



Planning application reference – 24/00987/FUL

Background

An application was submitted to the London Borough of Enfield for the property Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2.

for consent to carry out the following works:

“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.”

Executive Summary

Whitewebbs Park Golf Course is currently a disused facility, which permanently closed in 2021 and was leased by Enfield Council to the applicant. It is within Whitewebbs Park, which has various tree constraints throughout that include Veteran, mature and semi-mature trees of high quality, as well as woodland compartments situated to the west and east of the site.

The proposal has been subjected to various pre-application meetings with formal responses submitted by the Local Authority to assist in informing the final pitch layout and to mitigate against any potential impacts to retained trees and other features within the landscape. The finalised layout shows a collaborative approach between Arboricultural, Urban Design, Landscape and Heritage and through these discussions allowed for the retention of various category A trees as well as further protection for Veteran and Candidate Veterans within the site extent. There are still some concerns with the scheme, however, these are outlined below.

Comments and recommendations

As part of this application, an Arboricultural Impact Assessment has been submitted by The Tree and Woodland Company to inform design and operational planning throughout the duration of the development.

In total there have been 1677 trees/tree groups surveyed that have the potential to form a constraint on the successful implementation of the proposal. There were 92 category A, 741 category B, 743 category C and 101 category U trees/tree groups. Category A and B trees are material considerations in the planning process and removal should be discouraged, unless there is sound design rationale that demonstrates exemplary circumstances where they cannot be retained. No category A removals are proposed to facilitate the proposals, which is encouraging given the high visual amenity benefits they provide in the locality as well as their long retention span of 40+ years.

A veteran tree survey (TWC-1352-R-005) has been undertaken, which shows that within the whole site there are several surveyed trees identified as veterans (VT1, VT2 (T265), VT3 (T52), VT4 and VT5. As stated within the National Planning Policy Framework

'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists'

The development in its current form does not require the removal of any veteran trees, however there is the potential for direct and indirect impacts from the various operations throughout the site. These impacts are discussed later in this report.

Due to the significance of the site, each compartment will be discussed separately so that concerns or additional mitigation can be addressed on an individual basis.

Northern Clubhouse and Pitches

To allow for the development of this area there will be the requirement for the full removal of 22 category B trees, 46 category C trees, 5 category C tree groups and 19 category U trees as detailed within table 5 of the report. These are predominately early mature trees consisting of Oak, Ash, Hornbeam, Horse Chestnut, Lime, Field maple, Birch, Norway Maple and Scots Pine.

It is noted that there is a tree located adjacent to T4 on the west, which has not been plotted or surveyed in relation to the development. It has been earmarked for removal with no justification within the document, or no root protection area (RPA) shown on any plan. In addition, there are inconsistencies with T6 (early mature Hornbeam), T104 (Early mature Ash), T107 (mature Ash), T159 (mature European Lime) and T160 (early mature Horse Chestnut) in the report drawings and in the Arboricultural site plan drawing WPTC-F3A-ZZ-EX-SC-A-089402, as well as within section 4.6 of the AIA. As such, confirmation will be required as to whether these trees are to be retained and any other inconsistencies addressed on all arboricultural plans. The retention of these trees affects the impacts of this compartment. It is our professional opinion that they can be retained alongside the development with no justification for their removal provided at present.

There have been 39 trees and 24 groups identified with potential impacts within their root protection areas. These include root exposure, footpath construction, attenuation ponds as well as service, drainage, and lighting runs. Trees can be impacted by construction works through root severance, changes to the root environment, compaction through the movement and storage of plant, damage through harmful construction practices, contamination due to spillage of fuel or other materials, unsympathetic facilitation pruning, and direct damage to the stem and crown. It has been stated within sections 4.11-4.36 in the report that methods will include the use of Cellweb 3D cellular confinement, ground protection and arboricultural supervision as a few examples. These methods are acceptable; however, a comprehensive Arboricultural Method Statement will be required to ensure that there is a full working methodology available to show how each retained tree/tree group will be protected throughout the duration of the development.

T52 Veteran is at risk from this proposal as it is situated with adjacent pitches proposed to the west and south on the border of its RPA. Veteran trees can be impacted by construction and operational activities through direct and indirect operations that include but are not limited to, damaging or compacting the soil, changing the water table or drainage. These can affect their condition and long-term retention potential as well as the wildlife they support. As such, strict guidelines within a comprehensive protection strategy should be in place throughout and this should be demonstrated within any future Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP).

CV1-38 have been identified as candidate veterans within the site. Although not yet displaying all the necessary features to be considered veterans, it is important that they are afforded the same level of protection as their retention will mean the succession of the irreplaceable habitats they provide. In this section, there are expected impacts to T142 and T146 with the pitch and footpaths being located on the edge

of the RPAs and so consideration for any excavations or disturbance adjacent should be outlined and mitigation measures implemented. The AIA has stated the use of a no dig construction solution, and this is supported, but it would also be expected for a construction exclusion zone and a detailed working methodology to be shown on any subsequent documents.

T147 candidate veteran will be a constraint on the construction of the proposed northern clubhouse building because of entry into its RPA. As this area is currently grass it is anticipated that there could be a large volume of roots within the area of construction and the use of sheet piling will cause for the severing of 9% of the tree's rooting volume. In addition, this tree is already colonised by *Ganoderma spp.* fungal fruiting bodies around the base and so any further disturbance could likely lead to a decline in the tree's condition. The severing of the roots as well as the colonisation strategy of *Ganoderma* puts the rooting area of the tree at risk. Therefore, before this application can proceed further, investigation into the severity of the decay, extent of the rooting area and implications of root loss will be required. Recommended methods for this include trial holes and/or root radar for the rooting area and sonic tomography through an Arbotom or PICUS to assess the tree's current structural condition. This information is required as the risk for potential removal will be high, if any evidence is found that puts the new occupancy at risk.

To summarise, for this compartment all mitigation measures proposed will require a full methodology within a comprehensive Arboricultural Method Statement with associated protection measures shown on a Tree Protection Plan. The risk of further decline to T147 needs to be explored through a full assessment of the impact prior to determination.

Southern Clubhouse

This compartment has had 16 trees and 4 groups recorded as having the potential to form a constraint on the implementation of the scheme. It will require less removals than that of the northern clubhouse and pitches with T217 (category B), T218 (category C) and T222 (category U) specified as requiring removal to facilitate the construction. However, the design has not fully incorporated the current tree stock suitably within the proposed revised layout, seemingly with no justification for the removal of T217. Given that the tree a category B, the proposed layout should incorporate it, or provide sound arboricultural justification as to why it cannot be retained. It would be acceptable to remove T219 (Cat C) to allow for the retention of the T217 as well as enabling a larger area for developing and this option should be explored by the design team.

There is no objection for the removal of T218 as it is not a material consideration in the planning process, and it is also majorly suppressed by the presence of T217 which gives greater visual amenity benefits within the landscape.

Other trees to be impacted will be T216, T219, T220, T223-T226, T228 and G52 for the construction of new footpaths and tracks. It has been stated within the AIA that the methodology will include the use of Cellweb 3D cellular confinement, ground protection and arboricultural supervision. However, more detail will be required through the submission of an Arboricultural Method Statement with an accompanying Tree Protection Plan to show that all retained trees will be suitably protected throughout the duration of the scheme.

In summary, for this compartment there is no objection towards its implementation providing that the comments in relation to T217 are adopted or arboricultural justification that shows its requirement for removal is submitted to the Local Planning Authority.

Historic Access

Within this area, there have been 109 trees and 6 groups recorded as part of the tree survey. Of these, there are 31 category A trees, 27 category B trees/tree groups, 42 category C trees/tree groups and 15 category U trees/tree groups. The AIA has stated that to allow for the facilitation of the footpath that there will be the requirement to remove 3 category C tree/tree groups and 12 category U trees/tree groups. There is no objection towards these removals as the category C trees are not a material consideration and the category

U specimens will require removal irrespective of the outcome of this application. There are expected impacts to 20 category A trees, 20 category B trees/tree groups, 30 category C trees/tree groups and 3 category U trees. The AIA has outlined suitable rationale to show how these trees will be protected throughout the duration of the development with the use of no dig cellular confinement specified alongside no dig within the area. In addition, the surfacing that will be used alongside the cellular confinement is permeable and so will not disrupt the physiological functioning of the specimens along the historic access through reducing any associated impacts that compaction of the soil would cause. This will allow for the veterans and other category A/B and C trees/groups to be less significantly impacted by the works, providing that the methods within an Arboricultural Method Statement, to be supplied pre-commencement, are installed.

Remedial works have been outlined to 33 tree/tree groups along the existing access with the majority of the works stated being access requirements or in the interests of health and safety to the users of the network through deadwood removal. There is no objection towards these works, however further detail within a detailed tree schedule will be required alongside the arboricultural method statement for review.

Existing Access and Walled Garden.

There is the requirement for the removal of 17 category U trees/tree groups within this compartment. These are necessary on health and safety grounds because of the increased occupancy of the area and so will require removal irrespective of this proposal and so are not objected towards. The removal of G67 (category C) has been stated as requiring removal to allow for the construction of the bellmouth and their removal is not objected towards as they are low valued specimens in the locality and not a material consideration.

As with the historic access, there has been suitable rationale applied within the AIA that will allow for these works to proceed with less significant impacts on the retained trees. As with the other compartments further detailed mitigation measures should be outlined with any subsequent Arboricultural Method Statement and Tree Protection Plan to show that the retained trees are being protected as required.

Remedial works to 12 trees/tree groups have been specified and these works are required for access and in the interest of health and safety. Therefore, they are approved subject to works being undertaken in accordance with BS3998:2010 'Tree works' by a suitably qualified Arborist and referenced in a Schedule of Works.

Replacement Planting

Overall, it is accepted that the removal of identified trees is necessary to allow for the installation of the pitches. However, mitigation planting should be sought to compensate this loss and the volume should be denoted by the landscape consultant for this scheme to ensure that a suitable volume is sought to compensate for the visual amenity loss in the area. It is noted that the species to be planted in the northern clubhouse and pitches compartment are Field Maple, Silver Birch, Hornbeam, Beech, Scots Pine, Wild Cherry, Common Oak, Rowan and Small Leaved Limes. However, from an arboricultural perspective, there has been no consideration towards the long-term establishment of these trees with poor spacing evident on the landscape masterplan. To allow for a thorough appraisal towards the replacement planting further detail on the locations of each individual specimen will be required and it is recommended for the species requirements to be reviewed using 'Tree and Design Action Group (TDAG)'s *Tree Species Selection for Green Infrastructure: A Guide for Specifiers* to enable for the key principles of 'Right Tree Right Place' to be adopted as part of the scheme.

There are no objections towards the replacements specified within the historic parkland and the increased planting within this area is encouraged. In addition, it will improve the species diversity within this section and enrich the wildlife benefits. It is recommended for any replacement planting to avoid veteran trees to prevent any unnecessary competition to these irreplaceable landscape features.

Tree Preservation Orders

As the useage of the site will be changing it is anticipated that there will be a likelihood of future pressure for removal on some trees. The trees at most at risk are those that pose the highest health and safety risks, which on this site, would mostly be, but not limited to, the veteran and candidate veteran trees. If these trees are not protected, permission to carry out any arboricultural works will not be necessary, leaving the trees at risk. Although outside the scope of this representation, it is highly recommended that a site TPO be applied at a minimum to trees that have been recorded as category A or B. This will minimise work to important trees and ensure no work can be carried out without consent. This will ensure long term retention of the important trees on site and can be dealt with under the Planning Heads of Terms.

Recommendations

It is recommended that a holding objection is placed on this application in relation to arboriculture. The impact that is anticipated to T147 (candidate veteran tree) goes against planning guidance. The NPPF seeks to protect such trees from any direct impacts resulting from a scheme but also from the future pressure resulting from changes in site use.

In addition, there are some disparities between removals within the AIA drawings and in the Arboricultural site plan drawing WPTC-F3A-ZZ-EX-SC-A-089402 as well as within section 4.6 of the AIA, which will require addressing for this scheme to progress further as at present a definitive view cannot be provided on the suitability for their retention/removal. These two issues must be addressed prior to determination as they are material considerations.

At present, it is likely that retained trees would also be adversely affected, both directly and indirectly and so an Arboricultural Method Statement will need to be provided to show how the risk of these impacts will be negated with further methodology in conjunction with the points raised within the AIA submitted for review. This can be done once the application has been determined, providing that the trees can suitably be protected.

The replacement planting should be updated to provide further detail on the locations of each individual specimen and it is recommended for the specie requirements to be reviewed using 'Tree and Design Action Group (TDAG)'s *Tree Species Selection for Green Infrastructure: A Guide for Specifiers*'

Despite this, there are some elements of the scheme that have been well considered and these elements do reduce the conflict between trees and the proposals. Once the additional conflicts have been addressed, it is deemed that the scheme would be acceptable in terms of the trees on site.

This advice has been provided by Place Services on behalf of the London Borough of Enfield.