

Consultee Form (PRO-FORMA):



Consultee Department: Heritage	
Officer Name (consultee):	[REDACTED]
Application Reference:	24/00987/FUL
Address:	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
Description of development:	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.
Date:	15/05/24
/Date(s) of previous comment:	

IMPORTANT: This consultation does not consider the impact upon below ground archaeological remains. If advice on below ground archaeological remains is required, please consult the [Greater London Archaeological Advisory Service](#).

Relevant Policies:

[Planning \(LB&CA\) Act 1990](#)

- Section 16(2)
- Section 66(1)
- Section 72(1)

[National Planning Policy Framework 2023](#)

- Section 16 – Conserving and enhancing the historic environment

[London Plan 2021](#)

- HC1(C)

[Enfield Development Management Document 2014](#)

- DMD 37 – Achieving High Quality Design-Led Development
- DMD 44 – Conserving and Enhancing Heritage Assets

[Enfield Core Strategy 2010-2025](#)

- Policy 31 – Built and Landscape Heritage

Guidance:

[Making Enfield: Heritage Strategy 2019-24 \(June 2019\)](#)

[Enfield Local Heritage List \(May 2018\)](#)

Conservation Area Appraisal (2016)

Conservation Area Management Proposals (2016)

Assessment:

Having regard for the information submitted the following initial advice is provided. This identifies areas which require clarification; areas where further information is required; and, minor suggestions to improve the scheme.

Clarifications:

- Confirmation is required that the new access arrangements to Toby Carvery are acceptable to Highways. Until the design of the new access is finalised an accurate assessment of harm cannot be made. In particular, details such as width, material and lighting need to be agreed.
- New gates are proposed beside the North Lodge and South Lodge. Please clarify the rationale for these being formed of two parts rather than a single gate (which would be preferable). Please also confirm arrangements for their opening and closing.
- There are also inconsistencies within the documents with the Design and Access Statement identifying FT1 and AC4 as the two floodlit pitches.
- Not all plans including new areas of hedging are labelled. Please can drawings be updated to show that all new hedging beyond the inner boundary of the secure line will be mixed native species (i.e. hawthorn, black thorn, field maple, holly etc.) – I believe this aligns with the applicant's intention. This will help maintain a rural character and avoid an overly manicured or urban appearance.
- Information is required to show how vehicles will be prevented from parking along the new access road to the Toby Carvery.

Additional Information:

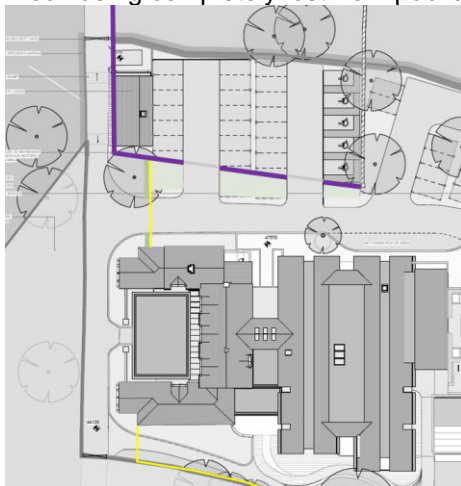
- Further details are required of the approach to conserving and restoring Conduit House. This should include archaeological excavation, evaluation and presentation in partnership with community groups. Further information is also required on how the heritage asset will be managed with regards to access and continued maintenance. A detailed scope of works to conserve the building is required for weight to be attributed.
- During pre-application discussions, the applicant was asked to provide further details of the approach to conserving the former Stable Block (northern clubhouse). A public benefit cannot be attributed to 'restoring' the Stable Block if details of what is proposed are not provided. For example; will the windows and doors be replaced? Will the fabric need to be upgraded to improve thermal performance? Are there defects which will be addressed? A detailed scope of works to conserve the building is required for weight to be attributed.
- During pre-application discussions, the applicant was asked to include large scale details of the junction between the courtyard infill extension and the former stable block so that the impact of the intervention could be fully assessed.
- During pre-application discussions, the applicant was asked to reference the heritage value / significance of the interior of the former Stable Block. This is a missed opportunity to demonstrate a heritage-led scheme which avoids harm and maximises conservation.
- Further details are required of the approach to restoring the fish pond. A public benefit cannot be attributed if details of what is proposed are not provided.
- The Light Spill Assessment and Landscape & Visual Impact Assessment do not appear to consider the effect of sky-glow on important views such as from Forty Hall (including the Ferme Ornee). This should include consideration of cumulative effects in combination with the Men's Training Ground.
- During pre-application discussions, the applicant was asked to consider views from the Ferme Ornee at Forty Hall. In particular this viewpoint should explore the visibility of structures (including floodlights) together with a night time assessment.
- During pre-application discussions, the applicant was asked to consider the kinetic experience of travelling northward along the southern driveway. The need to test this view was first raised in September 2023. In particular this viewpoint should explore the impact of topographical alterations together with boundaries, floodlights and ball stop fences. These should be winter views and not include mitigatory tree planting which has been identified as harmful to the historic parkland character.
- During pre-application discussions, the applicant was asked to include two east-west footpaths which followed the route of the New River (Old Course) to better reveal its significance and realise important heritage benefits. The alignment shown does not quite follow that of the former New River, the rationale for this is required. It is also unclear how these connect with existing footpaths and whether the scheme will contribute to upgrading footpaths beyond the red-line boundary to realise a consistent New River path which connects to the Flash Lane Aqueduct to the west and the Dowcra Aqueduct to the east.
- The number of trees proposed for planting within the parkland will erode rather than reinforce the open character of the historic parkland. During pre-application discussion, the applicant was advised that their landscape strategy

should reinforce the historic parkland character and that this should be evidenced through the study of maps and photos to understand how the parkland character has evolved over the past two centuries. They were also advised that if there is a requirement for additional trees to mitigate those lost, these may need to be accommodated through a contribution for off-site planting (E.g. Enfield Chase).

- During pre-application discussions, the applicant was advised that The Landscape Management Plan should, at a minimum, be a 25 year vision to match the length of the negotiated lease and reinforce its historic character through legacy planting and routine maintenance.
- The application proposes that the design of the parkland will be confirmed post submission through the Landscape Management Plan. Given the complexity of the parkland to deliver heritage, ecology, arboriculture, SUDs and landscape mitigation *and* enhancements not including a detailed landscape proposal at application stage is concerning and makes it difficult to assess whether there is sufficient mitigation and determine what weight to give to any enhancements. Whilst the approach to understanding the landscape and planning for its management within the LMP is generally agreeable, this work should have been completed prior to the application being submitted. The current approach could impose constraints upon a future LMP by approving a scheme which has not been informed by a thorough analysis. For heritage, this would include the study of maps and photos as well as the existing landscape forms and features to understand how the parkland character has evolved over the past two centuries.
- The LMP specifies planting of new parkland trees to provide habitats for certain butterflies. It should also specify specimen trees which should be planted to reflect the parkland's heritage, for example specimen trees such as the Wellingtonia's.
- During pre-application discussions, the applicant was asked to curate a holistic heritage strategy for interpretation across the landscape – including areas beyond the red-line boundary – to assist in stitching together the heritage of the landscape. This would result in a significantly greater public benefit compared against a limited number of information boards explaining individual heritage assets. This approach goes hand in hand with the design intention presented to the Design Review Panel of improving wayfinding across the wider landscape to create a series of walks (e.g. a '5km easy route', or '3km accessible route' etc.). Information on the strategy together with funding is required.
- Blocking up the existing layby, introducing a new mixed native species hedge along Whitewebbs Road and improving the footpath could result in a heritage benefit to the Forty Hill Conservation Area. There are, however, limited details on the landscaping in this area to give weight to this potential benefit.
- Heritage is not adequately addressed within the Landscape Management Plan. For example, 4.1.5 and 4.2.8 simply states "periodic condition surveys". This does not include all the heritage features within the landscape which require periodic inspection, does not set an expectation of how often they will be inspected, or how any remedial actions which may be undertaken. Without further information it is difficult to assign weight to the long-term conservation of heritage features as a public benefit.

Suggestions:

- Increasing the area of grass between the historic driveway and the parking spaces would result in a greater enhancement.
- Including trees within the hedges to the east of the Southern Clubhouse will help screen vehicles from view and result in a greater enhancement.
- Rebuilding a section of the former walled garden (in purple below) would result in a much greater heritage enhancement. This would also allow the reinstated wall and building line to become the secure line (yellow below); provide an opportunity to introduce a discreet security lodge built into the new wall; and stop the former Stable Block being completely lost from public view.



- Omitting pitched roof which links the former Stable Block and new block would improve the visual separation of the two with the flat roof element providing instead a more contemporary link.
- Introducing cattle grazing in a similar manner to those at Forty Hall would assist with managing the parkland as well as realising other non-heritage related benefits.