



Historic England

[REDACTED]
London Borough of Enfield

Your Ref: 24/00987/FUL
Our Ref: 220832

Contact: [REDACTED]
[REDACTED]

07 May 2024

Dear [REDACTED]

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023**

Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

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

Recommend Pre-Determination Archaeological Assessment/Evaluation

Thank you for your consultation received on 18 April 2024.

The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77315] Whitewebbs Hill, Bulls Cross and Forty Hill

This is a large-scale development on greenfield land within an Archaeological Priority Area and close to Forty Hall Tudor Palace scheduled monument. Our concerns relate to both impact on archaeological remains and historic landscape. We would therefore expect a planning application to be supported not just by an archaeological desk-based assessment as suggested in this submission but also by a thorough understanding of the historic landscape and a field evaluation.

GLAAS's 'risk model' establishes that large-scale development in such a location has a generally high risk of harm to heritage assets of archaeological interest, many of which remain to be discovered by survey and field evaluation. In the absence of such evaluation, or indeed any previous archaeological study of the land in question, it is only possible to conclude that there is insufficient information to make an informed judgment of the harm likely to be caused.

The proposals include the creation of high-quality football pitches and related works for the training ground which will require extensive earthmoving with little scope for preservation of archaeological remains or historic landscape features. The nature of works in the landscape around the training ground is unclear but could involve landscaping or tree-planting that could harm archaeological remains.

The development could also provide positive opportunities for historic landscape restoration with related public access and interpretation which should be explored prior to application.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary.

NPPF paragraphs 205 - 208 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 209). Conservation can mean design changes to preserve remains where they are.



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NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.

If preservation is not achievable then if you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.

Recommendations

Having looked at this proposal and at the Greater London Historic Environment Record but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

Because of this, I advise the applicant completes these studies to inform the application:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

In view of the large area covered and lack of previous investigation a trial trench evaluation is necessary. Previous land use as a golf course probably precludes reliable use of geophysical survey.

Historic Landscape Survey

A Historic Landscape Survey can be used to identify the chronological relationships of the elements of a landscape to one another. By interrogating these relationships a relative chronology can be built up. This information can be used to frame further research, to inform site management or as the basis for public presentation.

It was previously recommended at pre-application stage that the DBA be refined to include a consideration of the site's historic landscape character, which has not been included in the document submitted in support of this application. As such, an addendum should be constructed for the existing DBA which discusses the development of the landscape in detail and the opportunities this may afford.



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I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

[Redacted signature]

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



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[Redacted contact information]

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