The Woodland Trust
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[redacted]

Enfield Council
Civic Centre
Silver Street
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EN1 3XA

16th May 2024

Dear [redacted]

Reference: 24/00987/FUL
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, 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

Objection – loss and deterioration of veteran trees and ancient woodland

The Woodland Trust is the UK's largest woodland conservation charity and a leading voice in bringing to the attention of government, landowners and the general public the state of the UK's woods and trees. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters.

The Trust also campaigns with the support of local communities, to prevent any further destruction of ancient woods and veteran trees. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of a planning application.

Woodland Trust Position

The Woodland Trust **objects** to this planning application on the basis of loss and deterioration of veteran and notable trees and the potential loss and deterioration of ancient woodland from the proposed development. Our main concerns related to the following:

- Direct impacts on ancient woodland from works to access roads into the site.
- Direct loss of veteran trees to facilitate the proposed development.

- Deterioration of veteran trees through impacts on their root systems and rooting environment.
- Increased need to manage ancient woodland and veteran trees, resulting in loss of important habitat, such as deadwood.
- Fragmentation of ancient woodland and veteran trees and loss of open green habitat important for these habitats.

The ancient woodland in question is part of Whitewebbs Wood (grid ref: TQ 32816 99769) and is designated as a mix of Ancient Semi-Natural Woodland (ASNW) and Plantation on Ancient Woodland Site (PAWS).

The veteran and notable trees that we consider are likely to be impacted are detailed in the table below. Where possible, we have matched trees recorded by the applicant to records on the Ancient Tree Inventory (ATI).[1] In some cases we have not been able to identify whether the surveyed trees correlate to ATI records or where trees recorded on the ATI correlate to surveyed trees.

Tree no.	ATI no.	Species	Categorisation	Grid reference
T52	252014	Pedunculate oak	Veteran	TQ3326999417
T57	214514	Pedunculate oak	Dead (previous veteran)	TQ3334299403
T128	252239	Common ash	Veteran	TQ3305899456
T142	199443	Horse chestnut	Notable	TQ3301799737
T146	252242	Pedunculate oak	Veteran	TQ3295099521
T147	252241	Pedunculate oak	Notable	TQ3295099521
T180	252458	Pedunculate oak	Notable	TQ3287799205
T187	252459	Common lime	Veteran	TQ3290499362
T243	-	Pedunculate oak	Potential veteran	-
T244	-	Pedunculate oak	Potential veteran	-
T247	-	Pedunculate oak	Potential veteran	-
T258	252238	Pedunculate oak	Notable	TQ3273699712
T259	252236	Pedunculate oak	Veteran	TQ3273299728
T265	197050	Pedunculate oak	Veteran	TQ3275099640
T302	197064	Pedunculate oak	Veteran	TQ3273899555
T394	199446	Pedunculate oak	Notable	TQ3284599662
-	248212	Pedunculate oak	Ancient	TQ3291099572
-	197051	Silver birch	Veteran	TQ3272399611
-	197052	Pedunculate oak	Veteran	TQ3272399594
-	197053	Pedunculate oak	Veteran	TQ3270799590
-	197055	Pedunculate oak	Veteran	TQ3270999623
-	197057	Pedunculate oak	Veteran	TQ3271299604

Ancient and Veteran Trees

Ancient and veteran trees are irreplaceable habitats and afforded a high level of protection in planning policy. They possess unique features which provide a rich and diverse range of habitats, playing host to countless other species. In particular, many rare invertebrate, fungi and lichen species are dependent on the decaying wood provided by such trees[2]. Veteran trees are disproportionately valuable parts of the natural environment and where they occur

[1] http://www.ati.woodlandtrust.org.uk/

[2] https://www.ancienttreeforum.org.uk/wp-content/uploads/2015/02/ancient-tree-guide-6-special-wildlife.pdf

outside of woods they are also particularly important for landscape connectivity.[3] They are also an essential part of our landscape and cultural heritage.

Natural England's standing advice on ancient and veteran trees states that they "*can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats.*

"A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value.

"An ancient tree is exceptionally valuable. Attributes can include its: great age; size; condition; biodiversity value as a result of significant wood decay and the habitat created from the ageing process; and cultural and heritage value."

The Planning Practice Guidance (PPG) for Natural Environment[4] provides additional clarity on the status of ancient and veteran trees. It states: "*Ancient trees are trees in the ancient stage of their life. Veteran trees may not be very old but exhibit decay features such as branch death or hollowing. Trees become ancient or veteran because of their age, size or condition. Not all of these three characteristics are needed to make a tree ancient or veteran as the characteristics will vary from species to species.*"

As with ancient woodland, Government's '*Keepers of Time*' policy expresses the importance of ancient and veteran trees: "*Ancient and veteran trees are rich in biodiversity. They provide food, shelter and breeding sites to large numbers of species including birds, bats, fungi and insects, which are often restricted in their distribution. They can be found both inside and outside of woodlands.*"

Planning Policy

The National Planning Policy Framework, paragraph 186, states: "*When determining planning applications, local planning authorities should apply the following principles:-*

c) 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[67] and a suitable compensation strategy exists;"

Footnote 67 defines exceptional reasons as follows: "*For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat."*

There is **no wholly exceptional reason** for the loss or deterioration of veteran trees or ancient woodland from this development and therefore we consider it does not currently comply with national planning policy. The proposed loss of veteran trees contradicts the above policies unless clear evidence is provided to justify exceptional need.

[3] Ancient and veteran trees. An assessment guide. (woodlandtrust.org.uk)
[4] https://www.gov.uk/guidance/natural-environment

Regarding biodiversity net gain, paragraph 180 of the NPPF states the following: "*Planning policies and decisions should contribute to and enhance the natural and local environment by: minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*". Where an application involves the loss of irreplaceable habitats, such as ancient woodland or ancient and veteran trees, net gain for biodiversity cannot be achieved.

We note that the applicant's Arboricultural Impact Assessment states the following in paragraph 6.5: "*The National Planning Policy Framework (NPPF) 2023 assumes protection of all ancient woodland and veteran trees unless it can be clearly demonstrated that the need of, or benefits of, development outweigh the loss*." We would just like to make it clear that this reading of the NPPF is incorrect and instead reflects wording that was previously used in the NPPF before changes in 2018.

Impacts on Veteran and Notable Trees

The development in question is proposed within an area with a large population of old and important trees, as evidenced by multiple ancient, veteran and notable tree records on the Trust's ATI. While the applicant has made efforts to recognise veteran trees, it does not appear that they have fully recognised the veteran status of some trees and therefore it appears that a number of veteran trees will not be suitably protected.

Veteran features are not necessarily a product of tree age or size; they also develop as a result of a tree's life or environment. This is particularly emphasised within the PPG, in which the key characteristics of size, age or condition are considered separately. A key function of the term 'veteran' is to capture trees that have exceptional habitat value as well as those with cultural and heritage value. The term is not a true ecological grouping and serves to help us to identify trees which are important for biodiversity in their own right, and as part of a wider assemblage; veteran trees are important for the accumulation of features that are unable to be replicated within our lifetime.

Identifying and evaluating veteran features requires the application of knowledge, experience and judgement. It is not clear what methodology the applicant has applied in determining veteran status of trees on site. We acknowledge that government definitions do not provide precise, measurable parameters against which to easily recognise veteran trees. However, Natural England and Forestry Commission's standing advice[5], planning policy guidance, and expert reference texts do provide clear instruction that tree girth should not be used as the main qualifier for veteran classification.

This section will address the anticipated impacts of the development on veteran and notable trees on site. We have provided a table above of the trees we consider would be impacted by the development, however, further detailed is provided below about these specific trees.

Firstly, it is worth noting that trees are susceptible to change caused by construction / development activity. As outlined in *'BS 5837:2012 - Trees in relation to design, demolition and construction'* (the British Standard for ensuring development works in harmony with trees), construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed

[5] Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)

works on the scheme through the incorporation of the measures outlined in the British Standard.

This development will lead to a significant increase in human activity in the vicinity of the veteran trees. In turn this will increase the need to manage the veteran trees for safety reasons, whilst the proposed infrastructure and associated increase in footfall will impact on the root systems of these trees. Veteran trees typically feature significant deadwood habitat of great value for biodiversity, e.g. retained deadwood in the crown, broken or fractured branches, trunk cavities and wounds. As they age, the trees will inevitably shed limbs and branches, presenting a risk to their surroundings. As such, the health and safety risks associated with these trees will change and result in a requirement to manage them more intensively. This will lead to a loss of habitat from sanitisation of such trees through removal of deadwood, as well as the potential for consequential decline or need for removal.

Our concerns regarding the increased risk that veteran trees can pose when more exposed to human contact is supported by the guidance within David Lonsdale's 'Ancient and other Veteran Trees: Further Guidance on Management' (2013), which states in paragraph 3.5.2.1 *"…avoid creating new or increased targets: as happens for example following the construction of facilities (e.g. car parks or buildings) which will bring people or property into a high risk zone. Not only does this create targets, it also harms trees and therefore makes them more hazardous*". This is further supported by the BS 5837 guidelines referred to by the consultant, which state: "*particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development*" and that "*adequate space should be allowed for their long-term physical retention and future maintenance*".

Turning to specific concerns regarding trees detailed in the above table, tree T52 is on the eastern side of the development and appears to be located close to proposed sports pitches. The applicant recognises this tree as a veteran but has failed to afford it the necessary buffer zone in line with Natural England and Forestry Commission's standing advice, which states: "*For ancient or veteran trees, the* ***buffer zone should be at least 15 times larger than the diameter of the tree****. The buffer zone should be* ***5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter****. This will create a minimum root protection area [RPA]. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.*" Instead, the applicant has only afforded this veteran tree a 15m root protection area, which would not be sufficient to prevent adverse impact and would therefore affect the long-term vitality of this tree. In the same area, tree T57 is a large girth oak that has been listed as dead and recommended for monolithing. We would recommend that deadwood from this tree is retained in situ.

Tree T128 is a veteran ash tree in the centre of the site. Various forms of infrastructure and development are proposed around this tree, namely paths. The applicant has not recognised this tree as veteran despite significant veteran features and being listed on the ATI as veteran. We consider this tree must be properly buffered and protected, though it is not clear that this will be the case presently.

Similarly, trees T146 (a veteran oak) and T147 (a notable oak) are in the centre of the site and located close to new infrastructure and paths. The applicant does not appear to have recognised the veteran status of T146 and afforded it a suitable buffer. Therefore, this tree is likely to be subject to long-term deterioration and possible loss in the future. T147, while

notable, would have incursions into its RPA which will impact its vitality and long-term retention.

Tree T187 is a veteran lime in the centre south of the site. The applicant is proposing the felling of this tree due to health and safety reasons. Considering this tree is a veteran, which has not been recognised by the applicant, we would suggest that alternative solutions should be explored to retain it and manage its decline. Felling to ground level would constitute a loss of irreplaceable habitat.

The remaining trees of concern appear to be located close to access road to be used and upgraded for the proposed development. It appears there are two access points: the Tottenham Tottenham Hotspur Women Training Centre Entrance Road; and the Toby Carvery Customer Vehicular & Pedestrian Entrance Road. The latter appears to also be referred to as the historic access road and the former as the main access road. The upgrading of these roads could have significant impacts on a number of veteran trees.

Trees T243 (potential veteran oak), T244 (potential veteran oak), T247 (potential veteran oak), T258 (notable oak), T259 (veteran oak) and T265 (veteran oak) are all located in close proximity to the main access road. Trees T302 (veteran oak) and T394 (notable oak) are in close proximity to the historic access road. The remaining trees in the table (197051, 197052, 197053, 197055 and 197057) are ATI records that appear to be close to the historic access road also. The proximity of these veteran and notable trees to these roads is likely to adversely impact them in the following ways:

- Direct encroachment on their rooting system, including damage to and severance of roots.
- Impacts on rooting environment, resulting in soil compaction, reduction of nutrient availability, and hydrological soil changes.
- Increased need to manage these trees for health and safety reasons, which will inevitably lead to removal and reduction of important habitat features, such as deadwood.
- Potential for reduced vitality of trees and increased management that would lead to their earlier deterioration and likely facilitate the need for their removal.

We also make note of other notable trees on site that we believe need to be protected as much as possible to secure their long-term retention and ensure they are able to become veterans of the future. T180 (a notable oak) sits along a path leading to the southern clubhouse part of the site. It is not clear whether this path will require works and whether this tree will be affected as a result. T142 in the northern part of the site is a notable horse chestnut in close proximity to a proposed sports pitch. It is not clear whether the RPA of this tree will be safe from incursions.

Finally, there is one record of an ancient oak tree on the ATI (ref no. 248212) that appears to be located close to trees T146 and T147. However, the location of this tree on the ATI may be incorrect and we have not been able to identify this tree within the arboricultural survey. Any clarification from the applicant on the potential status of this tree would be appreciated.

Impacts on Ancient Woodland

As well as impacting veteran and notable trees, we are concerned by the impact of the proposals on ancient woodland. Ancient woodland within the development site is restricted

to the northwestern corner of the proposed development site and is part of the larger Whitewebbs Wood ancient woodland complex. It appears that the two access roads for the site, the historic access road and main entrance road would be constructed within ancient woodland. While we recognise that these roads both exist and are in use presently, further constructions works and additional removal of ancient woodland habitat (as detailed within the Ecological Impact Assessment) would constitute loss and deterioration of ancient woodland.

We consider that these impacts on the ancient woodland are unacceptable and alternative solutions are found that will not result in further impact on the ancient woodland.

Mitigation and Buffering

The applicant should ensure that the proposed works will not result in any detrimental impact on veteran trees or ancient woodland, in line with paragraph 186 of the National Planning Policy Framework (NPPF) and Natural England and Forestry Commission's standing advice. In particular, the standing advice states that:

"*Mitigation measures will depend on the type of development. They could include:-*

- *putting up screening barriers to protect ancient woodland or ancient and veteran trees from dust and pollution*
- *measures to reduce noise or light*
- *designing open space to protect ancient or veteran trees*
- *rerouting footpaths and managing vegetation to deflect trampling pressure away from sensitive locations*
- *creating **buffer zones**"*

We would refer you to Natural England and Forestry Commission's Assessment Guide[6] for Planning officers, to assist in making a comprehensive assessment of the potential effects of a development on ancient woodland and veteran trees when referring to the standing advice.

We consider that protections in line with veteran and notable trees should apply to these trees. While BS 5837 guidelines state that trees should have a root protection area of 12 times the stem diameter (capped at 15m), the guidelines recognise that veteran trees need particular care to ensure adequate space is allowed for their long-term retention. Natural England's standing advice on root protection areas for veteran trees states: "*For ancient or veteran trees (including those on the woodland boundary), the **buffer zone should be at least 15 times larger than the diameter of the tree**. The buffer zone should be **5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter**. This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.*"

We consider that where trees are deemed in need of works due to potential risk to people, then alternative measures to felling should be considered to remove the risk that the trees are expected to pose. Felling should be considered as an absolute last resort.

All veteran trees on site should be afforded an un-encroached buffer zone in line with the standing advice, as detailed further above. No development works should be undertaken within this area, to ensure no detrimental impact to the roots of the veteran trees will occur during either construction or operation of the development. Buffer zones for such trees

[6] Assessment Guide (publishing.service.gov.uk)

should be marked out with HERAS fencing to avoid incursions during construction and avoid adverse impacts, such as ground compaction from vehicles or stockpiles.

Conclusion

Veteran trees and ancient woodland are irreplaceable habitats and must be protected from loss, deterioration or harm. We also consider that, as likely veterans of the future, notable trees must also be protected and given proper consideration.

The Woodland Trust **objects** to this application on the basis of loss and deterioration of veteran trees and ancient woodland. While the application does largely avoid loss of veteran trees, certain features or proposals to remove such trees are not acceptable and alternative solutions must be found to avoid their loss or deterioration.

It is not apparent that the applicant has demonstrated that veteran trees on site will be retained and fully protected from detrimental impact and harm in line with paragraph 186 of the National Planning Policy Framework. The applicant should provide all veteran trees with an un-encroached buffer zone, protected during both construction and operation of the development. If this is not achievable, then the application must not be taken forward as it does not comply with national planning policy and government guidance designed to protected irreplaceable habitats.

We hope you find these comments helpful - if you would like clarification or further advice, please contact us at [redacted]

Kind regards

[redacted]
Programme Lead – Woods Under Threat
Woods Under Threat team