingford Reservoir SSSI lies c.4km to the east. The supporting Ecological Impact Assessment (Logika) (“EclA”) demonstrates the proposals will not affect these designations.

Heritage

- 2.23 A full review of all heritage assets (designated and non-designated) is contained in the Heritage Statement (Cogent), and it is demonstrated that there are no statutorily listed buildings within the Site. Several Grade II listed buildings lie within the surroundings, comprising:
- The King and Tinker Pub, adjacent to the northern boundary of the Site and positioned on the southern side of Whitewebbs Lane.
 - North Lodge, adjacent to the north-west corner of the Site and located to the immediate west of the former historic carriageway route to the northwest.
 - South Lodge, adjacent to the southern boundary of the Site.
 - Within Whitewebbs Wood to the west (but outside of) the Site is the Flash Road Aqueduct, a Scheduled Monument associated with Cuffley Brook. Further listed properties are found in Clay Hill to the south.
- 2.24 The Forty Hill Conservation Area lies across the eastern boundary of the site. The Clay Hill conservation area lies to the south and includes part of the southern tip of the Site only. The remainder and majority of the Site is therefore outside of any designated Conservation Area.
- 2.25 Whitewebbs Park, which includes the golf course and an area of woodland within the Site is a non-designated heritage asset. Similarly, both Conduit House and Whitewebbs House (outside the site boundary, other than a small part of its car park) are also non-designated heritage assets.
- 2.26 In addition to the statutory and locally non-designated heritage assets outlined above, the Site lies within an Area of Archaeological Importance (“AAI”); see the Archaeological Desk Based Assessment.

Emerging Plan

- 2.27 Enfield are currently preparing a new Local Plan. The Regulation 19 draft (“draft Local Plan”) was published on 6th December 2023 ahead of a Full Council meeting on 19 March 2024 where it was agreed to progress to public consultation commencing on 28th March 2024.
- 2.28 The draft Local Plan identifies the Site within Allocation RUR.07. This includes the existing training ground, land to the north of the existing training ground, the Western Field/Dickenson’s Meadow and the Site itself. The allocation confirms that the Site is suitable for nature recovery uses and that it could also provide professional sport, recreation and community sports/leisure uses, with ancillary related uses.

- 2.29 Allocation RUR.07 remains in the Green Belt with the uses identified as being appropriate subject to further consideration against relevant planning policies.
- 2.30 The draft Policies Maps identify further draft designations affecting the Site, including it being a 'Sports Excellence Area', a potential sport facility and new park, within the Epping Forest Zone of Influence and within Rural Enfield.

Relevant Planning History

The Site

- 2.31 There is limited planning history on the Site itself although it is understood that the golf course has operated since c.1932.
- 2.32 The Council's Public Access records identify limited history thereafter, with the most recent to the golf course being the conversion of a stable block into the golf clubhouse, permitted in 1997 (ref. TP/96/1099).
- 2.33 Of relevance to the enclosed application, an application for the erection of a kiosk café in the southern part of the Site was consented in September 2016 (ref. 16/01811/FUL).

The Surroundings

- 2.34 It is necessary to consider the planning history of the Club's surrounding assets, given the integral relationship of these to the enclosed proposals and as a demonstration of the Club's strong track record of high-quality delivery.
- 2.35 The Men's Training Centre to the east of the site operates under full planning permission (ref. TP/07/1623, as amended) granted in April 2008. This lies within the Green Belt and VSC were proven in support of the grant of that planning consent, some of which were secured by S106 Agreement (as well as conditions). Subsequent consents at the Men's Training Centre were also secured on the basis of VSC, which included:
- The need for the development and a lack of alternative sites.
 - The significant contribution of the proposal to national and regional football.
 - Benefits arising from the demolition of the existing sports pavilion and reinstatement of historic hedgerows around Myddelton House.
 - Local benefits to the wider community through access to the facility and implementation of a Community Partnership Programme.
- 2.36 This Statement considers these matters further in Section 8 and **Appendix 5**.
- 2.37 Along the eastern boundary of the Training Centre is Myddelton Lodge, a 45-room player lodge facility (ref. 14/03915/FUL). This is fully constructed and forms an integral part of the training centre's operations. Myddelton Lodge was also justified by VSC given its Green Belt location, being a need for the development and a lack of alternative accommodation.

- 2.38 The Western Field and Dickenson's Meadow were granted full planning permission in December 2018⁴ for their permanent redevelopment to provide a football pitch, educational and environmental centre, including a new nature reserve. These were approved under VSC. The consent was lawfully implemented and remains live, as confirmed by a Certificate of Lawfulness issued on 24 January 2022⁵. The Club have also begun the early stages of delivering the nature reserve within Dickenson's Meadow.
- 2.39 There has been exponential growth in the Women's game and there is a need for dedicated training facilities. There is no opportunity to accommodate the growing number of First Team and Academy players within the Men's Training Centre. Whilst the Club secured planning permission in January 2024 for a temporary training facility within the Western Field for use by the Women's First Team (ref. 21/03694/FUL), which supplements their training facilities which are shared with various organisations on various sites through North London and the Home Counties.
- 2.40 This comprised a football pitch and associated temporary building to provide changing and associated facilities. Consent was granted on a temporary basis until January 2025, by which time it was that a permanent solution would have been secured at Whitewebbs Park Golf Course. Due to ongoing delays regarding the Club's lease of the land and subsequent pre-application discussions, the Club are considering the need for extending the permission for these further temporary facilities.
- 2.41 Prior to this temporary facility being delivered, the Women's First Team were training at multiple locations, none of which provide the necessary standard of facilities to deliver elite sport and coaching. Indeed, the temporary facility is intended as an interim operation only, pending the delivery of a new permanent training centre and consequently the facilities are only rudimentary.
- 2.42 Section 3 of this Report explains the inadequacy of the current training operations which are holding back the Club from achieving their ambitions, and failing to deliver the facilities necessary to grow the women and girls' game for the Club and the local community.
- 2.43 It has been a key operational feature of the training facilities developed by the Club to engage the community in the schemes, and provides access to, and benefit from, the facilities. The existing Men's Training Centre, education/environmental centre and temporary Women's facilities were all accompanied by Section 106 Agreements to secure a variety of community-based benefits, including the provision of coaching and access by local schools/children.
- 2.44 There are a number of other relevant facilities that have been brought forward at the Training Centre, responding to the evolving needs of the Applicant. These include:
- Myddelton Lodge, as mentioned earlier in this Section (at paragraph 2.37).
 - A two-storey extension to the north façade to provide a new Media Centre, permitted under consent ref. 21/01648/FUL. This has been constructed and provides the Club's on-site media facilities.

⁴ LPA Ref. 17/01178/FUL.

⁵ LPA Ref. 22/00259/CEU.

- A two-storey extension to the south façade to provide enhanced facilities for the Academy teams, permitted under consent ref 21/01623/FUL. This responded to increased pressures on existing facilities and a demand for new facilities to support the boy's academy teams.
- 2.45 A single-storey extension to the northwest façade to provide improved facilities for the First Team coaches, permitted under consent ref. 23/00859/FUL. This responded to increased demands for coaching facilities which could not be accommodated within the existing building demise due to pressures for space.
- 2.46 The replacement of previously permitted floodlights with fewer, more efficient floodlights, permitted under consent ref. 22/03873/FUL.
- 2.47 The erection of an electrical switch room, permitted under ref. 22/03334/FUL.
- 2.48 Through the above consents, the Club have demonstrated a strong track record of delivering exceptional design quality sporting excellence, in a sustainable manner. The enclosed proposals are no different and would be fully aligned with development standards established by the Club elsewhere, and to date. This is explained in the Design and Access Statement (F3 Architects) and other supporting documents.

3 Growth in Women's Football

Growth in Women's Football

- 3.1 Women's football has grown at considerable rates in recent years, not only in terms of status of the professional game, but also the number of participants and interest from grass roots level and above. The fan base alone is reported as growing faster than other sports with the potential to double over the next decade to 328 million worldwide⁶.
- 3.2 The Union of European Football Associations (UEFA) estimates that European women's football could see a sixfold increase in commercial value over the next decade, reaching an annual value of £686 million by 2033, with Club sponsorship set to increase to £295 million in that time⁷.
- 3.3 Attendance and broadcast viewership records for women's football have been broken in the past 12 months, with these peaks in interest demonstrating fan interest to engage with both the national and elite professional games. At the UEFA Women's EURO 2022 competition held in England, over 574,000 people attended the matches with over 300 million viewing worldwide. On a domestic basis, the women's FA Cup prize money alone increased from £430,000 to just under £3 million for the 2022/23 season.⁸
- 3.4 The growth and popularity of the women's game is evidenced through the women's football pyramid to grass roots level. By indication, the number of girls registered to take part on Schools' Football Week 2023 was over 87,000, a significant increase above the previous year (57,000 registrations)⁹.
- 3.5 The women's game is at a pivotal moment in respect of its future growth and development. The sport has a positive image associated with inspiration, empowerment and a family-friendly environment. There is, however, both a challenge and an opportunity for the football pyramid in England, as demand and growth in the women's game have the potential to outstrip resource and capacity.
- 3.6 In this context, in September 2022 the Government launched a review of the women's game¹⁰ to examine the strategic priorities for its ongoing development and to dictate its future trajectory. This outlined a number of strategic recommendations, including:
- 3.7 Women's football should not settle for anything less than world-leading standards for players, fans, staff and everybody involved in the women's game.

⁶ UEFA, ['The Business Case for Women's Football'](#), August 2022.

⁷ UEFA, ['The Business Case for Women's Football'](#), August 2022.

⁸ Raising the bar – reframing the opportunity in women's football (updated 17 July 2023).

⁹ Raising the bar – reframing the opportunity in women's football (updated 17 July 2023).

¹⁰ Raising the bar – reframing the opportunity in women's football (updated 17 July 2023).

- 3.8 The Football Association (FA) needs to fix the talent pathway in order to create a sustainable pipeline of domestic talent.
- 3.9 The Women's Super League (WSL) and Championship leagues should become fully professional environments designed to attract, develop and sustain the best playing talent in the world. This includes "*mandating*" elite training facilities for elite players, "*mandating*" a world-leading parental package, and providing "*gold standard*" physical and mental health provision.
- 3.10 Urgently addressing a lack of diversity across the women's game, including both on and off-pitch roles.
- 3.11 The Government must deliver on recent commitments around equal access to school sports for girls.
- 3.12 The FA, Premier League and Football Foundation should ensure that women and girls are benefitting from funding flowing into facilities across the pyramid.
- 3.13 There should be an acute focus on grassroots clubs and the Women's National League.
- 3.14 The Government's review is clear that the future growth of women's football is not just associated with the professional game but must also be all-encompassing to restructure the game from grass roots and above. It identifies the need to "*prioritise a step-change*" in pathway structure and investment.
- 3.15 Currently there is a significant disparity between the men and women's games in this respect, evidenced by the £88m per year investment into men's academies from the Premier League, compared to the FA's overall budget for women's academies of £3.25m per year (Para. 60).
- 3.16 This lack of investment is associated with a gap in competitive playing opportunities for girls aged 11-14 in the development pathway, alongside a shortage of full-time and appropriately skilled staff. Paragraph 64 of the Government's Report notes:
- "Many clubs...rely on the development of home-grown talent to feed their first team squads. However, due to a lack of investment in the pipeline, the system is not delivering enough quality players who can readily progress into first team football."*
- 3.17 The Report considers a strongly funded, club (and league) owned development pathway system to be "*critical*" to ensuring the continued success of the women's national team alongside ensuring that the growth potential within the domestic game can be realised.
- 3.18 In a similar vein to the Government's Report, UEFA published their own report into "The Business Case for Women's Football" in August 2022. This identified key actions for leagues, clubs and partners to develop the women's game including:
- 3.19 Create more professional, high-performance environments to support and develop players, with improvements in coaching, support services and training facilities.

- 3.20 Invest in youth set-ups and academies to develop local talent and a sustainable pathway for young players.
- 3.21 Leverage existing men's team infrastructure where appropriate/applicable to create synergies and minimise costs.
- 3.22 More recently, Deloitte published the "*Football Money League*" Report in January 2024¹¹. This assessed 15 of the highest revenue generating women's football clubs in Europe for the financial year ending 2023. Tottenham's women's team was ranked 10th across the entirety of Europe.
- 3.23 The Report identifies an average growth in revenue by 61%, with this being attributed to a strong diversity of sources including broadcast deals, commercial revenue and matchday revenue.
- 3.24 Informed by the analysis, Deloitte predict that football will be the most valuable women's sport during 2024, potentially accounting for as much as 26% of the total elite women's sports market. Notably, the analysis concludes that "*continuous investment is required to drive further growth and financial sustainability in the women's game*" and that "*there is a real opportunity to define the sport in a global context through imaginative thinking across all facets, including player welfare, commercial relationships, governance structures and business models.*"
- 3.25 There is a unique and important opportunity in the women's game at the current time, recognised at both national and European stages and evidenced through the increased participation at all levels. It is essential that the game is appropriately resourced going forward to ensure that these opportunities are seized, and that the sport can continue to grow and develop.

The Benefits of Growth in Women's Football

- 3.26 The growth in women's football can deliver significant social benefits to those involved (see the separate Health Impact Assessment and the Socio Economic Benefits Statement by Quod). At the local level, increased opportunities for participation in football will encourage healthy and active lifestyles. The Government's Review¹² into women's football found that:

"The access and provision of football offered to women and girls at the local level is instrumental in securing a diverse and wide talent pool in the pathway, whilst also providing women and young girls with physical and mental wellbeing benefits."

- 3.27 Growth will enable a more organised and effective delivery of nutrition and physical and mental wellbeing at all levels, including improved access to and awareness of mental health and wellbeing support. Delivering a "gold standard" physical and mental health provision is a key recommendation of the Review, with 6 interventions highlighted:

¹¹ Deloitte Football Money League, 27th Edition (<https://www2.deloitte.com/uk/en/pages/sports-business-group/articles/deloitte-football-money-league-women.html>)

¹² Raising the bar – reframing the opportunity in women's football (updated 17 July 2023).

- The FA should introduce a dedicated research budget for issues affecting female footballers.
- A board should be established to ensure adoption of best practice in key areas.
- Current medical support should be uplifted in terms of expertise, quality of care, availability of support and continuity of care.
- Clubs should extend medical support for a period of 6-months to players transitioning out of the game.
- Performance psychologist should become a mandatory role within the FA's basic licensing requirements in both the Women's Super League and Championship.
- Players should be offered an official route to anonymously reporting non-compliance, for example through a union or a whistleblowing policy.

3.28 The increased economic growth of the game will also support the ability of more players to become full-time athletes and reducing the need for second jobs. The Government's review found that many players in the Women's Championship had to balance playing football with multiple jobs, which compromised their health and wellbeing through inadequate recovery between football activities.

3.29 Through recent growth, many clubs in the Women's Super League have already invested in their playing squads and offer a living wage. The Government see continued and expanded growth as essential to provide a solid financial foundation upon which players can work and thrive in football.

3.30 Continuing to grow all aspects of the game will assist a cycle of continued growth and improvement. For example, improving player welfare will encourage and develop new talent at grass roots level, alongside retaining existing talent in the game, which in turn will support ongoing growth in attendances at games and broadcast interest (and therefore commercial benefits).

3.31 As explained further below, the Club are just one example of where expansion in the women's game and the resultant need for a new, elite training centre will directly enable a more efficient delivery of education alongside football activities. Education is a significant factor in dissuading girls from pursuing careers in football.

Growth at THFC

3.32 THFC are no exception to growth in the women's game, the challenges faced, and the opportunities presented.

Inadequacies of Existing Operations

3.33 **Appendix 2** provides an Operational Statement from the Club and notes the current inadequacies of the women and girls' operations, which is summarised below.

3.34 There is no capacity at the Club's existing training centre to accommodate the existing (and projected future) women/girls team requirements alongside the existing operations of the men's first team and boy's academy teams.

- 3.35 The Club currently operate a temporary facility for their female teams on land known as the “Western Field” adjacent to their existing training centre; however, this is due to expire in January 2025 and the land also benefits from planning consent for its permanent redevelopment for a new education-based sports and environmental facility with close links to local schools (ref. 21/03694/FUL).
- 3.36 The Western Field cannot be a permanent home for the Club’s female operations and an alternative solution must be found. It provides a single training pitch (in contrast the men’s/boys teams have 12) and the temporary building falls short of the required space and facilities which a permanent facility for elite sports facilities would warrant and are themselves compromised in this regard.
- 3.37 The temporary facility is also restricted to on-site physical training activities only, with its regular use leaving inadequate time for recovery and pitch management, and a deteriorating quality as a result. Training currently takes place 5-6 times a week.
- 3.38 Alongside football training, the academy teams prioritise the delivery of necessary education in line with the national education curriculum and Government requirements. Presently this involves players between various locations to meet their education and training needs. This is neither sustainable nor efficient.
- 3.39 Academy players currently split their training and education between the Tottenham Hotspur Stadium, the Tottenham Hotspur Training Ground (Western Field), Enfield Grammar School (pitches), Goffs Churchgate Academy (pitches) and Cheshunt Football Club. Younger players also attend school with their football commitments based around this and additional home tutoring on top. Players will often visit three locations on the same day.
- 3.40 The current operations are highly inefficient, with players after travelling between facilities, which is neither sustainable (from an environmental perspective) or efficient. Several of the facilities are also publicly shared and do not therefore provide an elite, high-performance sporting environment, and are often shared with other groups and organisations.
- 3.41 Academy players have historically missed crucial education time when trying to balance their requirements. Education is a significant factor in dissuading girls from pursuing careers in football (in-part due to lower salaries). Improving the access and efficiency of education delivery alongside football training is, therefore, important. Providing education on-site whilst improving the coaching contact time players receive will increase the chances of players becoming professional athletes.
- 3.42 The current prevailing position makes the Club less attractive to new players as a consequence.

Opportunities for the Club’s Growth

- 3.43 The Club are seeking to respond positively to the past and projected growth in the women’s game, delivering a permanent home for their female teams with a facility of national class. The Site offers a unique location adjacent to the current men’s facility, allowing the sharing of facilities/infrastructure in a sustainable way.

3.44 **Appendix 2** provides an Operational Statement from the Club, explaining in further detail how the current female teams operate, alongside outlining the intended operation of the new facility and how this would support the Club's growth.

3.45 In this context, the Club's vision and objectives for a new facility are:

- Foster and sustain the growth of women and girls in football.
- Deliver a dedicated, state-of-the-art training centre that is exclusively dedicated to women's football and marks a pivotal stride towards gender equality and inclusivity.
- Deliver a comparable standard of facilities to the men's Training Centre, responding positive to UEFA and FA standards around the importance of equitable resource and facilities for female athletes.
- In the absence of standards for youth development in the female game, the Club are adopting the 'Elite Player Performance Plan' (EPPP) which is implemented by the English Football League and English Premier League, in order to enhance and standardise player development.
- Deliver a facility which will be the best of its class nationally.
- Embody sustainability at the heart of the scheme, achieving zero carbon development a minimising its carbon impact on the environment.
- There are currently 23 members of staff supporting the Women's First Team, and 31 members of staff supporting the Academy teams, 5 of which are shared (i.e. a total of 49 staff).

3.46 It is anticipated that football-related staff numbers will double as a direct consequence of the proposed facility (i.e. a total of 98 staff). Further new employment will arise through the grounds maintenance staff (c. 10 staff), landscaping (c. 5 new staff), parkland maintenance (c. 3 staff) and the southern café (c. 6 employees¹³).

3.47 Growth is also anticipated in every department, including coaches, analysis, physiotherapists and operational staff.

3.48 At Academy level, the Club currently run teams at U21, U16, U15, U14, U13 and U11 levels. These teams include a total of 120 registered players and 31 staff (of which 5 staff members are shared with the first team). Two further sides are to be introduced at U10 and U12 level as part of the new facility which will provide an additional players and staff.

3.49 Responding to the currently challenges of delivering education alongside football matters, the proposed facility would provide dedicated on-site classroom and educational space, ensuring that players are better supported and will balance football and education in a more effective and sustainable manner.

¹³ Using the Homes and Communities Agency Employment Density Guidance (3rd Edition, 2015), a NIA of 108sqm would equate to c. 6 employees at an average density of 17.5sqm per employee.

3.50 The on-site classroom usage would facilitate various forms of education, including BTEC sports programmes, GCSE support, A Levels, day release study sessions, homework clubs, workshops and parent meetings.

Summary

3.51 There has been considerable growth in Women's football in recent years, and the Government consider it critically necessary to have a strongly funded Club (and league) owned development pathway system, to ensure that the growth potential within the domestic game can be achieved.

3.52 Alongside the health benefits, there is a significant social importance to the growth in Women's football, bringing with it inspiration, social empowerment, health/wellbeing and improved education.

3.53 The Club's ambitions on growing their Women's football operations are presently severely undermined by inadequate facilities, set over a range of sites, distant from each other, and often shared with other organisations. By comparison, the Men's training facilities are at an entirely different level of quality and sophistication, and it is the Club's objective to match the training opportunities for Women with their Men's and Boys' academy.

3.54 There are clear social benefits in growing Women's football and a new dedicated training centre at the site would deliver significant social and health benefits, as demonstrated in the Health Impact Assessment (Quod) and the Socio Economic Impact Assessment (Quod).

4 Pre-Application Engagement

- 4.1 The Club and design team have undertaken an extensive pre-application process which has allowed the scheme to evolve. The various stages of this engagement are summarised below.

Bidding Process

- 4.2 Enfield Property Department invited interested parties to bid for the leasehold interest in the Site. The Club responded in January 2020, outlining a scheme proposal that incorporated a new women's football training centre in the north/north-east of the Site which utilised and adapted the Northern Clubhouse, alongside the provision of new public (restored historic) parkland in the southern part of the Site, and an enhanced café and visitor centre.
- 4.3 Written feedback was provided by Enfield Council in February 2020. In summary, this stated:
- 4.3.1 Parts of the proposal would comprise appropriate Green Belt development, notably the creation of football pitches, restoration of historic parkland and enhancement of the Ancient Woodland.
 - 4.3.2 Further details would be required pertaining to associated development to enable a Green Belt assessment to take place, including means of enclosure, floodlights, site reprofiling and buildings.
 - 4.3.3 The biodiversity merits of connecting the Site with Dickenson's Meadow is supported.
 - 4.3.4 The appropriateness of the development in flooding and drainage terms would need to be proven, having regard to any reprofiling of levels required.
 - 4.3.5 Heritage matters would need to be appropriately addressed, including all statutory and non-statutory assets of relevance.
 - 4.3.6 Use by the local community would be expected.
 - 4.3.7 Broadening the recreational amenity of the Site is welcomed.
- 4.4 The Club were subsequently selected by the Council as their preferred bidder for the Site in 2021, based upon the strength and merits of their submission, and the benefits that their proposals could deliver. An Agreement for Lease ("Afl") was signed in September 2023.
- 4.5 It is demonstrated in **Figure 4.1** below that the scheme that was presented as part of the pre-app in January 2020, and which the Council considered meritorious, subject to those matters outlined in paragraph 5.3 above, are very similar to the scheme that is now the subject of this planning application.

Figure 4.1: Pre-app Scheme (left) and Current Planning Application Scheme (right)



4.6 As noted below, the Applicant has undertaken subsequent formal pre-application discussions with the Council regarding the proposals. Importantly, the scheme principles which underpinned the bid submission have been retained.

Pre-Application Discussions

4.7 Several pre-application meetings were held with Enfield Council and their appointed planning advisors (Kew Planning) between February 2023 and February 2024. This included the involvement of technical officers on site-specific matters through workshop sessions.

4.8 In summary, the following meetings were undertaken:

- 20 February 2023.
- 26 April 2023.
- 10 August 2023.
- 8 September 2023.
- 21 September 2023.
- 22 September 2023 (heritage only).
- 4 October 2023.
- 28 November 2023.
- 6 December 2023.

- 20 December 2023.
- 29 February 2024.

- 4.9 The above discussions allowed comments to be provided (and responded to) on all planning, technical and environmental aspects of the scheme.
- 4.10 In addition to the above, separate discussions were held directly between the Applicant's consultant team and their respective technical counterparts at the Council to agree the scope of assessments, including transport, flooding/drainage, noise, arboriculture, archaeology and ecology, amongst others.
- 4.11 Throughout the above discussions, the principles which underpinned the Club's successful bid were retained. Whilst the scheme has evolved iteratively in collaboration with Officers, there is little difference in principle between the two schemes.

Greater London Authority (GLA)

- 4.12 A Level 1 pre-application requested was submitted to the GLA on 4 August 2023. A meeting was subsequently held on 12 September 2023 and written feedback received on 4 October 2023. In summary of the response:
- 4.12.1 The GLA commented on the potential of the scheme to comprise, in-part, appropriate Green Belt development. It was noted that further consideration of the applicable policy tests and any impacts on the openness of the Green Belt would need to be applied, alongside (where applicable) a demonstration of Very Special Circumstances.
- 4.12.2 The proposals impact on the Green Belt purposes should also be considered, with the GLA considering the following to apply only: purpose 1 (checking unrestricted sprawl), purpose 3 (safeguarding the countryside from encroachment) and purpose 5 (assisting in urban regeneration).
- 4.12.3 The proximity of the proposed development to the existing men's Training Centre and sharing of facilities is encouraged and should be explored to avoid unnecessary duplication of facilities.
- 4.12.4 Given the Site's lawful use as a golf course, any impact on the prevailing open space designation is limited and would be mitigated by the restoration of the historic parkland in the southern part of the Site.

Enfield Design Review Panel

- 4.13 The proposals were presented to the Enfield Design Review Panel (DRP) on 21 September 2023.
- 4.14 The DRP supported the proposals in principle, noting the positives arising from the landscape design including establishing a successful piece of public space. The DRP requested that a new wayfinding strategy be prepared to create a unique sense of place and character, which could include heritage and nature interpretation points.

- 4.15 The DRP noted that further justification would be needed regarding the loss and planting of trees, alongside the boundary treatments and associated built elements of the training facility. They also suggested that the historic walled garden be reinstated in part, and questioned whether the operational boundary could be reduced.
- 4.16 The reinstatement of the historic carriageway was supported in principle, but subject to further detail regarding impacts on trees, ecology and traffic.
- 4.17 Specific to the Northern Clubhouse, the DRP suggested that the courtyard be maintained as an entrance to produce a more coherent floorplan internally. The fabric first approach to the Southern Clubhouse restoration was supported, as was the restoration of Conduit House.

Stakeholder and Community Engagement

- 4.18 Detailed community and stakeholder engagement was undertaken between October 2023 and February 2024. This included the local community, political stakeholders, community groups, schools and local football clubs.
- 4.19 In summary, the following activities were undertaken:
- 4.19.1 Written communication to key stakeholders, including politicians, community groups, ecological groups, local businesses and schools. All were offered a briefing on the proposals.
 - 4.19.2 Twelve meetings with key community and political stakeholders, the majority of which were undertaken in person.
 - 4.19.3 A dedicated project and consultation website¹⁴.
 - 4.19.4 An informative flyer issued to c. 9,000 local residents and businesses, summarising the proposed development and inviting attendance at the consultation events.
 - 4.19.5 Newspaper adverts in the Enfield Independent and online in the Enfield Dispatch which promoted the consultation events and remained live for 2-weeks.
 - 4.19.6 A public exhibition held in-person over 3 days, alongside an additional “preview” exhibition event for key stakeholders.
 - 4.19.7 A webinar held via Zoom.
- 4.20 A newsletter updated issued in February 2024 to c. 9,000 local residents and businesses, updating on the proposals, consultation and feedback received, alongside outlining the key changes which had been incorporated as a result.

¹⁴ www.tottenhamhotspur.com/whitewebbs

4.21 A detailed explanation of the consultation activities undertaken, the feedback received and how the Applicant has responded to this is contained within the Statement of Community Involvement (SCI).

EIA Screening

4.22 A formal Environmental Impact Assessment (EIA) Screening Request was submitted to Enfield Council on 6 October 2023. The Council's formal Screening Opinion was issued on 1 November 2023 (ref. 23/03252/SO) which confirmed that the proposed development was not EIA development.

4.23 The Council's Screening Opinion was subject to an unsuccessful challenge, and the Secretary of State confirmed that the Council's decision was appropriate, and the proposed development is not EIA development.

5 Proposed Development

Scheme Overview

5.1 In summary, the proposed development comprises the following parts:

- Formation of a football training centre including associated infrastructure.
- Extension and adaptation of the Northern Clubhouse.
- Restoration of historic parkland.
- Provision of an improved public café and community facility in the Southern Clubhouse.
- Access improvements, including the reinstatement of the historic carriageway to Whitewebbs House, creation of an operational link to the Western Field and existing Training Centre to the east, and improved pedestrian routes throughout the Site.
- Landscaping works.
- Other development, including the upgrading of Conduit House and restoration of Whitewebbs Forest Pond

5.2 A key plan of the development components is shown in **Figure 5.1** below. Each of the development components is briefly explained further below, and in more detail in the Design and Access Statement (DAS).

Figure 5.1: Masterplan Overview



Planning Application Process

- 5.3 A full planning application is submitted for all works contained within the defined red line boundary.
- 5.4 Alongside the above, a separate (but related) application for non-material amendments is progressed to amend the extant planning consent at the Western Field for an environmental and education centre (ref. 17/01178/FUL). These amendments are explained and justified under separate cover; however, in summary they would amend the consented landscaping arrangement for the development create a route (for buggies, pedestrians and cyclists) between the Site and the existing Men's Training Centre.
- 5.5 The non-material nature of the operational link change has been agreed with Enfield Council through pre-application discussions.

Scheme Explanation

Training Centre and Associated Infrastructure

- 5.6 The north-east area of the Site would be demised to the Club and provide a new football training centre. Site levels would be reprofiled and new pitches would be provided, one of which would be an artificial surface. In total, eight full size pitches (including one artificial pitch) and two half size pitches are proposed.
- 5.7 As explained in the DAS, several pitch iterations were considered through the design development process based upon the operational needs of the Club and to ensure that an elite facility is delivered. The proposed layout is the most appropriate in terms of satisfying these requirements, but also minimising the consequential loss on trees, reducing the cut and fill required and minimising landscape and heritage impacts. The proposed layout and location of pitches was agreed through the pre-application process. It is, therefore, the most appropriate layout in functional, environment and technical terms.
- 5.8 The Site's unique location adjacent to the Club's existing Training Centre also allows the sharing of some facilities, reducing the amount of land required to deliver a facility of the elite standard proposed. The shared facilities are explained later in this Section (and in the DAS).
- 5.9 The scheme layout also corresponds to the Club's successful bid submission for the Site which was supported by Enfield Council both through electing the Club as the appointed leaseholder, but also through the initial written pre-application comments provided in February 2020.
- 5.10 A new building is proposed in the north eastern part of the Training Area which will provide facilities for the grounds maintenance team and the new Turf Academy. This building is a part reconstruction of the existing grounds maintenance building which is presently located in the vicinity of the Northern Clubhouse.
- 5.11 The operational boundary would be secured by perimeter fencing bounded by laurel hedging internally within the training centre, and native hedgerows and tree planting to the publicly facing interface. This will soften the appearance and naturalise the visual perception of the Club/s operational boundary.

- 5.12 Pitches would include associated amenities such as ball stop fencing, perimeter rails, goalpost storage, dug-outs and pitch-side WCs. Several ancillary buildings are also needed within the operational boundary, including a new grounds maintenance building in the north-east corner (259sqm GEA) which would replace the existing facility in the northern car park, a security lodge (50sqm GEA) at the Site's entrance, pitch side plant and kit storage units and CCTV.
- 5.13 Two pitches in the north of the Site would incorporate floodlights, each having 6 No. 21m tall floodlights.
- 5.14 Each pitch within the facility would be used for a maximum of 6 hours per week. There is, therefore, a maximum of 12 hours of floodlight use per week, albeit this could be reduced through the simultaneous use of both pitches. Consistent with the position established at the existing Training Centre, there would be a cap on floodlight use no later than 08:30pm.
- 5.15 A range of paths would form part of the internal circulation network within the operational boundary, including buddy/pedestrian paths, emergency service routes and those to facilitate deliveries by larger vehicles to the grounds maintenance building.

Northern Clubhouse

- 5.16 The existing Northern Clubhouse would be repurposed, upgraded and extended to provide the necessary primary accommodation for the training centre. The courtyard on the west of the clubhouse would be infilled to provide a gym with an extension to its rear (east) provided.
- 5.17 The extension would provide 2,739sqm (GEA) of additional floorspace across basement (1,013.28sqm), ground (736.73sqm) and first (988.97sqm) levels, forming a building of 3,303sqm (GEA) in total.
- 5.18 The Northern Clubhouse would provide the majority of facilities required by the training centre, including changing rooms, treatment rooms, gyms for the first and academy teams, classroom spaces, dining/kitchen areas and general administration/office space. All plant equipment would be stored at basement level.
- 5.19 Access to the Northern Clubhouse would be from its north façade to the existing car park. This facilitates the safe operational use of the building and allows appropriate drop-off and circulation, avoiding the existing access route along the west of the building which would still accommodate delivery and service vehicles associated with the Toby Carvery.

The Turf Academy

- 5.20 The Club have recently been exploring the establishment of an accredited¹⁵ Turf Academy, which will be education focussed "academy" dealing with horticulture, turf and sports grounds maintenance. The specific details are still being determined, but it is proposed to combine education courses alongside on-site practical experience, developing the skills of those enrolled in the horticulture of sports grounds.

¹⁵ Accredited by either City & Guilds of the Institute for Apprenticeships and Technical Education (IFATE).

- 5.21 It is proposed to locate the Turf Academy within the scheme (in the Grounds Maintenance Building), and with its proposed links to the existing Men's Training Centre, will enable students to benefit from, and gain first-hand experience across, working a leading (national and international) professional sports environments.
- 5.22 Accredited courses are likely to be offered by the Club through apprenticeships, City and Guilds accreditation or degree qualifications. All would provide education that embraces all aspects of grounds maintenance and horticulture, resulting in qualifications that will support full-time employment.
- 5.23 Through partnership with education providers, experience and is likely to cover plant/soil science, training centre management, stadium/venue management, sports science and business management, offering a comprehensive education-focussed programme.
- 5.24 Candidates would be sourced from local schools/colleges, jobs fairs, the National Apprenticeship Services System and through the THFC Foundation, amongst others. The focus would be on providing opportunities for women.
- 5.25 Training and education would be delivered though on-site practical experience, classroom education (within the GMB which will be fitted out with classroom space, as well as using the proposed spaces in the new Training Centre) as well as online platforms.
- 5.26 In the interim, and prior to the establishment of the Turf Academy on the site, the Club are proposing to use the Government's Apprenticeship Scheme. As part of this, they are looking at establishing a working relationship with Capel Manor College (CMC) for the horticulture apprenticeship and Myerscough College (MC) for the turf apprenticeship. The Club would progress with CMC and MC for the Apprenticeships once they are able to provide the educational support.
- 5.27 The Club propose that 5 apprentices would be enrolled in the forthcoming financial year (2024/25), each with an apprenticeship that is proposed for a **minimum term of 4 years**. Thereafter the Club will add a further 5 apprentices per annum. The first year intake would be refreshed on an annual basis as apprentices progress through their terms, i.e. a total of 20 apprentices at one time over a 4-year period. At the end of the course, it is anticipated that apprentices would have the opportunity for full-time employment at the Club (based on availability of posts at that time).
- 5.28 As well as future employment within the Club, completing these apprenticeships will also open up the opportunity for apprentices to access a wide range of future employment in sports and horticultural industries.

Historic Parkland Restoration and Landscaping

- 5.29 The southern part of the Site would be restored to historic parkland space from its established golf course use. This would significantly increase the area of publicly accessible space and

comprise a mix of green open spaces, wildflower meadows and significant planting of new trees (c. 2,000¹⁶).

- 5.30 The parkland would be appropriately managed in accordance with an agreed Management Plan.
- 5.31 New and improved public access routes would be provided throughout the public areas (see below).
- 5.32 Alongside the reinstated historic parkland, new woodland areas would be introduced around the east and north boundaries of the Site to create a habitat link between Dickenson's Meadow and Whitewebbs Wood. Whitewebbs Wood itself would also be subject to ongoing management to enhance its biodiversity and amenity value.

Southern Clubhouse

- 5.33 The current Southern Clubhouse provides a unique opportunity to restore and enhance a former public asset. This building is of some age and in poor condition, and following the closure of the golf course this currently provides a temporary café facility and toilets, alongside grounds maintenance storage facilities.
- 5.34 The proposals will upgrade the Southern Clubhouse with a new café, multi-functional space for community use, new toilet facilities and storage/facilities associated with grounds maintenance functions. Externally, the building will be re-clad with high-quality timber cladding, perforated with vertical fins to add articulation to the façade and create a natural finish appropriate to the surroundings.
- 5.35 There would be no change to the floorspace or footprint of the building, with all works adapting the existing established structure.
- 5.36 The adjoining southern car park would be resurfaced, and new soft landscaping introduced, providing improved and formalised public car parking spaces (including accessible parking), cycle parking and electric vehicle charging points. In total, the car park would provide an equivalent number of parking spaces to existing (93 standard), with 6 accessible spaces and 16 cycle parking spaces. The landscaping would include a new soft landscaping buffer at the car park entrance, adjacent to South Lodge, alongside new hedges to screen the car park from the reinstated historic parkland to the north.

¹⁶ This includes 241 individual trees, as well as tree planting in areas of new woodland which extend to 30,669 sqm (see Section 5 of the Landscape Statement and the Landscape Masterplan).

Access (Vehicular/Pedestrian/Cycle) Into the Site

- 5.37 The existing access route to the Northern Clubhouse and Whitewebbs House would be upgraded and retained for access to the training facility. It would also allow servicing and delivery access to Whitewebbs House only, alongside continuing to provide access to residential property at The Limes. Access would be controlled by a security lodge at the southern end of this route.
- 5.38 Further west lies a historic carriageway associated with Whitewebbs House. The surface of this remains in the majority and it currently provides pedestrian access into Whitewebbs Wood. The proposals would reinstate this historic carriageway to provide dedicated customer access to Whitewebbs House, with a segregated pedestrian and cycle route running in parallel. A “no dig” solution is proposed with the surface treatment finished in hoggin, ensuring that there are no unacceptable environmental or technical impacts through the reinstatement of this route.
- 5.39 A small area of vegetation clearance to the north-west of the existing car park serving the Toby Carvery would facilitate connection with the historic carriageway.
- 5.40 The reinstatement of the historic parkland provides opportunities to improve pedestrian routes through the Site which were inhibited by the former golf course layout. The existing north-south route connecting Whitewebbs House, and the Southern Clubhouse will be upgraded, with new footpaths, public routes and bridleways incorporated both within the Site and around its perimeter, connecting with the surrounding network. A hoggin surface would also be introduced along the New River Old Course, formalising an existing informal public route.
- 5.41 In the north-east corner of the Site, a new link would be formed with the Western Field site to its east. This route would utilise the redundant layby on Whitewebbs Lane, before returning into the Western Field and extending around its perimeter. This operational link will achieve an internal connection between the proposed facility, the Western Field and the existing Training Centre on Club-owned land. Importantly, it allows the sharing of facilities and sustainable movement of people away from the highway network, as explained further below.
- 5.42 The operational link would be screened from Whitewebbs Lane, with crossing points introduced where it interfaces with existing bridleways/footpaths in the north-east corner of the Site.
- 5.43 The operational link would be secured through two planning applications – the first as an integral part of the enclosed application relating to the Site, and the second as a non-material amendment to the extant Western Field planning consent (ref. 17/01178/FUL). The respective red line boundaries for these applications would adjoin each other and there would be no overlapping of consents as a consequence.

Other Development

- 5.44 The existing woodland in the north-west corner would be retained and enhanced, with new woodland planting and upgrades to Whitewebbs Forest Pond, and the local listed Conduit House restored.

5.45 Two attenuation basins are proposed along the east and south-east boundaries of the operational boundary, one of which would fall within the training centre demise and the other being immediately adjacent to (but outside of) this boundary.

Co-location with Existing Training Centre

5.46 The Site presents a unique opportunity to develop a female training facility adjacent to an established men's training centre. This allows both the men and women's operations to have their own dedicated training operations whilst sharing some key infrastructure.

5.47 The sharing of these aspects reduces the amount of built development required by the proposals, whilst still ensuring a high-quality facility of equivalent standard to the men's training centre.

5.48 Furthermore, through the creation of an internal operational link on Club-owned land, the women's and men's facility and be connected without the need to travel on the adopted public highway network. There are clear highways and sustainability merits from this approach which can only be achieved through the Site's location adjacent to the current training centre.

5.49 The proposed women's training centre would share the following existing functions:

- Media Centre (531sqm).
- Indoor Pitch (3.642sqm).
- Dexa Scanner (27sqm).
- Cryotherapy Room (10sqm).
- Auditorium (95sqm).
- HR, Safeguarding and Legal Services (244sqm).
- Recreation Room (224sqm).
- Amphitheatre (129sqm).
- Outdoor Player Recreation Area (170sqm).
- Myddelton Lodge (player/staff accommodation) (3,980sqm).

5.50 The co-location is not limited to player use, with it allowing the sharing of wider aspects such as coaching staff and grounds maintenance equipment.

5.51 These shared facilities total c. 9,054sqm of floorspace. This is almost 1ha of development that is not required to achieve a comparable standard of women/girls training facilities, and which is only possible given the Site's proximity to the current training centre and the ability to sustainably link the two. As well as reducing the quantum of development required in the Green Belt, it will support the delivery of the scheme by minimising costs alongside creating a more sustainable and cohesive operation across all training centre operations.

5.52 Even if the women/girl's teams were to access these shared elements at the current training centre alongside having their own location elsewhere, this would result in the movement of players unnecessarily between the two locations which is both unsustainable from a highways perspective, and inefficient from an operational point of view. Indeed, from an elite sports perspective, it would not be practical or expected to have the required facilities split over multiple sites.

Operation of Proposed Facility

5.53 The operational hours of the facility extend from early morning to nighttime, and **Appendix 2** provides a Statement from the Club of how the facility will operate during a typical week for the Women's first team, as well as the Academy teams. The facility will have 24 hour security.

5.54 Catering and maintenance staff will be first on site, and the operational staff will be present until late into the evening. The pitches will be operational during the daytime, and early evening, when training takes place.

5.55 Two pitches would have floodlights within the proposed training facility, one grass pitch and one synthetic pitch, both located within the northern part of the training ground (for environmental reasons). Each pitch (floodlit and unlit) would be used for a maximum of 6 hours per week.

5.56 There would be a maximum of 12 hours of floodlight usage per week, therefore. This is a worst case basis, as there is a prospect that the two floodlit pitches are used concurrently, and they will not ordinarily be floodlit outside the Winter season.

5.57 Consistent with the position established at the existing training centre, floodlight use would not extend beyond 20:30 on any day.

6 Planning Policy Overview

Introduction

6.1 The relevant Development Plan comprises the following:

- The London Plan (March 2021).
- Enfield Core Strategy (November 2010).
- Enfield Development Management Document (November 2014).
- North London Waste Plan (July 2022).

6.2 Relevant material considerations include:

- The National Planning Policy Framework (NPPF) (December 2023).
- Planning Practice Guidance (PPG).
- Various supplementary planning guidance/documents (SPD/Gs) produced by the Mayor of London and Enfield Council, as noted in this Report and referenced within the wider technical documentation.
- Investing in Enfield: the Enfield Council Plan 2023 to 2026.
- A Cultural Strategy for Enfield 2020-2025.
- Enfield's Economic Development Strategy¹⁷.
- Enfield's Parks and Open Spaces Strategy 2010-2020.

6.3 Enfield Council are also in the early stages of preparing a new Local Plan. This carries limited weight at the current time, although it shows the direction of travel of policy. Most notably, it designates (in draft) the Site and existing Training Centre for sport, recreation and community sports/leisure uses alongside nature recovery. A summary of the emerging designation for the Site and associated key planning policies is included below for completeness.

6.4 This Section outlines the key planning policies and objectives relative to the principle of the proposed development. A comprehensive schedule of all relevant development plan policies is included at **Appendix 3**.

Enfield's Strategic and Corporate Objectives

6.5 The **Core Strategy** outlines a spatial vision for Enfield to become a healthy, prosperous and sustainable Borough with a strong sense of place and identity. It outlines a need for access to high quality green spaces, cultural/leisure activities, and strong employment prospects for its residents, with new development to be of exemplary and flagship quality. Enfield's strategic position relative to the economic importance of London is noted.

¹⁷ An Economy that Works for Everyone (2020).

- 6.6 Several strategic objectives¹⁸ underpin this spatial vision, including providing sustainable patterns of development; ensuring that leisure and recreation facilities are sufficient to meet the needs of existing and future populations; ensuring efficient use of land and maximising economic potential, alongside securing new inward investment; supporting job creation and skills development; and enhancing the natural environment and open character of the Borough.
- 6.7 Similarly, the ‘**Empowering Young Enfield 2021-2025**’ Report¹⁹ produced by LBE, highlights the importance of creating parks and community spaces, creating new employment including enhanced opportunities for local people, and creating a cultural offer for Enfield which supports London’s status as a world class city. The overarching “ambition” of this Report is to create a lifetime of opportunities for children and young people in Enfield²⁰.
- 6.8 The **draft Local Plan** will update the Council’s strategic objectives. It proposes to retain the principles and approach of the current Core Strategy, noting the importance of addressing disparities in the Borough and ensuring that all residents have good access to community facilities and areas of open space.
- 6.9 The **Enfield Council Plan 2023-2026** includes²¹ green places, healthy communities and thriving young people amongst its priorities. Improvement in sports and leisure opportunities are seen as an important part of delivering these priorities, enabling more active lifestyles across the Borough, and the Plan outlines a commitment by the Council for continued investment in improving access to sport for everyone.
- 6.10 Sport, leisure and the natural environment are also seen as an important part of Enfield’s cultural identity, outlined in LBE’s ‘**Cultural Strategy 2020-2025**’²². Development and planning are seen as key mechanisms which can support the future development of culture across the Borough²³.
- 6.11 The **Economic Development Strategy** recognises the opportunities provided by Enfield’s northern green spaces, noting that these can be sensitively shaped to create a heritage environment destination with a complimentary culture and leisure offer²⁴. It also sees inward investment and job creation as two of several key measures of economic success²⁵.
- 6.12 In a similar manner to many of the Council’s corporate objectives, Sport England’s corporate mission is to tackle inequalities in access to sport, unlocking the advantages of sport and physical activity for everyone²⁶.

¹⁸ Enfield Core Strategy 2010, Paragraph 3.3 (P27) onwards.

¹⁹ Empowering Young Enfield 2021-2025 (approved 28 January 2021), P3.

²⁰ Empowering Young Enfield 2021-2025 (approved 28 January 2021), P3.

²¹ Enfield Council Plan 2023-26, P7.

²² A Cultural Strategy for Enfield 2020-2025, P14.

²³ A Cultural Strategy for Enfield 2020-2025, P69.

²⁴ An Economy that Works for Everyone – Enfield’s Economic Development Strategy, P29.

²⁵ An Economy that Works for Everyone – Enfield’s Economic Development Strategy, P33.

²⁶ <https://www.sportengland.org/about-us/uniting-movement/our-mission>.

Sustainable Development

- 6.13 The purpose of the planning system is to contribute towards sustainable development, with the following three principle objectives making up sustainable development:
- Economic: building a strong, responsive and competitive economic which supports growth and coordinates the provision of infrastructure.
 - Social: supporting strong, vibrant and health communities; fostering well-designed and safe places with open spaces; and supporting communities' health, social and cultural well-being.
 - Environmental: protecting and enhancing the natural, built and historic environment including making effective use of land, improving biodiversity and adapting to climate change.
- 6.14 The NPPF outlines a presumption in favour of sustainable development (Para. 11) which for decision making means *“approving development proposals that accord with an up-to-date development plan without delay”*.
- 6.15 A part of sustainable development is making an effective use of land in a way that makes *“as much use as possible”* of previously developed, brownfield land (Para. 123).

Sport, Leisure and Recreation

- 6.16 Promoting healthy, inclusive and safe places is a key objective of the NPPF. Paragraph 96 requires planning decisions to promote social interaction alongside enabling and supporting healthy lifestyles, referencing examples such as the provision of safe and accessible green infrastructure and sports facilities which will contribute towards this objective.
- 6.17 Paragraph 97 requires planning decisions to plan positively for the provision of sports venues and open spaces as part of wider provision of the social, recreation and cultural facilities that communities need.
- 6.18 The NPPF also recognises the wider benefits of open spaces and physical activity, stating:
- “Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support effects to address climate change.”*
- 6.19 Paragraph 103 concerns existing sports and recreational facilities, stating that these should not be built on unless (of relevance) the development is for alternative sports and recreation provision, the benefits of which *“clearly outweigh”* the loss of the current or former use.
- 6.20 Enfield's Local Plan is supportive of new sports provision in principle, with a preference for natural grass pitches outlined by Policy DMD74. Artificial pitches must be fully justified with consideration given to landscaping, enclosure and lighting.

- 6.21 Core Policy 34 of the adopted Core Strategy seeks to protect and enhance existing to open space²⁷, alongside seeking opportunities to improve the provision of good quality and accessible open space.
- 6.22 In similar vein, Local Plan Policy DMD71 resists the loss of open space unless: (i) replacement can be re-provided in the same locality and of better quality to support the delivery of the Council's adopted Parks and Open Spaces Strategy; or (ii) it has been demonstrated through the submission of an assessment that the open space in question is surplus to requirements. The Policy continues that essential structures and facilities to support the enjoyment of, and maintain the openness of the open space, will be acceptable providing that the size, siting, location, design and materials are sympathetic and proportionate to the operational requirements of the open space that it supports.

Green Belt

- 6.23 Great importance is attached to the Green Belt through the NPPF. Paragraph 143 outlines five purposes that the Green Belt serves, being: (i) to check the unrestricted sprawl of built-up areas; (ii) to prevent neighbouring towns merging into one another; (iii) to assist in safeguarding the countryside from encroachment; (iv) to preserve the setting and special character of historic towns; and (v) to assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 6.24 The NPPF requires local planning authorities to plan positively to enhance Green Belts beneficial use, including the provision of opportunities for outdoor sport and recreation amongst others (Para. 150).
- Certain forms of development only are considered to be “appropriate” in Green Belt locations. Of relevance to these proposals, the NPPF confirms that these include:
 - The provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and outdoor recreation, where the openness of the Green Belt is preserved and there is no conflict with the five purposes (Para. 154, b).
 - The extension or alteration of a building which does not result in disproportionate additions over and above the size of the original building (Para. 154, c).
 - The replacement of a building, providing that the new building is in the same use and not materially larger (Para. 154, d).
 - Limited infilling or the partial or complete redevelopment of previously developed land, which would not have a greater impact on the openness of the Green Belt than the existing development (Para. 154, g).
 - A material change in land use, such as for outdoor sport or recreation (Para. 155, e).

²⁷ The site is designated as Local Open Space (Enfield Local Plan, Policies Map).

- 6.25 Where development is not appropriate it will be, by definition, “inappropriate” and therefore harmful to the Green Belt. The NPPF requires that substantial weight is given to any harm arising from inappropriate development, and any other harm arising from a scheme, and that this must be clearly outweighed by “VSC” (Para. 153). Local Plan Policy DMD74 makes explicit reference to the need for Very Special Circumstances to justify artificial sports pitches which incorporate flood lighting.
- 6.26 Local Plan Policy DMD82 adds that appropriate development will only be permitted where all of the following criteria are met:
- The siting, scale, height and bulk is compatible with the preservation of openness.
 - Visual impact is minimised through a high standard of design and landscaping, including materiality.
 - Existing natural features should be retained and integrated, with adequate mitigation provided where this is not possible.
 - Appropriate parking, access and landscaping are provided.
- 6.27 This Statement (at Section 8) considers the application of Green Belt policy in this case, where the proposals are for outdoor sport and recreation, but where some limited and discreet physical development is proposed.

Heritage

- 6.28 The legislative background to the consideration of planning applications that may affect heritage are set out in Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, which provide that “...*special regard [will be had] to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*” and that “...*special regard shall be paid to the desirability of preserving or enhancing the character or appearance*” of Conservation Areas.
- 6.29 The NPPF requires an understanding of the significance of any heritage assets that may be affected by the development, and to consider whether any level of harm arises to their significance. In respect of non-designated heritage assets, the NPPF requires the effect of an application on their significance to be taken into account when determining an application.
- 6.30 When considering the impact of a proposed development on the significance of a designated heritage asset, the NPPF states that “*great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)*” (Para. 205). It goes on to state at Paragraph 206 that any harm should require “clear and convincing” justification.
- 6.31 In this case, there are no designated heritage assets on the application site, albeit there are designated heritage assets close to the site. These are considered in the enclosed Heritage Impact Assessment including the potential impact of the proposals on these assets.
- 6.32 Paragraph 208 of the NPPF notes that where development proposals will “...lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...”.

- 6.33 It is demonstrated in the Heritage Impact Assessment that any harm to designated heritage assets arising from this development will be less than substantial and, in some cases, the overall impact will be neutral or beneficial.
- 6.34 Dealing with non-designated heritage assets, the NPPF (Para. 209) notes that “...in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset...”
- 6.35 In view of the above, this Planning Statement along with the Heritage Impact Assessment addresses the effects of the development on heritage assets, in the circumstances where significant importance is attached to their conservation, and whether the public benefits of this proposal outweigh any harm to heritage assets. It is demonstrated that there are significant public benefits associated with this development which clearly outweigh the less than substantial harm arising overall.

Design

- 6.36 Achieving good design is a key aspect of sustainable development (NPPF, Para. 131). The London Plan (Policy D6) requires development to make a positive contribution through its architecture, contribute to the distinctive character and amenity of the local area, and to not cause any unacceptable harm to the amenity of surrounding land and buildings.
- 6.37 Planning decisions should ensure that developments (NPPF Para. 135):
- Will function well and add to the overall quality of the area over the lifetime of the development.
 - Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
 - Are sympathetic to local character and history, whilst not preventing or discouraging appropriate innovation or change.
 - Establish a strong sense of place.
 - Optimise the potential to accommodate an appropriate mix and amount of development.
 - Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and proposed users.
- 6.38 It is noted that “significant weight” should be given to development which reflects local design policies and government guidance on design (NPPF Para. 139). The National Design Guide should be used to guide decisions on applications in the absence of locally produced design guides or design codes (NPPF Para 134).
- 6.39 Local Plan Policy DMD37 seeks high quality and design-led development which is suitable to its context, and which has appropriate regard to its surroundings. Opportunities to improve land in accordance with the following objectives should be supported: character; continuity and enclosure; public realm quality; ease of movement; legibility; adaptability and durability; and diversity.

6.40 The adopted Core Strategy notes the Council's intent to prepare a Design SPG/D. This has not yet been prepared, however, and as noted by the NPPF (Para 134) the National Design Guide should guide decisions.

Other Key Policies

6.41 As noted, **Appendix 3** provides a schedule of all relevant development management policies. In summary, this includes amongst others:

6.41.1 All new development is expected to be zero carbon. Major development is to achieve a minimum on-site energy reduction of 35% beyond Building Regulations, with 15% through energy efficient measures (London Plan Policy SI2).

6.41.2 Development Management Policy DMD50 requires major non-residential development to achieve BREEAM Excellent rating, "moving towards" Outstanding post-2019 (which the Policy notes is often expressed as net zero carbon). The Policy notes that exceptional circumstances where other planning requirements of site characteristics mean that the required BREEAM rating cannot be met, including technical feasibility and economic viability.

6.41.3 Development should not be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be "severe" (NPPF, Para 111).

6.41.4 New community facilities should be easily accessible to the community they are intended to serve by walking, cycling and public transport to reduce dependence upon private car use. They should also make efficient and effective use of land and buildings and, where appropriate, provide opportunities for co-location, flexible spaces and multi-use (Development Management Policy DMD16).

6.41.5 New development should be at least "*air quality neutral*" (London Plan Policies SI1 and GG3).

6.41.6 Sustainable Urban Drainage Systems (SUDS) should be utilised where practical, and proposals should aim to achieve greenfield run-off rates (London Plan Policy SI13).

6.41.7 Proposals should mitigate, and reduce to a minimum, potential adverse impacts resulting from noise (NPPF Para. 185; London Plan Policy D14).

6.41.8 Development resulting in the loss or deterioration of irreplaceable habitats (including Ancient Woodland and ancient or veteran trees) should be refused, unless there are "*wholly exceptional reasons*" and a suitable compensation strategy exists (NPPF, Para. 186, d).

6.41.9 Mandatory requirements to secure a 10% uplift in biodiversity net gain (BNG) value of the Site will apply.

6.42 The provision of a café at the Site is a “main town centre use” (“MTCU”) within an out-of-centre location. The NPPF (paragraph 91) requires the application of a sequential test to demonstrate that there are no suitable or available sites within a town centre or edge of centre location. However, this replaces an existing MTCU.

Emerging Planning Policy

6.43 Enfield Council will begin consultation of their draft Local Plan on 28 March 2024.

6.44 The emerging draft allocation for the Site and existing Training Centre (Ref. RUR.07) outlines the following design principles, in summary:

- Maximise publicly accessible space and contribute towards enhanced pedestrian and cycle connectivity, including improving north-south and east-west pedestrian/cycle connections.
- Ensure no reduction in public rights of way and retain public access along the New River, Turkey Brook and Cuffley Brook.
- Minimise the removal of high-value trees to reinforce existing green buffers.
- Promote nature recovery with additional tree planting, biodiversity enhancements and green connections. Proposals that offer greater biodiversity gain than minimum requirements will be encouraged.
- Respond sensitively to the heritage and landscape context.
- Provide streetscape improvements the surrounding areas.
- Maximise the use of natural/landscaped boundaries between sports pitches and different uses.
- Incorporate SuDS to minimise and mitigate flood risk.

6.45 This Planning Statement demonstrates how the scheme has been developed to address the design principles outlined above, and these are addressed in various documents supporting the application.

7 Principle of Development

7.1 In general terms, the Site is lawfully established for sports and recreation use given its last use as a golf course. It is also designated as Local Open Space in its entirety. The proposals would continue to provide sports, recreation and open space functions consistent with the policy objectives and designations.

Replacement of Sports and Recreation Facilities

7.2 The proposals would provide an alternative sports use (a football training centre) within part of the Site, restoring the remaining area to publicly accessible parkland and recreation space. The sports facility would be for elite-level football but with community access. The proposals represent a significant improvement in quality compared to its lawfully established golf course function.

7.3 Presently, the site is a redundant, over-grown golf course in the main, with a significant area of woodland. When it was used as a golf course those playing golf had priority over other members of the public using the land. The proposals involve significant enhancement to the site, including the following:

7.3.1 Retaining the existing woodland, but with a new management strategy to improve both the arboricultural environment, as well as the ecological conditions of the woodland (see the Outline Parkland Management Plan).

7.3.2 Restoring the southern part of the parkland to its previous historic nature and opening it up for wider recreational use (beyond its current condition) and compared to when it was a golf course. Notably, as a golf course, the public could only walk on parts of the site where they did not interfere with play and paying golfers had priority of the golf course. In contrast, the restored and enhanced parkland to the south will be accessible to, and useable by, all.

7.3.3 Dedicated high quality sports provision for the use by the Club but with managed community access (see Section 9).

7.3.4 Improvement to the pedestrian, bridleways and cycle routes through the site, along with improvements to the bridle ways and public rights of way outside the site (which are to be improved by the Applicant).

7.4 **Figure 8.1** (Section 8 of this Statement) below demonstrates the public access and site areas that will be delivered as part of these proposals, and the DAS and Landscape Strategy (The Landscape Agency) outline the significant enhancement to the landscape and parkland that will be delivered as part of these proposals, and which will benefit existing users of the park and mark it more attractive to new users.

7.5 Consistent with Paragraph 103 of the NPPF, the redevelopment of existing sports and recreational facilities to provide alternative and improved facilities of this nature is entirely appropriate.

7.6 More generally, the NPPF requires planning decisions to positively respond to the provision of sports venues and open spaces as part of wider social, recreation and cultural facilities that communities need. Local Plan Policy DMD74 also supports new sports facilities in principle.

Development of Local Open Space

7.7 The development is proposed on land designated Local Open Space. It satisfies Policy DMD71 of the Enfield Local Plan given that:

7.7.1 Replacement open space is provided on-site, with this being of a superior quality and having far greater accessibility to the public than the former golf course.

7.7.2 The improved public spaces align with LBE's Council's Parks and Open Spaces Strategy (2010-2020). Although now aged, the principles of this strategy remain applicable with it seeking to deliver high-quality open spaces; make open spaces in Enfield places for everyone; and create sustainable open spaces for the future.

7.7.3 The former golf course has been deemed surplus to requirements by LBE, as evidenced through their disposal of the land and AfL with the Club. Part (b) of Policy DMD71 is, therefore, addressed and satisfied.

7.7.4 The enhancements to designated Local Open Space that arise in terms of its quality and accessibility also satisfy Core Policy 34 of the Core Strategy which seeks to protect and enhance existing open space²⁸.

7.8 The principle of repurposing the land for the use for sports and recreation use in this case is fully supported by adopted policy. Furthermore, the proposals are also consistent with the emerging Local Plan allocation for the site and wider area.

Health and Wellbeing

7.9 Providing new elite sports facilities (with local community access and other initiatives and programmes in the local community which will come forward as part of this scheme) and enhanced public recreation areas aligns with the NPPF's objective to promote healthy, inclusive and safe places. Social interaction, alongside the enabling and supporting of healthy lifestyles, is also supported.

7.10 The NPPF acknowledges that access to high-quality open spaces and opportunities for sport and physical activity are important for the health and well-being of communities (Para. 102). The proposed development fully aligns with these aims of national policy.

²⁸ Allocation RUR.07.

Re-use of the Southern Clubhouse

- 7.11 It is proposed to maintain but enhance the café use within the Southern Clubhouse and, given that this is an existing use its principle is, therefore, appropriate. Moreover, this building will be re-purposed to include a new community facility to be used by local groups, and new WC facilities.
- 7.12 The use of this building for community and café facilities will increase the attraction of the parkland for recreational and sports use by the local community.

Alignment with Enfield's Corporate Objectives

- 7.13 The proposals are fully aligned with LBE's corporate objectives. In summary, they will:
- 7.13.1 Adhere to the Core Strategy spatial vision for Enfield to become a healthy and prosperous Borough, meeting a need for high-quality green spaces and cultural/leisure activities amongst others.
 - 7.13.2 Align with the strategic objectives which underpin this spatial vision, including supporting job creation, enhancing the natural environment and open character of the Borough, ensuring the efficient use of land, securing new inward investment and ensuring that leisure/recreation facilities will meet the needs of existing and future populations.
 - 7.13.3 Creating improved park land, community spaces and employment opportunities in line with the '*Empowering Young Enfield 2021-2025*' report.
 - 7.13.4 Be consistent with the priorities of the Enfield Council Plan 2023-2026, notably the provision of green spaces, assisting healthy communities, supporting young people, improving sports/leisure facilities and enabling more active lifestyles.
 - 7.13.5 Assist Enfield's cultural identity through an improved sporting, leisure and natural environment.
 - 7.13.6 Delivery new inward investment and job creation, alongside sensitively shaping green spaces to create a heritage environment with a complimentary culture and leisure offer, and thereby aligned with LBE's *Economic Development Strategy*.
- 7.14 There is also wider support expressed by Sport England's corporate mission to tackle inequalities in sport, in turn unlocking the advantages of sport and physical activity for everyone. The proposals are aligned with this.

Emerging Policy

7.15 Although emerging policy attracts little weight at the current time, it is noted that the draft allocation²⁹ concerning the site supports the full range of uses being proposed, including professional sport, community sports/leisure uses, recreation and ancillary related uses.

Principle of Development – Summary

7.16 In summary, there is clear support in principle for the proposed development at national, London and local levels of planning policy. The principle of the development is both appropriate and supported therefore, but subject to further consideration of policies concerning the Site's Green Belt designation which are addressed in the following section.

²⁹ Site allocation RUR.07 of the Regulation 19 Local Plan.

8 Green Belt Assessment

- 8.1 This Section goes on to consider whether the proposals are appropriate, or inappropriate, development within the auspices of Green Belt policy, and where any of the development is considered to be inappropriate, whether VSC prevail.

Appropriate and Inappropriate Development

- 8.2 There are several interrelated component parts of the scheme which will collectively deliver the Club's operational needs alongside a range of public benefits. The component parts must be considered individually, and not cumulatively, when assessing whether they are "inappropriate" or "appropriate" development in the Green Belt. Section 7 clarifies how policy within the NPPF defines each type of Green Belt development.
- 8.3 Disaggregating the component parts of the scheme allows a clear assessment of those elements of the scheme which are appropriate development in the Green Belt, and those which are not. Should any inappropriate development arise, it is only this aspect(s) which must then be outweighed by *Very Special Circumstances* in line with the NPPF tests.
- 8.4 This approach was adopted by Enfield Council when assessing the Club's Men's Training Centre (ref. TP/07/1623). In approving consent, the Council found that the open sports ground would be an essential facility for outdoor sport and recreation which would preserve the openness of the Green Belt; and that some of the ancillary facilities would be facilities for outdoor sport and recreation which preserved the openness of the Green Belt and did not conflict with the purposes of including land within it.
- 8.5 The Officer Report supporting approval of the Club's existing Training Centre cites several other examples whereby a disaggregated approach has been undertaken, including Manchester United, Arsenal, Sunderland and Derby. More recent examples continue this approach. Millwall's training academy consented in February 2023³⁰ considered the football pitches to be appropriate development which had no impact on openness, with associated buildings and parking found to be inappropriate development that was outweighed by VSC. The VSC case included the community, economic and social benefits arising alongside the scheme's alignment with the Council's Economic Development Strategy.
- 8.6 **Appendix 4** considers each scheme component against the appropriate and inappropriate categories of Green Belt development identified by the NPPF (Paras. 154 and 155). It concludes that the entirety of the scheme has the potential to be "appropriate" Green Belt development. This is, however, subject to further consideration of whether:

- 8.6.1 In the case of the Northern Clubhouse extension only, whether this is proportionate to the original building;

³⁰ Reference 22/01961/FUL.

8.6.2 For all components, whether there is no greater impact on the openness of the Green Belt than the former golf course; and

8.6.3 Whether certain components only would conflict with the five Green Belt purposes.

8.7 Each of the above factors is discussed in turn, below, to reach a concluding position on what aspects of the scheme are appropriate and inappropriate development. This is summarised in **Table 8.1** below.

Northern Clubhouse Extension

8.8 In the case of the Northern Clubhouse extension, Paragraph 154 (c) of the NPPF treats proportionate extensions to original buildings as appropriate Green Belt development.

8.9 “Disproportionate” is not defined in national policy or guidance, whereas the original building is as it exists on 1 July 1948 or, in the case of those building after this date, as first constructed. The Northern Clubhouse has not been extended and its original construction provides 564sqm split over ground and first floor.

8.10 The Northern Clubhouse would be extended by an additional 2,739sqm in total, providing a total building of 3,303sqm (GEA). A significant amount (c. 1,103sqm) of the new floorspace would be at basement level however, which is not visible and would not be read as part of the building when viewed externally.

8.11 In Quod’s view, the proposed extension would extend beyond what can reasonably be deemed a proportionate increase. Indeed, appeals indicate that percentage increases as much as 93% above the original building can be considered proportionate (i.e. appropriate)³¹, but those in exceedance of this are likely to be disproportionate subject to any site-specific factors.

8.12 The Northern Clubhouse extension would not fall within the scope of Paragraph 154 (c) of the NPPF. It does, however, comprise the partial redevelopment of previously developed land and could still be appropriate development that falls within Paragraph 154 (g) of the NPPF subject to further consideration of any impacts on openness.

Impact on Openness

8.13 When applying NPPF Paragraphs 154/155 in this case, all scheme components are subject to further consideration as to whether any impact on the openness of the Green Belt arises.

8.14 In *R (Boot) v Elmbridge BC* [2017] EWHC 12 (Admin), the High Court clarified the approach to assessing the impact on Green Belt openness, noting that if any harm to the openness arises, regardless of whether this harm is significant or not, then a proposal cannot fall within the appropriate categories of development outlined by the NPPF Paragraphs 154 and 155.

³¹ A 93% cumulative increase was appropriate in APP/J1535/D/22/3304864; a 72% increase was appropriate in APP/J1915/D/22/3307995; and a 64% increase was appropriate in APP/T3725/D/23/3322331.

- 8.15 The Supreme Court has further clarified the concept of “openness” and how this should be interpreted in *R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire Country Council* [2020] UKSC 3. This judgment confirms that openness is a matter of planning judgment for the planning authority to determine, and includes both visual and spatial (ie, temporal) considerations when reaching a decision.
- 8.16 Consequently, it is necessary for each individual component of the development to be assessed to determine whether it causes harm to the openness with regards its visual and spatial aspects. If it does, then it is inappropriate, and it is necessary to establish if there are VSC that would warrant diverging from the presumption against inappropriate development in the Green Belt. This is considered further below.
- 8.17 The accompanying Landscape and Visual Impact Assessment (“LVIA”) (The Landscape Agency) considers the relationship of all individual scheme components to the openness of the Green Belt, having regard to both the spatial and visual openness. In reaching its conclusions, the LVIA recognises the existing nature of the Site, including its built form, topography and landscape character which all assist in mitigating any potential effects.
- 8.18 In summary and informed by the wider technical documentation supporting the planning application, the LVIA concludes that the scheme as a whole will have a “*slight beneficial*” effect on landscape character and a “*neutral*” effect on visual effects.
- 8.19 The LVIA concludes that some components of the scheme would affect the spatial openness of the Green Belt, being the Northern Clubhouse extension and the small scale security hut and pitch plant room only. All other scheme components are assessed in the LVIA as having no harm to the openness of the Green Belt. This is summarised in **Table 8.1** (later in this Section).
- 8.20 It is material to the consideration of this harm that it is reduced and mitigated through scheme and site-specific circumstances. Given the sheer size of the site area of Whitewebbs Park, the limited proposed volumes of additional building, the impact is proportionately de minimis. Moreover, extension to the Northern Clubhouse is essential for the Training Centre facility as demonstrated in the DAS, which explains the facilities and functions required to deliver professional sporting facilities.
- 8.21 The design and location of these facilities have been carefully considered, in order to reduce the impact on the openness. For example, part of the extension to the Northern Clubhouse is within the existing Courtyard and, therefore, contained within an existing built form and the pitch side plantroom has been sunken within the existing land form and incorporates a green roof.
- 8.22 Other infrastructure is proposed as part of the Training Centre (eg, ball stops, low level lighting, fencing and six floodlights). In order to minimise any harm to the openness of the Green Belt, these are highly limited in scale and form, but are essential infrastructure for the proper and efficient operations of the Training Centre.

- 8.23 The effect of these build forms/infrastructure of the scheme on the visual openness of the site is limited due to the screening effects of mature woodland and topography. Other than close-up views of the Northern Clubhouse from the viewpoints, the proposals are either fully or partially hidden by existing vegetation, which will be reinforced by proposed planting, especially on the boundaries of the site.
- 8.24 Despite the above, consistent with the judgement in *Boot* and recognising that a limited degree of harm does arise, the Northern Clubhouse extension and grounds maintenance building do not fall within those categories of appropriate Green Belt development.

Green Belt Purposes

- 8.25 Consideration as to whether conflict arises with the five Green Belt purposes must also be given. Paragraphs 154 and 155 of the NPPF confirm that this applies to the following categories of development only, of relevance, where they do not harm the openness:
- The provision of appropriate facilities for outdoor sport and recreation (Para. 154(b)).
 - Engineering operations (Para. 155(b)).
 - The re-use of buildings of permanent and substantial construction (Para. 155(d)).
 - Material changes in the use of land (for outdoor sport or recreation) (Para. 155(e)).
- 8.26 **Table 8.1** and **Appendix 4** explain which components of the development are considered to fall within these sub categories.

(i) To check unrestricted sprawl of large built-up areas

- 8.27 The Site already contains a range of buildings, structures and associated highways, car parking and is a recreational amenity which attracts a good level of activity. It has been historically used as a golf course in a large part. The Site is clearly defined on all sides, with the Club's existing training centre to the east, Whitewebbs Wood to the west, Whitewebbs Lane to the north and the existing residential area of Clay Hill to the south. Further north, beyond Whitewebbs Lane, is open Green Belt land and then the M25 motorway.
- 8.28 The nearest built-up areas are Turkey Street c. 1.5km to the east and Crews Hill c. 1.5km to the west. There are no built-up areas immediately north with the M25 providing a clear barrier.
- 8.29 The Site is contained and defined by these barriers, with them unaffected following the development. The proposals also limit the majority of built form to the north-east part of the Site, seeking to utilise existing buildings wherever possible, and with the majority of the scheme comprising either open pitches or public parkland.

8.30 In addition, the area of land demised to the Applicant through the AfL is clearly defined and would prevent the Club from extending beyond the agreed boundaries in its current form, other than for some modest works to improve the existing public rights of way where they are deemed necessary.

8.31 There would be no unrestricted sprawl of any large built-up areas arising from this scheme.

(ii) To prevent neighbouring towns merging into one another

8.32 It is far from clear that this purpose is relevant here as it is focussed on neighbouring towns merging into one another. But as above, the Site is clearly defined and contained by existing boundary treatments. It is located a considerable distance from the nearest built-up areas at Turkey Street and Crews Hill (both 1.5km away) and does not sit adjacent to any built-up area in addition.

8.33 The Site's defined barriers would remain in place post-development, with these being strengthened through further planting and landscape treatments. Through the planning application and Agreement for Lease, the areas of the Site allocated to football activities and public parkland would be clearly defined and controlled.

8.34 The LVIA also concludes that the proposals would not constitute a dominant feature within the landscape due to the screening effects of existing vegetation. Any perceived visual effects are limited to the immediate setting of the Site, with wider views and perception of built development screened by mature woodland.

8.35 There would be no merging of neighbouring towns occurring, therefore.

(iii) To assist in safeguarding the countryside from encroachment

8.36 The Site is lawfully established for sports development having last been used for a golf course. The proposals would provide an alternative sports use on part of the Site and restoring the remainder (majority) from managed golf course functions to open public parkland with resultant improved public access.

8.37 The area of managed sports functions over the site would, therefore, be much reduced from the 41 ha covered by the golf course to only 15.71ha covered by the operational boundary of the Training Centre. Therefore, a greater area of the Site will be put over to fully publicly accessible parkland compared to the lawful fallback of the established golf course use.

8.38 Notably, the LVIA concludes that the proposals would not be uncharacteristic of the local landscape character, and that they can be appropriately assimilated without harm to landscape character or the visual amenity of the surrounding area. Indeed, many of the scheme aspects are expected to enhance and restore the local landscape character.

8.39 Wherever possible, existing buildings and those parts of the Site that are previously developed land are used by the scheme to provide the required built form.

(iv) *To preserve the setting and special character of historic towns*

8.40 There are no historic towns within the setting of the Site which would be affected by the proposals. This Green Belt purpose is therefore not relevant to the proposals.

(v) *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*

8.41 The Site is lawfully established for a managed sports use in its entirety which includes associated built form. Parts are previously developed, land. The extent of the land that are previously developed extend beyond the buildings themselves to also include their curtilage and any associated fixed surface infrastructure³².

8.42 The proposals involve an alternative managed sports use on part of the Site only, with this being much reduced in area from the lawful managed use of the site for golf course purposes. The remaining land would be restored to public open parkland. Existing buildings and their curtilage (i.e. the brownfield elements) would be sensitively re-used and adapted to provide the necessary training functions and southern public café.

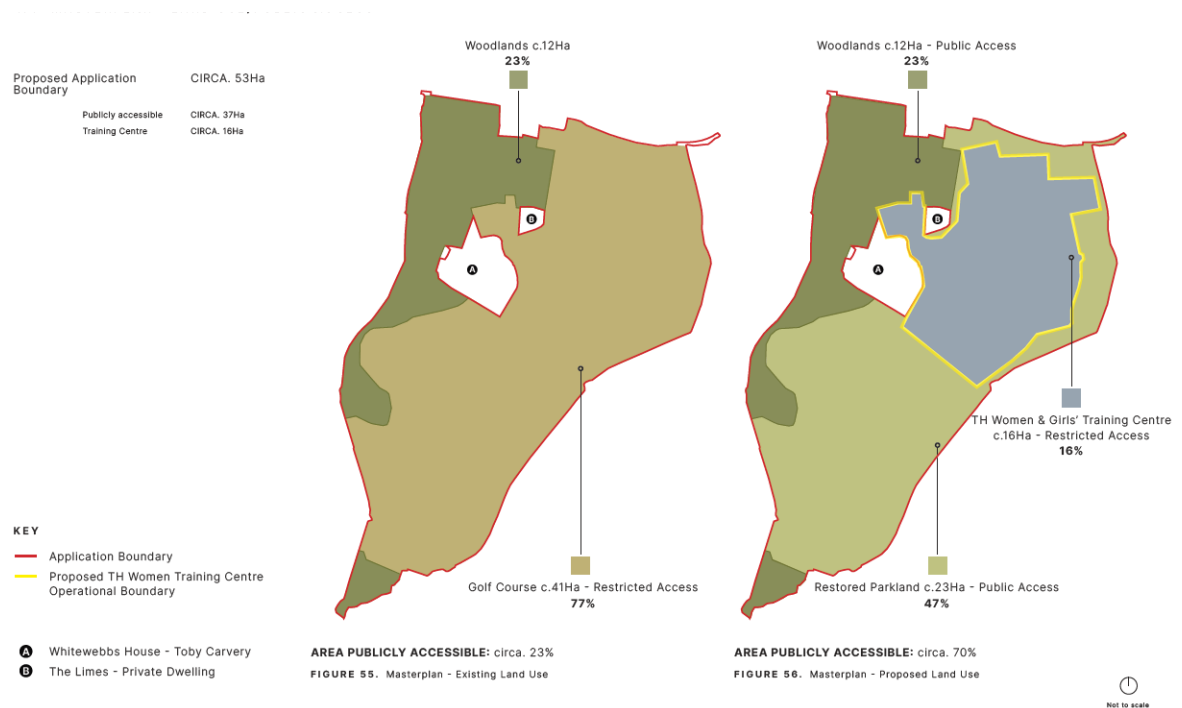
8.43 **Figure 8.1** below compares the existing (ie, the former golf course area) and proposed areas of managed sports use, publicly accessible parkland and public woodland to demonstrate the betterment achieved by the development.

8.44 In summary:

- The area of the site given over to managed sports use would reduce from 41ha of the Site's coverage to only 16ha
- 23ha (ie 47%) of the Site would be delivered as enhanced public parkland
- 12 ha (ie 23%) of the Site would remain unchanged, ie the publicly accessible woodland

³² Previously Developed Land is defined in the Glossary to the NPPF as "*Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.*"

Figure 8.1: Existing and Proposed Land Functions



8.45 The proposals will therefore recycle a former managed sports use into an alternative sports use, but in a manner which achieves a more efficient use of brownfield and former sports land, allowing a significant improvement in the quantum and quality of publicly access parkland open to all. There would be no conflict with the LBE’s urban regeneration objectives, but more important the scheme is well aligned there will be alignment with a range of LBE’s Corporate objectives (see Section 4).

Spatial and Temporal effects of the development on the Green Belt

8.46 The proposals, being recreational and sports related, mean that the temporal and spatial implications of the scheme are functionally indifferent to the lawfully established use. The supporting technical evidence in terms of transport, noise, air quality and the night time assessment demonstrate that there will be no material harm to the amenity of the environment, within which the Site is set.

Appropriate and Inappropriate Development - Conclusion

8.47 Based on the above analysis, **Table 8.1** summarises the Applicant’s position in respect of appropriate and inappropriate development; the judgement on visual harm is explained in the LVIA.

Table 8.1: Summary of Appropriate and Inappropriate Development

Component	Disproportionate Addition?	Harm to Openness (spatial/visual)?	Conflict with 5 Purposes?	Appropriate?
(1) Sports pitches				
New pitches	n/a	N	N	Y
Topography remodelling	n/a	N	N	Y
(2) Ancillary Buildings				
Northern Clubhouse (extension)	Y	Y	N	N
Grounds Maintenance Building	n/a	N	N	N
Security Lodge	n/a	Y	N	N
Pitch-side plant room	n/a	Y	N	N
Pitch-side kit storage	n/a	N	N	Y
Boundary Treatments	n/a	N	N	Y
Boundary of Training Centre	n/a	N	N	Y
(3) Enclosure				
5m ball-stop fencing	n/a	DM	N	N
3m synthetic pitch enclosure	n/a	DM	N	N
1.1m tall pitch side railings	n/a	DM	N	N
2.5m green waste silo	n/a	DM	N	N
(4) Pitch Amenities				
Pitch-side dugouts	n/a	DM	N	N
Goalpost storage	n/a	DM	N	N
Pitch-side WCs	n/a	DM	N	N
(5) Lighting and MEP				
Embedded low level lighting	n/a	DM	N	N
Low level lighting bollards	n/a	DM	N	N
Pitch floodlights	n/a	DM	N	N
Flood light drivers	n/a	DM	N	N
CCTV cameras	n/a	DM	N	N
PTZ cameras	n/a	DM	N	N

Component	Disproportionate Addition?	Harm to Openness (spatial/visual)?	Conflict with 5 Purposes?	Appropriate?
(6) Southern Clubhouse				
Café & WCs	n/a	N	N	Y
(7) Parkland & Public Access				
Reinstatement of historic parkland	n/a	N	N	Y
Footpath upgrades/new provision	n/a	N	N	Y
(8) Access				
Upgrading of existing access route	n/a	N	N	Y
Reinstatement of historic carriageway	n/a	N	N	Y
Operational link to Western Field	n/a	N	N	Y

DM = De minimis effect on openness.

8.48 In summary, only the following items are inappropriate development in the Green Belt, whereby the harm arising from these (alongside all other harm) must be outweighed by VSC:

- The extension to the Northern Clubhouse.
- Security Lodge.
- Pitch side plant room.

8.49 Enclosures, pitch amenities and lighting/MCP, albeit the visual effects on the openness of the Green Belt is de minimis individually and in combination.

8.50 All other components of the scheme are appropriate Green Belt development.

Harm to the Green Belt

8.51 As stated by the NPPF (Para. 152), inappropriate development will have a degree of harm on the Green Belt. It is important to consider the degree of harm arising from each component.

8.52 The degree of harm arising from these elements of the scheme judged as inappropriate, justified through the supporting technical documentation, is limited to the following:

- Northern Clubhouse: harm is limited by the two existing and proposed landscaping which limit views of the extension; the existing brownfield character of the extension's location; and the positioning of a significant quantum of floorspace below ground level (equating to c.40% of the total floorspace proposed). The LVIA confirms that the subterranean element has no impact on openness (i.e. no harm).
- Grounds maintenance building: this is a single storey building with a volume that is proportionately very small to the overall scheme. It is also an essential building for the proposed land use function, and it is notable that this would replace an existing grounds maintenance building albeit in a different location.
- De minimis effects on the visual openness of the land arising from pitch side infrastructure.

8.53 The Northern Clubhouse extension which runs eastwards from the existing building will be on previously developed land.

8.54 There is limited visibility of both components from surrounding public receptors due to the screening effects of mature woodland and topography, alongside the significant landscaping and boundary treatments which are proposed.

8.55 It is also of note that the scheme as a whole is judged by the LVIA to have a "slight beneficial" effect on the landscape character and a "neutral" effect on visual effects. There is also no conflict arising with the five Green Belt purposes, as explained above.

8.56 The NPPF (Para. 153) also requires that "other" harm from a proposal is considered. In this case the following harm is considered to arise:

8.56.1 The LVIA concludes that there would be "slight adverse" landscape effects during construction of the development; however, these are short term only and following completion of the scheme there will be a "slight beneficial" effect on landscape character and "neutral" effect on visual character which would prevail post-construction of the scheme.

8.56.2 The proposals involve the removal of 137³³ trees. A further 70 Category U trees which require felling as part of good arboricultural management. The loss of high quality trees has been kept to a minimum amount and, notably, there will be no Category A or Veteran trees lost. Within the operational boundary, 231 new trees would be planted equating to a net gain of 115 trees. Across the Site as a whole, c. 2,000 new trees would be planted by the Applicant. There is a significant gain in tree planting across the Site, therefore, which will assist with improvements to the landscape and visual character, alongside the Site's biodiversity value.

³³ Excluding those being transplanted.

8.56.3 The EclA illustrates that the effects on ecology will not to be significant, other than during the construction period (assuming effective mitigation and management of the construction process) or at the final operation of the scheme. Any effects should be balanced against the scheme’s ability to deliver significant levels of Biodiversity Net Gain (BNG).

8.56.4 The Heritage Statement finds that there will be some harm to both the Listed South Lodge and the King & Tinker pub. The harm is considered to be very slight (low) in the case of South Lodge and low in terms of the King & Tinker. However, in the case of the South Lodge, the net heritage “position” is a considerable improvement of its setting. There is also judged to be some harm to the non-designated heritage assets of Whitewebbs Park and Whitewebbs House. Again, the harm is deemed to be moderate harm in respect of Whitewebbs Park, and low level to Whitewebbs House. The Heritage Statement, however, concludes that with the beneficial impacts of the development, demonstrates a net benefit overall (see Section 9 of this Planning Statement and Section 8 of the Heritage Statement).

8.56.5 All other reports demonstrate that the environmental effects are not harmful.

8.57 Both individually and collectively, the harm arising from inappropriate development and all other harm is considered to be low. The consideration of how this is clearly outweighed by the VSC is outlined below.

Very Special Circumstances

8.58 VSC are a matter of planning judgement for the local planning authority to consider. There are significant and demonstrable benefits in this case which would amount of VSC and clearly outweigh any harm arising to the Green Belt – both by virtue of aspects being inappropriate and any other harm.

(i) Need

8.59 As outlined in Section 3, women’s football is at a pivotal stage of its development and there is a clear need for dedicated, high-quality facilities for the Club’s female teams.

8.60 The scheme is directly aligned with the strategic recommendations of the Independent Review³⁴ into women’s football by the Department for Culture, Media and Sport (DCMS), which include:

- Women’s football should “*not settle for anything less*” than world-leading standards for players, fans, staff and everybody involved.
- A “*need*” to fix the talent pathway from grass roots level.
- “*Mandating*” elite training facilities for elite players and “*providing gold standard*” physical and mental health provision.

³⁴ Raising the bar – reframing the opportunity in women’s football (updated 17 July 2023).

- Government “*must*” deliver on recent commitments around equal access to school sports for girls.

8.61 It is important that comparable facilities are provided for women/girls to those currently experienced by the men’s team, ensuring gender equality. There is a need for a minimum level of quality of training facilities necessary to achieve these equal standards.

8.62 The Club’s female facilities are current sub-standard, being temporary accommodation that does not provide the full range of facilities required with no permanent solution in place, whilst also requiring the unsustainable transport of players between the Site and the Club’s stadium in Haringey to delivery their educational programme to younger players. The existing temporary facilities expire in January 2025 and with no permanent home thereafter, the Club will be forced to use public facilities elsewhere which are not of the standard necessary for elite support.

8.63 Competing sides are already operating or progressing new training facilities for their women and girls’ teams. This includes, amongst others:

- Manchester United opened a new elite women’s facility for the 2023/2024 season at an investment value of £7m³⁵.
- Manchester City recently submitted a planning application for a purpose-built women’s training facility with an investment value of up to £10m³⁶.
- Liverpool announced plans in June 2023 for a new women’s training facility³⁷.
- West Ham United opened a new women’s training facility in July 2020³⁸.

8.64 It is essential that an appropriate standard of training facilities are provided to sustain the Club’s position within the Women’s Super League in the long term, whilst allowing them to grow alongside the women’s game more generally. A failure to address the Club’s existing inadequate infrastructure and respond positively to the wider growth in the women’s game will leave the Club at a disadvantaged position.

8.65 The proposals would be the first women’s training centre to be built to the equivalent men’s standards set by the Football Association, achieving a best in class facility. Currently, there are no prescribed standards for women’s football and the proposed development would ensure gender equality across all Club sides at Tottenham Hotspur. The proposed Training Centre will be the best facility in the country.

³⁵ <https://www.bbc.co.uk/sport/football/67133463>

³⁶ <https://www.mancity.com/news/womens/manchester-city-women-submit-plans-for-purpose-built-training-facility-63840501>

³⁷ <https://www.liverpoolfc.com/news/liverpool-fc-create-elite-training-facility-lfc-women-melwood>

³⁸ <https://www.whufc.com/news/articles/2020/july/06-july/west-ham-united-unveil-new-womens-headquarters>

- 8.66 As the training centre will be of an equivalent standard to the men's facility, it has the potential to be used by international teams in the same way that the men's training centre is, not just limited to England but capable of accommodating visiting teams from abroad. The sharing of player/staff accommodation within Myddelton Lodge and internal access via the operational link will allow women's teams to stay and train at the facility, as occurs occasionally at the current men's Training Centre.
- 8.67 Alongside the Club's ability to compete nationally and internationally being compromised by the sub-standard existing facilities, at the local level inadequate facilities will make it more difficult to retain and develop local playing and coaching talent through the football pathway, and failing to capitalise on the significant economic and social benefits to Enfield.
- 8.68 Delivery of a new, national class training facility will support the attraction, retention and development of local people. It will also encourage more local people to participate in the game through the multiple community initiatives that the Club will undertake in conjunction with the Training Centre's operation (explained further below).
- 8.69 There is a clear need to provide a permanent home for the Club's female football operations, alongside a need to positively grow the women's game by providing an elite training facility which is aligned with Government recommendations. The proposals will make a significant contribution to the development of women's football both nationally and regionally, benefitting professional players and young people beginning/hoping to undertake a career in the sport.

(ii) **Lack of More Suitable Alternative Sites**

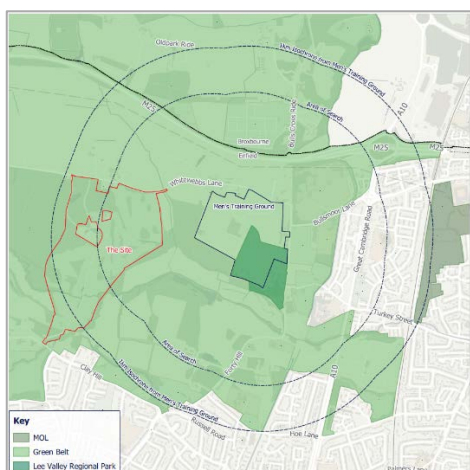
- 8.70 It is not necessary for a formal sequential assessment of all potential alternative sites. National policy is explicit where this must be undertaken, and this does not extend to proposed development in the Green Belt requiring VSC. Had this been the intention, then the NPPF would have been explicit that a sequential assessment is needed.
- 8.71 In this context, in *Bramley Solar Farm Residents Group v Secretary of State for Levelling Up, Housing and Communities* [2023] EWHC 2842 (Admin), the High Court confirmed that (at [269]):
- "... land may be developed in any way which is acceptable for planning purposes. The fact that other land exists upon which the development proposed would be yet more acceptable for such purposes would not justify refusal of planning permission for that proposal."*
- 8.72 The above drew on the conclusions of the High Court in *Trusthouse Forte Hotels Ltd v Secretary of State for the Environment* (1986) 53 P & CR 293 and confirmed that this has been endorsed in several other cases since³⁹.

³⁹ Including by the Court of Appeal in *R. (on the application of Mount Cook Land Ltd) v Westminster City Council* [2003] EWCA Civ 1346 and *'R (on the application of J (A Child)) v North Warwickshire Borough* [2001] EWCA Civ 315.

- 8.73 Most recently, in *R (Peak District and South Yorkshire Branch of the CPRE) v Secretary of State for Transport* [2023] EWHC 2917 (Admin), the High Court confirmed that an error in law cannot arise from the failure to take account of alternative sites, unless these alternatives are so obviously material that it would be irrational to do so.
- 8.74 In short, decision making must be about assessing the adequacy of a proposal judged against the relevant Development Plan and other applicable material considerations. There needs to be clear planning objections to a development in order to consider whether a more appropriate site exists elsewhere. In the absence of any planning policy conflict or other planning harm, the consideration of alternative sites is irrelevant.
- 8.75 In this case, the proposals are proven to be fully compliant with the Development Plan and all other material considerations. Nonetheless, it is still relevant to understand the Site's locational benefits and how it is the most suitable location for the proposal.
- 8.76 The Site presents a unique opportunity to develop a female training facility adjacent to an established men's training centre. This allows both the men and women's operations to have their own dedicated training operations whilst sharing some key infrastructure (which is outlined at Section 5).
- 8.77 Clearly, the sharing of facilities reduces the amount of built development required by the proposals, whilst still ensuring a high-quality facility of equivalent standard to the men's training centre. Through the creation of an internal operational link on Club-owned land, the women's and men's facility and be connected without the need to travel on the adopted public highway network. There are clear highways and sustainability merits from this approach which can only be achieved through the Site's location adjacent to the current training centre.
- 8.78 The proposed women's training centre would share the following existing functions:
- Media Centre (531sqm).
 - Indoor Pitch (3.642sqm).
 - DEXA Scanner (27sqm).
 - Cryotherapy Room (10sqm).
 - Auditorium (95sqm).
 - HR, Safeguarding and Legal Services (244sqm).
 - Recreation Room (224sqm).
 - Amphitheatre (129sqm).
 - Outdoor Player Recreation Area (170sqm).
 - Myddelton Lodge (player/staff accommodation) (3,980sqm).
- 8.79 The co-location is not limited to player use, with it allowing the sharing of wider aspects such as coaching staff and grounds maintenance equipment.

- 8.80 These shared facilities exceed 9,000sqm of floorspace. This is almost 1ha of development that is not required to achieve a comparable standard of women/girls training facilities elsewhere, and which is only possible given the Site's proximity to the current training centre and the ability to sustainably link the two. As well as reducing the quantum of development required in the Green Belt, it will support the delivery of the scheme by minimising costs alongside creating a more sustainable and cohesive operation across all training centre operations.
- 8.81 Even if the women/girl's teams were to access these shared elements at the current training centre alongside having their own location elsewhere, this would result in the movement of players unnecessarily between the two locations which is both unsustainable from a highways perspective, and inefficient from an operational point of view. Indeed, from an elite sports perspective, it would not be practical or expected to have the required facilities split over multiple sites.
- 8.82 The Site's former and established golf course use (i.e. sport and recreation) is also a unique characteristic which allows an alternative sport and recreation function to be established, but in a manner which is firstly more efficient in terms of land take, and secondly more beneficial in the amount of land returned to fully-publicly accessible parkland. The golf course also has established access, parking and buildings (i.e. brownfield land) which are suitable for re-use.
- 8.83 There are no appropriate alternative sites that would satisfy the operational requirements, deliver the new public spaces, or allow the sharing of facilities which could be considered available, preferable or suitable in planning and operational terms. The only way to achieve the co-location benefits would be to consider alternative land adjoining the existing training centre.
- 8.84 **Figure 8.2** shows an area of search around the Club's existing Training Ground to understand whether any such land exists. This considers two distances – the first being an equivalent distance of the proposed new facility, and the second being a larger 1km radius. An equivalent distance was selected as a comparable basis to the Site and proposals in the first instance, with the wider 1km radius also being adopted to allow for a reasonable degree of flexibility in the search.

Figure 8.2: Area of Search for Alternatives



- 8.85 As demonstrated above, the majority of alternative sites would either be within the Green Belt or Metropolitan Open Land, and therefore of no preference for development in planning policy terms.
- 8.86 More so, there are no other sites lawfully established for sports use with the same scale of brownfield elements.
- 8.87 Where there are limited areas of land falling within the urban area, there are no available alternatives of the scale and size required which could reasonably accommodate the proposals.

(iii) **Socio-Economics Benefits**

- 8.88 UEFA estimates⁴⁰ that European women's football could see a sixfold increase in commercial value over the next decade, reaching an annual value of €686 million in 2033, with Club sponsorship set to increase to €295 million in that time.
- 8.89 The English game is at the forefront of this growth and the proposals are an integral part of maximising the associated economic growth within Enfield. They would deliver high-quality facilities of national standing, raising the profile of the local area with resultant social and economic benefits.
- 8.90 From 2025, UEFA will introduce a second women's European competition alongside the existing Champions League. This will increase the chances of the Club participating in European football requiring further resource across all departments. It is important that the Club have an elite training facility to ensure continued success on the European stage and to maximise the growth potential from this.
- 8.91 The Socio Economic Benefits Statement demonstrates that there are a range of quantifiable economic benefits that will arise from the proposed development, both at construction and operational phases.
- 8.92 In terms of construction phase impacts, there will be an average of circa 212 full time equivalent (FTE) jobs, supported over the 27 month construction period, with approximately £29.4m in GVA during that same duration.
- 8.93 At the operational phase, there are likely to be between 65-82 net additional FTE permanent, operational jobs, along with between £347,000 - £432,000 in employee spending per year, which will be available to local businesses. Additionally, between £3.4m and £3.5m per year in GVA, and almost £2m in the form of wages per year.
- 8.94 Social benefits will also arise, and these are outlined below:

⁴⁰ UEFA, ['The Business Case for Women's Football'](#), August 2022.

- 8.94.1 Significant improvements to facilities available for women and girls football activities (from community and grassroots level to professional level). These facilities could potentially be seen as a 'golden standard' for other football clubs in terms of their provision for the women's and girl's teams.
- 8.94.2 Significant improvement in the quantity and quality of publicly accessible open space in the local area – and the benefits this has to health and well-being of users.
- 8.94.3 Enhancing access to nature and biodiversity – up to 2,000 additional trees set to be planted-on-site, providing new habitats for existing & future wildlife and creating a new biodiversity corridor that links to Dickenson's Meadow.
- 8.94.4 Expansion of THFC's current community activities in the local area (beyond the commitments already made by the Club at both the Men's Training Centre and the Western Field development and being delivered in conjunction with THFC's other sites in the surrounding area).
- 8.95 As explained earlier in this Report, education is a significant factor in dissuading girls from pursuing careers in football. Given the Club's current training arrangements, education and football training are split across several locations which is inefficient. The new facility would combine elite sports facilities and education delivery on-site, improving both access to and the efficiency of education delivery alongside football training. In turn, this will better support players with an improved balance of football and education, improving education offering on one hand, and increasing the coaching contact time on the other (increasing the changes of players becoming professions athletes).

(iv) [Community Access](#)

- 8.96 As part of the proposals, the Club will engage with local communities and organisations in order to improve access for women and girls to football, with consequential social, health and wellbeing benefits.
- 8.97 The Club and its Charitable Foundation will work with a range of partners to develop a formal programme aimed at providing pathways and access for Women into football, as well as delivering wider health and sports benefits. They will be working with global coaching, the Football Foundation, the FA, local schools and the Council's Directorate of Leisure, Parks and Culture on these programmes.
- 8.98 It is proposed that these programmes will be undertaken both on-site at the new facility and off-site within the local communities. On-site activities will include coaching and training, both on the pitches and within the classroom space provided in the Northern Clubhouse.
- 8.99 These programmes will be both educational and tailored towards improved football skills and health. Coaching programmes will also be run off-site and will be held at various venues.
- 8.100 As part of the terms of the Section 106 Agreement, the Club will be committing to a minimum number of hours of programmes, including access to the proposed training centre (both the pitches and the facilities within the building), and this will be expressed also as a financial equivalent.

- 8.101 **Appendix 6** contains a provisional package of obligations to be delivered, and the details of this will be worked up with LBE and their partners, prior to determination of this application.
- 8.102 This approach is similar to that adopted by the Applicant where they secured approval for the Men's Training Centre in 2008 (ref. TP/07/1623), where the Club proposed a programme of access to the new facilities, and training and education programmes for the local community. These are outlined in **Appendix 5**, which demonstrates the community access/programmes which have been secured as part of the planning consents for the Men's Training Centre, the Western Field Education and Environmental Centre and the temporary women's training facility in the Western Field, in addition.
- 8.103 It is of especial note that In the case of the existing Training Centre, the Club considerably exceeded their obligations and continue to provide ongoing community activities beyond their 10-year requirements.
- 8.104 The community based programme underpinning the enclosed application is a significant planning benefit that responds positively to the objectives of the Council's corporate objectives, the adopted Local Plan and the emerging Local Plan. These include that Enfield will become a healthy and sustainable Borough with high-quality green spaces; ensuring that leisure and recreation facilities are sufficient to meet the needs of existing and future populations; creating enhanced opportunities for local people; and ensuring that all residents have good access to community facilities and areas of open space.

(v) **Health Benefits**

- 8.105 The proposals will have significant positive health impacts, including improved access to both sport/recreation facilities and enhanced walking and cycle routes. The respond positively to corporate and policy objectives, notably:
- 8.106 They achieve healthy, inclusive and safe places in accordance with the NPPF requirements.
- 8.107 The reinstatement of historic parkland and the associated significant increase in public access maximises positive health impacts in accordance with London Plan objectives (Policy GG3).
- 8.108 The proposals will encourage healthy lifestyle choices and recreation, both through increase community activities undertaken by the Club, access to an elite sporting facility, and the delivery of high-quality, publicly accessible parkland. The latter is a considerable increase in the amount of publicly accessible space at the Site compared to the established golf course function.
- 8.109 In turn, the above addresses the Council's policy and Strategic Objectives to achieve a healthy, prosperous and sustainable Borough in Enfield which includes high-quality social infrastructure.

- 8.110 The development aligns with the Council’s Health and Wellbeing Strategy (2020-2023) priorities, including encourage active and healthy lifestyles, and being socially connected through in-part public spaces. They also respond positive to the Council’s health challenge and opportunities noted in their Joint Strategic Needs Assessment (2022), including the encouragement of healthy lifestyles, addressing obesity and health inequalities, and feeling safe.
- 8.111 As well as providing access to new sports facilities, the proposals will increase the quantity and quality of public footpaths within the Site along with enhancing truly publicly accessible open green space.
- 8.112 The Health Impact Assessment (Quod) has assessed the proposals against the locally specific health priorities, and concludes that there are a range of positive health impacts that arising as a consequence of:
- The creation of a brand new state of the art women’s training centre that will act to support the women’s and girl’s games;
 - The creation of high-quality buildings including applying inclusive design principles that meet building regulations;
 - Significant improvements to existing pedestrian and cycle routes, in addition to new pedestrian and cycle paths for players and visitors of the centre;
 - The provision of a new community space including a café, an information & meeting area and a repaired pond;
 - Cycle storage and facilities for local residents, players and visitors to the site;
 - The creation of an average of 212 FTE construction jobs over the 27-month demolition and construction period;
 - The creation of 97-104 FTE jobs within the operational phase of development including football related roles, grounds maintenance staff, landscape maintenance staff, parkland maintenance staff and café workers;
 - The provision of training and apprenticeship programmes for students within the local area;
 - The restoration of historic parkland on the southern part of the former golf course, including wildflower meadows and a new tree planting layout;
 - The provision of opportunities for the shared community use of the training facility; and
 - Various specific community improvements and programmes including player development centres, the expansion of the club’s women and girl’s coaching programme and better sporting and educational facilities for local clubs and schools.

(vi) **Heritage Benefits**

- 8.113 Heritage benefits will directly arise from the proposals, being:
- Preserving and maintaining existing buildings for meaningful future use, including the locally listed Conduit House and the Northern Clubhouse.

- Sensitively expanding the locally listed Northern Clubhouse, securing its future use allowing its future repurposing as an integral part of the training centre.
- Reinstatement of the historic carriageway route to Whitewebbs House.
- Restoration and reinstatement of a significant area of public parkland (23.55ha or 44% of the Site area) for public use.
- Preservation and improvement of the setting of South lodge (Grade II listed) through a new soft landscaping interface with the southern car park.
- Securing a Heritage Management Plan for the Site, incorporated as part of the Outline Parkland Management Plan to be secured by planning condition or S106 Agreement.
- Introduction of a heritage trail.
- Including physical references to the historic walled garden within the Northern Clubhouse car park.

(vii) **Environmental and Sustainability Benefits**

8.114 The proposed development is an environmentally led scheme, ensuring that considerable improvements are delivered over and above the baseline fallback position of the Site. In summary, these environmental and sustainability benefits (beyond this already outlined above) include:

8.115 A net gain in tree planting across the site, restricting necessary tree loss to less valuable trees where possible and planting c. 2,000 new trees across the Site.

- Achieving net zero carbon through on-site measures and where necessary, as a last resort, financial contributions.
- Introduction of electric vehicle charging points for both club use (north car park) and public use (southern car park).
- Significantly exceeding the minimum statutory 10% requirement for BNG.
- Ecological management, including the Ancient Woodland (in part).
- Improvement works to the existing pond both environmentally and from a safety perspective.
- Formation of a new nature corridor connecting the site with Dickenson's Meadow.
- Reducing the need to travel, both through the provision of a single facility for education and football activities, alongside an internal operational link which allows movement between the existing and proposed Training Centres.

8.116 Overall, there will be a net heritage benefits seen from this development, which are outlined in Section 8 (Conclusions) of the Heritage Statement. Notably, those benefits would not arise if it was not for this development. Furthermore, the heritage benefits are measured against the fallback position of a reinstated golf course.

(viii) Ecology Benefits

- 8.117 The mandated⁴¹ requirement for BNG is 10%.
- 8.118 The objectives of this scheme in terms of biodiversity is to deliver significant environmental benefits to the local biodiversity condition, through ecological intervention and management. The EclA demonstrates that the scheme will deliver:
- A BNG in habitat units of 27.09%.
 - 100% (a nominal figure, given the starting value is zero) in hedgerow units.
 - 81.69% in river units.
- 8.119 However, as explained the EclA the calculation of BNG is precautionary, and with appropriate management, greater value could be achieved over time.

(ix) Turf Academy

- 8.120 As part of the proposals, the Turf Academy will help to secure educational and socio-economic benefits to those apprentices that work their way through the Academy. The benefits are demonstrated in the Socio Economic Benefits Statement.

Very Special Circumstances - Summary

- 8.121 It is demonstrated above that there are significant benefits that will arise from this development, across a broad spectrum of matters that are relevant to planning, and which carry significant weight. Together, and individually, these benefits represent VSC and are summarised as follows:
- 8.122 In summary, the VSC of this proposal is:
- Responding to a need to grow the women's game.
 - A lack of alternative, more suitable sites.
 - Socio-economic benefits, including commercial value, employment and education.
 - Community access, training and Club-led programmes.
 - Health benefits.
 - Heritage benefits.
 - Ecological benefits.
 - Environmental and sustainability benefits.
- 8.123 These clearly outweigh the low level of harm arising to the Green Belt from both inappropriate development and all other harm and, therefore, paragraphs 152-153 of the NPPF are satisfied.

⁴¹ Environment Act 2021.

9 Planning Assessment

- 9.1 Alongside the significant planning benefits and demonstration of VSC outlined in the preceding section, consideration must also be given to compliance with the Development Plan and other relevant material considerations.
- 9.2 This Section summarises the compliance of the proposals and should be read alongside the enclosed technical reports. In addition, **Appendix 3** provides a schedule of compliance with all planning policies of relevance to the scheme.

Fallback Position

- 9.3 A key material consideration in the determination of the planning application is the prevalence of the fallback position which prevails.
- 9.4 As explained in **Appendix 1**, there is a genuine fallback established by the Site's former golf course use. Therefore, should planning consent be refused, none of the scheme benefits would necessarily be achieved as the fallback could be reinstated, including:
- 9.4.1 A need for the Training Ground, responding positively to national and international growth in women's football and ensuring equality in provision.
 - 9.4.2 Socio-economic benefits including increases in local GVA; employment during construction and operation (both football-related and beyond); education and career opportunities through the Turf Academy; access to elite sporting facilities for the local community; and increased pathways into football.
 - 9.4.3 Community access – increased/enhanced public routes and permeability; reinstatement of accessible public parkland; an upgraded Whitewebbs Pond; and community access to the sporting facilities.
 - 9.4.4 Southern Clubhouse – upgrading the public café and WC facilities, alongside providing a new community space and upgrading the public car park.
 - 9.4.5 Heritage benefits - preservation and reinstatement of Conduit House, the reinstatement of historic (public) parkland, improved setting of statutory assets and the reintroduction of the historic carriageway to Whitewebbs House.
 - 9.4.6 Environmental benefits – exceeding the minimum 10% requirement for BNG; ecological management of the site; planting c. 2,000 new trees; delivering new habitat routes; and achieving a zero carbon development.
 - 9.4.7 Unique co-location opportunity of the women's and men's facilities, delivering elite facilities which share resources sustainably, alongside reducing the required vehicular movements on the highway network.

- 9.5 This is a genuine fallback position and there is a possibility that the Site would be reinstated for its former golf course use in the event that planning permission is not granted for the proposed development.
- 9.6 The proposed development would deliver significant economic, social and environmental benefits over and above this fallback position. This is a material consideration that must be taken into account when considering the proposed development.
- 9.7 The fallback will also assist the defence against objections to the proposals, where these objections relate to the loss of natural/open parkland space. Whilst such functions currently prevail due to the inactivity of the golf course, they are not lawfully established in planning terms and could be removed at any time through the reinstatement of a managed golf course.

Heritage

Statutory Requirements

- 9.8 The starting point for assessing heritage impact is the statutory duty, imposed by the Planning (Listed Buildings and Conservation Areas) Act 1990, to pay special regard to the desirability of preserving listed buildings and their setting (Section 66), and preserving or enhancing the character or appearance of a Conservation Area (Section 72).
- 9.9 The applications have had full regard to and comply with this statutory duty, and this is as confirmed in the Heritage Statement.

Policy Requirements

- 9.10 Case law⁴² has established that if a decision maker is to apply themselves to the application of the heritage tests in the NPPF and a consideration of whether any 'harm' arises, then they will have complied with the statutory duty noted above.
- 9.11 NPPF Paragraph 196 recognises that new development can make a positive contribution to local character and distinctiveness. It is also recognised, however, that great weight is attached to the conservation of heritage assets. Consistent with the NPPF, the application is supported by a Heritage Statement which considers the relationship of the proposed development to the significance of the relevant heritage assets, and the impact of the development on these assets.
- 9.12 In summary, the Heritage Statement concludes that of the relevant heritage assets, there will be no harm to:
- North Lodge (Grade II Listed).
 - The Clay Hill Conservation Area.
 - The Forty Hill Conservation Area.
 - Conduit House (non-designated heritage asset).

⁴² *Jones v Mordue & Others* [2015] EWCA Civ 1243.

9.13 It concludes that in the case of the following assets, there will be some harm (of the scale indicated) namely:

- South Lodge (Grade II Listed – low level harm, but with many heritage benefits through enhancements to its setting; consequently, net heritage benefits through enhancement to its setting.
- The King & Tinker (Grade II Listed) – very low harm to its setting but no benefits nor enhancement.
- Whitewebbs Park (NDHA) – moderate harm, but with moderate-high benefits with resultant heritage benefit through enhancements.
- Whitewebbs House (including the stable block and garden walls) (NDHA) – low level of net harm to Whitewebbs House, but heritage benefits to the stable block and to the garden walls.

9.14 As a consequence, the heritage statement concludes that the level of residual impact would be as shown in the table below (re-produced from Section 8 of the Heritage Statement).

Table 9.1: Summary of Heritage Impacts

Heritage asset	'Net heritage balance'	Level of residual impact
North Lodge (grade II listed)	No harm; heritage benefits through enhancements to its setting.	Low beneficial
South Lodge (grade II listed)	Low level harm, many heritage benefits through enhancements to its setting; net heritage benefits through enhancements to its setting.	Low beneficial
The King and Tinker (grade II listed)	No benefits/enhancement; very low level harm to its setting.	Very low harm
The Clay Hill Conservation Area	No harm; heritage benefits through enhancements to its setting.	Very low beneficial
The Forty Hill Conservation Area	No harm.	N/A
Whitewebbs Park (NDHA)	Moderate harm, moderate-high benefits; net heritage benefit through enhancements.	Very low beneficial
Conduit House (NDHA)	No harm, net heritage benefits through restoration and enhancements to its setting	Very high beneficial
Whitewebbs House (including the Stable Block and Garden Walls) (NDHA)	Low level of net harm to Whitewebbs House. Heritage benefits to the Stable Block. Heritage benefits to the Garden Walls.	Very low harm

- 9.15 In view of the above, there are heritage benefits that are to be brought forward into the overall planning balance, in relation to Grade II Listed Buildings, a Conservation Area and NDHAs.
- 9.16 Notably, it is included in the Heritage Statement that there is a net heritage enhancement in relation to the Listed Buildings and a net heritage enhancement in relation to the NDHAs. The overall heritage benefits would be attenuated when measured against the fallback position of a reinstated golf course.
- 9.17 In such cases, the NPPF requires that this less than substantial harm is be outweighed by the public benefits arising including securing the optimum viable use (Para. 208). The PPG describes public benefits as anything that delivers economic, social or environmental progress.
- 9.18 The public benefits in this case are significant and are detailed in the demonstration of VSC in Section 9. In summary, they are:
- 9.18.1 A need for the development arising from extensive growth in the women's game, delivering dedicated, high-quality and elite facilities for the Club's female teams.
 - 9.18.2 Ensuring parity between the men's and women's teams in terms of the standard of training facilities provided.
 - 9.18.3 Ensuring the Club can remain competitive at the national and international levels, assisting in the retention of local talent from Enfield and beyond.
 - 9.18.4 Increasing both playing and coaching pathways into female football, whilst facilitating education delivery in a more efficient manner.
 - 9.18.5 Delivering a significant increase in the quality and quantity of publicly accessible space, including the reinstatement of historic parkland, new and improved cycle and footpaths, and enhanced café and WC facilities. This will have corresponding health and wellbeing benefits which align with the Council's corporate strategy and strategic objectives.
 - 9.18.6 New employment opportunities including those for local people. c. 212 FTE positions would be delivered during the construction phase, with over 100 jobs created by the operational facility itself.
 - 9.18.7 Provision of a community programme to be secured via a S106 Agreement, to including amongst other things coaching programmes, on and off-site community activities and education.
 - 9.18.8 Heritage specific benefits, as outlined above.
 - 9.18.9 There being no suitable alternative sites.
 - 9.18.10 Sustainability and efficiency benefits from the Site's unique location adjacent to the existing Training Centre, allowing a sharing of facilities which would require c. 9,000 of floorspace at alternative sites.

- 9.18.11 Environmental improvements, including an exceedance of biodiversity net gain requirements (over 27% compared to 10%), the planting of c. 2,000 new trees, formation of new nature corridors, delivery of ecological management and achieving a zero carbon development.
- 9.19 The public benefits are significant and would outweigh the less than substantial harm arising. Accordingly, Paragraph 208 of the NPPF is addressed. It follows that the applicable Local Plan policies are also met given that:
- 9.19.1 The development adopts a thorough site analysis to demonstrate how it respects and enhances relevant heritage assets (Core Strategy Policy 31).
- 9.19.2 The proposals conserve and enhance heritage assets with a design, materials palette and level of detailing which is appropriate to the Site's historic setting (Policy DMD 44).
- 9.20 Turning to the issue of archaeological heritage assets, the site contains no known or identified archaeological assets, albeit it is located within the Whitewebbs Hill, Bulls Cross and Forty Hill "Archaeological Priority Area".
- 9.21 That part of the site which will be subject to intrusive ground works (ie, cut and fill) and in the vicinity of any buildings is limited to the northern part of the site, where it is judged in the Archaeological Desk Based Assessment that any archaeological potential is likely to be medieval, post-medieval and modern periods but the remains are most likely to be only of local (ie, low) significance. However, it is proposed to mitigate any archaeological effects through an appropriate Written Scheme of Investigation (WSI) or a watching brief methodology.
- 9.22 The application responds positively to the character and setting of the Site's historic environment and is compliant with policy requirements on heritage matters at the national, London and local level. They are, therefore, appropriate in heritage terms.
- 9.23 **Appendix 3** demonstrates the proposals comply with the relevant policies requirements of the Development Plan.

Design, Landscape and Visual Impact

- 9.24 The DAS demonstrates the process of analysis of the site, the level of consultation with relevant bodies, and the resultant high quality, beautiful and sustainable buildings and places that will be delivered at the site⁴³.
- 9.25 The design of the buildings on the site is limited to an extension to the Northern Clubhouse, a replacement of the existing grounds maintenance building, new small scale buildings for security hut and pitch side plant, and repurposing of the existing Southern Clubhouse, with a design enhancement.

⁴³ NPPF, paragraph 131.

- 9.26 The design of these buildings (and extension) are grounded in a full understanding and evaluation of the area's characteristics, and have been developed in accordance with the principles set out in the National Design Guide and National Model Design Code.
- 9.27 The resultant design of the buildings, and the landscape (ie, "place") is one that responds well to both the area's characteristics and has been developed to minimise any impact on the openness of the Green Belt.
- 9.28 The Landscape Statement (and the associated site wide Landscape Masterplan) demonstrates how the Women's Training Centre and Girls' Academy has been set within an enhanced landscape setting with improved public access and new opportunities for recreational and community use. The Landscape Statement sets out the landscape vision for the site, which is to create a sensitive, high quality landscape, restoring the historic landscape at Whitewebbs Park.
- 9.29 The LVIA demonstrates that the scheme (buildings, pitches, parkland and function of the area will have a slight beneficial effect on the landscape character, through the restoration of the site, renovating/repurposing existing buildings and ensuring the long term management of the landscape which will greatly improve its character, as well as its ecological value.
- 9.30 The visual effects of the proposal are largely assessed as neutral, with the majority of locations of any built development being screened by existing tree cover, as well as new tree, hedge and other planting which will filter and screen any views.
- 9.31 Any effects on visual amenity are limited to the immediate setting of the site, where a large proportion of the site will be enhanced. There will be some short term effects from views from the footpaths along the north and eastern boundary of the site, but proposed planting along these boundaries will, overtime, mitigate any impact on views.
- 9.32 In summary, the scheme will be appropriately assimilated into its landscape setting, without any harm to landscape character and/or visual amenity of the surrounding area. In fact, the proposals are expected to enhance through repair and restoration, the local landscape character, with new public access allowing the landscape to be experienced and appreciated by a greater community.
- 9.33 As demonstrated in **Appendix 3**, the scheme satisfies the relevant policies where they relate to landscape, design and visual amenity, of the development plan.
- 9.34 **Appendix 3** demonstrates the proposals comply with the design, landscape and visual impact policies of the Development Plan.

Transport

- 9.35 The application is supported by a Transport Assessment (Arup) which demonstrates that the proposals will have a negligible effect on the highway network, both during construction and the operational stages of the development. There are a number of bus stops close to the site, and rail stations (Crews Hill and Turkey Street).

- 9.36 The proposals will extend the network of informal pedestrian and cycle tracks and footpaths benefiting users (walkers, cyclists and horse riders) which will also benefit from upgrades and investments in the statutory footpaths and bridleways within the site.
- 9.37 The proposals involve the creation of a new buggy track that will link with Women's and Men's training facilities and will involve an environmental enhancement to the now closed lay-by on Whitewebbs Lane. The works proposed at the lay-by will be dealt with under a Section 278 Agreement (see the Transport Assessment).
- 9.38 It is proposed to provide a new vehicular access to the Toby Carvery as part of these proposals, through the restoration and reinstatement of the historic carriageway that runs from Whitewebbs Lane through Whitewebbs Woods. This reinstated historic carriageway will represent, as noted previously, a heritage benefit that would not be realised without this scheme.
- 9.39 A separate Framework Travel Plan (Arup) outlines the practical measures and initiatives which will be adopted as part of the development, to reduce the impact of travel on the environment and to encourage the use of sustainable modes of transport by staff and visitors. It is anticipated that a full Travel Plan will be secured through an appropriate planning condition.
- 9.40 **Appendix 3** demonstrates that the proposals comply with the relevant transport and access policies of the Development Plan.

Sustainable Design and Construction

- 9.41 Enfield Development Management Policy DMD49 requires all planning applications to be accompanied by a Sustainable Design and Construction Statement, as set out in **Appendix 3** of the DMD. **Appendix 3**⁴⁴ outlines indicative headings to be included, noting that the scale and scope of the Sustainable Design and Construction Statement is determined on a site-by-site basis. **Appendix 3** also notes that the requirements for this Statement will be outlined further within the Council's published validation list.
- 9.42 The Council's validation list does not include a requirement for this Statement, however. All matters of sustainable design and construction are instead covered by various other technical documents within the published list, corresponding to the Council's **Appendix 3** indicative headings.
- 9.43 For the avoidance of doubt, therefore, the requirements of Policy DMD49 are addressed in full through the full suite of supporting technical and environmental reports which accompany the planning application. These reports and their associated compliance with the Development Plan policies are further summarised within this Planning Statement.
- 9.44 **Appendix 3** demonstrates the proposals comply with the relevant sustainable design and construction policies of the Development Plan.

⁴⁴ Including energy, water efficiency, design, waste/construction management, materials and green procurement, health and wellbeing, surface water run-off and flooding, ecology and green infrastructure, travel, BREEAM.

- 9.45 The application is supported by a BREEAM Pre-assessment Report (WSP) which demonstrates the progress and outlines the actions which are being used to target a formal BREEAM “Excellent” Certification at the design stage (interim).
- 9.46 The application is also supported by a Circular Economy Statement (WSP) which demonstrates how the design and construction of the development addresses the challenges of the climate emergency, by promoting resource efficiency and adopting a circular economy within the development. This is to be achieved through the following commitments:
- Conserving resources.
 - Eliminating waste.
 - Management waste sustainably.
- 9.47 The Energy Strategy (WSP) demonstrates how the scheme has been developed to achieve an energy efficient and sustainable development, with an optimised energy performance for the development. It is demonstrated that significant carbon reduction can be achieved through the development, including 72% improvement over Part L of the 2021 Building Regulations, and this carbon reduction has been maximised on site, therefore, it is proposed that the remaining carbon emissions will be off-set through a payment to the Council’s carbon off-set scheme, which will be secured through a Section 106 Agreement.
- 9.48 The carbon emissions from the proposed development are reported in the Whole Life Cycle Carbon Assessment (WSP), the purpose of which is to determine the carbon implications of the development, and identify future opportunities to increase efficiencies in order to reduce carbon reduction during the design stage.
- 9.49 It is concluded that the project achieves high levels of sustainability in terms of energy consumption, carbon impacts and efficiencies in the circular economy. Consequently, the proposals are compliant with the Development Plan policies where relevant to the matters of sustainable construction and operation.

Ecology and Biodiversity

- 9.50 It is demonstrated in Section 8 that there will be no significant impacts on ecology and, moreover, there will be a substantial biodiversity net gain (considerably beyond the mandated 10% requirement).
- 9.51 Moreso, the EclA demonstrates that there will be no impacts on the ecological condition of the Ancient Woodland and the same conclusions are reached regarding the arboricultural effects of the proposals (see the AIA).
- 9.52 The ecological strategy of improving the biodiversity worth of the site, through management, landscaping and tree planting (and minimising tree loss) means that the scheme satisfies the biodiversity policies of the Development Plan.
- 9.53 **Appendix 3** demonstrates the proposals comply with the relevant ecology and biodiversity policies of the Development Plan.

Trees

- 9.54 It is demonstrated in the Landscape Statement, and supported by the evidence in the AIA, that there will be a major benefit to the arboricultural character of the site, with a net increase in trees over the site of circa 2,000. There will be minimal impact on any trees of any high quality, and there will be a beneficial impact on the landscape character of the site (see the Landscape Statement).
- 9.55 **Appendix 3** demonstrates the proposals comply with the relevant tree policies of the Development Plan.

Flood Risk and Drainage

- 9.56 The FRA demonstrates that the majority of the site is within Flood Zone 1 and those parts of the site within Flood Zones 2 and 3 are not proposed for any development. Furthermore, the surface water mapping⁴⁵ indicates that the majority of the site is at a very low of flooding, although areas to the south and east of the site are subject to some flooding risk, but build development is not proposed in any of these areas.
- 9.57 The drainage strategy for the site is to adopt sustainable urban drainage practices, and these will be both managed and maintained to ensure that the site is appropriately drained, and this will benefit both the users of the site the ecology and landscaping on the site, as well as the surrounding area.
- 9.58 The drainage and flood risk aspects of the proposals satisfy the relevant development plan policies, and the site is appropriate from a hydrological perspective, as referred in **Appendix 3**.

Contamination

- 9.59 There are no anticipated contamination constraints which would preclude the development (including the site reprofiling) subject to appropriate mitigation measures. A Phase 1 geo-environmental risk assessment accompanies the planning application and the extent of any mitigation required as part of the construction process would be confirmed through a further Phase 2 analysis to be secured by condition.
- 9.60 Core Strategy Policy 32 and Development Management Policy DMD66 are therefore addressed.

⁴⁵ The Flood Risk and Surface Water Mapping (Environment Agency).

Noise

- 9.61 A Noise Impact Assessment (Logika) supports the application, and addresses the use of the training pitches and their impact on nearby noise sensitive receptors. It is noted in the NIA that pitch use will vary day to day, and for long periods there will be little to no activity on those pitches. Furthermore, the pitches will not be used at night time and, consequently, the effects of the use of the pitch on the nearby noise sensitive receptor (there is only one, that is The Limes) will be within acceptable limits, and is not projected to give rise to a significant adverse impact on health or quality of life, in respect of noise.
- 9.62 Therefore, in light of the relevant Development Plan policies, the development is acceptable in relation to noise amenity effects.

Air Quality

- 9.63 The application is supported by an Air Quality Assessment (Air Quality Consultants) which assesses the air quality effects of the scheme, in terms of road traffic, mechanical engineering and the temporary construction impacts. Overall the construction and operational air quality effects of the proposals are judged to be not significant, and will not have an adverse impact on air quality, given that:
- 9.63.1 It will not lead to further deterioration of existing poor air quality.
- 9.63.2 It will not cause any exceedances of legal air quality limits.
- 9.63.3 It will not create unacceptable risk of high levels of exposure to poor air quality.
- 9.63.4 The AQA demonstrates that whilst the emissions associated with the proposed buildings is below the relevant benchmark, the road traffic generation of the scheme exceeds the air quality neutral benchmark. However, that is because the methodology adopted has not taken account of the traffic generation of the football pitches have not been used in the benchmark calculation, as there is no relevant benchmark available for such uses should, however, it be concluded that there is any impact, this could be addressed through mitigation, which is recognised as an appropriate approach in Development Planning Policy⁴⁶.
- 9.64 As a consequence, the implications of the scheme on air quality are deemed to be consistent with the relevant Development Plan policies.

Lighting

- 9.65 As part of the effects of the development, a Light Spill Assessment (WSP) has been undertaken which considers the implications of the lighting design of the proposals, including the floodlights. It is demonstrated that through the sensitive design approach, and the appropriate positioning of lighting, that the scheme satisfies ILP guidance for obtrusive light, as well as the relevant policies of the Development Plan.

⁴⁶ See paragraph 8.5 – 8.8 and 11.6 of the Air Quality Assessment (Logika) – Document 20.

Other Matters

- 9.66 The application is supported by technical assessments in relation to utilities⁴⁷ and fire risk⁴⁸. These documents demonstrate that the scheme can be provided with telecommunications and electricity, but further analysis is required on the possible water capacity in order to establish if any upgrades are required.
- 9.67 The Fire Safety Statement demonstrates that subject to the recommendations made in the LPFSS the scheme is in accordance with the relevant policies of the London Plan⁴⁹.

Main Town Centre Use

- 9.68 The proposed café within the Southern Clubhouse is a main town centre use in an out-of-centre location, require consideration of the sequential assessment (NPPF para 91). However, paragraph 93 of the NPPF notes that the sequential approach is not applicable to schemes for “*small scale rural development*”. Consequently, it is arguable that in this case the sequential test would not be applicable. Even if it was applicable, however, the sequential test is satisfied for the reasons outline below.
- 9.69 Case law⁵⁰ has established that when applying the sequential assessment, regard must be had to the specific circumstances of a case, and that if a site is not suitable for the commercial requirements of the development in question, then it is not suitable for the purposes of the sequential approach.
- 9.70 In this case there are clear site-specific circumstances which apply, including that the café is simply a replacement and upgrade of an existing facility rather than a new use, and that the café is an integral part of the public benefits arising from the reinstated historic parkland.
- 9.71 Any alternative site would clearly be unsuitable for the proposal, and the sequential assessment is satisfied as a consequence.

Emerging Policy

- 9.72 Although the emerging Local Plan carries limited weight at the current time, the application is consistent with its strategic objectives and allocation for the Site (RUR.07), given that:
- 9.72.1 The proposals maximise publicly accessible space and contribute towards enhanced pedestrian and cycle connectivity, including improving north-south and east-west pedestrian/cycle connections.

⁴⁷ Utilities Statement for Planning (WSP).

⁴⁸ London Planning Fire Safety Statement (BB7).

⁴⁹ Policies D12 (a and b) and Policy D5.

⁵⁰ See ‘Tesco Stores Limited v Dundee City Council (Scotland), 21 March 2012’; ‘Rushden Lakes Secretary of State Decision. Ref. APP/G2815/V/12/2190175’; and ‘Next, Sheffield Ref. APP/J4423/A/13/2189893’, amongst others.

- 9.72.2 There would be no reduction in public rights of way, only improvements to both the quality and quantity. Public access along the New River, Turkey Brook and Cuffley Brook would be retained.
- 9.72.3 The proposals achieve the most appropriate solution in technical and environmental terms to meeting the operational requirements, assisted by the unique location and sharing of facilities with the existing Training Centre. This allows the removal of high-value trees to be minimised as far as possible.
- 9.72.4 Nature recovery is central to the scheme, providing additional tree planting (c. 2,000 new trees), biodiversity enhancements and green connections. The draft allocation encourages schemes such as the enclosed which offer greater biodiversity gain than minimum requirements.
- 9.72.5 The scheme responds sensitively to the heritage and landscape context, with a net overall heritage benefit achieved.
- 9.72.6 Natural/landscaped boundaries are maximised, and SuDS are incorporated to minimise and mitigate flood risk.
- 9.73 It is concluded that in terms of all relevant planning considerations, the scheme is appropriate and consistent with the Development Plan. Should it be determined that there is any inconsistencies or conflicts with the Development Plan, there are clearly a number of significant benefits that weigh in favour of these proposals and would outweigh any which should be taken into account in the planning balance.

10 Delivering the Benefits

10.1 The economic, social and environmental benefits of the proposals would be delivered through planning conditions, Section 106 (S106) obligations and Community Infrastructure Levy (CIL) payments.

Planning Conditions

10.2 It is anticipated that planning conditions will secure the following benefits, unless it is considered necessary to include with the S106 Agreement as an alternative:

- Maintenance and ongoing management of the public parkland through a Management Plan covering ecological, landscape and heritage management.
- Phasing of the scheme, ensuring that the publicly accessible areas and associated enhancements are delivered in a timely manner.
- Biodiversity net gain plan.
- New tree planting and wider landscaping enhancements.
- Implementation of a heritage trail.

10.3 The framework for the management of the above is set out in the Outline Parkland Management Plan, which is anticipated to be controlled by a planning condition, requiring detailed management plans in respect of the operational aspects of the site, the landscape and ecological management, as well as the management of the heritage.

10.4 The application is supported by a range of Management Plans that are designed to mitigate any impacts of the development itself, either at construction or at operational phase and, furthermore, will secure benefits in terms of the management of the development itself. These include the following management plans to protect the environment:

- Construction Logistics Plan.
- Demolition Method Statement.
- Waste Management Plan.
- Construction Management Plan.

Section 106 Heads of Terms

10.5 The scope of S106 obligations will be subject to further discussion as part of the planning application, ensuring that these are necessary to make the scheme acceptable in planning terms; that they are directly related to the development; and that they are fairly and reasonably related in scale and kind (as required by Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended).

10.6 Draft Heads of Terms are outlined below, intended to form the basis of subsequent discussions and negotiations with the Council during the determination of the application:

- A community based programme of access, coaching and activities, to be developed further during the determination of the application.
- Securing publicly accessible areas and green space.
- Local employment and training.
- Transport and highways (where not covered by CIL), including a Travel Plan and sustainable transport improvements.
- Maintenance of the lay-by and associated operational link.
- Carbon offsetting payments to achieve zero carbon development in accordance with London Plan requirements.
- A signage and wayfinding strategy.
- Ongoing management of biodiversity net gain.
- Monitoring.
- Air Quality Neutral, should this be necessary.
- A commitment to the Considerate Contractors Scheme.

Section 278 Agreement

10.7 It is proposed to undertake works to the lay by (now closed off) on Whitewebbs Lane, through a Section 278 Agreement. This will bring about improved access through this area, through the creation of a buggy link and shared footpath, with environmental enhancements. The applicant proposes to take on the maintenance liability of this area as part of the works, which they will also fund.

10.8 These works will address a current known anti-social problem, with the lay by attracting fly-tipping and other anti-social activity. This will be a further public benefit.

Community Infrastructure Levy

10.9 The proposal will be liable to pay Mayoral CIL(2) charge of £60 per square metre on all qualifying floorspace. Enfield charge CIL on new café uses at a rate of £60 per square metre, although the proposals re-provide an existing café use in this case.

10.10 Enfield Council does not charge CIL on Sui Generis (football training centre) uses.

10.11 Given the additional floorspace which would arise from the development, the scheme is estimated at the time of preparing this application to generate £287,695.96 in CIL payments⁵¹.

⁵¹ Mayoral CIL of £278,534.67 and LBE CIL of £9,161.29.

11 Conclusions

- 11.1 In conclusion, the scheme has significant planning merit, delivering an appropriate form of development with significant social, economic and environmental benefits.
- 11.2 It is demonstrated in this Planning Statement, and supported by the other documents that make up this planning submission, that the development has significant planning merit, will deliver a range of benefits which individually and together represent VSC. In conclusion:
- 11.2.1 The proposals satisfy, and are consistent with the relevant policies of the Development Plan.
- 11.2.2 Similarly, the proposals are consistent with National Policy (the NPPF and its supporting guidance).
- 11.2.3 The proposals will bring about wide-ranging social, environmental and economic benefits, which are demonstrated to be significant and of a level that are judged to be VSC (sufficient to weigh heavily in favour of the proposals, when judged against the presumption against inappropriate development in the Green Belt).
- 11.2.4 Where there is any potential harm from the development, it is demonstrated that there is appropriate mitigation to address that harm. That mitigation can be controlled through appropriate planning conditions and/or a legal agreement.
- 11.2.5 This is a scheme that attracts the presumption in favour of development, given its consistency with Development Plan (as well as national) policy.



Appendix 1



Whitewebbs Park - Fallback

1 Introduction

1.1 This Note clarifies the “planning fallback” which prevails at the former Whitewebbs Golf Course (“the Site”).

2 What is a Planning Fallback?

2.1 A fallback position is an alternative, established planning position likely to occur if a proposed development is refused planning permission. The fallback is a material consideration when determining planning applications, allowing this to be used as leverage to secure planning consent.

2.2 The fallback position at the Site (noted below) is the potential alternative function of the Site which could realistically prevail without requiring planning consent.

3 Fallback Position

3.1 For a genuine fallback position to exist, there needs to be a prospect that a site would revert back to its lawfully established use. The Court of Appeal¹ has established that the prospects of the fallback position taking place do not have to be “likely” or even “probable”; instead, the mere “possibility” is sufficient.

3.2 Furthermore, the Court of Appeal² clarified that this possibility does not need to include any statement or intention from an applicant to reinstate a former permitted use. Rather, the specific nature of a site to determine the possibility of reinstatement will suffice.

3.3 The lawfully established use of the Site is a managed golf course and associated buildings and infrastructure, dating from c. 1932. The golf course operated continuously prior to its closure in 2021 and has not been abandoned³.

3.4 Therefore, the lawful uses on the Site, which can be claimed to be a fallback are:

- Use of the Site as a golf course which will involve the reinstatement of a highly manicured environment.
- Should that land be used as a golf course again, the access by general public will be limited to footpaths and rights of way through the golf course.

¹ Mansell v Tonbridge and Malling Borough Council [2017] EWCA Civ 1314.

² Mansell v Tonbridge and Malling Borough Council [2017] EWCA Civ 1314.

³ “Abandonment” is a legal concept to describe circumstances in which a previous use can be lawfully resumed. A dormant or inactive use can still be existing so long as it was lawful previously and had not been extinguished. There are four assessment criteria established by *The Trustees of Castell-y-Mynach Estate v Taff-Ely BC [1985]*, being (i) physical condition of the buildings; (ii) period of non-use; (iii) whether there has been any other use; and (iv) the owner’s intentions.



Note continued

- The northern clubhouse would be reinstated for golf-related use in its existing condition.
- Associated levels of traffic movements with the golf course use would prevail via the northern car park.
- The southern clubhouse would be reinstated in its existing (poor) condition, with the existing café operational. The southern car park would continue to be used in its current condition.

3.5 Therefore, should planning consent be refused, none of the scheme benefits would necessarily be achieved as the fallback could be reinstated, including:

- A need for the Training Ground, responding positively to national and international growth in women's football and ensuring equality in provision.
- Socio-economic benefits including increases in local GVA; employment during construction and operation (both football-related and beyond); education and career opportunities through the Turf Academy; access to elite sporting facilities for the local community; and increased pathways into football.
- Community access – increased/enhanced public routes and permeability; reinstatement of accessible public parkland; an upgraded Whitewebbs Pond; and community access to the sporting facilities.
- Southern Clubhouse – upgrading the public café and WC facilities, alongside providing a new community space and upgrading the public car park.
- Heritage benefits - preservation and reinstatement of Conduit House, the reinstatement of historic (public) parkland, improved setting of statutory assets and the reintroduction of the historic carriageway to Whitewebbs House.
- Environmental benefits – exceeding the minimum 10% requirement for biodiversity net gain; ecological management of the site; planting c. 3,000 new trees; delivering new habitat routes; and achieving a zero carbon development.
- Unique co-location opportunity of the women's and men's facilities, delivering elite facilities which share resources sustainably, alongside reducing the required vehicular movements on the highway network.

3.6 This is a genuine fallback position and there is a possibility that the Site would be reinstated for its former golf course use in the event that planning permission is not granted for the proposed development.

3.7 The proposed development would deliver significant economic, social and environmental benefits over and above this fallback position. This is a material consideration that must be taken into account when considering the proposed development.



Appendix 2



OPERATIONAL STATEMENT – TOTTENHAM HOTSPUR WOMEN'S TRAINING CENTRE

1 Introduction

- 1.1 This Statement outlines the proposed operation of the Women's Training Centre at the former Whitewebbs Golf Club Site. It explains the teams that would use the facility, including the first team and the Academy teams, and the growth trajectory of the Academy as a consequence of these facilities.
- 1.2 Without dedicated facilities for the Women's teams, the Academy cannot grow. It's operations are presently highly compromised meaning the Club cannot grow nor deliver the community benefits that are explained in the planning application.
- 1.3 This Note also explains the educational role of the Club, and the ability for the new training facility to improve the education of the players, most notably those in the Academy squads.
- 1.4 This Note also highlights the operational hours of the facility, including the use of the football pitches. It outlines the employment growth that will arise from this development, which will have economic benefits to the area.
- 1.5 Finally, the Note also addresses the proposed links with the existing men's facilities, which are addressed further in the planning report which demonstrates that there are both operational, sustainability and economic benefits that can only be delivered from this site.

2 First Team

- 2.1 The Women's First Team is formed of 23 squad players (plus 3 currently out on loan) and 23 members of staff.
- 2.2 The team train 4-days per week alongside 1-day of recovery, on average. Training takes place at a temporary facility within the Western Field adjacent to the Men's Training Centre with access to one pitch only (in contrast the Men's Team have 12 pitches) and a temporary building.
- 2.3 The first team typically play 1 competitive (league or cup) match per week, with home matches taking place at Brisbane Road (home of Leyton Orient FC).
- 2.4 All future training sessions would take place at the new training facility, enabling Western Field to be used for the purpose it was originally approved for, ie, for use by the Men's teams.
- 2.5 The provision of multiple new pitches for both the First Team and Academy sides (see below) would avoid the repetitive use of the First Team temporary pitch within the Western Field, ensuring the maintenance of high-quality training pitches.
- 2.6 It would also ensure parity with the men's facility which provides 12 pitches on-site, whereas a single temporary pitch is only available for women.
- 2.7 A typical week for the First Team is summarised at **Appendix A**.
- 2.8 A breakdown of the current First Team staff structure is as follows:



Note continued

Role	No of Employees
Head Coach	1
Senior Assistant Manager	1
Lead Performance Analyst	1
Goalkeeping Coach	1
Performing Analyst	1
Sports Therapist	1
Physio	2
Head of Medical	1
Head of Performance and Female Athlete Health	1
Junior Nutritionist	1
Kit Lead	1
Kit Assistant	1
Team Liaison	1
Team Operations Manager	1
General Manager	1
Head of Player Recruitment (under review)	1
Performance Psychologist	1
Physical Performance Lead	1
General Manager	1
Managing Director	1
Total	23



Note continued

3 Academy (Existing)

- 3.1 The Club currently run teams at U21, U16, U15, U14, U13 and U11 levels. These teams include a total of 120 registered players and 31 staff (of which 5 staff members are shared with the first team).
- 3.2 Academy players currently split their training and education between the Tottenham Hotspur Stadium, the Tottenham Hotspur Training Ground (Western Field), Enfield Grammar School (pitches), Goffs Churchgate Academy (pitches) and Cheshunt Football Club. Younger players also attend school with their football commitments based around this and additional home tutoring on top. The current operations are highly inefficient, with players after travelling between facilities, which is neither sustainable (from an environmental perspective) or efficient. It makes the Club less attractive to new players as a consequence.
- 3.3 Many of the facilities used for training are publicly shared and therefore do not provide an elite, high-performance sporting environment.
- 3.4 Given the optimised use of the Men's training pitches, no women's Academy team train on any of the pitches at the Men's Training Ground other than the U21 team who have occasionally used the synthetic pitch but only on an irregular basis since July 2023.
- 3.5 Players receive in-house education at the Stadium, with both education and training at the Western Field Training Ground; and training only at Cheshunt Football Club.
- 3.6 Due to a lack of dedicated facilities for the women's Academy players that can be used on a full time basis, operational requirements must be split across the above locations due to competing demands from the men's and Academy (boys) teams, alongside wider Club operations.
- 3.7 Players will often visit all three locations on the same day, requiring travel between venues. This is an inefficient and unsustainable way to manage the player's schedule, placing unnecessary vehicular movements on the highway network and creating an inefficient schedule of activities. For example, those in the U16 squad (c. 24 players) are undergoing GCSEs and must balance school requirements with off-site training at several locations.
- 3.8 Furthermore, the constant use of the temporary Western Field pitch by the First Team and Academy Team impacts on its quality and performance.
- 3.9 An indicative month of the Academy training programme is included at Appendix B which illustrates the number of training sessions and variety in locations.
- 3.10 In addition to the teams currently run by the Club, two further sides are to be introduced at U10 and U12 level as part of the new Academy at Whitewebbs. This would provide an additional players and staff.
- 3.11 The table below summarises the typical weekly usage across all Academy players.



Note continued

Age Group	Training (sessions/week)	Gym (sessions/week)	Fixtures (games/week)	Classroom (use/per week)
U21	4	3	1-2	5 days
U16	3	3	1-2	2 evenings, 1 day
U15	3	3	1-2	2 evenings, 1 day
U14	3	3	1-2	3 evenings
U13	3	3	1-2	3 evenings
U12	2	0	1	1-2 sessions
U11	2	0	1	1-2 sessions
U10	2	0	1	1-2 sessions

- 3.12 The classroom usage noted above would comprise various forms of education, including BTEC sports programmes, GCSE support, A Levels, day release study sessions, homework clubs, workshops and parent meetings.
- 3.13 All of the above activities would take place on-site at the proposed training centre.
- 3.14 Many of the facilities used for training by the Academy teams at present are publicly shared and therefore not conducive to an elite, high-performance sporting environment. The proposed facility would deliver elite facilities for all age ranges.
- 3.15 Employment associated with the Academy Teams is anticipated to double as a direct consequence of the proposed facility, resulting in 62 staff.

4 Education

- 4.1 Education of Academy players is currently inefficient, requiring players to balance school/education requirements with training across several different locations, some of which are a considerable distance from each other.
- 4.2 Historically players have missed crucial education time, missing school to train within a limited window of pitch/facility availability.



Note continued

- 4.3 Education is a significant factor in dissuading girls from pursuing careers in football (in-part due to lower salaries). Improving the access and efficiency of education delivery alongside football training is, therefore, important. Providing education on-site whilst improving the coaching contact time players receive will increase the chances of players becoming professional athletes.
- 4.4 The proposed facility would provide dedicated on-site classroom and educational space, ensuring that players are better supported and will balance football and education in a more effective manner.
- 4.5 The on-site classroom usage would facilitate various forms of education, including BTEC sports programmes, GCSE support, A Levels, day release study sessions, homework clubs, workshops and parent meetings.

5 Operational Hours of the New Women's Training Centre

- 5.1 The operational hours of the facility extend from early morning to nighttime, and Appendix A provides a summary of a typical week for the first team, as well as the Academy teams.
- 5.2 The facility will have 24 hour security and will be open for players and staff during the hours of 8am – 8pm.
- 5.3 Catering and maintenance staff will be first on site, and the operational staff will be present until late into the evening. The pitches will be operational during the daytime, and early evening, when training takes place.
- 5.4 Two pitches would have floodlights within the proposed training facility, one grass pitch and one synthetic pitch, both located to the north of the training ground (for environmental reasons).
- 5.5 Each pitch (floodlit and unlit) would be used for a maximum of 6 hours per week.
- 5.6 There would be a maximum of 12 hours of floodlight usage per week, therefore. This is a worst case basis, as there is a prospect that the two floodlit pitches are used concurrently, and they will not ordinarily be floodlit outside the Winter season.
- 5.7 Consistent with the position established at the existing training centre, floodlight use would not extend beyond 20:30 on any day.

6 Growth in the Number of Registered Players and Employment

- 6.1 There are currently 23 members of staff supporting the Women's First Team, and 31 members of staff supporting the Academy teams, 5 of which are shared (i.e. a total of 49 staff).
- 6.2 It is anticipated that football-related staff numbers will double as a direct consequence of the proposed facility (i.e. a total of 98 staff).
- 6.3 Further employment will be generated as follows:
 - a. Grounds maintenance staff: 1 per pitch required (i.e. 10 new staff)
 - b. Grounds maintenance staff: 1 per pitch required (i.e. 10 new staff)
 - c. Landscape (Club) maintenance: 5 new staff.



Note continued

- d. Parkland maintenance: 3 new staff.
- e. Southern café: 6 new staff.

- 6.4 Along with the growth in the pool of players, growth is anticipated in every department including coaches, analysts, physiotherapists and operational staff.
- 6.5 From 2025, UEFA will also introduce a second women's European competition alongside the existing Champions League. This will increase the chances of the Club participating in European football requiring further resource across all departments.

7 Links With the Existing Men's Facilities

- 7.1 The proposed women's training centre would share the following existing functions with the Men's Training Centre:
 - Media Centre (531sqm).
 - Indoor Pitch (3.642sqm).
 - Dexa Scanner (27sqm).
 - Cryotherapy Room (10sqm).
 - Auditorium (95sqm).
 - HR, Safeguarding and Legal Services (244sqm).
 - Recreation Room (224sqm).
 - Amphitheatre (129sqm).
 - Outdoor Player Recreation Area (170sqm).
 - Myddelton Lodge (player/staff accommodation) (3,980sqm).
- 7.2 The co-location of these facilities is not limited to player use, with the sharing of wider aspects such as coaching staff and grounds maintenance equipment.
- 7.3 The sharing of these aspects reduces the amount of built development required by the proposals, whilst still ensuring a high-quality facility of equivalent standard to the Men's Training Centre. It is also demonstrably integral to the Men's Training Centre, and the planning benefits (all planning policy implications) associated with this are address in the planning report
- 7.4 A plan of these co-location facilities is provided in the DAS.



Appendix 3



Policy Compliance Matrix

1 The London Plan (2021) ([LINK](#))

Ref.	Summary	Addressed in	Compliance with Policy?
GG1: Building strong & inclusive communities	To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, this policy sets out broad actions for those involved in the planning and development process (e.g. early engagement with stakeholders, including local communities; the provision of good quality community spaces; etc.).	Planning Statement Social and Economic Benefits Statement Health Impact Assessment Statement of Community Involvement Design and Access Statement	Yes
GG2: Making the best use of land	Encourage the best use of land, namely: <ul style="list-style-type: none"> ▪ The reuse of brownfield land; ▪ Applying a design-led approach to determine the optimum capacity of sites; ▪ Understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character ▪ Protect and enhance open spaces (inc. Green Belt), and aiming for BNG; and ▪ Encouraging sustainable travel methods (car free). 	Planning Statement Design and Access Statement Transport Assessment Framework Travel Plan Ecological Impact Assessment Outline Parkland Management Plan	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
GG3: Creating a healthy city	Improve the health of residents and reduce health inequalities, for instance by promoting more active and healthy lives and assessing the impact of proposals on public mental and physical health.	Health Impact Assessment Social and Economic Benefits Statement Air Quality Assessment	Yes
GG5: Growing a good economy	Strengthen the wider London economy by encouraging the diversification and strengthening of the economy across the GLA area, including the promotion of London's cultural assets.	Planning Statement Social and Economic Benefits Statement	Yes
GG6: Increasing efficiency & resilience	Promotes the improvement of energy efficiency, the incorporation of climate change adaptation and mitigation measures, the creation of a safe environment and the delivery of infrastructure through multi-stakeholder approaches.	Energy Strategy Design and Access Statement Flood Risk Assessment London Planning Fire Safety Statement Circular Economy Statement Whole Life Carbon Assessment BREEAM Pre-Assessment Report Utility Statement	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
SD10: Strategic & local regeneration	Boroughs should seek to regenerate those areas identified as in particular need, in collaboration with the communities. Proposals should contribute to regeneration by tackling environmental, economic and social barriers.	Planning Statement Social and Economic Benefits Statement Health Impact Assessment	Yes
D2: Infrastructure requirements for sustainable densities	This policy seeks to ensure that proposals can be accommodated with existing and planned future infrastructure in the area.	Design and Access Statement Transport Assessment	Yes
D3: Optimising site capacity through the design-led approach	Proposals must make the best use of land using a design-led approach. This should consider the form and layout, experience, and the quality and character of a proposal's design.	Design and Access Statement	Yes
D4: Delivering good design	Outlines the approach to design masterplans that should be used to achieve high quality design and placemaking. Guidelines are set for how the design review will occur.	Design and Access Statement	Yes
D5: Inclusive design	Achieve the highest standards of accessibility and inclusive design. The Design and Access Statement should include an inclusive design statement.	Design and Access Statement	Yes
D8: Public realm	Explore opportunities to create new public realm. The public realm should well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context and easy to understand, service and maintain.	Design and Access Statement Outline Parkland Management Plan	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
D11: Safety, security & resilience to emergency	Proposals should maximise building resilience and minimise potential physical risks, and should include measures to design out crime.	Design and Access Statement London Planning Fire Safety Statement Flood Risk Assessment	Yes
D12: Fire safety	The highest standards of fire safety must be achieved. A London Planning Fire Safety Statement should be included in all major proposals to address the policy requirements.	London Planning Fire Safety Statement	Yes
D13: Agent of Change	New noise and other nuisance-generating proposals near noise-sensitive uses should put in place measures to mitigate and manage any impacts.	Sports Pitch Noise Assessment Light Spill Assessment	Yes
D14: Noise	This policy sets standards for development proposals to reduce, manage and mitigate noise to improve health and quality of life, in particular avoiding significant adverse noise impacts and improving the acoustic environment.	Sports Pitch Noise Assessment	Yes
S1: Developing London's social infrastructure	Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies are supported. Development proposals that seek to make best use of land, including the public-sector estate, are encouraged. Any loss of social infrastructure is resisted.	Planning Statement Social and Economic Benefits Statement	Yes
S4: Play and informal recreation	Proposals for schemes that are likely to be used by children and young people should increase opportunities for play and informal recreation; incorporate accessible routes; and include incidental play.	Design and Access Statement	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
		Social and Economic Benefits Statement	
S5: Sports & recreation facilities	<p>Proposals for sports and recreation facilities should ensure their accessibility, maximise the multiple use of facilities and support the provision of lighting within reasonable hours.</p> <p>Existing sports and recreational land and facilities should be retained unless the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the former use.</p> <p>Where facilities are proposed on existing open space, proposals should be considered against policies G2, G3, G4, the need and opportunities for sports facilities, and the potential impact that the development will have.</p>	Planning Statement Light Spill Assessment Social and Economic Benefits Statement Design and Access Statement	Yes
S6: Public toilets	<p>Large scale developments that are open to the public should provide and secure the future management of (i) publicly accessible toilets suitable for all users; and (ii) free changing places toilets designed with the guidance in British Standard BS8300-2.2018.</p>	Design and Access Statement	Yes
E11: Skills & opportunities for all	<p>Inclusive access to training, skills and opportunities are encouraged in both the construction and occupation period. These can be included in the s106 agreement.</p>	Planning Statement Social and Economic Benefits Statement	Yes
HC1: Heritage conservation & growth	<p>Proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Cumulative effects should also be considered. Harm should be avoided, and enhancement opportunities identified.</p> <p>Assets of archaeological significance should be identified, and harm avoided or minimised.</p>	Heritage Statement Archaeological Desk-Based Assessment	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
	Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and reuse.		
G1: Green infrastructure	Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.	Design and Access Statement	Yes
G2: Green Belt	The Green Belt should be protected from inappropriate development: 1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist, 2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.	Landscape Statement Ecological Impact Assessment Planning Statement	Yes
G4: Open Space	Proposals should not result in the loss of protected open space, and where possible, create areas of publicly accessibly open space, especially in areas of deficiency.	Design and Access Statement Planning Statement	Yes
G5: Urban greening	Proposals should contribute to the greening of London by incorporating high-quality landscaping (including trees). Green roofs, green walls and nature-based sustainable drainage. Urban Greening Factor to be calculated.	Landscape Statement Design and Access Statement	Yes
G6: Biodiversity & access to nature	Proposals should manage impacts on biodiversity and aim to secure BNG, informed by best available ecological information and addressed from the start of the process. Proposals that reduce deficiencies in access to nature should be considered positively.	Ecological Impact Assessment Design and Access Statement	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
G7: Trees & woodlands	Existing trees of value should be retained, or adequate replacement should be achieved based on the existing value of the tree using an appropriate valuation system.	Arboricultural Assessment Impact	Yes
SI1: Improving air quality	<p>Development proposals should not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; create unacceptable risk of high levels of exposure to poor air quality.</p> <p>As a minimum, development proposals must be at least Air Quality Neutral, should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.</p> <p>In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.</p>	Air Quality Assessment	Yes
SI2: Minimising greenhouse gas emissions	Major development should be net zero-carbon by minimising greenhouse gas emissions in operation and minimising both annual and peak energy demand. A detailed energy strategy should be included. At least 35% on-site reduction should be achieved by major development, with 15% through energy efficiency measures. Off-site contributions or cash in lieu may be acceptable when on-site reduction is not possible. All parts of the development, including those not under Building Regulations, should be included.	Energy Strategy Whole Life Cycle Carbon Assessment Circular Economy Statement	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
SI4: Managing heat risk	Proposals should minimise adverse impacts on the urban heat island through their design, layout, orientation, materials and incorporation of green infrastructure. The energy strategy should demonstrate how they will reduce the potential for internal overheating and reliance on AC systems through a set hierarchy set out in the policy.	Energy Strategy Design and Access Statement	Yes
SI5: Water infrastructure	<p>Development proposals should:</p> <ol style="list-style-type: none"> 1) through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption) 2) achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development) 3) incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing <p>Development proposals should:</p> <ol style="list-style-type: none"> 1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided 2) take action to minimise the potential for misconnections between foul and surface water networks. 	BREEAM Pre-Assessment Report Utility Statement Flood Risk Assessment Design and Access Statement	Yes
SI6: Digital connectivity infrastructure	Sufficient ducting space for full fibre connectivity should be provided for all end users, unless affordable alternative 1GB/s connections are made available. The demand for mobile connectivity should also be met. Avoid or mitigate any reduction in connectivity in the area. Support use of roofs and public realm for well-designed and suitably located mobile digital infrastructure.	Utility Statement	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
SI7: Reducing waste & supporting the circular economy	This policy sets out guidelines for achieving waste reduction and promoting a circular economy. Referable applications should promote circular economy outcomes and aim to be net-zero, including a Circular Economy Statement.	Circular Economy Statement	Yes
SI12: Flood risk management	This policy sets out the approach that proposals should take in relation to FRM. Flood risk should be minimised and mitigated, and should not be worsened elsewhere, and should include space for water and the use of natural management methods.	Flood Risk Assessment	Yes
SI13: Sustainable drainage	Proposals should aim to achieve greenfield run off rates and ensure surface water is managed as close to its source as possible. The policy sets out the drainage hierarchy. Drainage should be designed in a way that promotes multiple benefits.	Flood Risk Assessment	Yes
T1: Strategic approach to transport	Proposals should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on the transport networks are mitigated.	Transport Assessment Framework Travel Plan	Yes
T2: Healthy Streets	Proposals should promote and demonstrate how they are aligning with Healthy Streets Indicators, reduce the dominance of cars and be permeable by foot and cycle and connect to local networks.	Transport Assessment	Yes
T3: Transport capacity, connectivity & safeguarding	Proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.	Transport Assessment	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
T4: Assessing & mitigating transport impacts	Proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. This policy sets out guidelines for the Transport Assessment, Framework Travel Plan and other potentially necessary plans. Adverse impacts may require mitigation measures, including financial contributions. Road danger should not be increased.	Transport Assessment Framework Travel Plan	Yes
T5: Cycling	Barriers to cycling should be removed, and proposals should encourage the use of cycling. Cycle parking should be aligned with the London Cycling Design Standards. The policy includes other guidance on cycle parking.	Transport Assessment Design and Access Statement	Yes
T6: Car Parking	Car-free development should be the starting point for site design in places that are well-connected to public transport. Maximum car parking standards are set out in policies T6.4 (leisure uses) and T6.5 (disabled parking – sports facilities). EV parking should be accommodated. A Parking Design and Management Plan should be included.	Transport Assessment Design and Access Statement	Yes
T7: Deliveries, servicing & construction	Proposals should facilitate safe, clean and efficient deliveries and servicing. During the construction phase, inclusive and safe access for walking and cycling should be prioritised.	Design and Access Statement Site Construction Management Plan Planning Statement	Yes



2 Enfield Core Strategy (2010) [\(LINK\)](#)

Ref.	Summary	Addressed in	Compliance with Policy?
Core Policy 9: Supporting Community Cohesion	The Council seeks to promote community cohesion by: <ul style="list-style-type: none"> - The tackling of social disadvantage. - Promoting access to open space training, employment, and other social facilities. - The reduction of crime and fear of crime. - Encouraging the community to engage in planning. - The provision of necessary community facilities to support local need. 	Planning Statement Social and Economic Benefits Statement Statement of Community Involvement	Yes
Core Policy 11: Recreation, Leisure, Culture and Arts	The Council seeks to protect and enhance the provision of these facilities, and notably how sport and physical activity provision can be provided. Employment opportunities in these areas are encouraged.	Planning Statement Social and Economic Benefits Statement	Yes
Core Policy 13: Promoting Economic Prosperity	The Council promotes economic prosperity, setting targets for job growth, diversifying the economy, building on existing sectors; including in sport, leisure and recreation.	Planning Statement Social and Economic Benefits Statement	Yes
Core Policy 16: Taking Part in Economic Success and Improving Skills	The Council is committed to tackling worklessness, creating new jobs in the Borough and working to ensure that local residents are able to access existing and new jobs.	Planning Statement Social and Economic Benefits Statement	Yes
Core Policy 20: Sustainable Energy Use and Energy Infrastructure	New developments should address the causes and impacts of climate change by: Minimising energy use; Supplying energy efficiently; and use energy generated from renewable sources	Energy Strategy Circular Economy Statement Whole Life Cycle Carbon Assessment	Yes
Core Policy 21: Delivering Sustainable Water	This policy sets out the Council's approach to the delivery of this type of infrastructure. New development may need to be phased to allow delivery of necessary infrastructure. Water conservation and efficiency	Flood Risk Assessment Utility Statement	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
Supply, Drainage and Sewerage Infrastructure	measures are promoted. Sustainable drainage measures are encouraged. A development's impact on the water supply and infrastructure may be required.		
Core Policy 22: Delivering Sustainable Waste Management	<p>The Council will:</p> <ul style="list-style-type: none"> ▪ Encourage the inclusion of reuse and recycling of materials ▪ Encourage the incorporation of on-site reuse and recycling of construction, demolition and excavation waste ▪ Require appropriate provision for on-site waste treatment, storage and collection throughout the lifetime of a development 	Circular Economy Assessment Design and Access Statement Site Waste Management Plan	Yes
Core Policy 24: The Road Network	The Council will seek to deliver improvements to the road network, including by encouraging sustainable travel choices, along with the setting of car parking standards and the provision of EV infrastructure.	Transport Assessment	Yes
Core Policy 25: Pedestrians and Cyclists	This policy sets out guidelines for how the Council wants to provide safe, convenient and accessible routes for non-motorised modes of travel.	Design and Access Statement Framework Travel Plan Transport Assessment	Yes
Core Policy 26: Public Transport	New developments should ensure that public transport levels can accommodate them, and where needed, identify opportunities to improve them.	Transport Assessment	Yes
Core Policy 28: Managing Flood	This policy sets out the Council's approach to flood risk, directing development to areas of lowest risk.	Flood Risk Assessment	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
Risk through Development			
Core Policy 29: Flood Management Infrastructure	Any development adjacent to a watercourse should consider opportunities for the removal of culverts, river restoration and naturalisation. Additional culverting and development of river corridors are resisted.	Flood Risk Assessment	Yes
Core Policy 30: Maintaining & Improving the Quality of the Built and Open Environment	All developments in the public realm should be high quality and design-led, with regard to their context and should help achieve Core Policy 9.	Design and Access Statement	Yes
Core Policy 31: Built and Landscape Heritage	<p>This policy sets the objective to preserve and enhance heritage assets, in particular by:</p> <ul style="list-style-type: none"> - Ensuring that built development and interventions in the public realm that impact on heritage assets have regard to their special character and are based on an understanding of their context. Proposals within or affecting the setting of heritage assets will be required to include a thorough site analysis and character appraisal which explicitly demonstrates how the proposal will respect and enhance the asset; - Identifying opportunities for the repair and restoration of heritage assets and working with owners of heritage assets on English Heritage's Heritage at Risk Register to find viable solutions to secure the asset's long-term future. Where necessary, the Council will make full use of its legislative powers to ensure their preservation; 	Heritage Statement Archaeological Desk-Based Assessment	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
	<ul style="list-style-type: none"> - Ensuring developments in areas of archaeological importance take into account the potential for new finds by requiring consultation with English Heritage and on-site investigations, including the appropriate recording and dissemination of archaeological evidence; - Supporting appropriate initiatives which increase access to historic assets, provide learning opportunities and maximise their potential as heritage attractions, particularly at Forty Hall and the Area of Special Character in the north west of the Borough; 		
Core Policy 32: Pollution	This policy sets out how the Council will minimise air, water, noise and light pollution, and address the risks from contaminated land and hazardous substances. It sets out guidelines for new development.	Air Quality Assessment Flood Risk Assessment Sports Pitch Noise Assessment Light Spill Assessment Phase 1 Geo-Environmental Preliminary Risk Assessment	Yes
Core Policy 33: Green Belt and Countryside	The Council will protect the Green Belt in line with national policy.	Planning Statement	Yes
Core Policy 34: Parks, Playing Fields and Other Open Spaces	Existing open spaces should be protected and enhanced, and opportunities for the provision of new spaces is encouraged. Maximising the potential for playing pitches for formal, organised sporting activities is encouraged.	Planning Statement Design and Access Statement Outline Parkland Management Plan	Yes



Note continued

Ref.	Summary	Addressed in		Compliance with Policy?
Core Policy 36: Biodiversity	Biodiversity interests should be protected, enhanced, restored or added to.	Ecological Assessment	Impact	Yes



Note continued

3 Enfield Development Management Document (2014) ([LINK](#))

Ref.	Summary	Addressed in	Compliance with Policy?
DMD16: Provision of New Community Facilities	New community facilities will be supported, subject to there being a community need; making efficient use of land; is easily accessible by non-car modes; high quality design; does not harm local amenity; and is appropriate in traffic generation.	Planning Statement	Yes
DMD37: Achieving High Quality & Design-Led Development	<p>The opportunities to improve an area should be taken following the objectives of urban design:</p> <ul style="list-style-type: none"> ▪ Character ▪ Continuity and enclosure ▪ Quality of the public realm ▪ Ease of movement ▪ Legibility ▪ Adaptability and durability ▪ Diversity <p>Secure and safe places should be created.</p>	Design and Access Statement	Yes
DMD38: Design Process	Design and Access Statement should clearly document the design evolution and rationale behind the proposal, including a site analysis, opportunities/constraints and direct references as to how the design complies with relevant policy and guidance.	Design and Access Statement	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
DMD44: Conserving & Enhancing Heritage Assets	Applications should conserve and enhance heritage assets, appropriate to their significance. All applications affecting a heritage asset should include a heritage assessment	Heritage Statement	Yes
DMD45: Parking Standards & Layout	Outlines parking standards and layout requirements. Parking to be considered against London Plan standards.	Transport Assessment Design and Access Statement	Yes
DMD47: Access, New Roads & Servicing	This policy sets out guidelines for the provision of non-vehicular access (pedestrians, cyclists, public transport) and vehicular access and servicing.	Transport Assessment Design and Access Statement	Yes
DMD48: Transport Assessment	Outlines requirements for Transport Assessment & Framework Travel Plans. Includes a requirement to consider servicing/deliveries alongside providing a Construction Logistics Plan.	Transport Assessment Framework Travel Plan Outline Construction Logistics Plan	Yes
DMD49: Sustainable Design & Construction Statements	A Sustainable Design and Construction Statement must be included to address the headings in Appendix 3. (<i>note: these headings are covered by the various technical documents, and Quod will provide a SDCS in the planning statement which signposts to these documents</i>).	Planning Statement	Yes
DMD50: Environmental	Major non-residential development must “move towards” BREEAM Outstanding.	BREEAM Pre-Assessment Report	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
Assessment methods			
DMD51: Energy Efficiency Standards	Minimise energy-related CO2 emissions in accordance with the stated hierarchy. Major non-residential development must “ <i>move towards</i> ” zero carbon.	Energy Strategy Whole Life Carbon Assessment	Yes
DMD 52: Decentralised Energy Networks	Proposals which produce heat and/or energy should contribute to the supply of decentralised energy networks, unless not feasible or viable.	Energy Strategy	Yes
DMD53: Low & Zero Carbon Technology	Where major developments have secured all possible savings through energy efficiency and decentralised energy networks, and still fail to achieve the specified carbon reduction targets in DM51, on-site renewable energy generation should be provided through the use of low and zero carbon technologies. Developments will be required to make up the identified shortfall or provide a 20% carbon dioxide reduction, whichever is the greatest, unless it can be demonstrated that this is not feasible or viable. In the Green Belt, measures may constitute inappropriate development and very special circumstances will need to be demonstrated.	Energy Strategy	Yes
DMD54: Allowable Solutions	Financial contributions allowed if DMD51 targets cannot be attained.	Energy Strategy	Yes
DMD55: Use of Roof Space/Vertical Surfaces	These spaces must be used for low and zero carbon technologies, green roofs and living walls, subject to feasibility and viability.	Design and Access Statement Energy Strategy	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
DMD56: Heating and Cooling	Heat gain should be controlled and managed, and reliance on mechanical cooling should be reduced in accordance with the stated hierarchy.	Energy Strategy	Yes
DMD57: Responsible Sourcing of Materials, Waste Minimisation & Green Procurement	This policy sets out guidance on the procurement of materials and waste minimisation, subject to technical and economic feasibility and other relevant planning considerations. For non-residential schemes assessed under relevant BREEAM document: a minimum of 3 out of 6 credits under MAT1; and, a minimum of 2 out of 3 credits under MAT3.	BREEAM Pre-Assessment Report Circular Economy Assessment Site Waste Management Plan	No
DMD58: Water Efficiency	This policy sets out guidelines for water efficiency under WAT1 BREEAM. Development is to “move towards” a 65% improvement in water efficiency over the notional baseline, subject to feasibility and other relevant planning considerations.	BREEAM Pre-Assessment Report	Yes
DMD59: Avoiding and Reducing Flood Risk	This policy sets out guidelines for avoiding and reducing flood risk, in line with national and regional policy.	Flood Risk Assessment	Yes
DMD60: Assessing Flood Risk	This policy sets out guidelines for the Flood Risk Assessment.	Flood Risk Assessment	Yes
DMD61: Managing Surface Water	This policy sets out guidelines for the Drainage Strategy.	Flood Risk Assessment	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
DMD62: Flood Control and Mitigation Measures	This policy sets out guidelines for flood mitigation measures, where required.	Flood Risk Assessment	Yes
DMD64: Pollution Control & Assessment	Pollution and the risk of pollution must be prevented, reduced and mitigated during all phases of development. Policy applies to all forms of pollution including noise, vibration, light, odour, dust, land, water, air-based pollution.	Site Construction Management Plan Air Quality Assessment Sports Pitch Noise Assessment Light Spill Assessment Site Waste Management Plan	Yes
DMD65: Air Quality	Planning permission will be refused for developments which would have an adverse impact on air quality unless the developer is able to demonstrate that measures can be implemented that will mitigate these effects. Development will only be permitted if it is air quality neutral.	Air Quality Assessment	Yes
DMD66: Land Contamination and Instability	This policy sets out guidelines for the remediation of land and how proposals that are in areas at risk of contamination will be considered.	Phase 1 Geo-Environmental Preliminary Risk Assessment	Yes
DMD68: Noise	This policy sets out guidelines for how noise should be considered within proposals. Developments that generate or would be exposed to an unacceptable level of noise will not be permitted.	Sports Pitch Noise Assessment	Yes
DMD69: Light Pollution	This policy sets out guidelines for how light pollution should be considered within proposals. Development which results in light pollution that has a harmful impact on local amenity, nature conservation/wildlife,	Light Spill Assessment	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
	environment, and will not be permitted. Development should limit and, where possible, reduce the adverse impact of light pollution.		
DMD70: Water Quality	This policy sets out guidelines for how water quality should be considered within proposals.	Flood Risk Assessment	Yes
DMD71: Protection and Enhancement of Open Space	Development involving the loss of other open space will be resisted unless: a. Replacement open space can be re-provided in the same locality and of better quality to support the delivery of the Council's adopted Parks and Open Spaces Strategy; or b. It has been demonstrated through the submission of an assessment that the open space in question is surplus to requirements.	Planning Statement	Yes
DMD74: Playing Pitches	This policy sets out the Council's approach to playing pitches, with a preference for natural grass over artificial. Criteria are set for the approval of artificial pitches. Proposals for artificial pitches with floodlights in the green belt must demonstrate VSC.	Planning Statement. Transport Assessment (2a, b). Phase 1 Geo-Environmental Preliminary Risk Assessment (2c) Design and Access Statement (2d). Heritage Statement (2d). Landscape and Visual Impact Assessment (2d).	Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
		Sports Pitch Noise Assessment (2e, 3). Light Spill Assessment (2e, 3). Ecological Impact Assessment (2f, 3). Landscape Statement (3).	
DMD78: Nature Conservation	Harm to important ecological assets will only be permitted where it cannot be reasonably avoided and has been demonstrated that mitigation can address the harm.	Ecological Assessment	Impact Yes
DMD79: Ecological Enhancements	Onsite ecological improvements should be provided for proposals of 100sqm or more, subject to viability and feasibility.	Ecological Assessment	Impact Yes
DMD80: Trees on Development Sites	Removal of trees of significant amenity or biodiversity value must be justified by exceptional circumstances and adequate replacement must be provided.	Arboricultural Assessment	Impact Yes
DMD81: Landscaping	Landscaping should be of high quality and add to the local character, biodiversity, help mitigate climate change and reduce water runoff. Species of high ecological value should be prioritised.	Design Statement Landscaping Statement	and Access Yes
DMD82: Protecting the Green Belt	Inappropriate development within the green belt will not be permitted. This policy sets out criteria for permitting development that is not inappropriate.	Planning Statement	Yes
DMD84: Areas of Special Character	New development within the Areas of Special Character will only be permitted if features or characteristics which are key to maintaining the quality of the area are preserved and enhanced.	Design Statement	and Access Yes



Note continued

Ref.	Summary	Addressed in	Compliance with Policy?
DMD89: Previously Developed Sites in the Green Belt	Limited infilling or the partial or complete redevelopment of previously developed sites elsewhere in the Green Belt will only be permitted if all of the following criteria are met: a. New development does not have a greater impact on the openness of the Green Belt; b. The proposal does not lead to an increase in the developed proportion of the site; c. The proposal does not lead to any significant increase in motorised traffic generation, as evidenced through a suitable traffic modelling tool; and d. The proposal contributes towards the aims of sustainable development.	Planning Statement	Yes



4 Supplementary Planning Documents (SPDs)

SPD	Summary	Addressed in	Compliance with Policy?
Section 106 SPD (2016) (LINK)	This SPD provides further guidance to Section 106.	Planning Statement	Yes
Decentralised Energy Network Technical Specification SPD (2015) (LINK)	This SPD provides further guidance to DMD52.	Energy Strategy	Yes
Heritage Strategy (2019) (LINK)	This SPD gives further guidance on top of the local plan.	Heritage Statement	Yes
Accessible London SPG (LINK)	Guidance on implementing inclusive design principles.	Design and Access Statement	Yes
Characterisation and Growth Strategy LPG (LINK)	Guidance on reflecting character and context in development.	Design and Access Statement	Yes
Fire Safety Guidance (draft) (LINK)	To be read alongside London Plan Policy D12	London Planning Fire Safety Statement	Yes
Public London Charter (LINK)	Outline 8 principles that public spaces need to follow to be safe, accessible, attractive and inclusive.	Design and Access Statement	Yes



Note continued

SPD	Summary	Addressed in	Compliance with Policy?
Optimising Site Capacity (LINK)	Supports London Plan Policy D3 on adopting a design-led approach to optimise site capacity.	Design Statement and Access	Yes
All London Green Grid SPG (LINK)	Supports London Plan policies on green infrastructure and urban greening.	Design Statement and Access Landscape Statement	Yes
Urban Greening Factor LPG (LINK)	Supports London Plan Policy G5 on UGF.	Design Statement and Access	Yes
Air Quality Neutral LPG (LINK) and Air Quality Positive LPG (LINK)	Supports London Plan Policy S11.	Air Quality Assessment	Yes
Be Seen Energy Monitoring Guidance (LINK)	Supports London Plan Policy S11.	Energy Strategy	Yes
Circular Economy Statement Guidance (LINK)	Further guidance on Circular Economy Statements.	Circular Economy Statement	Yes
Energy Assessment Guidance (LINK)	Further guidance on carbon emission reductions.	Energy Strategy	Yes



Note continued

SPD	Summary	Addressed in	Compliance with Policy?
Control of Dust & Emissions SPD (LINK)	Guidance to reduce emissions of dust from construction and demolition.	Site Construction Management Plan	Yes
Whole Life Cycle Carbon Assessments (LINK)	Further guidance on WLCCAs.	Whole Life Carbon Assessment	Yes



Appendix 4



Whitewebbs Park: Green Belt Policy Assessment

No	Component	Potential to be “Appropriate” GB Development?	Considerations Applicable
1	Sports Pitches	Y (Para 154 b) – appropriate facilities for outdoor sport.	No greater impact on openness than former golf course use.
		Y (Para 155 e) – material change in use for outdoor sport.	No greater impact on openness than former golf course use. No conflict with purposes of including land in Green Belt.
2	Ancillary Facilities & Infrastructure	n/a	Must be considered individually, not collectively.
a	Floodlights	Y (Para 154 b) – appropriate facilities for outdoor sport.	Subject to preserving openness and not conflicting with the five GB purposes.
b	Fencing	Y (Para 154 b) – appropriate facilities for outdoor sport.	Subject to preserving openness and not conflicting with the five GB purposes.
c	Grounds Maintenance Building	Y (Para 154 a) – buildings for agriculture.	“Agriculture” definition includes horticulture (TCPA 1990, S336). No further considerations of openness apply in this case.
		Y (Para 154 b) – appropriate facilities for outdoor sport.	Subject to preserving openness and not conflicting with the five GB purposes. Would replace existing GMB in northern car park.
d	Security Lodge	Y (Para 154 b) – appropriate facilities for outdoor sport.	No greater impact on openness. No conflict with GB purposes.
		Y (Para 154 g) – partial redevelopment of PDL.	No greater impact on openness than existing development.
3	Northern Clubhouse Extension	Y (Para 154 c) – extension or alteration of a building.	Subject to demonstrating that extension is not disproportionate – design ongoing and subject to further consideration.
		Y (Para 154 g) – redevelopment of PDL.	Subject to having no greater impact on openness than existing – design ongoing.
4	Southern Clubhouse – provision of café & WC	Y (Para 154 g) – partial redevelopment of PDL.	No greater impact on openness than existing development.
		Y (Para 155 d) – reuse of buildings.	Would preserve openness and no conflict with GB purposes.
5	Restoration/reinstatement of Historic Parkland	Y (Para 155 e) – material change in use for outdoor recreation.	No greater impact on openness than former golf course. No conflict with purposes of including land in Green Belt.

Note continued



No	Component	Potential to be “Appropriate” GB Development?	Considerations Applicable
6	Access	n/a	Must be considered individually, not collectively.
a	Upgrading of Existing Access Route	Y (Para 154 g) – partial redevelopment of PDL.	No greater impact on openness than existing.
		Y (Para 155 b) – engineering operation.	No greater impact on openness arising and no conflict with GB purposes.
b	Reinstatement of Historic Carriageway	Y (Para 155 b) – engineering operation.	Subject to preserving openness and not conflicting with five GB purposes.
		Y (Para 155 c) – local transport infrastructure.	Intrinsically linked to Whitewebbs House, therefore requires GB location. Subject to preserving openness and not conflicting with five GB purposes.
		Y (Para 154 g) – partial redevelopment of PDL.	Subject to demonstrating no greater impact on openness than existing.
c	Link Route to Western Field	Y (Para 155 b) – engineering operation.	Subject to preserving openness and not conflicting with five GB purposes.
		Y (Para 155 c) – local transport infrastructure.	Necessary to link new facility with existing THFC Training Centre, therefore requires GB location. Subject to preserving openness and not conflicting with five GB purposes.
7	Public Access (footpath upgrades/new provision)	Y (Para 155 e) – change in the use of land for outdoor recreation.	No greater impact on openness than former golf course use. No conflict with purposes of including land in Green Belt.
		Y (Para 154 g) – limited infilling or partial redevelopment of PDL.	No greater impact on openness than existing golf course.
		Y (Para 155 b) – engineering operation.	Subject to preserving openness and not conflicting with five GB purposes.



Appendix 5



Summary of Historic “Community” Section 106 Obligations

Original Training Centre (ref. TP/07/1623)

Topic	Summary of Obligation
Community Football Partnership Management Committee	Establish a “Committee” (this was subsequently established in 2009), which is responsible for managing and agreeing with the Council a programme of sports based community activities within the borough of Enfield and wider Lee Valley.
Community Office and Education Centre	Provide a dedicated 200sqm (GIA) community office and education centre within the Academy Building. <i>(NB: THIS WAS SUBSEQUENTLY REMOVED AND TRANSFERRED TO THE WESTERN FIELD S106 AGREEMENT – SEE BELOW).</i>
Community Football Partnership Activities	Maintain the community based programme formulated with the Committee (above), schools and other community organisations for a 10-year period (until 30 June 2020).
	Objectives of the community based programme are: <ul style="list-style-type: none"> - Community participation in healthy recreation. - Advancement in education. - Promotion of regeneration. - Development of skills capacity of disadvantaged members of the community.
	Allocate up to 70,000 coaching hours over a 10-year period (at the applicable rates at that time of £25 per hour, this equated to £1.75m).
	Access to the first team and academy training facility for an average of 20 hours per week over a 10-year period (at the applicable rates at that time of £30 per hours, this equated to £312k).

Myddelton Lodge (ref. 14/03915/FUL)

Topic	Summary of Obligation
Employment and Skills Training	To use reasonable endeavours during construction to use local businesses, labour and materials, alongside other measures relating to on-site skills training.
	To agree an Employment and Skills Training Strategy pre-commencement.
	To submit a Local Labour Report post completion (1 month).



Western Field (Permanent Education & Environmental Centre) (ref. 17/01178/FUL)

Topic	Summary of Obligation
Nature Reserve	Construct and layout the Nature Reserve within Dickenson's Meadow.
	Manage the maintain the Nature Reserve for a 10-year period expiring 21 December 2028.
	Permit the students of Capel Manor and the Friends of Forty Hall Park (on a volunteer basis) to assist with the Nature Reserve creation.
	Set up a Management Committee for the 10-year period, including a representative of Capel Manor and the Friends of Forty Hall Park. To meet once per annum and discuss the management of the Nature Reserve.
	Facilitate the Schools Visits Programme (see below).
"SEC" Building	To build and maintain the SEC for a 10-year period expiring 21 December 2028.
	Provide a minimum 200sqm (GIA) within the SEC for use by schools.
Schools Visits Programme	To provide the programme and the 200sqm space within the SEC for either (i) the 10-year period expiring 21 December 2028; or (ii) until the cost of school visits reaches £312k (being £750 per visit for 416 visits).
	Qualifying Schools entitled access to the SEC and Nature Reserve for one day each academic year. Each school can bring a maximum of 60 children to the SEC and a maximum of 30 children to the Nature Reserve, unless otherwise agreed.
	To establish a central booking system and appoint a central coordinator.



Note continued

Western Field (Temporary Women's Facility) (ref. 21/03694/FUL)

Note: S106 not yet signed by Heads of Terms are agreed. The below summary is based on the latest draft received 17.11.2023.

Topic	Summary of Obligation
Schools Visit Programme	Allow qualifying schools to use the Indoor Training Pitch or the Outdoor Artificial Training Pitch for: <ul style="list-style-type: none">- No less than 5 weeks per year.- No less than 2 visits per day.- Between June and July, Monday to Friday during term time. <p><i>NOTE: THE "INDOOR TRAINING PITCH" AND THE "OUTDOOR ARTIFICIAL TRAINING PITCH" REFER TO THOSE AT THE EXISTING MEN'S TRAINING CENTRE, I.E. THERE IS NO SCHOOL ACCESS TO THE WOMEN'S TEMPORARY FACILITY FOR SCHOOL USE.</i></p>
	Provide UEFA qualified coaches.
	Conduct a maximum of 150 school visits over 3 years. Equivalent number of training sessions to be run in schools if this is not achieved, for completion no later than 31 July 2025.
	To establish a central booking system and appoint a central coordinator.
	Each school can bring a maximum of 30 children unless otherwise agreed.



Appendix 6



Note

COMMUNITY OUTREACH ACTIVITY WPGC

The below represents a provisional package of planning obligations to be delivered by the Club and its charitable Foundation with oversight and input from Enfield Council's Parks, Leisure, and Culture team.

In preparing this document the Club has reviewed the corporate objectives contained within Enfield Council's [Investing in Enfield: Council Plan 2023–2026](#) and [Enfield's Joint Local Health and Wellbeing Strategy 2024 – 2030](#).

The programmes outlined in the below table align with these objectives and specifically the ambitions of Enfield Council to:

- Create strong, safe, and healthy communities.
- Improve leisure and sport opportunities to enable more active lifestyles.
- Engage young people and children in positive activities.
- Improve physical activity among children and young people.

Programmes are further anchored in the Club and its Foundation's objectives to further develop women and girl's football whilst increasing women and girl's participation in football, sport, and exercise more widely. Programmes have been assigned under the following headings:

- Girls' football
- Education delivery
- Crime diversion and engagement
- Promoting healthy lifestyles



Note continued

This work will be subject to oversight & input from Enfield Council's Parks, Leisure, and Culture team in the coming weeks and months.

Below is an indicative set of community obligations. The Applicant has agreed to monthly meetings with the Council's education, leisure services and planning teams to develop the scope and specific nature of the obligations further, and to ensure that they are anchored with the Council's corporate objectives. The below are therefore subject to change and further development.



Note continued

Girls' football

Activity	Target group	Description	Potential Delivery hours	Policy link
Global Football Development (GFD) Premier Days	8-15 year old girls	<p>Providing unique access to the new Women's and Girls' Training Centre, GFD Premier Days are prestigious events which offer 8-15 year olds a unique insight into coaching methods and techniques.</p> <p>The new Women's and Girls' TC enables us to host 8 new GFD Premier Days each year exclusively for girls. Each session will have 100 participants taking part in 8 hours of coaching.</p> <p>800 participants will take part over 12 months.</p>	<p>800 participants will receive 8 hours of coaching each year</p> <p>6,400 hours</p>	<p>This programme aligns with the <i>'Thriving children and young people'</i> objective identified as a priority in both Enfield's Joint Local Health and Wellbeing Strategy 2024 – 2030 and within Enfield Council's Investing in Enfield Council Plan 2023 – 2026</p> <p>Both plans identify that in 2022/23, 43% of year 6 children in Enfield were overweight or obese, higher than the London average.</p> <p>They further highlight an ambition to <i>'Engage children and young people in positive activities' and 'Improve nutrition, oral health and physical activity among children and young people'</i></p>
	5 – 15 year old girls			As above



Note continued

Activity	Target group	Description	Potential Delivery hours	Policy link
Global Football Development (GFD) Centers		<p>The new Women's and Girls' TC enables us to deliver GFD Development Centers tailored for girls aged 5 – 15. This would operate in term time (approx. 40wks a year) from 4.30pm-6.30pm each Friday.</p> <p>Each session will have 60 participants taking part in a 6 week programme. 6 different groups of girls will participate each year.</p> <p>360 participants will receive 12 hours of teaching over 12 months.</p>	<p>360 participants will receive 12 hours of teaching each year</p> <p>4,320 hours</p>	
Next Generation Girls	12-17 year old girls	<p>This programme, led by Tottenham Hotspur Foundation, targets the traditional age range girls 'drop-out' of football.</p> <p>Operating a 'turn up and play model' with the opportunity to play</p>	<p>15 participants will receive 2 hours of coaching once a week for 40 weeks</p> <p>1,200 hours</p>	As above



Note continued

Activity	Target group	Description	Potential Delivery hours	Policy link
		<p>in tournaments, attend Spurs Women matches and gain qualifications.</p> <p>The programme currently runs in locations across the community, but the new Women's and Girls' TC provides the opportunity to run a session once a week in term time for 2 hours.</p> <p>15 participants will receive 2 hours of coaching each week during term time.</p>		
Wildcats	5-11 year old girls	<p>Wildcats Girls' Football is an FA led initiative that offers non-competitive sessions for girls who want to give football a go for the very first time.</p> <p>These sessions will be run at locations across the Borough for one hour each week.</p>	<p>25 participants will receive 1 hour of coaching once a week for 40 weeks</p> <p>1,000 hours</p>	As above



Note continued

Education delivery

Activity	Target group	Description	Potential Delivery hours	Policy link
GFD College Programmes	16 – 18 year old girls	<p>The Club has active partnerships with 3 local colleges e.g., Barnet and Southgate College, where local students have the opportunity to undertake football coaching lessons and graduate with a Btech qualification in Sport.</p> <p>This is currently delivered at Barnet and Southgate College, but the new Women's and Girls' Training Centre provides the opportunity to welcome students and deliver teaching facilities in-house.</p> <p>Each partnership would take part in one full day (8 hours of teaching) per month.</p>	<p>150 participants will receive 96 hours of teaching each year</p> <p>14,400 hours</p>	<p>This programme aligns with the '<i>Strong, safe, and healthy communities</i>' objective identified as a priority in both Enfield's Joint Local Health and Wellbeing Strategy 2024 – 2030 and within Enfield Council's Investing in Enfield Council Plan 2023 – 2026.</p> <p>Enfield's Council Plan highlights an ambition to '<i>improve our leisure and sport opportunities to enable more active lifestyles</i>' and '<i>nurture our arts, heritage and creative sectors to connect people through culture</i>'</p>



Note continued

Activity	Target group	Description	Potential Delivery hours	Policy link
		A total of 150 participants will receive 96 hours of coaching and Training Centre access each year.		
GFD Coach Academy Open Days	16 – 18 year olds mixed gender	<p>GFD will run bespoke education events for key partners including local sports clubs and schools for those interested in learning more about coaching.</p> <p>Covering both practical and theory based sessions, a total of 30 participants will participate one full day each month.</p>	<p>360 participants will receive 8 hours of teaching each year</p> <p>2,880 hours</p>	
Women’s Health Education Programme and annual roadshow event	Mixed gender group drawn from local sports Clubs and schools	<p>Tottenham Hotspur Foundation has ambitions to run an education programme centered around women’s health.</p> <p>The programme aims to educate grassroot clubs and schools about women’s health to ensure girls are</p>	Up to 150 participants will be invited to attend an annual roadshow event at the Training Centre which will be one full day of 8 hours	<p>As above.</p> <p>We know that girls are typically less active as they enter their teenage years.</p> <p>This programme aims to educate local sports clubs and schools across the Borough to prevent young girls stopping</p>



Note continued

Activity	Target group	Description	Potential Delivery hours	Policy link
		<p>properly supported to stay active as they approach their teenage years.</p> <p>It will include information about puberty and menopause and include 6 courses throughout the year. These courses will take place off site, but the women's and girls' training centre provides the opportunity to host one annual roadshow event each year to share learnings and promote the programme within the context of an elite sporting facility.</p> <p>Participants would be drawn from local sports Clubs and schools.</p>	<p>1,200 hours</p>	<p>physical activity thus aligning with Enfield Council's ambition to 'enable more active lifestyles'</p>
Primary Stars	Ages 5-11 mixed gender	A programme which utilizes the appeal of Tottenham Hotspur Football Club to inspire children to be active and develop important life skills.	This is an externally based programme in primary schools. Our intention would be to use the Women's and Girls'	This programme aligns with the ambition set out in Enfield Council's Investing in Enfield Council Plan 2023 – 2026 that 'children and young people do well at all levels of learning'



Note continued

Activity	Target group	Description	Potential Delivery hours	Policy link
		<p>The curriculum-linked teaching resources support English, Math, PSHE and PE, with flexible activity ideas, worksheets, lesson plans, assemblies, and exclusive videos.</p> <p>PSHE topics include resilience, diversity, self-esteem, and fair play.</p>	<p>Training Centre as an incentive and reward for KS2 classes.</p> <p>25 participants will receive 1 hour of coaching once a week for 40 weeks</p> <p>1,000 hours</p> <p>In addition, 25 participants will receive 2 hours of coaching at the Training Centre four times a year.</p> <p>200 hours</p>	



Note continued

Crime diversion and engagement

Activity	Target group	Description	Potential Delivery hours	Policy link
PL Kicks	9 – 18 year olds mixed gender group	<p>Premier League Kicks is a series of free football and multi-sport sessions that provide positive activities through participation in football, workshops on important social topics, tournaments, qualifications, and volunteering.</p> <p>The new Women's and Girls' Training Centre provides the opportunity to host bi-monthly tournaments for Kicks participants as a reward and to keep those on the programme engaged.</p> <p>A total of 30 participants would take part in one full day every 2 months.</p>	<p>30 participants will receive 8 hours of on-site coaching every 2 months</p> <p>1,440 hours</p>	<p>This flagship programme has been inspiring children and young people to achieve their potential and wellbeing; working together to build stronger, safer, and more inclusive communities.</p> <p>A targeted version of the programme works with young people at risk of becoming victims or perpetrators of youth violence.</p> <p>This programme aligns with the '<i>Strong, safe, and healthy communities</i>' objective identified as a priority in both Enfield's Joint Local Health and Wellbeing Strategy 2024 – 2030 and within Enfield Council's Investing in Enfield Council Plan 2023 – 2026.</p>



Note continued

Activity	Target group	Description	Potential Delivery hours	Policy link
Hosting school/regional grassroots football tournaments	Various participants with a range of ages	<p>The new Women's and Girls' Training Centre provides the opportunity to host various grassroots tournaments once a month.</p> <p>These will be linked to key campaigns, e.g., the Godwin Lawson tournament which diverts young people at risk of gang violence away from crime.</p>	<p>On two half days each month a different school or other group will be hosted at the Training Centre.</p> <p>Approx 60 participants will receive 3 hours of access each month</p>	As above.



Note continued

Promoting healthy lifestyles

Activity	Target group	Description	Potential Delivery hours	Policy link
Women's Football	Walking Women aged 40+	<p>Targeting inactive females in a safe and fun environment. The aim is to create opportunities to participate in football – often for the first time – as well as socialize. Outcomes include improved physical and mental wellbeing.</p> <p>This programme is delivered across Enfield in various locations, but the new Women's and Girls' Training Centre provides the opportunity to host 4 half day sessions a year</p> <p>A total of 25 participants will take part in each session</p>	100 participants will take part in 4 hours of coaching each year 400 hours	<p>This programme targets inactive adults which is a priority set out in Enfield's Joint Local Health and Wellbeing Strategy 2024 – 2030.</p> <p>Pillar 2 of the 'Population Health' approach outlined within the strategy is 'Lifestyles and behaviours'.</p> <p>59.7% of Enfield adults are overweight or obese compared with 55.9% of the London average</p>



Quod

James Beynon

James.beynon@quod.com
0113 245 1243

Capitol Bond Court
Leeds
LS1 5SP