

LB Enfield

FAO: Planning Support

By email only

09 May 2024

**Planning Practice Guidance Paragraph: 003 Reference ID: 37-003-20140306**

**Application Reference:** 24/00987/FUL

**Site:** WHITEWEBBS PARK GOLF COURSE (CLOSED)

**Proposal:** 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[...] 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 etc.

**Sport England Reference:** PA/24/L/EF/67450

Thank you for consulting Sport England on the above application.

**Summary**

Sport England welcomes these proposals to provide improvements to the Whitewebbs open space and the opportunity for the local community to have access to an elite training academy that will provide new facilities for women and girl's professional football.

However, due to the permanent loss of the Whitewebbs public golf facility, Sport England objects to these proposals as we require more information before we are satisfied that the application complies with NPPF paragraph 103 (bullet point c) and London Plan Policy S5 C (3) that require that the benefits of the development clearly outweigh the loss of the former use.

**Sport England – Non Statutory Role and Policy**

The site is not considered to be playing field therefore Sport England does not consider this proposal requires a statutory consultation with us, under the terms of the Town and Country Planning (DMP) (England) Order 2015. However, it is

considered to be a development where consultation is advised under the terms of National Planning Policy Guidance Para. 003 Ref. ID 37 003 20140306.

Sport England assesses this type of application in light of the National Planning Policy Framework (NPPF) and against our 3 Planning for Sport Objectives; protect, enhance, provide. Further information on the objectives and Sport England's wider planning guidance can be found on this website: <http://www.sportengland.org/planningforsport>

### **The Proposal and Assessment against Sport England's Objectives and the NPPF**

The proposal is for a football training centre (principally for Tottenham Hotspur women's team) and an area of parkland. Prior to its closure in 2021 the site was an 18 hole public golf course.

### **National Governing Body comments**

As part of our assessment we have contacted the relevant sport national governing bodies. A copy of their comments is set out in the attached annex and summarised as follows;

England Golf objects to the loss of the course and highlights that a needs assessment / supply and demand assessment has not been carried out for this area and the applicant has not evidenced that the public golf course isn't required in this area.

The Football Foundation, commenting on behalf of the Football Association, comment that they have no objection to the facility. However, they advise the following;

- The pitch layouts may not meet the FA's recommended pitch size dimensions (including run offs)
- The plan for the changing rooms does not include details for showers/WCs and any space for officials
- No plan is provided of the sports lighting. Pitches should provide an averaged maintained level of 200lux, with uniformity >0.6.
- The Section 106 Heads of Terms reference 'a community based programme of access, coaching and activities, to be developed further during the determination of the application'.

## **Strategic/Local Need for the Facility**

As highlighted by England Golf, it is unfortunate that a needs assessment was not undertaken before closing the golf course. England Golf advise that there aren't any other municipal courses nearby which are generally considered entry level courses that are accessible for all levels of golfer. They advise that they would object to the proposal.

Sport England consider that before closing the public golf course a needs assessment should have been undertaken. We request that officers at the council meet with Sport England and England Golf at the earliest opportunity to understand whether further losses of any golf facilities are being considered within LB Enfield, how best to meet the current and future needs of the borough's golfers and what improvements can be made to Enfield's golf offer to ensure that there is an entry level course for new golfers.

It is further highlighted that the application does not contain an assessment which clearly shows the golf course is surplus to requirements, would be required for compliance with NPPF Paragraph 103 (a) of the NPPF and London Plan Policy S5 (1) (see assessment section below).

The requirement to provide training facilities to support a women's professional football team and academy is set out in the applicant's statement but limited detail is provided regarding the arrangements for community access to these facilities to fully secure sports related benefits for the local community.

The proposal to provide a public park on the remaining area of the golf course is welcome but few details have been provided about the sport and recreational benefits the park will provide. The benefits include upgrading the existing path network and converting the existing clubhouse building to provide a café and public toilets.

## **Active Design/availability for community sport**

It is intended that a large area of the former golf course will remain a public park, with access to members of the general public permitted all year round.

We consider this element to be in line with some of Sport England's Active Design principles, which aim to promote activity through the way we design and build our towns and cities this will be further strengthened by including appropriate supporting infrastructure such as the proposed conversion of the former golf clubhouse to provide a café and public toilet facilities and the

upgrading of walking and cycling routes within the park. Sport England ask that paths and infrastructure within the park are made accessible to all including those who are unable to use stairs.

Sport England's Active Design [guidance](#) highlights ten principles that contribute to providing an active environment. These include providing a network of open spaces, providing activity infrastructure and also activating spaces to create an active environment. Sport England consider that without additional sport and physical activity infrastructure within the Whitewebbs park, there will be a missed opportunity to activate this public open space and fully realise its benefits for the whole community. Active Design includes case studies that exemplify the principles. Please see page 25 for the example of Sowerby Park & Sports Village, North Yorkshire where the publicly accessible space contains a range of different sport and recreation uses. Sport England requests more information that demonstrates the sport and recreational benefits of the proposed park.

To outweigh the loss of the former golf course, currently used as open space, Sport England requests more information about the community access to the planned football training facilities. Sport England notes the comments from the Football Foundation and we would like further information about what this community access will entail and how it will be secured for the future and in perpetuity.

We note that the hours of use of the sports lighting will be curtailed to only 12 hours, finishing at 8:30PM and we are concerned that this will reduce the number of hours this site could potentially be used by the community in the evening.

## **Assessment**

Sport England acknowledges the concerns of England Golf and the loss of the golf course and considers that the Council should have undertaken a needs assessment before the decision was made to close the golf course.

With reference to paragraph 103 (a) of the NPPF and London Plan Policy S5C(3), the application does not contain an assessment which clearly shows the golf course is surplus to requirements and it is understood that the applicant is not seeking to comply with this part of the policy. Nor is the applicant seeking to replace the golf course with equivalent provision in a suitable location (NPPF paragraph 103 (b)).

Sport England welcomes these proposals to provide improvements to the Whitewebbs public open space, including the permanent provision of a publicly accessible park for Enfield residents with new footpaths and cycleways and ancillary facilities with a new café and public toilet facilities.

We further support the provision of a new football facility to support the growth of women and girls' football as well as the opportunity for the local community to have access to the facilities at an elite training academy.

However, we are concerned that in addition to the loss of an entry level golf facility, the proposals include the loss of part of what was a publicly accessible sports facility (the public golf course) to private use (the football club training facilities).

As currently presented Sport England considers that this proposal does not meet paragraph 103 (c) of the NPPF and London Plan Policy S5 C (3) which states;

*'the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'*

This bullet point is consistent with the SE objective to provide new sports facilities (Planning for Sport Objective 3).

As highlighted in the sections above, we require more information about the sport and recreational benefits that will be realised on the remaining public open space. We also require more information about community use of the private training facility and the proposed community based programme of access, coaching and activities at the Tottenham Hotspur Academy, so that we can be satisfied that the proposal complies with policy as explained above.

### **Sport England Position:**

In light of the above, Sport England objects to this application based on the information so far presented. We are prepared to review this position if further/amended details are provided (see section below).

### **Potential to overcome the objection**

We may withdraw our objection if the applicant provides;

- more information about the sport and recreational benefits associated with the new park, including details of the access arrangements, whether any new sports and recreational facilities are proposed within the park (e.g. trim trails, circuit to support Park Run, BMX track, tennis courts etc.) and details of how activity in the park will be supported.
- details of the community use of the football facilities that will be included within the Section 106;

- the provision of updated plans showing in more detail the changing room layouts that are intended to support community sports provision and confirmation that the new football pitches comply with the FA's relevant design guidance; and
- a plan showing the proposed sports lighting on the grass pitches.

It is unfortunate that Sport England were not engaged at pre app stage on this application as many of the points above could have been addressed then.

Please note that this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

If you would like any further information or advice, please contact me.

Yours sincerely,

[Redacted signature]

[Redacted contact information]

## Annex National governing body comments

### *England golf*

England Golf would object to the proposed loss of the golf course. We believe as there hasn't been a needs assessment / supply and demand assessment carried out for this area and it is difficult to evidence that golf isn't required in this area.

Whitewebbs Golf Course was previously an 18 hole parkland Municipal public golf course, designed in 1932 and was closed by LB Enfield council in 2021 and has since been used a park/open space open space for walkers, runners, dog walking, nature lovers, horse riders and cyclists. There aren't any other municipal courses nearby which are generally considered entry level courses that are accessible for all levels of golfer. Whitewebbs would have been more of a pay and play option so would have had less members than commercial or members clubs.

There are 6 other 18 hole affiliated golf clubs other than Whitewebbs in the LB Enfield authority within 5 facilities: Hadley Wood GC, Hadley Wood Artisans GC, Crews Hill GC, Bush Hill Park GC, Enfield GC and Trent Park GC.

### *Football Foundation on behalf of the Football Association*

The Design and Access Statement (DAS) outlines the development, including:

- Demolition of the Northern Clubhouse to provide a football training centre,
- Restoration and enhancement of the landscape,
- Modifications to the Southern Clubhouse (inc café, community room, toilets and parking,
- Construction of grounds maintenance building (inc housing the Turf Academy).

The applicant, Tottenham Hotspur FC (THFC) were identified as the preferred bidder for improvements to Whitewebbs Wood, including consideration of community benefits, sustainability and viability.

THFC Women are currently located on the Western Field on a temporary basis. This proposal therefore provides a permanent facility, located adjacent to the existing men's facility.

Given that the proposal does not impact on, or prejudice the use of, any current community accessible football facilities, the Football Foundation and Middlesex FA have no objection.

We would however welcome additional information with respect to:

### **1. Pitch dimensions, design and specification.**

The pitch dimensions shown deviate from recommended pitch sizes. Furthermore, reference in the DAS makes comparison to minimum dimensions, and deviance from these, rather than recommended dimensions. Specifically:

Pitch AC1: stated as 105m x 224m area providing equivalent to three grass pitches. We would encourage a detailed plan be shared detailing the individual dimensions of each of the four pitches shown, including run offs.

Pitch AC2: provides a 105m x 68m pitch, plus additional training area. The plan doesn't state whether dimensions are inclusive of run off. The recommended dimensions for an open age 11v11 pitch are 100m x 64m (106m x 70m including run offs).

Pitch AC3: provides a 100m x 64m pitch. The plan doesn't state whether dimensions are inclusive of run off. The recommended dimensions for an open age 11v11 pitch are 100m x 64m (106m x 70m including run offs).

Pitches AC4 and FT1: provides a 105m x 68m artificial pitch. The plan doesn't state whether dimensions are inclusive of run off. The recommended dimensions for an open age 11v11 pitch are 100m x 64m (106m x 70m including run offs). Specifics of the design; including surface type/specification, fencing, goal storage/recesses, infill loss management (including perimeter barriers, drain filters, stamp mats, boot brushes, equipment storage etc.) are not provided.

Pitch AC5: provides a 70m x 50m pitch. The plan doesn't state whether dimensions are inclusive of run off. The recommended dimensions for a 9v9 pitch are 73m x 46m (79m x 52m including run offs)

Pitch AC6: provides a 60m x 40m pitch. The plan doesn't state whether dimensions are inclusive of run off. The recommended dimensions for a 7v7pitch are 55m x 37m (61m x 43m including run offs).

Pitch FT2 provides a 105m x 64m pitch, plus additional training area. The plan doesn't state whether dimensions are inclusive of run off. The recommended dimensions for an open age 11v11 pitch are 100m x 64m (106m x 70m including run offs).

Where pitches are adjacent, and additional 2m of space (in addition to each 3m run off) providing 8m separation is required.



## **2. Ancillary facilities.**

All ground floor changing rooms provided meet or exceed open changing space requirements. The detail within the plan however doesn't show the configuration of WCs or showers (including whether open showers or cubicles) and would therefore be welcome. It is recommended that open showers are avoided.

It is not evident which facilities would be used for officials' changing, or whether there is the intention that the venue is for training only, and that officials' changing would therefore not be a requirement.

## **3. Floodlighting.**

We would welcome sight of a detailed floodlighting plan for the two floodlit pitches. Pitches should provide an averaged maintained level of 200lux, with uniformity >0.6.

## **4. Community Access/Impact**

The planning documentation makes frequent references to managed community use of the facilities, and increased pathways into football; including within the DAS and the Planning Statement.

Whilst we recognise and support the primary football objectives of providing the club with high quality training facilities for elite football, we also welcome and encourage the reference to community opportunities.

Notably, the S106 Heads of Terms commentary references "a community based programme of access, coaching and activities, to be developed further during the determination of the application".

Middlesex FA would welcome further engagement to understand the detail behind the community based programme of access, and to provide support in the design and development of these opportunities for the betterment of local football and local communities whether in relation to access to on site facilities, or opportunities for the proposed Turf Academy to support local organisations/clubs/pitches in providing better quality provision to the community via off site impact.