

Advice on objecting to the Planning Application by Spurs for Whitewebbs Park.

More specific guidance and suggestions will be available in the FOWW newsletter, on www.whitewebbspark.org.uk and on posters, maps and printed material in the park, by the café.

An appeal is under way against the ruling in the recent Judicial Review . This quote from the judgement may be worth quoting in planning objections where reference is made to public access and community use of the facilities.

“...in my view, it is clear that football academy and training facilities [...] are not facilities which, to any significant degree, will be accessible to the public for recreation. The football training facility will be primarily focused on the development of emerging and elite professional footballers in a highly managed programme operated by a long established and successful premier league football club. The opportunity for members of the public to access that facility for recreation are likely to be very limited and subsidiary to that principal purpose.”

Planning applications affecting Whitewebbs Park

Currently there are two planning applications

1. **Ref. 24/01012/NMA | Non-material amendments to Conditions 1,5,8, and 16 of planning permission 17/01178/FUL to deliver a revised access route along the eastern and southern part of the site. | Land To The South Of Whitewebbs Lane & West Of Hotspur Way Enfield EN2 9AP .**

Work on this appears to have started already—trees have been removed and fencing lines extended even though the application has not been approved and the time for comments has not expired 16th May

2. **24/00987/FUL | 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 cafe 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. | Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2**

The first application seems to make the assumption that the main planning application for Whitewebbs Park is going ahead and *“The proposed changes have been subject to pre-application discussions whereby it was agreed that they are non-material in nature. The enclosed NMA is submitted concurrently with a separate, full planning permission for a new female training centre and public parkland on the former Whitewebbs Golf Course.” Preparatory work has started , it appears without waiting for permission.”* Legal but presumptive.

Objecting to a Planning Application

- 1. Look up the details of the Planning application on the Council's website.** Go to Enfield.gov.uk, scroll down a little and click the "Find a Planning Application " button. On that page you can click the [online planning register](#) link and /or click the online user guide link (Not the clearest guide I've ever seen)
On the register page you can search using an address (Hotspur Way for Spurs or Whitewebbs Park / Lane) or the reference no. if you know it e.g. 24/00987/FUL. You can also use the weekly/monthly lists tab which can be filtered by ward and date e.g. Whitewebbs Ward month April 24
- 2.** The first is a small application with a few maps and a covering letter. The direct link is <https://planningandbuildingcontrol.enfield.gov.uk/online-applications/applicationDetails.do?keyVal=SBOIM1JNK1O00&activeTab=summary>
- 3.** The second is a much larger application with about 150 documents attached. This is the direct link. <https://planningandbuildingcontrol.enfield.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=SAYPT2JNJZ900>
We will have to focus on certain aspects of the application so it is not necessary to read every document—see below for more guidance
- 4. Making an objection.** Enfield insists that all objections and comments are made through the planning web portal. Emails and letters will not be accepted. . Please make your views on this known to Councillors.
The more objections there are, the better BUT
the general advice is that petitions are a waste of time and carry no weight. Standard "Template" letters should be avoided. Objectors should use their own words, these will carry much more weight. (Chat GTP can help)
Council Officers and the Planning Committee will, by law, only look at Planning Issues. There is little point in putting in points that are irrelevant to planning. No comments on the Council, no libel or abuse (whatever you may feel)
- 5. What can we object to?**
 - A. Significant change to the landscape.** The construction of the pitches will make a major change to the park landscape. The land will be levelled in the pitch area (about 40 acres). Fencing and bunds (earth barriers) will disrupt views across the park. Important views (see Local Plan) Southwards from Whitewebbs Lane will be blocked by fencing and planting. The openness of the parkland will be restricted by the pitches and the tree planting programme.
THFC will argue that the planting of trees will hide the pitches and the changes in the landscape but that is not the point. The lease is for 25 years, any such landscape changes will be forever.
The character of the area around the Lake will be seriously affected by the proposed access road for the Carvery. Traffic will disturb the peaceful atmosphere. It will disturb the wild life and the nesting birds and it will be a danger to pedestrians.
 - B. Deviation from the Local Plan.** We are in a difficult position, the previous Local Plan is well out of date. The Council can argue that the draft Local Plan currently under discussion is their reference point for planning decisions. This is why we have been objecting to certain aspects of the Local Plan—see below for details. We should be supporting the importance of views from Whitewebbs Lane looking southwards across Whitewebbs.

C The proposed development is out of character—it will impose an industrialised form of leisure in an open landscape. THFC will argue that the golf course did the same thing but we can point to the fact that this was open land and a public course. It could also be asserted that the Public Golf Course was intended as a temporary measure to help with park finances with a view to it being returned to public open space in due course. The tree planting proposals will change the character of the park and disrupt the open spacious views from Beggars Hollow car park northwards.

While previous work by the applicant could be considered irrelevant it might be worth referring to the fencing and surrounds of the existing training ground.

D. Views— the Local Plan does not protect the views northwards from Beggars Hollow. Friends of Whitewebbs have objected to this in the Local Plan response. It does value the views southwards from Whitewebbs Lane across the park. The wording is vague about the viewpoints but the only possible ones are between the King and Tinker and the existing Spurs ground, from the footpath. FOWW have included quite specific details of these views and locations in the Local Plan response. Any fencing proposed by Spurs will severely interfere with these views. Spurs in their planning application has chosen viewpoints from public footpaths that deliberately obscure views across the park. Details of these are in the additional guidance sheets.

E. Access to the park, externally and internally.

1. There is no provision for **parking** at the Northern end of the park. Currently there is a carpark. Spurs claim that it is used for anti social behaviour. This will limit access to the Northern part of the park.

2. **Bridleways and Rights of Way** may not be taken into account in planning but Spurs has included specific references and concerning omissions. Only the two North South Bridleways are statutory. The planning application refers to the one on the Eastern side of the Park. This will be used by horse riders, pedestrians and cyclists. There will be a hardened surface for cyclists alongside the softer surface for horses. Riders, cyclists and pedestrians might want to consider the safety implications of this.

3. The Planning Application is far from clear about the **permissive paths and permissive bridleways**. Maps are not consistent. There does not appear to be a commitment to enhancing the permissive East /West bridleways on the leased area. There is only provision is for a footpath along the Northern edge of the lease area. Within the lease area there are only two footpath "enhancements", both designed to lead people away from the pitch area.

F. Ecology. Ecological objections must be evidence based. Spurs have included reports from various ecological consultants in their application. These must be countered by evidence based arguments, proving that the consultants' reports are in error or have omitted important factors.

G. Spurs have chosen to include their **consultation programme** in the Planning Application. Their evidence is selective and partial with just over a hundred respondents. Friends of Whitewebbs conducted their own survey with over 750 respondents. The details were published on whitewebbspark.org.uk and made available to Spurs. As Spurs has raised this area we should be able to submit the FOWW survey results, including the comments to the Planning Committee.

H. Traffic—the principal concern is the traffic that will be generated on the new access road to the Toby Carvery. This will disturb the peace and quiet of this area for both wildlife and people. It is an important change in landscape and character and should be highlighted in responses

What we cannot object to within the planning process:

1. The impact of construction work while it is in progress—traffic, mess, noise, disruption.
2. Lands ownership (This is subject to a separate legal action)
3. Rights of Way, covenants—these have to be dealt with separately.
4. The morality of the application
5. The motives of the applicant
6. Any profit to be made by the applicant
7. The behaviour of the applicant
8. Concern about any future development of the site

The Process

The Council may decide that the planning application can be dealt with by Officers under delegated powers. Unlikely but possible We must ask our Councillors to ensure that this does not happen.

Objections and comments must be submitted by way of the web portal. We are pressing for a change in this. The Council says that people without equipment or IT skills can use facilities at local libraries. Please protest about this.

The statutory period for objections and comments ends on 31st May but they can be submitted up to the time of or just before the planning committee meeting.

At the Planning Committee meeting

“Members of the Planning Committee must take decisions on behalf of the community as a whole. Much is often at stake in the process and opposing views are often strongly held by those involved. Whilst members of the Planning Committee should take account of those views, they must not favour any person, company, group or locality, nor put themselves in a position where they appear to do so. “

Lobbying members of the Planning Committee. There is a code of conduct for the Planning Committee on the Council’s website. Every local authority has its own guidance. If lobbying by email or other means is done then the same letter should be sent to all members of the committee, to the applicant and to the planning officer.

If you wish to speak at the hearing contact the planning office but it is likely that you will be limited to 3 minutes and only one speaker from a particular interest group will be allowed.

If the application is turned down the applicant can appeal. The same right does not apply to objectors. Legal challenges can be made but only on points of law (Judicial Review) Judges cannot overturn a planning decision properly made.

In really exceptional circumstances a decision can be called in by the Secretary of State