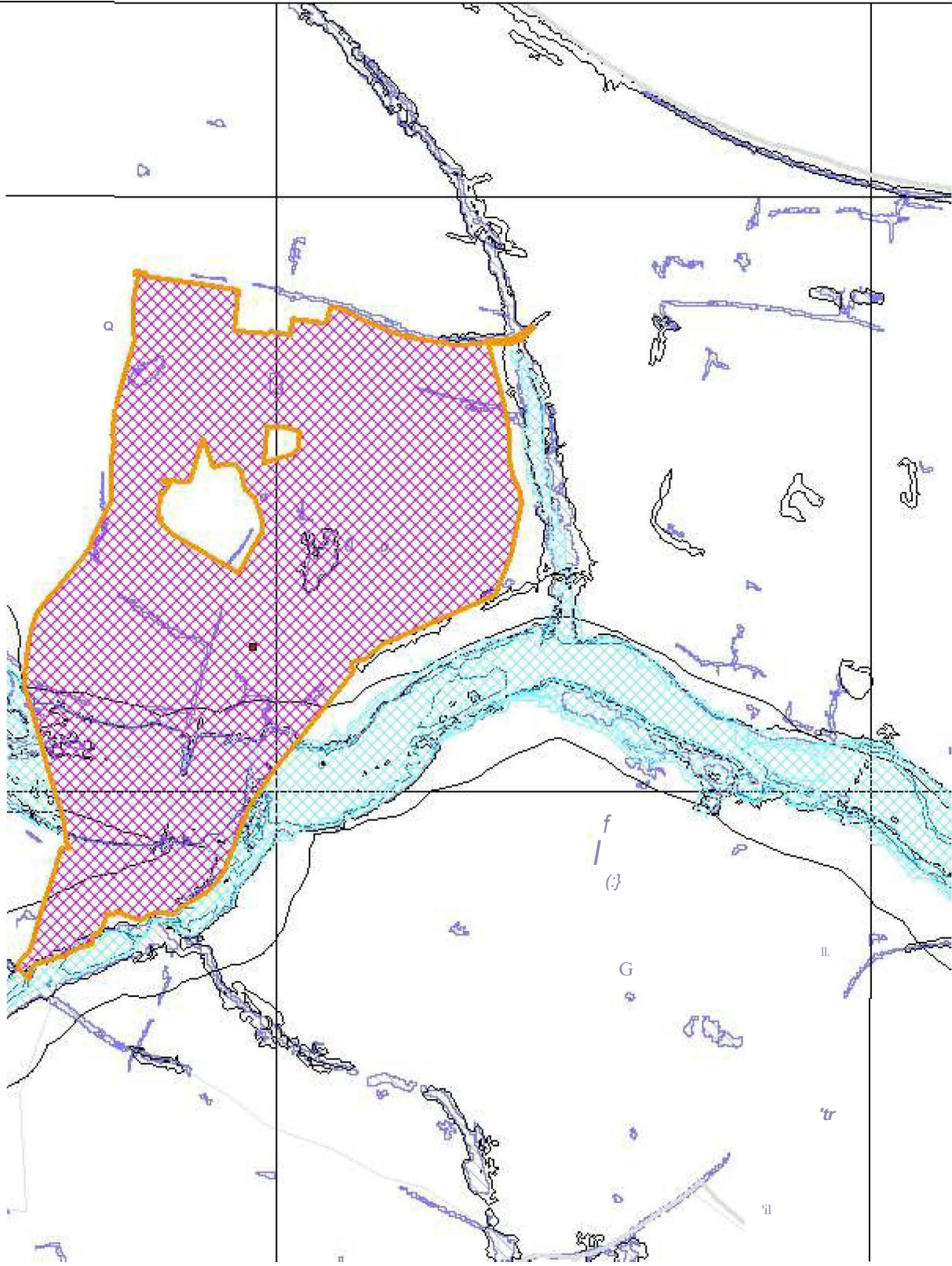


<b>PLANNING COMMITTEE</b>	<b>Date: 11 FEBRUARY 2025</b>	
	<b>Contact Officers:</b>  Planning Decisions Manager - Sharon Davidson Case officer - Samuel Wong	<b>Category</b>  Full Planning Application
<b>Ward – Whitewebbs</b>	<b>Councillor Request - No</b>	
<b>LOCATION:</b> Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2		
<b>APPLICATION NUMBER:</b> 24/00987/FUL		
<p><b>PROPOSAL:</b> 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.</p>		
<p><b>Applicant Name &amp; Address:</b> Richard Serra Tottenham Hotspur Football Co. Ltd Lilywhite House 782 High Road London N17 0BX</p>	<p><b>Agent Name &amp; Address:</b> James Beynon Quod Capitol House Bond Court Leeds LS1 5SP</p>	



## **RECOMMENDATION:**

1. That subject to the finalisation of a shadow S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Planning be authorised to GRANT planning permission subject to conditions and the referral of the application to the Greater London Authority and Secretary for Communities and Local Government.
2. That the Head of Planning be granted delegated authority to agree the final wording of the conditions and the shadow S106 to cover the matters in the Recommendation section of this report.
3. That the Head of Planning be given delegated authority to include any additional planning conditions or Heads of Terms to the shadow S106 requested by the Greater London Authority and/or Government body following referral of the application.

### **1. Note for Members:**

- 1.1 There is a separate Non-Material Amendment (NMA) application reference 24/01012/NMA, that is associated with this application. This NMA seeks an amendment to conditions 1, 5, 8 and 16 of planning permission 17/01178/FUL to deliver a revised access route from the existing men's Training Centre, along the eastern and southern part of the site. This application is recommended for approval.

## **2 Executive Summary**

### ***Background***

- 2.1 The application site comprises of the former Whitewebbs Park golf course, and adjacent land comprising an 18-hole "Pay and Play" municipal golf course with clubhouse, woodland and pasture, extending to approximately 52.97 hectares. Enfield Council is the Landowner of this area. The golf course had been operating at a financial loss for several years and required significant investment to compete with other local golf clubs and leisure facilities. In light of this, the Landowner decided in 2019 to market the area for lease by way of a 25-year tenancy.
- 2.2 In 2021, the golf course formally closed due to financial difficulties and through time a permitted change of use to open parkland has taken place. There are numerous features still present from the golf course use, including bunkers and the general extent of the fairways remain, with open grasslands. There has been no management of the site and consequently, many areas are more overgrown than others. The site is well used as open space by the local community for recreational purposes.

### ***The Proposals***

- 2.3 This Full planning application is made by Tottenham Hotspur Football Co. Limited (referred to as 'THFC'), to provide a new women's and girls' football training complex (Sui Generis) and the restoration of the parkland (Class F2), with enhancements and refurbishments of footpaths; the part demolition of the Southern Café to allow for refurbishment works and a new community hub facility, with public realm improvements. A historic carriageway will be reinstated, and there are other

improvements to parking facilities, security and the management of the parkland proposed, as well as significant tree planting and enhancement works.

- 2.4 The application site measures 52.97 hectares, and within this area 16 hectares is defined by the operational boundary for the proposed football training complex. There would be approximately 23 hectares that would see restoration works to the historic parkland area which will be accessible to members of the public. The remaining 12 hectares would be preserved as woodland and would see a number of enhancements to improve the quality of the woodland.
- 2.5 The proposals include the following:

Within the training centre operational boundary:

- Construction of 11 football pitches and associated infrastructure.
- Change of use, modification, and extension of the existing Northern Clubhouse to provide a football training centre (Sui Generis).
- Demolition of existing groundskeeper's building and construction of replacement grounds maintenance building.
- Construction of a gatehouse.
- Hard and soft landscaping works to include land reprofiling.

Outside the training centre operational boundary:

- Modifications and part change of use of the existing Southern Clubhouse to provide a replacement café, public toilets, a flexible community space measuring 57 square metres (Use Class F1/F2/Class E).
- Restoration and enhancement of parkland landscape, including new footpaths.
- Restoration of Whitewebbs Pond.
- Reinstatement of the Historic Carriageway in Whitewebbs Wood to form a new vehicular and pedestrian access to Whitewebbs House.
- Modifications to the existing vehicular and pedestrian access to the Northern Clubhouse and parking.

### ***Consultation & Engagement with residents and LBE***

- 2.6 The proposals have been subject to a number of pre-application workshops with LBE Officers and have been presented to The Enfield Place & Design Quality Panel. The proposals have evolved and revisions made following this engagement.
- 2.7 LBE has undertaken two statutory consultations for the application; the second consultation was required due to a request for amendments and further information in relation to the proposals. The consultation included letters being sent to 241 neighbouring properties. A total of 296 objections, 41 statements of support, and 3 neutral responses (expressing neither support nor objection) have been received for this application at the time of finalising this report. These numbers differ to those on the public online register, as comments received from the same individuals are not double counted. These responses are considered in detail within sections 6 and 8 of this report.

### ***Assessment Summary***

#### ***Green Belt***

- 2.8 The application site is located within the Metropolitan Green Belt and must be assessed in accordance with Paragraphs 153 – 106 of the NPPF (2024), London

Plan Policy G2; and Local Planning Policies DMD 82 and 89; Core Strategy Policy 33 and Emerging Local Plan Policies BG5 and RE1.

2.9 Development within the Green Belt is considered to be inappropriate, unless it complies with one of the exceptions identified in paragraph 154. Most of the proposals fall within the exception use defined in part b) of the NPPF set out below.

“b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.”

2.10 The principle of appropriate outdoor sport and recreational facilities in the Green Belt is ‘appropriate’ in Green Belt terms. However, there are elements of the proposals which result in either very low or low harm on the openness of the Green Belt, meaning that these elements are inappropriate and the resultant harm requires Very Special Circumstances (VSC) to outweigh this.

2.11 The resultant harm to the spatial, visual and openness of the Green Belt has been weighted as low. Whilst the impact on openness is low, harm to the Green Belt by virtue of inappropriateness and impact on openness must be given significant weight. An assessment of the VSC submitted by the applicant has been undertaken below, to ascertain whether the VSC outweighs the harm caused by the proposals.

2.12 The applicant has provided information to support the VSC case. When these benefits are considered cumulatively, officers consider they outweigh the harm caused to the Green Belt through inappropriate development and a loss of openness. In summary the VSC items are:

1. The need for an elite female football training facility is a relevant and compelling factor in support of the application, and **substantial weight** is afforded to the need.
2. It is acknowledged there are no other suitable sites within the 1km radius, which is considered sufficient, in the context of the clear co-locational benefits, which carry **substantial weight**.
3. The proposed programme directly promotes the participation of women and girls in sports and ensures that the proposed training facility is inclusive of the local communities. Officers consider this a significant factor in contributing to the VSCs that support the application and have afforded this **substantial weight** in the decision-making process.
4. Environmental and sustainability benefits (set out in section 8) have afforded this **substantial weight** in the decision-making process.
5. There are several health and social benefits (set out in section 8) derived directly from the proposals. These benefits have been given **substantial weight** in the decision making process.
6. There are economic benefits that arise during construction and during the operational phase. These benefits have been given **moderate weight** in the decision making process.

- 2.13 The proposal contains some inappropriate development. Therefore, the acceptability of the proposal as a whole is reliant on VSC meeting the threshold set out in the NPPF paragraph 153 *“when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*
- 2.14 The benefit items detailed (1 to 6 above) are considered in combination to constitute very special circumstances sufficient to outweigh the harm to the Green Belt identified

### ***Loss of open space***

- 2.15 The application site is designated as an area of Local Open Space and part of the site is within a Site of Metropolitan Importance for Nature Conservation (SINC) within the adopted development plan. Some weight is also afforded to the draft site allocation SA RUR.707 for nature recovery uses; professional sport, recreation and community sports/leisure uses, with ancillary related uses. Therefore, the proposal should be assessed in accordance with the relevant paragraphs of the NPPF; and LBE policies that relate to these site designations.
- 2.16 The proposal involves the change of use from the former golf course (Class F2), to use part of the site (16ha) for an elite female football training complex (Sui Generis). The proposal also includes the restoration of the remaining portion of the former golf course (23ha) to an historic parkland and preserves the existing 12ha of publicly accessible woodland.
- 2.17 LBE Parks & Leisure have reviewed and discussed at length the proposals with the applicant and provided a letter expressing their strong support for the application. The proposals would provide facilities to attract girls to engage in sport, which is identified by Sport England as having a 7% lower participation rate than boys under the age of 16. The applicant has also agreed to provide transportation from the eastern areas of the Borough to enable more deprived areas access to these elite facilities.

### ***Restoration of Parkland***

- 2.18 In assessing the quality of the proposed parkland, the proposal will restore and enhance 23ha of the parkland and preserve the existing 12ha of woodland. The plans include new paths within the parkland, which is a positive feature, as it will improve access and movement through the site. The application also includes the refurbishment of the Southern Clubhouse, with the provision of new public toilets, café, a new community room (57sqm), and improved landscaping and seating, which is another positive outcome of the proposal. The preservation and enhancement of the existing 12ha of woodland within the application boundary is also proposed. The applicant upon entering into a lease with the Council for the application site, will assume responsibility for managing the entire site for the duration of the lease period. Information about the parkland management is provided in the submitted Outline Parkland Management Plan (OPMP). The plan includes commitments within and beyond the application boundary, such as tree planting, landscape maintenance, community engagement, and collaboration with the Council to further enhance the park and surrounding woodland. A detailed Full Parkland Management Plan will be submitted before development commences for approval, this will be secured within the S106 legal agreement.

- 2.19 Officers have considered Policy DM71 and CS34 and the proposals comply with preserving and enhancing the quality and quantity of publicly open space, and the principle of the Elite Female Football Training Facility Use is acceptable.

### ***Design***

- 2.20 There has been substantial engagement at pre-application and application stages in relation to the design and appearance of the proposals. Policy CS30 has been reviewed in considering the ability of maximising public accessibility, keeping the operational boundary tight, whilst also seeking to protect high quality groups of trees. The layout of the pitches as such as been directly informed by the positioning of the tree groups, resulting in an unusual plan form. Officers requested amends to the initial proposals, which resulted in one of the drainage attenuation basins now being publicly accessible. Following many discussions on improving the elevational treatment of buildings; materials; layout and boundary treatment, officers raise no objection to the design of the proposals.

### ***Ecology and Biodiversity Net Gain***

- 2.21 There have been extensive discussions and engagement (both at pre-application and at determination stages) with the Council in relation to the information prepared to address the ecological and biodiversity sensitivities of the application site. At the request of LBE, new botanical, bat and bird surveys have been undertaken. The findings of these have been accepted. Measures are proposed within the Ecology Impact Assessment to protect species and there is no objection to the proposed development. This has been confirmed by both the Ecology Officer and within an independent audit report conducted to ensure that all information submitted by the applicant and representations received from the public were reviewed comprehensively.
- 2.22 In relation to the Biodiversity Net Gain (BNG), the submitted information confirms that there will be an increase in BNG, by around 30%, which is above the 10% statutory requirement. The long-term maintenance to secure the BNG uplift and ongoing management is secured both by planning condition and within the legal agreement. The ecological information provided by the applicant has been prepared in accordance with standard best practice and addresses the appropriate legal and policy requirements relating to habitats and species that could be impacted by the proposal. As such, considering the evidence, officers are satisfied that the proposals are not detrimental to the ecological significance of the site and comply with Enfield Core Strategy Policy 36 Biodiversity, and London Plan Policies G7 and G6.

### ***Trees***

- 2.23 The application is supported by an Arboricultural Impact Assessment (AIA) and a Landscape Statement. These have been reviewed and further information was requested both at pre-application and during determination, by the Tree Officer. The Tree Officer has confirmed that no Category A trees will be removed or harmed by the proposals. The proposed pitches and Northern Clubhouse require the full removal of 22 category B trees, 46 category C trees, five category C tree groups and 19 category U trees.
- 2.24 The proposed planting has been shown for this proposal on the Landscape Masterplan, which suggests in excess of 2000 new trees will be planted across the site to mitigate against the loss of all trees to facilitate the development.

- 2.25 Overall, the Tree Officer has confirmed that the application is acceptable from an arboricultural perspective and there is no objection to the proposed development, subject to the conditions requested.

### **Highways**

- 2.26 The Highways Officer has raised no objection to the proposed development. This follows lengthy discussions with additional information requested and submitted to address queries both at pre-application and during determination. Conditions and contributions will be sought to mitigate against the highway and transport impacts the proposals would have on the application site and surroundings.

### **Heritage**

- 2.27 Policy CS31 has been considered to pro-actively preserve and enhance all of the Borough's heritage assets. The Heritage Officer has engaged in lengthy pre-application and application discussions regarding the impact upon the heritage assets. The proposals result in '*Less than Substantial Harm*'. The Heritage Officer identifies the harm to some heritage assets and the benefit to some heritage assets. Overall, there is a net heritage benefit.

### **Scheme Benefits**

- 2.28 As assessed in the various sections of this Report, the proposal will deliver various benefits to the local area, which are summarised below (note this excludes the VSC benefits identified in para 2.12 above):

- **Enhancements to Heritage Assets:**
  - Preservation and enhancement of the conduit house.
  - Sensitive expansion of the Northern Clubhouse.
  - Reinstatement of the historic carriageway.
  - Preservation and improvement of the setting of South Lodge (Grade II listed) through the introduction of a new soft landscaping interface with the southern car park.
  - Creation of a Heritage Trail.
- **Providing buildings and public realm of high quality and good design:**
  - Provision of well-designed buildings and public realms, including the Northern and Southern Clubhouses and an attenuation basin.
- **Re-providing open space in the same locality and of better quality:**
  - Provision of open space in the same locality with improved quality.
  - Enhancements in the quantity and quality of publicly accessible routes.

### **Conclusion**

- 2.29 A detailed assessment of the proposals has been undertaken, taking account of the relevant policies and legislation and the response to the public consultation. On balance, taking account of the national Green Belt policies, the presumption in favour and the weight to be given to development, it is concluded that the proposed development for the reasons set out within this report, has demonstrated 'Very Special Circumstances,' and overall accords with the policies of the NPPF and Development Plan and other relevant material planning considerations including emerging policy.

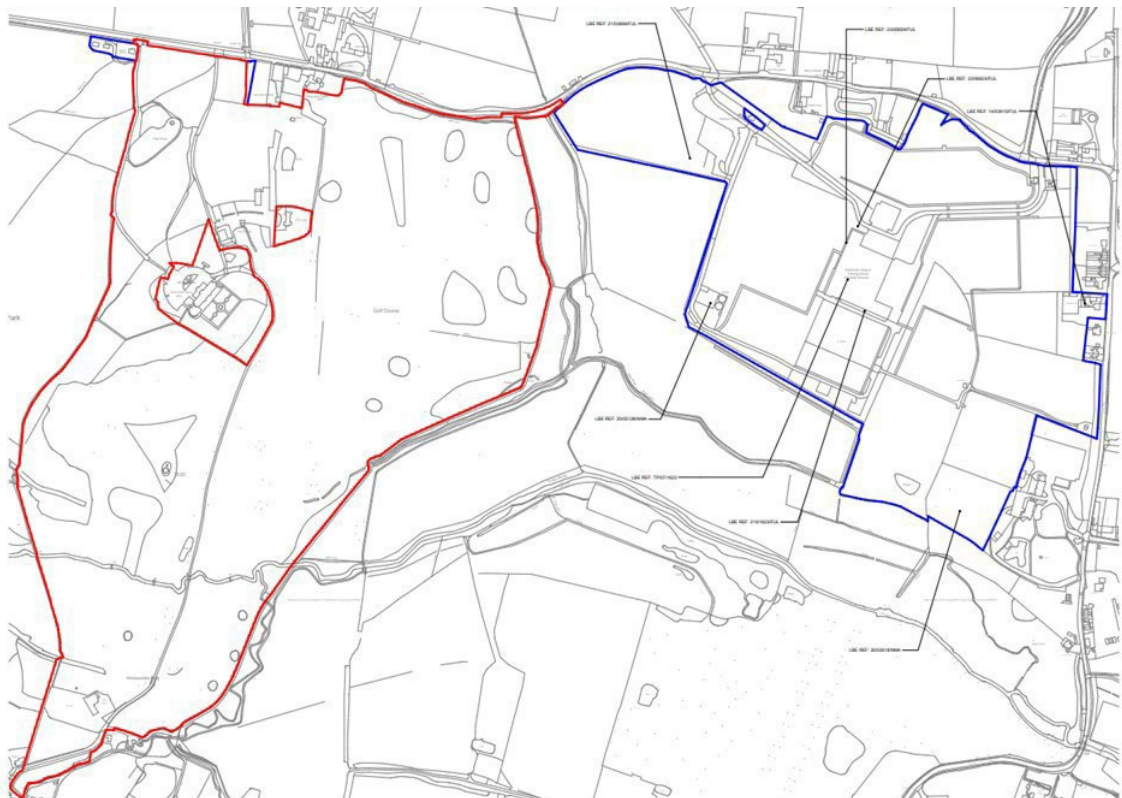


The application is therefore recommended for approval, subject to planning conditions, and contributions and obligations secured via legal agreement to mitigate the impacts of the development.

### **The Site**

- 3.1 The application site is situated at the Former Whitewebbs Golf Course, Beggars Hollow, Clay Hill, Enfield, Middlesex EN2 9HH. The site is located in the northern part of the London Borough of Enfield, within the Whitewebbs ward, and is rural in character.
- 3.2 The application site covers the Former Whitewebbs Golf Course (circa 41 hectares), which ceased operation in 2021. This also includes the Southern Clubhouse, the Northern Clubhouse, a groundskeeper's building, part of Whitewebbs Park (circa 12 hectares), and a highway layby which is currently the responsibility of the Highways Authority. Whitewebbs House and its associated parking area, currently occupied by Toby Carvery, together with a parcel of third-party land, is excluded from the application. Additionally, the private residential properties known as South Lodge and The Limes are located outside the application and remain in third-party ownership. **Figure 1** shows the location of the site (in red) and the wider land in the applicant's ownership (in blue) in relation to the surroundings.

**Figure 1 - Submitted Site Location Plan (Drawing Reference: WPTC-F3A-ZZ-EX-ST-A-089001)**



- 3.3 The site primarily consists of a large open space characterised by diverse vegetation, including grasslands, shrubs, and trees. The northwest of the site, which forms part of Whitewebbs Park, is densely vegetated and includes Whitewebbs Pond.

- 3.4 The Northern Clubhouse is a two-storey building associated with the former golf course, being the club house. It is constructed of red brick and grey tiled Dutch gable roof and is located in the northwest area of the site. It is a U-shaped building, with an entrance in the middle and two wings on its north and south. The building has been the subject of recent vandalism and is in a state of disrepair. To the east of the Northern Clubhouse is a groundskeeper's building, constructed of metal sheeting. Both structures are currently vacant.
- 3.5 The Southern Clubhouse is a single-storey, timber-clad building in a dilapidated condition. Its associated car park is hardstanding. Some outdoor seating is located to the southeast of the building and is currently used by the public, together with a temporary standalone café block and a standalone toilet block to the east of the Southern Clubhouse.
- 3.6 The application site also includes a section of highway layby, situated to the north of Dickens Trough Meadows, along Whitewebbs Lane. This layby is currently secured with concrete barriers and wooden bollards, as it has been subject to significant fly-tipping. It is understood that the layby is used for parking by personnel responsible for maintaining the beaver enclosure located within the Forty Hall Estate in Archer's Wood. An alternative access to allow the personnel to monitor the beaver enclosure is being provided from within the existing men's Training Centre.
- 3.7 Several watercourses run through and around the site. Turkey Brook, classified as a main river, is located to the east of the site, running from the east and meeting the southeastern boundary. Cuffley Brook, a tributary of Turkey Brook, meanders through the southern part of the site. New River (Old Course), classified as an ordinary watercourse, is situated to the east, partially flowing within the southern area of the site and forming part of its eastern boundary.

#### Access

- 3.8 The site is accessible via two vehicular access points: one from Whitewebbs Lane in the north, through a vehicular route leading to the Northern Clubhouse, and another from Beggars Hollow in the south.
- 3.9 The site contains several informal paths. One extends from the Southern Clubhouse into Whitewebbs Park, passing west of Whitewebbs House, continuing past Whitewebbs Pond, and eventually reaching Whitewebbs Lane near the North Lodge. One north-south path runs between the Northern and Southern Clubhouses, linking the two access points. There is a section of footpath located in the northern area of the site and east of the King and Tinker Pub.
- 3.10 There is one bridleway that runs along the eastern boundary outside the application site, from Beggars Hollow to Dickens Trough Meadow. It is designated as a Public Right of Way (PRoW).

#### The Surroundings

- 3.11 The site is bordered to the west by Whitewebbs Park woodland; to the north by Whitewebbs Road and agricultural uses; to the east by Dickenson's Meadow (which is in the process of being turned into a nature reserve by the Applicant); the existing Tottenham Hotspur Training Centre beyond; Archers Wood to the south east; and agricultural and residential uses to the south. Forty Hall Country Park is located to the southeast. The South Lodge and Clay Hill are located to the south and southwest. Whitewebbs Park and the North Lodge are in the west of the site.

3.12 The site and its surrounding area are situated within the Green Belt, with the predominant character being open countryside. This area mainly comprises parkland, agricultural fields, and sports grounds, contributing to a green and open environment. The site and its surroundings are also designated as Local Open Space and Whitewebbs Wood, a Site of Metropolitan Importance for Nature Conservation, partially overlaps the site, see policies map within the Enfield Local Plan.

Historic Environment

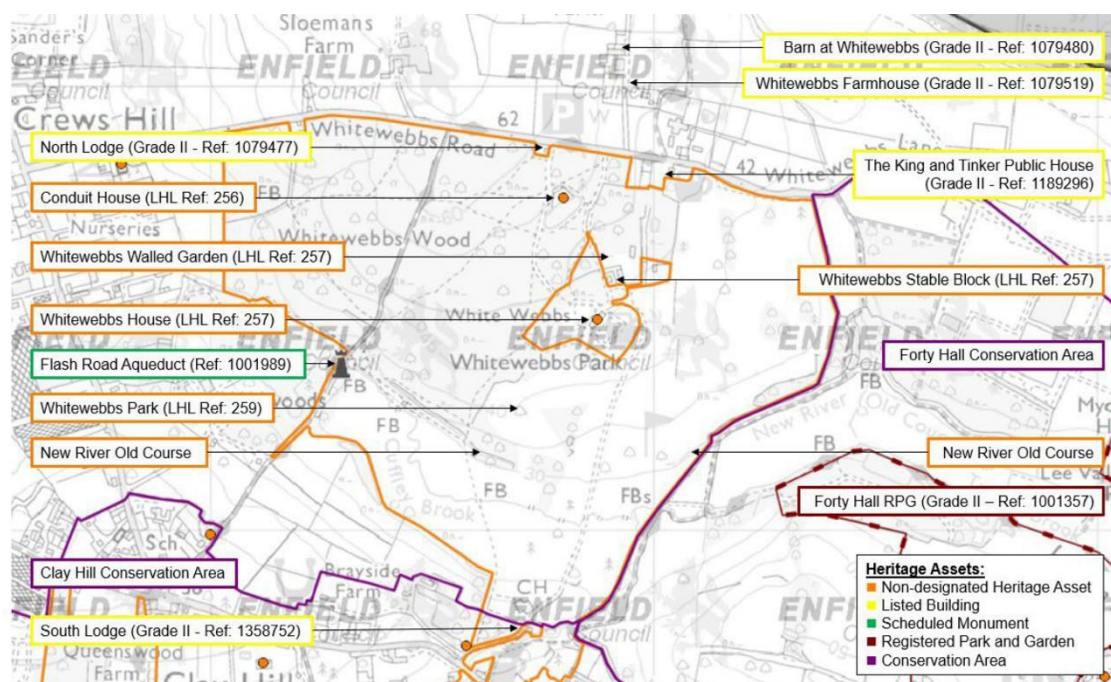
3.13 The application site and its surrounding area are known as Whitewebbs Park. It contains a public golf course (which has now ceased operation) and areas of woodland. The area was Enfield parish common land from 1777 and was then converted into a parkland in 1803, following the closure of the Enfield parish common land. In 1931 the estate was bought from Sir Duncan Orr-Lewis by Enfield Urban District Council and Middlesex County Council and made into the public golf course, which retains much of the parkland character.

3.14 Agnes and Stephen Wilford lived at Whitewebbs in 1543, and in 1570 a mansion of that name, was owned by Dr Robert Huicke, physician to Henry VIII. The house was reputed to have been one of the meeting places of the Gunpowder Plot conspirators. The old house was demolished in 1790. The present Whitewebbs House was built in 1791 by Dr Abraham Wilkinson, a notable agricultural improver.

3.15 At one time the New River, constructed in the early 17th century by Sir Hugh Myddelton, ran through Whitewebbs estate and was carried over Cuffley Brook in a cast iron aqueduct, built in 1820. However, the loop through Whitewebbs was abandoned in 1859, when work was carried out to straighten the New River. When the Whitewebbs loop of the New River became redundant it was turned into an ornamental lake.

3.16 The Council’s Heritage Officer identified a number of designated and non-designated heritage assets. Their details and locations are mapped in **Figure 2**.

**Figure 2 - Mapping of Identified Heritage Assets Provided by the Council’s Heritage Officer**



- 3.17 The application site is situated in a rich historic setting and there a number of non-designated heritage assets within the site:
- Conduit House, Local List Reference: 256
  - Whitewebbs Park, Local List Reference: 259
  - Whitewebbs Stable Block, Local List Reference: 257
  - Whitewebbs Walled Garden, Local List Reference: 257
  - Whitewebbs House, Local List Reference: 257
  - New River (Old Course)
- 3.18 There are a number of designated historic assets that have been identified as relevant to the context of the site:
- The North Lodge, a Grade II Listed Building
  - The South Lodge, a Grade II Listed Building
  - Barn at Whitewebbs, a Grade II Listed Building
  - Whitewebbs Farmhouse, a Grade II Listed Building
  - The King and Tinker Public House, a Grade II Listed Building
  - Clay Hill Conservation Area
  - Forty Hall Conservation Area
  - Forty Hall, a Grade II Registered Park and Garden
  - Flash Road Aqueduct, a Scheduled Monument

#### Former Whitewebbs Golf Course

- 3.19 The Former Whitewebbs Golf Course was an 18-hole, pay-and-play municipal golf course, with two clubhouses operated from 1932, until its permanent closure in 2021. The land is owned by the Council.
- 3.20 Prior to its permanent closure, the golf course had been operating at a financial loss for several years. In 2019, the Council, as the landowner, decided to market the site for lease by way of a 25-year tenancy. Following a marketing and tendering process, Tottenham Hotspur Limited was selected as the preferred bidder, entering into an Agreement for Lease in 2024.
- 3.21 The golf course was temporarily closed in 2020 due to the COVID-19 pandemic. Although golf activities were suspended, the site remained accessible to members of the public for walking and running. Since the permanent closure in 2021, the site was vacated but continued to be informally used as open space by the local community, for recreational purposes, including walking, running, and dog walking.
- 3.22 This Full Planning application was submitted by Tottenham Hotspur Co. Limited in March 2024, following the signing of the Agreement for Lease in January 2024.

## **4 The Proposals**

- 4.1 This Full planning application is made by Tottenham Hotspur Football Co. Limited (referred to as 'THFC'), to provide a new women's and girls' football training complex (Sui Generis) and the restoration of the parkland. The site as defined by the application boundary measures 52.97 hectares. Within this, an area of 16 hectares, is defined by the operational boundary, and is proposed as the football training complex. Approximately 23 hectares will be restored to historic parkland and accessible to members of the public. Approximately 12 hectares will be preserved as woodland.

**Figure 3** shows both the red line application boundary and the operational boundary of the training centre, as denoted by the yellow line.

#### 4.2 The proposal includes the following:

Within the training centre operational boundary:

- Construction of 11 football pitches and associated infrastructure.
- Change of use, modification, and extension of the existing Northern Clubhouse to provide a football training centre (Sui Generis).
- Demolition of existing groundskeeper's building and construction of replacement grounds maintenance building.
- Construction of a gatehouse.
- Hard and soft landscaping works to include land reprofiling.

Outside the training centre operational boundary:

- Modifications and part change of use of the existing Southern Clubhouse to provide a replacement café, public toilets, a flexible community space measuring 57 square metres (Use Class F1/F2/Class E).
- Restoration and enhancement of parkland landscape, including new footpaths.
- Restoration of Whitewebbs Pond.
- Reinstatement of the Historic Carriageway in Whitewebbs Wood to form a new vehicular and pedestrian access to Whitewebbs House.
- Modifications to the existing vehicular and pedestrian access to the Northern Clubhouse and parking.

**Figure 3 - Submitted Whitewebbs Park Proposed Site Plan (Drawing Reference: WPTC-F3A-ZZ-EX-GA-A-089004)**



## **Within the Training Centre Operational Boundary**

### Football Pitches

- 4.3 The application includes 11 football pitches of various sizes designed for different age groups. A diagram provided by the applicant illustrates how each pitch will be utilised. Two pitches measuring 106x68 metres, FT1 and FT2, will be for First Team players and follow the Football Association's minimum size requirements. Pitches AC1-6 comprise several pitches intended for Academy players aged 7 to 23. Pitch AC4 will have a synthetic surface, while the remaining pitches will be made of natural grass.
- 4.4 The football pitches are designed primarily for use by the First Team and Academy players and will not be accessible to the general public. However, the applicant has committed to offering football activity programs for schools and community groups. Pitches AC2 and AC4 will be available for use in these community programs, as well as rooms within the Training Centre for educational programmes. This will be secured in the legal agreement should planning permission be granted.

### Ancillary Infrastructure

- 4.5 Each grass pitch will be enclosed by 5-meter-tall ball stop fencing at the goal posts end, and 1.1-meter-tall pitch-side railings on one side of the pitch, opposite the dugouts. The synthetic pitch will be enclosed by a 3-meter-tall synthetic pitch fence.
- 4.6 Pitches AC2 and AC4, located in the northern section of the training facility, will each be equipped with six 21-meter-high floodlights, which shall be used for a maximum of 6 hours per day per pitch. No floodlights shall operate after 20.30 daily. This use will be restricted by condition (see **Appendix 1**).
- 4.7 The internal circulation routes to each pitch will be illuminated by low-level lighting bollards.
- 4.8 A 224 sqm pitch-side plant room is proposed, to house ground source heat pumps that will provide under-pitch heating. This plant room will be an earth-sheltered building, surrounded by banked earth and topped with a green roof. Defensive planting around the base will help disguise the building.

### Football Training Centre at the Northern Clubhouse

- 4.9 A Football Training Centre is proposed within the existing building. This will be extended with a two-storey rear extension of 1,950 sqm (Gross Internal Area), a single-storey infill at the courtyard of 122 sqm (Gross Internal Area), and a basement of 922 sqm (Gross Internal Area).
- 4.10 The infill will take the form of a glass box. The rear extension will feature English bond brickwork on the ground floor level and black timber cladding on the first floor. It will compose of two set linear blocks, with pitched roofs, which are connected by a corridor with a flat roof. The extension will be linked to the existing building via the reception space on the ground floor and via a link bridge on the first floor.
- 4.11 The proposed building will be accessed from an entrance on the north side, situated between the existing building and the rear extension. The ground floor will provide dedicated changing rooms, gyms, showers, toilets, and medical facilities for both THFC's First Team and Academy players, along with back-of-house areas, a reception area, and a crèche/parent lounge. The first floor will provide offices, dining

space, two classrooms, and facilities such as the kitchen and chef's office. The basement will accommodate a pool, additional changing rooms, laundry rooms and plant spaces, connected to a courtyard light well.

- 4.12 The existing car park at the Northern Clubhouse will be gated and is for THFC use. It provides 87 car parking spaces, including 6 accessible spaces, along with 30 cycle parking spaces. The car park will also include a pickup/drop-off area. There is another northern (public) car park, which will remain in public use with 10 car parking spaces. This will be enhanced with re-surfacing and CCTV security installed to improve safety of the users of the car park.
- 4.13 The proposed Northern Clubhouse will primarily be used by the First Team and Academy players and will not be publicly accessible. However, it will be partially accessible to participants of the community and education programmes, to be secured in the legal agreement. They will have access to two classrooms on the first floor, measuring 63 sqm and 54 sqm, which will be used for educational initiatives. Additionally, they will have access to two changing rooms, each equipped with showers, toilets, and lockers, measuring 52 sqm and 56 sqm.

#### Ground Maintenance Building

- 4.14 A Ground Maintenance Building (GMB) is proposed in the northeast of the application site, within a yard covered with hardstanding materials. This building will be used by THFC's ground maintenance team. It includes changing rooms, toilets, office space, and workshop areas.
- 4.15 The yard will feature hardstanding surfaces, two irrigation tanks, the GMB, 14 car parking spaces (including 1 accessible bay) with EV charging, 2 short-stay cycle parking spaces, 4 long-stay cycle parking spaces, and green waste management bays. The yard will serve as a storage area for ground maintenance vehicles and green waste management.
- 4.16 A sliding gate is proposed to the north of the yard, allowing ground maintenance vehicles (which are buggies) to exit and access the "operational link", which is further explained from paragraph 4.41 of this report.

#### New Gatehouse

- 4.17 A security gatehouse is proposed in the northwestern corner of the Northern Clubhouse car park. It is a small single-storey standalone lodge building, with a gross internal area of 33 sqm. Its external material and architectural details are designed to match with the proposed Northern Clubhouse.
- 4.18 The new gatehouse will be used by security staff who monitor and control traffic into and out of the facility. The building will provide a security office, a kitchenette, a storage room, as well as interior and exterior toilets.

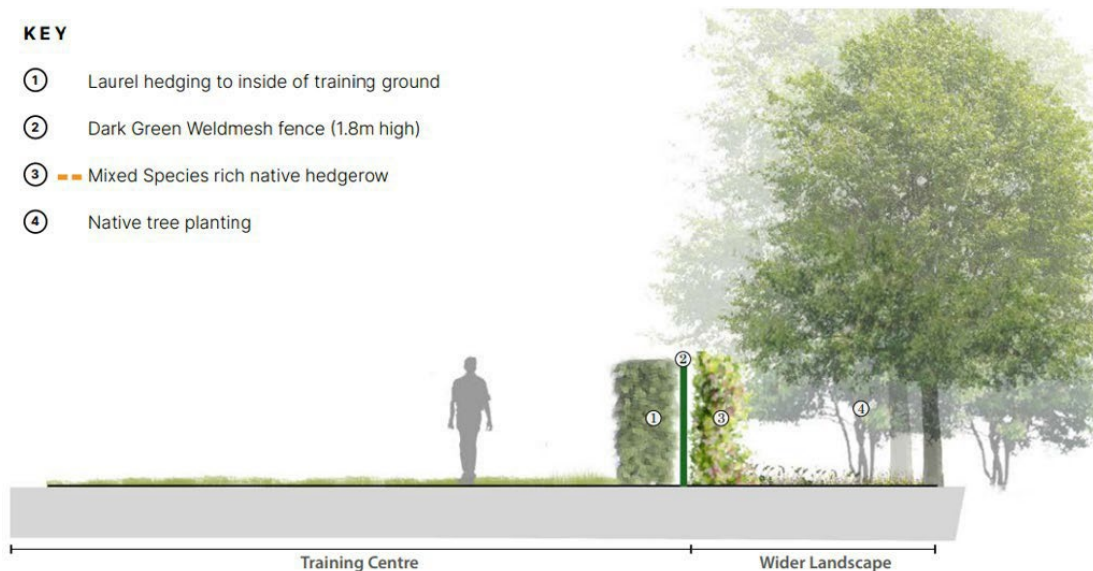
#### Ground works and Boundary Treatment

- 4.19 The proposal involves earthworks in the northern section of the application site to create level surfaces for the proposed football pitches. The existing site, previously used as a golf course, features an extremely varied topography, as shown on pages 15 and 16 of the Design and Access Statement submitted with the application.



4.20 The hard landscaping includes bound gravel, stone paving, street furniture, lighting, and signage. The boundary treatment includes fencing and planting proposed for the operational boundary and will consist of a “three-layer” structure, as shown in **Figure 4**. The inner layer features a laurel hedge inside the Training Centre, which is consistent with boundary treatment at the existing training facility and will provide a robust, evergreen boundary. The middle layer will comprise a 1.8m high weld mesh fence, which will be screened and reinforced by the laurel hedge. It maintains security and prevents animals from entering the facility. The outer layer will be mixed species native hedgerows, which aims to maintain a rural character and visually soften the appearance of the boundary.

**Figure 4 - Operational Boundary Treatment Section (From Figure 109 of the Submitted Design and Access Statement)**



#### Operational Hours of the Training Facility

4.21 The facility will be open for use by players and staff, being operational from 8am to 9pm, with 24-hour security.

#### **Outside the Training Centre Operational Boundary**

##### Café, Public Toilets, and Community Room at the Southern Clubhouse

4.22 The proposal includes demolishing part of the existing single-storey Southern Clubhouse building, the temporary café block, and the temporary toilet block, and the roofs. This building would be refurbished and is to be publicly accessible, used by local people and for community use when visiting the parkland.

4.23 The refurbished building will provide an 86sqm café, a 57sqm multifunctional community room, a ground maintenance store, and an office to be used by a park warden, along with publicly accessible toilets. The external materials of the building will be timber with glazing, and a dark zinc roof. Timber panels and timber louvres create a “pavilion” style building, that matches the character of Whitewebbs Park.

- 4.24 Outside the building, the external circulation route will be on a hoggin surface. A new raised deck will provide outdoor seating. Additional picnic tables will be placed on the grass nearby. Dog washing/cleaning taps will be situated around the building, and a community notice board (detailing community events) will be provided.
- 4.25 The community room (57sqm) is to be managed by the Tottenham Hotspur Foundation and run by designated community 'key holders.' This facility is new and is intended to be used by the local community for a range of activities, including sports, and any other educational and community related uses. The commitment to maintain, manage and allow for dedicated community use will be secured via the legal agreement.
- 4.26 The existing car park at the Southern Clubhouse is proposed to be upgraded. The proposed car park will be resurfaced, with permeable asphalt in place of the existing hardstanding. White-lined parking spaces will be provided, with each section divided by hedges. A total of 8 active EV charging points will be provided, with a further 8 charging points marked out for future provision. 95 car parking spaces will be available, with 6 accessible bays constructed on grasscrete. In addition, 4 long-stay cycle parking spaces and 28 short-stay cycle parking spaces will be provided. This will be a significant improvement compared to the current car park facilities.

#### Parkland & Landscaping

- 4.27 The parkland area outside of the training centre operational boundary has not been maintained over the last four years. The proposal includes restoration of the historic parkland, with extensive tree planting and new way finding signage.
- 4.28 A tree and woodland planting mixed plan has been submitted for this application. c.2000 new trees will be planted across the site as a whole; 231 new trees would be planted within the operational boundary (equating to a net gain of 115 trees), 241 new trees within the operational boundary and c.1,800 new trees within areas of new woodland. The landscape strategy comprises of four-character areas:
- New woodland areas (north of the training centre operational boundary) – includes the planting of new trees
  - Existing Whitewebbs Wood – management and enhancement of this woodland.
  - Restored parkland – new tree planting and grasslands to restore historic parkland setting.
  - Setting to southern café and visitor centre – creation of a new landscape area around the refurbished café and community room.
- 4.29 A Full Parkland Management Plan will be submitted to the Council for consideration and approval, setting out how the park will be managed and maintained. This will be secured through the legal agreement and will be monitored and reviewed by the Council annually for the first 5 years and then every 5 years thereafter for the lifetime of the development.

#### Drainage Attenuation Basins

- 4.30 There are two attenuation basins included on the east and southeastern boundary to the proposed Training Centre, to prevent on-site surface water flooding. One basin is within the training centre operational boundary (east) and the other (southeastern) is outside, allowing the public to access to this.

#### Public Accessibility in the Parkland

- 4.31 **Figure 5** shows all enhanced and new public access routes in the parkland, in and outside the application site.
- 4.32 Within the parkland area, the main pedestrian historic route from Whitewebbs House to the southern café, will be resurfaced using hoggin. There are also several footpaths within the application site that will be enhanced and resurfaced.
- 4.33 There will be five new footpaths created within the parkland. The permissive path, which runs along the northern boundary of the application site is to be formalised as a statutory bridleway.
- 4.34 The installation of 17 new wayfinding totems will be provided throughout the new and enhanced footpaths. Details of the signage will to be secured by conditions in **Appendix 1**. As well as new signage to assist in legibility, there will be new site furniture including seating and litter bins.

#### Historic Carriageway (Entrance 1)

- 4.35 The application proposes to reinstate an Historic Carriageway, from the North Lodge to Whitewebbs House (Toby Carvery). There would be entrance gates to this route, accessible in line with the opening hours for the Toby Carvery, designed to be sympathetic to the listed northern gate house. This route is primarily for customers visiting the Toby Carvery. This road surface would comprise no dig build up hoggin, which is sympathetic to the setting of the heritage assets, and a permeable material. Replacement kerb edging and low-level lighting bollards (placed every 4.5m), will be inserted along the route for highway safety. The width of the entrance from Whitewebbs Road onto the Historic Carriageway is to be widened to 4.97m, to create safe access and egress. Parking bollards are proposed near the entrance to prevent parking on the Historic Carriageway. This carriageway will be managed and maintained by the applicant, secured within the legal agreement.

#### Existing Vehicular and Pedestrian Access to the Northern Clubhouse and Parking (Entrance 2)

- 4.36 The existing northern vehicular and pedestrian access routes to the parkland will remain in place, with a new light coloured tarmac surfacing, removing existing potholes and widening the carriageway to 4.5m. This access is for use by the Training Centre; commercial servicing vehicles for the Toby Carvery; the residents of The Limes, and also the northern car park. There will be new security gates at the northern entrance, which would control access 24/7, to be managed by the applicant. In addition, there are another set of security gates for both the northern car park and for the residents of The Limes, which will be controlled and managed by the applicant, to improve the security of the parkland. This area is currently subject to extensive anti-social behaviour and these security measures seek to aid in reducing this.

#### Existing Vehicular and Pedestrian Access to the Southern Clubhouse and Parking (Entrance 3)

- 4.37 The existing southern vehicular and pedestrian access routes are currently permanently open, which is a security risk at present. There will be a new light coloured tarmac surfacing for the access, and the parking area will be a permeable tarmac of a different colour. New gates are proposed for the southern entrance, which again are sympathetic to the heritage assets.

- 4.38 The detailed design of the northern and southern entrance gates are to be secured by condition in **Appendix 1**. The opening hours of entrance 3 (southern car park) would be sunrise to sunset. The applicant is agreeable to a planning condition that controls the access times required for the public.

#### New River (Old Course)

- 4.39 A public footpath that runs along the New River (Old Course) would be enhanced by resurfacing with hoggin, to formalise this footpath. There will be condition surveys undertaken for the New River (Old Course), by accredited conservation engineers, to record the state of the asset as existing and prepare survey reports of the works (reinforcing in concrete where repair is required) to be undertaken to upgrade these assets.

#### Whitewebbs Pond

- 4.40 Whitewebbs Pond is proposed to be restored, which will include resurfacing the tarmac apron around the pond with a hoggin gravel surfacing, and the establishment of marginal vegetation, through the use of pre-planted coir rolls and/or planted gabion baskets.

#### The Operational Link

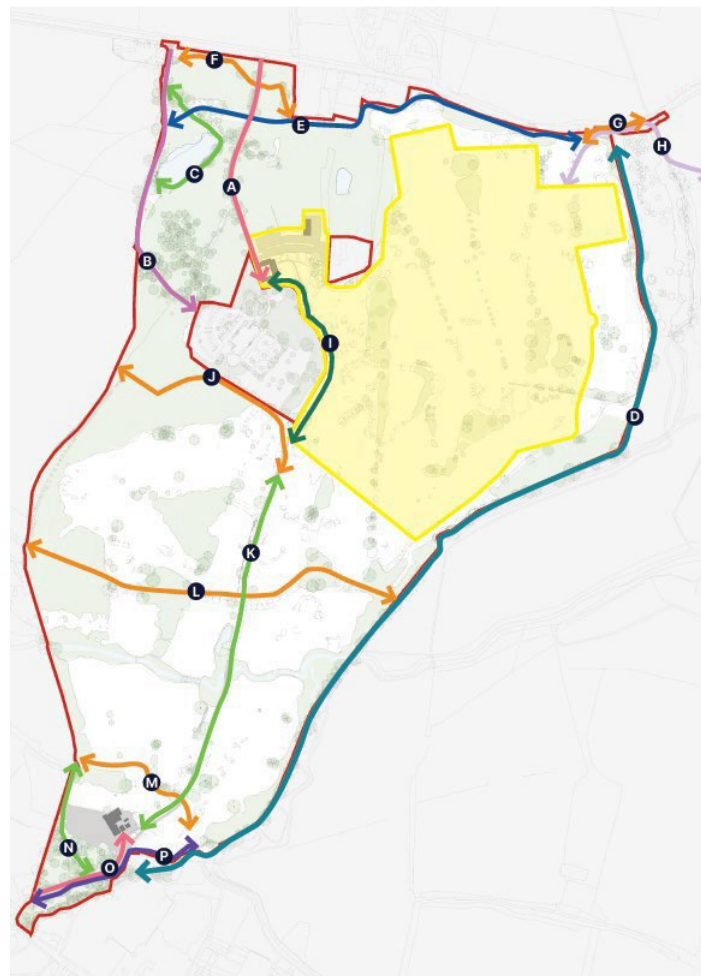
- 4.41 The application includes constructing a section of road surface, to link the proposed training facility with the existing Men's training facility. This operational link is designed to accommodate slow-moving off-road vehicles ("buggies") used for transporting ground maintenance equipment, as well as players, between the two facilities.
- 4.42 The route will begin at the sliding gate of the proposed ground maintenance building, heading northeast towards Whitewebbs Lane. It will then run along the northern edge of Dickens Trough Meadow and pass through a gate at the Western Field. The operational link will then continue through the Western Field and connect to the existing training facility. The non-material amendment application (24/01012/NMA) referred to in section 1, proposes to adjust the pathway in the approved Western Field application (reference 17/01178/FUL) to create a suitable surface for the operational link within the Western Field.
- 4.43 The section of the operational link that is between the two gates at the ground maintenance building and the Western Field is publicly accessible.
- 4.44 A part of the operational link is proposed on a layby which is under the Highways Authority's control. The application proposes converting the existing highway layby, currently blocked by bollards (due to high incidents of fly-tipping) into the road surface for the operational link. There is a Grampian condition that requires a strategy to be submitted for approval, that demonstrates access to the PRow and Bridleway is maintained; that the safety of all users of the highway is maintained; and that the long-term management and maintenance arrangements and responsibilities are agreed, whilst the operational link is in situ.

#### Conduit House

- 4.45 Conduit House is a non-designated heritage asset, which has fallen into a state of disrepair. The application seeks to restore this building, repairing the walls and constructing a new roof. The asset would subsequently be maintained and managed by the applicant, with the Enfield Society having a key to use this as desired for community

use, providing a new facility for the public to utilise. The method of construction, materials and detailed information will be submitted to the Local Planning Authority for approval prior to beneficial use and the maintenance of the building secured by condition (refer to **Appendix 1**).

**Figure 5 Status of Public Access Routes & Proposed Enhancement Works**



	EXISTING			PROPOSED		
	STATUS	DESCRIPTION	CONDITION	STATUS	DESCRIPTION	CONDITION
<b>A</b>	NONE	VEHICULAR ACCESS TO NORTHERN CLUBHOUSE	GENERAL DISREPAIR - TARMAC	NONE	VEHICULAR ACCESS TO WOMEN'S TRAINING CENTRE, PUBLIC ACCESS TO NORTHERN CAR PARK, SERVICE ACCESS TO TOBY CARVERY & RESIDENT ACCESS TO THE LIMES	MANAGED & MAINTAINED - NO DIG PERMEABLE TARMAC
<b>B</b>	NONE	INFORMAL FOOTPATH	OVERGROWN & UNMANAGED - PARTIAL HOGGIN	NONE	VEHICULAR, PEDESTRIAN & CYCLING ACCESS TO TOBY CARVERY	MANAGED & MAINTAINED - NO DIG HOGGIN SURFACE
<b>C</b>	NONE	INFORMAL FOOTPATH	OVERGROWN & UNMANAGED - PARTIAL HOGGIN	NONE	INFORMAL FOOTPATH	MANAGED & MAINTAINED - HOGGIN SURFACE
<b>D</b>	PROW	BRIDLEWAY	UNMANAGED - NO SURFACE FINISH	PROW	BRIDLEWAY*	REPAIRED BY THFC - CHIPPINGS SURFACE. FENCE TO BE MAINTAINED THROUGHOUT
<b>E</b>	NONE	INFORMAL FOOTPATH (SIGANLED PERMISSIVE PATH ON SITE)	UNMANAGED - NO SURFACE FINISH	PROW	BRIDLEWAY	REPAIRED, MANAGED & MAINTAINED - CHIPPINGS AND PERMEABLE TARMAC
<b>F</b>	N/A	N/A	N/A	NONE	INFORMAL FOOTPATH	MANAGED & MAINTAINED - HOGGIN SURFACE
<b>G</b>	N/A	N/A	N/A	NONE	INFORMAL FOOTPATH*	MANAGED & MAINTAINED - PERMEABLE TARMAC
<b>H</b>	N/A	N/A	N/A	NONE	OPERATIONAL LINK TO EXISTING MEN'S TRAINING CENTRE*	MANAGED & MAINTAINED - HOGGIN SURFACE
<b>I</b>	NONE	INFORMAL FOOTPATH	UNMANAGED - TARMAC	NONE	HISTORIC TRACK RETAINED - NOT PUBLICLY ACCESSIBLE	MANAGED & MAINTAINED - HOGGIN SURFACE
<b>J</b>	N/A	N/A	N/A	NONE	INFORMAL FOOTPATH	MANAGED & MAINTAINED - HOGGIN SURFACE
<b>K</b>	NONE	INFORMAL FOOTPATH	UNMANAGED - TARMAC	NONE	INFORMAL FOOTPATH	MANAGED & MAINTAINED - HOGGIN SURFACE
<b>L</b>	N/A	N/A	N/A	NONE	INFORMAL FOOTPATH	MANAGED & MAINTAINED - CHIPPINGS SURFACE
<b>M</b>	N/A	N/A	N/A	NONE	INFORMAL FOOTPATH	MANAGED & MAINTAINED - HOGGIN SURFACE
<b>N</b>	NONE	INFORMAL FOOTPATH	UNMANAGED - PARTIAL HOGGIN	NONE	INFORMAL FOOTPATH	MANAGED & MAINTAINED - HOGGIN SURFACE
<b>O</b>	NONE	VEHICULAR ACCESS TO SOUTHERN CLUBHOUSE	GENERAL DISREPAIR - TARMAC	NONE	VEHICULAR ACCESS TO THE PARK & CAFE	MANAGED & MAINTAINED - HOGGIN SURFACE
<b>P</b>	PROW	FOOTPATH	UNMANAGED - PARTIAL HOGGIN	PROW	FOOTPATH	MANAGED & MAINTAINED - HOGGIN SURFACE

## 5 Relevant Planning Decisions

### Application Site

- 5.1 Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2, application 23/03252/SO for request under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for a EIA Scoping Opinion in relation to *change of use of former golf course (Use Class F2) to provide a football training centre (Sui Generis) and parkland (Use Class F2), comprising the provision of football pitches and associated infrastructure; change of use and modifications to the existing Northern Clubhouse building to provide football training centre and associated uses (Sui Generis); modifications to existing Southern Clubhouse to form a replacement café, public toilets and associated parking; demolition of existing grounds maintenance building and construction of replacement grounds maintenance building; construction of gatehouse; restoration of Conduit House, hard and soft landscaping works to include land reprofiling; restoration and enhancement of parkland landscape, including new footpaths; new vehicular and pedestrian access, modifications to existing vehicular and pedestrian access; modifications to Toby Carvery Car Park, modifications to consented operational link in Western Field, and associated works*, was decided **Screening Option - EIA Not Required on 01.11.2023**.

### Western Field

- 5.2 Land To The South Of Whitewebbs Lane & West Of Hotspur Way Enfield EN2 9AP, application 24/01012/NMA made under Section 96 of the Town and Country Planning Act 1990 makes non-material amendments to Conditions 1, 5, 8, and 16 of planning permission 17/01178/FUL to deliver a revised access route along the eastern and southern part of the site; status is **In Progress**.
- 5.3 Tottenham Hotspur Training Centre Hotspur Way Enfield EN2 9AP, application 24/03169/VAR made under Section 73 of the Town and Country Planning Act 1990 amends the wording of condition 1 to *“this permission shall be for a limited period of 3 years only, expiring on 31/01/2028. Following this date, the building and any enabling development (excluding the car parking and training pitch) shall be removed from the site and the land shall be reinstated to an open landscape and thereafter be retained as such”*; status is **In Progress**.
- 5.4 Tottenham Hotspur Training Centre Hotspur Way Enfield EN2 9AP, planning application 21/03694/FUL for *Part retrospective erection of a temporary building (Sui Generis) to provide training facilities; installation of a sports pitch; car parking; hard and soft landscaping; and associated works*, was **Granted with Conditions and S106 Agreement on 30.01.2024**.
- 5.5 Land To The South Of Whitewebbs Lane & West Of Hotspur Way Enfield EN2 9AP, planning application 17/01178/FUL for *Formation of outdoor educational facility comprising ground works to form a nature reserve/ecological enhanced area together with erection of a single storey detached building with basement for education, sports and leisure uses, a 4-pitch Multi Use Sports Pitch with spectator stands and floodlighting, associated car parking and ancillary works*, was **Granted with Conditions and S106 Agreement on 21.12.2018**.

## The Existing Tottenham Hotspur's Training Facility

- 5.6 Tottenham Hotspur Training Centre Hotspur Way Enfield EN2 9AP, planning application 21/01648/FUL for *part single, part 2-storey extension to the existing Training Centre Building*, was **Granted with Conditions on 19.07.2021**.
- 5.7 Tottenham Hotspur Training Centre Hotspur Way Enfield EN2 9AP, planning application 21/01623/FUL for *erection of a single storey extension to existing Training Centre Building (Academy wing)*, was **Granted with Conditions on 14.07.2021**.
- 5.8 Tottenham Hotspur Training Centre Hotspur Way Enfield EN2 9AP, non-material amendment application 20/02618/NMA for *Non-material amendment to TP/07/1623 to allow installation of an outdoor teaching area/amphitheatre within the Clubs Training Centre estate*, was **Granted with Conditions on 14.09.2020**.
- 5.9 Land South Side of Whitewebbs Lane, incorporating Rolenmill Sports Ground, and Land Rear of Myddelton House, Bulls Cross, Enfield, Middx, EN2 9HA, planning application TP/09/1658 for *Construction of a football training centre comprising a building incorporating training and associated facilities*. (Amended design of approved scheme under Ref:TP/07/1623), was **Granted with Conditions on 31.03.2010**.
- 5.10 Land South Side of Whitewebbs Lane, incorporating Rolenmill Sports Ground, and Land Rear of Myddelton House, Bulls Cross, Enfield, Middx, EN2 9HA, planning application TP/07/1623 for *Construction of a football training centre comprising a building incorporating training and associated facilities, ancillary buildings and plant, external pitches, access roads, parking, pathways, fences and external lighting*, was **Granted with Conditions on 11.04.2008**.
- 5.11 Land East Of Bulls Cross, Rear Of Myddelton House, Bulls Cross, Enfield, Middx, EN2, planning application TP/06/0735 for *Construction of a football training centre involving erection of a building incorporating basement, ground and first floor levels with an indoor football pitch with a domed roof, together with a total of 12 1/2 external pitch areas (1 x floodlit grass, 1 1/2 x floodlit artificial surfaced, 10 x grass), installation of mesh fencing and associated pathways, together with erection of groundsmans' store, two irrigation water storage tanks, entry lodge with barrier and electricity sub-station. Construction of access road off Whitewebbs Lane with associated car and coach parking, water feature and landscaping*. (Revised scheme), was **Refused on 04.10.2006**.

## **6 Statutory Consultation**

- 6.1 Table 1 below provides a summary of the statutory consultation process that has been undertaken on this planning application and the number of responses received, together with a summary of the issues that have been raised through that process.

**Table 1 - Summary of Statutory Consultation**

External Statutory and Non-statutory Consultees	
Cadent Gas	Initial holding objection received as Cadent Gas requests more time for reviewing the submission. No further objection is received.
Environment Agency	No objection.



Greater London Authority (GLA)	Supported in principle.  Stage 1 letter states further referral to consult with the Mayor is required, if the LPA chooses to resolve to grant the application.
Greater London Archaeological Advisory Service (GLAAS)	No objection.
Garden Trust	No objection.
Metropolitan Police	No objection.  A planning condition requesting the development to achieve Secure by Design accreditation has been suggested.
Sport England	<b><u>Non-statutory consultee</u></b> to application.  The planning application is supported by the Football Association (FA).  Holding objection, which relates to the loss of the golf facility & sport. Requested community programmes be delivered and clarity on sports use for the parkland area.
Thames Water	No objection.
Woodland Trust	Objection, based on the impact to the ancient woodland as a result of the historic carriageway.
Internal Statutory and Non-statutory Consultees	
Leisure	Support.
Arboriculture	No objection.
Ecology	No objection.
Heritage	No objection.  The proposal results in 'Less than Substantial Harm'.  The officer identifies the harm to some heritage assets and the benefit to some heritage assets. Overall, there is a heritage net benefit.
Environmental Health	No objection.
Highways	No objection.
Landscape	No objection.
Policy	No objection.
Sustainability	No objection.
Urban Design	No objection.

## External Statutory and Non-statutory Consultees

### 6.2 **Cadent Gas:**

Cadent Gas placed a holding objection on the proposal whilst their engineers reviewed the available information. No further response has been received.

### 6.3 **Environment Agency:**

No objection.

### 6.4 **Greater London Authority (GLA) Stage 1 Referral:**

London Plan policies on Green Belt; sports facilities; heritage; transport; sustainable design; and environmental issues are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- Land use principles: The proposed development is inappropriate development within the Green Belt. Very special circumstances which outweigh the harm to the Green Belt could be established, subject to the public benefits being appropriately secured.
- Heritage and design: Less than substantial harm is identified to three listed Grade II buildings (two low level and one a very low level). The public benefits could outweigh this harm if secured appropriately. Officers will conclude on this matter at the Mayor's decision making stage.
- Transport: Further information is required to justify the quantum of car parking proposed; the Active Travel Zone Assessment should be updated to include night time assessment; and relevant management plans should be secured.
- Sustainable development: Further information is required on energy; whole life-cycle carbon and circular economy.
- Environmental issues: Further information required in relation to air quality. The proposed development is generally compliant with London Plan Policies on urban greening; biodiversity; sustainable drainage and water efficiency.

Officers have planning conditions and clauses for the legal agreement to address the items where additional information is requested, to address these matters.

The GLA have requested the application be referred back to them at Stage 2, if the Council resolve to approve the application.

### 6.5 **Greater London Archaeological Advisory Service (GLAAS):**

The results of the archaeological field evaluation demonstrated that buried remains on the site in the Roman, medieval and post-medieval periods, most likely relates to peripheral activity at a distance from settlement during all these periods, probably associated with agriculture or land management.

The only concentration of features was located in and around trench 15, which under current plans will be built up to level the area for playing pitches. However, these remains are considered of low significance, so no further archaeological investigation is recommended.

The Old Course of the New River should be identified as a non-designated heritage asset (NDHA) of archaeological interest, which is of equivalent significance to scheduled monument. Its protection and positive management should be secured by a planning condition.

Officers have agreed conditions (refer to **Appendix 1**) to ensure the protection and management NDHA.

**6.6 Garden Trust:**

The proposed floodlights would not adversely affect Forty Hall Park, especially given that it is unlikely that anyone would be using it in winter evenings, other than the occasional dog walker/runner or if the park was staging its own event.

**6.7 Metropolitan Police:**

Support, with arrangements to meet Secured by Design standards. **Appendix 1** contains a condition to provide the details requested.

**6.8 Sport England:**

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 overall advising they require more information before they are satisfied that the application complies with NPPF paragraph 104 (bullet point c) which states:

*“Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:*

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

London Plan Policy S5 C (3) that states:

*“Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:*

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

Officers provided details of the marketing information, offers received and the level of golf provision in and nearby to the application site. However, Sport England stated that this review must be conducted in conjunction with England Golf.

Sport England has not acknowledged the permitted change of use from a golf course to parkland and that the golf course has been closed since 2021.

The Football Association is satisfied with the information submitted on the design of the club house (including the shower cubicles), pitches and sports lighting and support the proposals.

In officers' opinion, the application would provide the introduction of a new outdoor elite sports facility, which through the legal obligations commits the applicant to the community and education programmes (refer to section 7 of the report). This in conjunction with the improvements to the parkland to enhance walking, running and cycling are substantial. There is also the new community room to allow the provision of new activities by the local community. The resultant benefits that arise from the proposals are considered to outweigh the concerns raised by Sport England.

**6.9 Thames Water:**

No objection.

#### 6.10 **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. Main concerns relate 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 Tree Officer has helpfully provided the following comments in relation to the above concerns:

- The direct impacts to the ancient woodland have been noted in the consultee response. The onus is placed on the project arboriculturist to demonstrate a suitable construction methodology to be covered in an arboricultural method statement (AMS) via a discharge of condition application.
- No identified veteran trees have been noted for removal following a review of the tree removal plans and AIA.
- An RPA will provide the correct buffer zone for veteran trees.
- The applicant is to manage the woodland and this requirement is secured in the legal agreement and by condition.
- The veteran tree survey has identified VT1, VT2 (T265), VT3 (T52), VT4 and VT5 as veterans.
- The applicant has demonstrated there will be no loss of veteran trees and that a 15m buffer zone will remain to protect the ancient woodland.

#### Internal Statutory and Non-statutory Consultees

#### 6.11 **Parks & Leisure:**

The Parks & Leisure (P&L) team express strong support on the application, given the benefits the new facility will provide future habitat conservation and management of Whitewebbs Park, and the benefit that it will provide for grassroots sport and physical activity in Enfield. It aligns with our shared goals within the Council's Blue and Green Strategy, including those of promoting habitat conservation and sustainable land management. The proposed development will deliver significant and much-needed environmental benefits, particularly through the restoration and enhancement of Whitewebbs Park. Reasons why this project is a positive step forward:

##### Parkland and Landscaping

**Restoration of Historic Parkland:** The proposal to restore the parkland, which has suffered from poor maintenance over the past four years, will revive its historic character and ecological function. Extensive tree planting and grassland restoration are invaluable to biodiversity and landscape quality. The planned addition of 241 specimen trees and 1,800 new trees within a 3-hectare woodland demonstrates a significant commitment to afforestation and carbon sequestration.

**Layered Woodland Planting:** The incorporation of both canopy and understory planting ensures the creation of diverse woodland habitats that support a range of flora and fauna. **6. Defined Character Areas:** The landscape strategy, with its four character areas, balances ecological restoration with visitor accessibility. Highlights include: New

woodland areas north of the training centre; Enhanced management of the existing Whitewebbs Wood; Restoration of the historic parkland setting with grasslands and tree planting; New landscaping around the southern café and visitor centre, which enhances the visitor experience and community engagement.

**Sustainable Management:** A robust five-year planting, maintenance, and monitoring programme demonstrates a long-term vision for sustainability, ensuring that the ecological and aesthetic improvements are preserved and enhanced over time.

**Drainage and Surface Water Management:** The inclusion of two attenuation basins on the eastern and southeastern boundaries will significantly mitigate the risk of surface water flooding while enhancing local water management infrastructure. Public access to one of the basins further integrates the community into the park's natural restoration.

**Restoration of Whitewebbs Pond:** The restoration of Whitewebbs Pond is a vital ecological and aesthetic improvement. The resurfacing with hoggin gravel and the introduction of marginal vegetation will not only enhance its natural appearance but also support aquatic biodiversity. The use of pre-planted coir rolls and gabion baskets ensures a stable and sustainable approach to habitat creation.

**Invitation for Engagement:** We are particularly encouraged by the applicant's openness to collaboration and monitoring. We welcome the opportunity to participate in wider discussions regarding the landscape recovery scheme, contributing to the design, implementation, and long-term management of this transformative project. The proposed interventions represent a rare opportunity to achieve meaningful conservation outcomes while fostering community engagement and improving public access. We are confident that this initiative will serve as a model for integrated landscape restoration and management.

**Sport & Leisure:** Sport England research demonstrates that women and girls are less active than males, and the lack of suitable facilities is known to be a contributing factor. Sport England's Active Lives Survey states that nationally, 51% boys (below the age of 16) are active, compared to just 44% of girls of the same age. The proposed new dedicated facility has the potential to close the gender participation gap in Enfield and provide a facility that will have wide reaching community benefit. As part of the planning application, Tottenham Hotspur has committed to the delivery of a community programme that will enable many women and girls from across Enfield to benefit from the new facilities at the training centre. The proposed community programme commits to over 36,000 hours of community contact through the delivery of a range of programmes including school tournaments, the Premier League Kicks programme, Tottenham's Global Football Development and inclusive activities such as walking football. With a strong focus on grassroots football, the community programme will help more females to be active and benefit from a purpose-built facility targeting women and girls. Tottenham's transport provision also allows for free bus travel to the facility for those located in the east of the borough where travel could be a barrier to accessing the facility.

The modification of the Southern Clubhouse will revive the facility as a community and community sport asset. Once complete, the Southern Clubhouse will support the council in broadening participation, and will serve the walkers, runners and cyclists that have long used the park, who will benefit from the enhanced parkland. The Southern Clubhouse will also provide modern community space for sport and physical activity sessions in an area of the borough with few other similar community assets. The Council's 5-year strategy (2024 – 2029), adopted by Council 6th November, which aims to get more of Enfield's residents active, "Our Active Wellbeing", recognises the need for

targeted sessions for women and girls, and the Whitewebbs facility and associated community programme will help deliver our aspiration.

In summary the proposed new facilities, park and landscape enhancements at Whitewebbs aim to improve access, conserve habitats, and empower more and more diverse members of the community to engage in active, healthy lifestyles.

#### 6.12 **Arboriculture:**

No objection, with request for conditions. This scheme is acceptable from an arboricultural perspective with all concerns raised in previous consultations addressed to ensure the scheme meets an acceptable standard in arboricultural terms.

Given that only an AIA has been provided by the applicant at this stage, there is still further information that is required to enable retained trees to be suitably protected throughout the duration of the development of the site. Precise detail is necessary to prevent direct and indirect damage from occurring, and so an Arboricultural Method Statement and Tree Protection Plan will need to be provided prior to commencement of development, to reduce the impacts identified in the AIA. On some trees, there will need to be a phased approach where access will be required into the root protection areas of some trees, and this detail will also need to be included in the AMS. Furthermore, due to the constraints posed within the operational boundary, Arboricultural Supervision will be required throughout to ensure that details outlined within the current AIA and any subsequent documents are strictly adhered to by the operatives on site. The schedule for this monitoring will need to be agreed pre-commencement.

#### 6.13 **Ecology:**

No objection to the application.

The BNG information has been reviewed and the proposals will result in a net gain of 33% for habitats, 81% for watercourses and the creation of 17 hedgerow units (baseline is 0) meaning that all the elements are well in excess of the 10% mandatory target.

#### 6.14 **Heritage Officer:**

The LBE heritage officer assessment concludes there is Less than Substantial Harm upon all heritage assets. These heritage comments are reviewed in detail within the Assessment section of this report (section 7).

The proposed scheme will have a profound effect upon the historic environment, having both positive and negative affects upon those heritage assets within it. The greatest affect will be upon the group of heritage assets which together form the Whitewebbs Estate.

Given the number of heritage assets affected by the proposed development and its complexity, this consultation does not seek to carry out a “net” or “internal” heritage balance. Identified heritage harm and heritage benefits are described separately, to allow the decision maker to come to a clear judgement, without risk of ‘double counting’.

Within this advice, the categories very low, low, moderate, high and very high are used to describe the varying degrees of ‘less than substantial harm’ and heritage benefit.

**Figure 6** below provides a summary of assessment of harm and benefit to heritage assets carried out by the Heritage Officer, extracted from his consultation response dated 10.10.2024.

**Figure 6 - Assessment of Harm and Benefit**

Heritage Asset	Harm	Benefit
<b>Designated Heritage Assets</b>		
North Lodge – Grade II Listed Building	Nil	High
South Lodge – Grade II Listed Building	High	Moderate
Barn at Whitewebbs – Grade II Listed Building	Nil	Nil
Whitewebbs Farmhouse – Grade II Listed Building	Nil	Nil
King and Tinker Public House – Grade II Listed Building	Low	Nil
Clay Hill Conservation Area	Low	Low
Forty Hall Conservation Area	Low	Low
Forty Hall – Grade II Registered Park and Garden	Low	Nil
Flash Road Aqueduct – Scheduled Monument	Nil	Moderate
<b>Non-Designated Heritage Assets</b>		
Conduit House – LHL Ref: 256	Nil	Very high
Whitewebbs Park – LHL Ref: 259	Very High	High
Whitewebbs House – LHL Ref: 257	High	Moderate

**6.15 Environmental Health Officer:**

Environmental Health does not object to the application as there is unlikely to be a negative environmental impact. Request for conditions.

**6.16 Highways Officer:**

No objection with request for conditions.

**6.17 Landscape Officer:**

Following a review of the submitted information, there is likely to be some adverse effect on visual amenity and landscape character receptors in Year 1. However, by Year 10, once the landscape proposals and ecological enhancements have established themselves and matured, the residual impact on visual amenity and landscape will be reduced with a slightly beneficial result, and are deemed acceptable against policy requirements. On this basis, the proposals are supported, with conditions requested.

**6.18 Sustainability Officer:**

The proposed scheme is acceptable from a climate perspective, with conditions requested.

BREEAM pre-assessment shows that the development is on the path to achieve 'Excellent' rating.

Public Consultation

6.19 Public consultation of this planning application involved notification letters being sent to 241 neighbouring properties on 1 May 2024. A press advert was published in the Enfield Independent on 8 May 2024, and 32 site notices were erected on 29 April 2024. An extended consultation period was implemented (with a minimum of 24 days given to respond), with responses requested by 31 May 2024.

6.20 Amendments to the application were received on 7 July 2024. These changes were considered material to the scheme. As a result, a further period of consultation was carried out. Public consultation involved notification letters being sent to 515 neighbouring properties on 16 July 2024. Press adverts were published on 17 July 2024 and 7 August 2024. Again, another 29 site notices were erected on 17 July 2024. An extended consultation period was implemented, with responses requested by 13 August 2024 (with a minimum of 28 days given to respond).

6.21 As a result of the public consultation, a total of 296 objections, 41 statements of support, and 3 neutral responses (expressing neither support nor objection) have been received for this application at the time of finalising this report. Duplicate submissions from the same individuals containing repetitive content have been recorded once. In the table below, a summary of the comments raised in objection to the application and officer's comments in response to these are provided.

Number	Matter of Objection	Public Comments	Officer Comments
1	Loss of golf course	The golf course did not operate at a financial loss before its closure. The original change of use decision was based on biased misinformation and unjustified.	The golf course was operating at a loss, which is why the decision was made to close the business. Following this LBE as landowner undertook a marketing exercise seeking bidders to submit offers for the land.
2	Historic landscape and views	<p>The proposed pitches, fencing, and tree planting will change the historic landscape and protected views.</p> <p>Laurel hedges should not be used for fencing and screening should form of native countryside species.</p>	<p>Outdoor sport recreation is an appropriate use for the site, as set out in paragraph 154 of the NPPF. The operational infrastructure associated with the sports use (boundary treatment; flood lighting; grounds maintenance buildings) is inappropriate development in the Green Belt and would have a low level of harm on the visual and spatial openness of the Green Belt. VSC are provided to outweigh this harm.</p> <p>The proposed landscaping (tree planting) seeks to mitigate against the harm and has been appropriately assessed in the Landscape Visual Impact Assessment and reviewed by LBE Landscape officer. No objection is raised.</p>
3	Local wildlife and habitats	The proposal will have a significant negative impact on local wildlife and biodiversity due to the loss of meadows and grassland as well as the construction of pitches and fencing.	<p>There is no objection raised by the LBE Ecologist.</p> <p>The submitted Ecological Impact Assessment (EclA) concludes there are appropriate mitigation measures contained.</p>



		<p>The proposed access to Toby Carvery will disturb the tranquillity of the pond and impact the wildlife due to an increase in noise, pollutants, and traffic.</p> <p>The noise and lighting from the pitches will disturb the local wildlife.</p> <p>The Council should complete a SINC review as the site would have been designated a SINC and afford protection.</p> <p>The BNG baseline is not accurate and too low.</p>	<p>There are conditions to control the hours of use to protect both ecological wildlife and the amenity of the neighbouring occupiers.</p> <p>Part of the site is designated a SINC. The proposals do not affect this part of the site, with no development being located on the SINC.</p> <p>The BNG metric calculation is in excess of the statutory requirement to enhance by 10%.</p>
4	Health and Wellbeing	<p>Loss of public open space will have a significant impact on the mental and physical health of the residents.</p>	<p>An assessment of the provision of local open space has been undertaken in this report (refer to section 8) and the proposals result in enhanced parkland as well as an increase in the ability to access elite football training facilities.</p> <p>The proposals include the restoration and improvement to the parkland, provision of community and potential space for sports use in the Southern Clubhouse.</p> <p>Consequently, there would be no negative impact on the mental and physical health of residents as a direct result of the proposals.</p>
5	Public access to the facility and public open space	<p>A large amount of public open space will be taken away and the public will not be able to access the training facility area.</p> <p>The proposed pitches will result in the loss of natural green space.</p> <p>The removal of the northern car park will reduce the public access from the north.</p>	<p>An assessment of the provision of local open space has been undertaken in this report (refer to section 8) and the proposals result in enhanced parkland as well as an increase in the ability to access elite football training facilities.</p>

			There are two northern car parks, one will remain public and will be accessible and managed by the applicant. The other will be within the training centre operational boundary.
6	Trees	The proposal will result in the loss and deterioration of valuable trees and ancient woodland.	<p>LBE Tree officer has no objection.</p> <p>The proposals include planting 241 new trees within the parkland area, as well as 1,800 new trees within a new woodland area of 3ha, this is proposed to mitigate for the removal of trees within the operational boundary.</p> <p>The proposals do not affect the ancient woodland.</p>
7	Policy	The proposal does not protect green belt, historic landscape and features, and open space as required in the Local Plan and London Plan.	The assessment in section 8 of this report reviews the proposals in accordance with adopted planning policy and made a planning judgement that the proposals accord with policy, and where there is harm to the Green Belt, mitigating proposals in the VSC outweigh this harm.
8	Location of the development	<p>Whitewebbs is an important public green space that contributes to the health of the people of Enfield and is an area of great natural beauty, which is not appropriate for this development.</p> <p>Alternative sites proximity to the men's facility have not been considered.</p> <p>No evidence showing the existing training facility could not accommodate women's and girl's training.</p> <p>The applicant should develop the facility on a brownfield site instead.</p>	<p>The applicant has undertaken a site search exercise and this is addressed section 8 of this report.</p> <p>There is a demonstrable need, with the current women's facility being temporary on the Western Field.</p> <p>There is a 1ha land-take saving, as a result of the co-location of the women's training facilities adjacent to the men's.</p>
9	Community benefits	Insufficient benefits for local communities from the development.	The education and community programmes are

		<p>The managed community access is ambiguous and the community infrastructure and benefit the applicant is proposing may not be able to well-utilised by the residents or may not be delivered on time.</p>	<p>detailed within the legal agreement (see section 8 and appendix 2).</p> <p>The legal agreement stipulates monitoring evidence of delivery, that must be submitted to ensure these programmes are being undertaken in line with the commitments.</p>
10	Historic asset	<p>The heritage trail should follow the course of the new river loop from Myddelton house through the Whitewebbs and Forty Hall estate. Information panels should be provided.</p> <p>There is no plan to restore the North Lodge.</p> <p>The restoration of North Lodge should be in the s106 and s106 work should be undertaken first.</p> <p>The proposal will cause significant harm to the historic assets.</p>	<p>Refer to the heritage assessment within section 8 of this report for a detailed review of this.</p> <p>There will be new wayfinding signage and information boards provided and this will be secured by condition.</p> <p>There are restoration works proposed and these are also assessed in the heritage assessment within section 8 of this report.</p> <p>The heritage officer considers there to be Less than Substantial Harm to the heritage assets. The overall assessment concludes a net heritage benefit as a result of the full scope of works proposed.</p>
11	Parkland infrastructure improvement and management	<p>No commitment to enhance all bridleways to provide a safe circuit for horses.</p> <p>The proposed shared bridle and cycle way is inadequate.</p> <p>There is no footpath directing the public from south to north.</p> <p>The applicant has no experience managing a park and they should not control all vehicular access to the park.</p> <p>The area around the existing training facility is poorly managed.</p>	<p>Figure 5 in this report shows the enhanced and new footpaths proposed, which extend outside of the application site.</p> <p>The northern permissive path will be formalised as part of the proposals to a statutory bridleway.</p> <p>An Outline Park Management Plan is submitted with the application detailing measures to ensure the parkland will be well maintained.</p>

		<p>The applicant has a poor track record of complying with planning conditions and there should be a mandated timetable to ensure improvement works are made and a commitment towards no more future expansion into the parkland in the future.</p> <p>There should be an advisory committee of local stakeholders with the right to be informed and consulted about the management of the public parts of the lease area.</p> <p>No commitment to fund the enhancement outside the lease area.</p>	<p>A detailed Full Parkland Management Agreement, requiring numerous measures, including management of landscaping and pathways, will need to be submitted for approval and secured in the Legal Agreement.</p> <p>The legal agreement requires community engagement to be undertaken to inform the Parkland Management Plan to capture the needs of the local community.</p>
12	Other	<p>The proposed access and football pitches will increase the risks of flooding.</p>	<p>LBE Drainage &amp; Flood officer has no objection.</p> <p>The proposed attenuation basins provide on-site water storage and management, enhancing the blue infrastructure within the park.</p>

## **7 Relevant Planning Policies**

7.1 Planning legislation states that applications must be determined in accordance with the development plan unless material considerations indicate otherwise, section 38 (6) of the Planning and Compulsory Purchase Act 2004. The relevant planning policies that the development must be in accordance with are set out below.

### **7.2 The London Plan 2021**

- GG1 Building Strong and Inclusive Communities
- GG2 Making the Best Use of Land
- GG3 Creating a Healthy City
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- D1 London's form, character and capacity for growth
- D3 Optimising Site Capacity through the Design-Led Approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D11 Safety, Security and Resilience to Emergency
- D12 Fire Safety
- D14 Noise
- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- S3 Education and childcare facilities
- S4 Play and Informal Recreation
- S5 Sport and recreation facilities
- E1 Skills and opportunities for all
- HC Heritage Conservation and Growth
- HC3 Strategic and Local Views
- G1 Green Infrastructure
- G4 Open Space
- G6 Biodiversity and Access to Nature
- G7 Trees and Woodland
- SI1 Improving Air Quality
- SI2 Minimising Greenhouse Gas Emissions
- SI3 Energy Infrastructure
- SI4 Managing Heat Risk
- SI5 Water Infrastructure
- SI7 Reducing Waste and Supporting the Circular Economy
- SI 8 Waste capacity and net waste self-sufficiency
- SI12 Flood Risk Management
- SI13 Sustainable Drainage
- T1 Strategic Approach to Transport
- T3 Transport Capacity, Connectivity and Safeguarding
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car Parking
- T6.5 Non-residential disabled persons parking
- T7 Deliveries, Servicing and Construction
- T9 Funding Transport Infrastructure through Planning
- DF1 Delivery of the Plan and Planning Obligations

### 7.3 **Local Plan – Core Strategy 2010**

- Core Policy 7 Health and Social care facilities and wider determinants of health
- Core Policy 8 Education
- Core Policy 9 Supporting Community Cohesion
- Core Policy 11 Recreation, leisure, culture and arts
- Core Policy 13 Promoting economic prosperity
- Core Policy 16 Taking part in economic success and improving skills
- Core Policy 20 Sustainable Energy use and energy infrastructure
- Core Policy 21 Delivering sustainable water supply, drainage and sewerage infrastructure
- Core Policy 22 Delivering sustainable waste management
- Core Policy 24 The road network
- Core Policy 25 Pedestrians and cyclists
- Core Policy 26 Public Transport
- Core Policy 28 Managing flood risk through development
- Core Policy 29 Flood Management Infrastructure
- Core Policy 30 Maintaining and improving the quality of the built and open environment
- Core Policy 31 Built and landscape heritage
- Core Policy 32 Pollution
- Core Policy 34 Parks, Playing Fields and Other Open Spaces
- Core Policy 36 Biodiversity

### 7.4 **Local Plan – Development Management Document 2014**

- DMD16: Provision of New Community Facilities
- DMD17: Protection of Community Facilities
- DMD37: Achieving High Quality and Design-Led Development
- DMD38: Design Process
- DMD44: Conserving and Enhancing Heritage Assets
- DMD45: Parking Standards and Layout
- DMD47: New Road, Access and Servicing
- DMD48: Transport Assessments
- DMD49: Sustainable Design and Construction Statements
- DMD50: Environmental Assessments Method
- DMD51: Energy Efficiency Standards
- DMD52: Decentralized energy networks
- DMD53: Low and Zero Carbon Technology
- DMD54: Allowable contributions if targets cannot be met (energy)
- DMD55: Use of Roofspace/ Vertical Surfaces
- DMD56: Heating and Cooling
- DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement
- DMD58: Water Efficiency
- DMD59: Avoiding and Reducing Flood Risk
- DND60: Assessing Flood Risk
- DMD61: Managing surface water
- DMD62: Flood Control and Mitigation Measures
- DMD64: Pollution Control and Assessment
- DMD65: Air Quality
- DMD68: Noise
- DMD69: Light Pollution
- DMD70: Water Quality

- DMD71: Protection and Enhancement of Open Space
- DMD72: Open Space Provision
- DMD74: Playing Pitches
- DMD78: Nature conservation
- DMD79: Ecological Enhancements
- DMD80: Trees on development sites
- DMD81: Landscaping
- DMD82: Protecting the Green belt
- DMD84: Areas of Special Character
- DMD89: Previously developed land in the Green Belt

## 7.5 **Other Material Considerations**

- National Planning Practice Guidance
- National Design Guide (2021)
- GLA: Fire Safety LPG (draft)
- GLA: Characterisation and Growth Strategy LPG (draft)
- GLA: Optimising Site Capacity: A Design-led Approach LPG (draft)
- GLA: Urban Greening Factor (draft)
- GLA: Air Quality positive (draft)
- GLA: Air Quality neutral (draft)
- Play and Informal Recreation (September 2012)
- Sustainable Design and Construction (April 2014)
- The Control of Dust and Emissions during Construction and Demolition (July 2014.)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- Social Infrastructure SPG (2015)
- Cross Rail Funding SPG (March 2016)
- Be Seen Energy monitoring (September 2021)
- Circular economy statement (March 2022)
- Energy Planning Guidance (2020)
- Whole life cycle LPG (March 2022)
- Enfield Climate Action Plan (2020)
- Enfield Biodiversity Action Plan
- Enfield Characterisation Study (2011)
- Enfield Local Heritage List (May 2018)
- Enfield S106 SPD (2016)
- Enfield Decentralised Energy Network Technical Specification SPD (2015)
- Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
- The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning: 3, Historic England (2017)
- TfL London Cycle Design Standards (2014)
- Mayor's Transport Strategy (2018)
- Healthy Streets for London (2017)

## 7.6 **National Planning Policy Framework 2024**

- Achieving sustainable development (Paragraphs 8 – 14)
- Promoting healthy and safe communities (Paragraphs 96 – 107)
- Protecting Green Belt Land (Paragraphs 142-160)
- Conserving and enhancing the natural environment (Paragraphs 187 – 201)
- Conserving and enhancing the historic environment (Paragraphs 202 - 221)

## 7.7 Enfield Draft New Local Plan and Draft Proposals Map

- The New Enfield Local Plan (ELP) was published at Regulation 19 Stage between 28 March and 28 May 2024. The Enfield Local Plan is at an advanced stage of preparation and is considered by the Council to be sound and has not be modified significantly prior to examination.
- The NPPF Paragraph 48 states that decision-makers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the London Plan and the NPPF. As the emerging Local Plan progresses through the plan-making process, the draft policies within it will gain increasing weight.
- The ELP examination commenced in January 2025, and so more than limited weight can be given to a policy or group of policies where (i) they are consistent with the NPPF and (ii) there is no objection to them (in relation to the parts of the policies relevant for the decision). However, if there are substantial objections to any policy then it would be unlikely that the Council could justify giving it more than limited weight.
- The draft Local Plan identifies the application site within Allocation SA RUR.07 (see **Figure 6** below). This identifies it as suitable for nature recovery uses; professional sport, recreation and community sports/leisure uses, with ancillary related uses. There have been 31 objections received in relation to the draft allocation, which have been fully considered as part of the plan-making process in allocating the application site.
- Allocation RUR.07 remains in the Green Belt with the uses identified as being appropriate, subject to further consideration against relevant planning policies. In light of the above, and the advanced stage of the emerging plan, a **moderate** amount of weight has been afforded, with the draft allocation shown within the Deposit Local Plan.





permanent buildings located at the southern end and north western corner of the site represent the best locations for new built development associated with new or improved leisure uses in the Green Belt. Harm would be minimised by confining new development/uses within the existing fabric of these permanent buildings or through relatively small ‘proportionate’ extensions to them” (**officers emphasis added**).

**Figure 7- Table Extract of site CFS161 from The Green Belt and Metropolitan Open Land Study (June 2021 prepared by LUC)**

**8.14 Table 8.2** names the six remaining site options, all of which are being promoted for land uses which may be appropriate in the Green Belt or MOL, and which may provide opportunities to enhance and/or diversify the beneficial uses of the designations. **Figure 8.2** illustrates the locations and extent of these site options.

**Table 8.2: Green Belt and MOL promoted for potential beneficial uses**

Site Reference and Location	Promoted Uses
<b>Green Belt Sites</b>	
CFS161 – Whitewebbs Golf Course, Beggar's Hollow	Green and blue infrastructure enhancements, incorporating sport or leisure uses.

- In the Study paragraph 8.18 explains that in judging whether promoted uses preserve the openness of the Green Belt, NPPG offers some guidance on some of the matters to consider: v openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume; the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and the degree of activity likely to be generated, such as traffic generation. These matters have been considered in the Green Belt assessment, in section 7 of this report.
- Key other local emerging policies from the draft plan are listed below:
  - Policy DM SE2 – Sustainable design and construction
  - Policy DM SE4 – Reducing energy demand
  - Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
  - Policy DM SE7 – Climate change adaptation and managing heat risk
  - Policy DM SE8 – Managing flood risk
  - Policy DM SE10 – Sustainable drainage systems
  - Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
  - Policy DM DE2 – Design process and design review panel
  - Policy DM DE10 Conserving and enhancing heritage assets
  - Policy DM DE11 – Landscape design
  - Policy DM T2 – Making active travel the natural choice
  - Policy SP D1 – Securing contributions to mitigate the impact of development
  - Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
  - Policy BG5 – Green Belt & Metropolitan Open Land

- PolicyBG6: Development in the open countryside and greenspaces including the Green Belt and Metropolitan Open Land
- Policy BG8: Protecting open spaces
- Policy DE1: Delivering a well-designed, high quality and resilient environment
- Policy DE2: Design process and Design Review Panel
- Policy DE4: Putting heritage at the centre of place-making
- Policy DE10: Conserving and enhancing heritage assets
- Policy RE1: Character of the Green Belt and open countryside
- Policy RE2: Improving access to the countryside and green corridors
- Policy CL4: Promoting sporting excellence
- Policy CL5: Sport, open space and recreation
- Policy ENV1: Local environmental protection

## 8 Planning Assessment

- 8.1 The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan, unless material considerations indicate otherwise. Furthermore, paragraph 11 (c) of the NPPF goes on to state that development proposals that accord with the development plan should be approved without delay.

### Green Belt Assessment

- 8.2 The site is located within the Metropolitan Green Belt, and any proposal affecting Green Belt land should be assessed in accordance with Paragraphs 153-160 of the NPPF, London Plan policy G2 and Local Planning Policies DMD 82 and 89; Core Strategy Policy 33 and Emerging Local Plan Policies BG5 and RE1.
- 8.3 Paragraphs 154 and 155 of the NPPF provide categories of development which are considered appropriate in the Green Belt. Of particular relevance to the assessment of this application are paragraphs 154(b), 154(c), 154(d), 154(g), and 154(h). Paragraph 143 of the NPPF states that the Green Belt serves five purposes, listed below, which officers have numbered 1 to 5.
- a) to check the unrestricted sprawl of large built-up areas; **(1)**
  - b) to prevent neighbouring towns merging into one another; **(2)**
  - c) to assist in safeguarding the countryside from encroachment; **(3)**
  - d) to preserve the setting and special character of historic towns; and **(4)**
  - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. **(5)**
- 8.4 The Green Belt and Metropolitan Open Land Study (June 2021), states “*the site comprises the Whitewebbs Golf Course and some of its associated buildings. This Green Belt land generally makes a **strong contribution** to two of the Green Belt purposes (**purposes 3 and 5**) and a **relatively strong contribution to purpose 1.**”*
- 8.5 Paragraph 154 of the NPPF advises that “Development in the Green Belt is inappropriate unless one of the following exceptions applies:
- a) buildings for agriculture and forestry;
  - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
  - c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
  - d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
  - e) limited infilling in villages;
  - f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- i. mineral extraction;
- ii. engineering operations;
- iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;

v. the re-use of buildings provided that the buildings are of permanent and substantial construction; v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.”

8.6 Paragraph 153 of the NPPF states, when considering any application, substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is by definition harmful to the Green Belt, and should not be approved, except in Very Special Circumstances (VSC). VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

8.7 It is also pertinent to review the proposals in relation to the Planning Policy Guidance at Paragraph: 001 Reference ID: 64-001-20190722 on assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

8.8 The proposals are set out in Section 4 of this report and have been divided into development within the training centre operational boundary and outside of the training centre operational boundary. This assessment, therefore, follows the same approach, reviewing the proposals in relation to paragraph 154. Table 2 provides the Green Belt assessment. After the assessment of the impact on the Green Belt, the review of the VSC and evidence submitted by the applicant is undertaken, in relation to the need and benefits in seeking to help with the growth in women’s football and deliver a substantial community and educational package of programmes, to promote health and well-being of the residents of Enfield.

### ***Within the training centre operational boundary***

#### **Outdoor Sports Facility in the Green Belt**

- 8.9 Development within the Green Belt is considered to be inappropriate, unless it complies with one of the exceptions identified in paragraph 154. Most of the proposals fall within the exception use defined in part b) of the NPPF set out below.

“b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;”

- 8.10 The principle of appropriate outdoor sport and recreational facilities in the Green Belt is ‘appropriate’ in Green Belt terms. However, there are elements of the proposals which result in either very low or low harm on the openness of the Green Belt, which is detailed in Table 2 (level of harm), meaning that these elements are inappropriate and the resultant harm requires Very Special Circumstances to outweigh this.

**Table 2 - Green Belt Assessment**

No.	Proposal	Appropriate / Inappropriate	Level of Harm
<b>Within the training centre operational boundary</b>			
1	Football Pitches	Appropriate development. (paragraph 154 (b))	<b>No harm</b> to the openness of the Green Belt.
2	Ancillary Infrastructure	Inappropriate development.	<p>The 6no. 21m tall floodlights will have a <b>low level of harm</b> to the Green Belt, due to their visual impact on openness.</p> <p>The pitch side plant room will have a <b>very low level of harm</b> to the Green Belt due to the spatial impact openness only. It will not be visible from outside of the operational boundary.</p> <p>The 5m tall ball-stop fencing and the 3m tall synthetic pitch enclosure will have a <b>low level of harm</b> to the Green Belt, due to the visual impact on openness only.</p>
3	Football Training Centre at the Northern Clubhouse	Inappropriate development.	This is an extension to an existing building, which would be over and above the size of the original building, but the majority of the extension is within the basement. The scale and massing has been sensitively designed to reduce the visual impact on openness.

			This would result in a <b><u>low level of harm</u></b> , with limited visual and spatial impact on the openness, with significant mature landscaping surrounding the Northern Clubhouse. This aligns with the Green Belt and Metropolitan Open Space Study assessment (see para 6.13 in this report) and paragraph 154 (c) of the NPPF, being an extension to an existing building of a disproportionate size.
4	Ground Maintenance Building (GMB)	Appropriate development (paragraph 154 (d))	This is the replacement of an existing outbuilding (being relocated and therefore has no increase in floorspace) and aligns with NPPF para 154 (d). The GMB has a gross internal area of 221 sqm with a 3m green waste silo. Although appropriate development, it will have a <b><u>very low level of harm</u></b> on the spatial and visual aspects of openness, being confined to the northern part of the site, mainly screened within the operational boundary.
5	New Gatehouse	Appropriate development (paragraph 154(g))	No harm.
6	Ground works	Appropriate development (paragraph 154(h))	The re-profiling to level the site, which has areas on undulating topography would have no harm on the visual and spatial aspects of openness.
7	Boundary Treatment	Inappropriate development	The proposed boundary treatment (see Figure 4), with new landscaping enclosing the training facility, together with hard landscaping detailed in section 3, would result in a <b><u>very low level of harm</u></b> on the visual and spatial aspects of openness
<b>Outside the operational boundary of the training centre</b>			
1	Café, Public Toilets, and Community Room at the Southern Clubhouse	Appropriate development (paragraph 154 (d))	No harm.
2	Historic Carriageway	Inappropriate development	Paragraph 154 (h)(iii) sets out other forms of development, including

			<p>local transport infrastructure where a requirement for a Green Belt location can be justified, can be appropriate, if it preserves the openness of the Green Belt.</p> <p>The historic carriage will change from a rural informal footpath, which does not accommodate vehicles, to a formalised route, expected to support approximately up to 150 trips daily. The traffic generation would result in a <b>low level of harm</b> to the Green Belt, due to the increase in vehicles resulting in an impact on the spatial and visual aspect of openness. The route is not visible from any views within the application site, being screened by mature trees.</p>
3	Parkland and New Footpaths	Appropriate development (paragraph 154 (b and h))	No harm
4	Whitewebbs Pond	Appropriate development (paragraph 154 (h))	No harm
5	Existing Vehicular and Pedestrian Access to the Northern Clubhouse and Parking	Appropriate development (paragraph 154 (h))	No harm
6	Operational Link	Appropriate development (paragraph 154 (h))	No harm

**(1) Football Pitches**

- 8.11 The football pitches align with the exception clause in paragraph 154(b) of the NPPF, and is appropriate development, provided that such facilities preserve the openness of the Green Belt and do not conflict with its purposes. The football pitches themselves result in no harm on the openness of the Green Belt and align with the purposes of the Green belt in paragraph 143 of the NPPF.

**(2) Ancillary Infrastructure**

- 8.12 Paragraphs 3.5 – 3.8 of this report provide detailed information regarding the ancillary infrastructure associated with the football pitches. It includes the floodlights; ball-stop fencing; pitch enclosure and the pitch side plant room. The location, size and quantum of the proposed ancillary infrastructure are shown on the proposed site plan infrastructure drawing (Drawing reference: WPTC-F3A-ZZ-EX-SC-A-089502). The proposed ancillary infrastructure is considered inappropriate development, resulting in very low to low level of harm due to the impact on the visual aspect of openness. The ancillary infrastructure does not conflict with the purpose of the Green Belt in paragraph 143 of the NPPF.



8.13 In assessing the proposal's impact on the visual aspect of the openness, the applicant has conducted a Landscape and Visual Impact Assessment (LVIA), showing the views to application site as existing, in 1 year post construction and in 10 years post construction, from selected viewpoints agreed with the Council's Heritage Officer and Landscape Officer. The LVIA shows in the first year post-construction, the floodlights will be visible from viewpoints 4, 12, 14, and 15. In 10 years post-construction, the floodlights will not be visible during the daytime due to the significant tree planting and landscaping. A night-time assessment conducted as part of the LVIA shows that the floodlights will be visible from viewpoints 4, 7, 12, and 15 during winter months, with an element of skyglow until 08.30pm. The proposed floodlight will have a low level of harm due the visual impact on openness.

**(3) Football Training Centre at the Northern Clubhouse**

8.14 The proposal comprises a two-storey extension above ground to the rear of the existing Northern Clubhouse, along with a basement. Additionally, a single-storey infill of the courtyard within the existing building is proposed to provide a gym. Paragraph 154(c) of the NPPF applies to the proposed extension, while Paragraph 154(g) is relevant to the infill.

8.15 The proposed infill will be constructed on previously developed land and will cover an area of 122sqm. The increase in floor space is minimal and the infill will not be visible to the public as the access route will be partially closed off from any viewpoints, as evidenced in the LVIA. As such, we consider this infill to constitute appropriate development. There would be no harm on the openness of the Green Belt, being screened from the wider views of the parkland, sitting within the curtilage of an existing building.

8.16 Paragraph 154(c) stipulates that extensions or alterations to a building may be considered appropriate provided it does not result in disproportionate additions over and above the original building size. The existing gross external area (GEA) of the Northern Clubhouse is 565sqm, and the proposed extension will add 1,725.70sqm above ground.

**Table 3 - Comparison between the original Northern Clubhouse, the Proposed Extension and the Proposed Northern Clubhouse after Extension**

Gross External Area	The original Northern Clubhouse	The proposed rear extension	The proposed Northern Clubhouse after extension
Overall (above ground)	565 sqm	1725.70 sqm	2290.70 sqm (GIA)
Overall	565 sqm	2738.98 sqm	3303.98 sqm (GEA)

8.17 As a result, the extended Northern Clubhouse will be approximately four times larger in terms of floorspace above ground and twice as large in volume, when compared to the original building. It is considered that the proposed above ground extensions are disproportionately larger than the original building, as defined in paragraph 154 c) of the NPPF, resulting in inappropriate development. In assessing the level of harm, we note that the proposed access route to the Northern Clubhouse will be partially closed off from the public and dedicated to THFC, thereby reducing its visibility. The Northern Clubhouse is screened by dense vegetation and is unlikely to be seen from any publicly

accessible areas. The LVIA provides evidence that the Northern Clubhouse will not be visible from Viewpoints 1-15. The elevational treatment and materiality utilised is sympathetic to the rural character of the area, utilising timber prominently, limiting the visual impact on the openness. As a result, the extension has a low level of harm, with limited visual and spatial impact on the openness, with significant mature landscaping surrounding the Northern Clubhouse. This aligns with the Green Belt and Metropolitan Open Space Study assessment (see para 6.14 in this report). The Football Training Centre at the Northern Clubhouse does not conflict with the purpose of the Green Belt in paragraph 143 of the NPPF.

#### **(4) Ground Maintenance Building (GMB)**

- 8.18 The GMB is an existing building (see figure 42 in the DAS) measuring a gross external area of 221 sqm, with 3m green waste silo, which is being relocated to the far northern part of the training centre, within the operational boundary. It is being reused to house maintenance equipment associated with the management of the football pitches and wider training centre, within the operational boundary. The GMB is appropriate development falling within paragraph 154(d) of the NPPF, as it is not materially larger (the same building is being used and moved) than the building it replaces. It will have a very low level of harm on the spatial and visual aspects of openness, being confined to the northern part of the site, mainly screened within the operational boundary. The GMB does not conflict with the purposes of the Green Belt in paragraph 143 of the NPPF.

#### **(5) New Gatehouse**

- 8.19 The new gatehouse falls within Paragraph 154(g), as it will be constructed on the existing car park of the Northern Clubhouse, constituting development on previously developed land. The new gatehouse is 50sqm (GEA), and the existing groundskeeper's building being demolished there will be an overall reduction in building floorspace and is appropriate development in the Green Belt in accordance with Paragraph 154(g).
- 8.20 The new gatehouse is not visible from the viewpoints assessed in the LVIA. Visibility from publicly accessible areas will be limited viewing the building when approaching the training centre security gate and would have no harm on both the visual and spatial openness of the Green Belt. The new gatehouse does not conflict with the purpose of the Green Belt in paragraph 143 of the NPPF.

#### **(6) Ground works**

- 8.21 The ground works to enable creation of a level area for the delivery of the football pitches is considered appropriate development (within paragraph 154(h)), being negligible in relation to the scale and size of the operational boundary within the training centre and does not harm the spatial and visual aspects of the openness of the Green Belt. The ground works does not conflict with the purpose of the Green Belt in paragraph 143 of the NPPF.

#### **(7) Boundary Treatment**

- 8.22 The boundary treatment encloses the training facility into a single, unified built form. These proposals are considered to be inappropriate development. There will be a very low level of harm on the visual and spatial aspect of openness. The boundary treatment will obscure long views from the Southern Clubhouse looking north (refer to viewpoints 14 and 15 from the LVIA). It will also be visible from viewpoints 4, 9, 12, 14, and 15, during the first year post construction, but this diminishes by year 10 post construction, resulting in a 'slightly beneficial' impact on the landscape character and 'neutral' effect on the visual aspect, as evidenced in the LVIA (refer to Table 2). The boundary treatment does not conflict with the purpose of the Green Belt in paragraph 143 of the NPPF.

### **Green Belt Conclusion (within the operational boundary)**

- 8.23 There are a total of seven elements which have been assessed within the training centre operational boundary, four of which are deemed to be appropriate development. The ancillary infrastructure and the boundary treatment are considered to be inappropriate development, with a very low to low level of harm to the spatial and visual aspects of the openness of the Green Belt when assessed in relation to paragraph 154 of the NPPF.
- 8.24 The football training centre in the northern clubhouse is inappropriate development, with a low level of harm to the spatial and visual aspects of the openness of the Green Belt when assessed in relation to paragraph 154 of the NPPF. This harm has been minimised by using the cluster of existing development within the Green Belt. This assessment aligns with the appraisal of the promoted land uses at Whitewebbs Golf Course (CFS161) in the Green Belt and Metropolitan Open Land Study prepared in support of the emerging Local Plan and supports the allocation of the site in SA RUR.707 for nature recovery uses; professional sport, recreation and community sports/leisure uses, with ancillary related uses. The Study states in paragraph 8.36 "harm would be minimised by confining new development/uses within the existing fabric of these permanent buildings or through relatively small 'proportionate' extensions to them".
- 8.25 The overall level of harm is **low** when applying planning judgement on the impact of both spatial and visual aspects on the openness of the Green Belt for this part of the proposals. Therefore, VSC are required to outweigh the harm caused by the inappropriate development.
- 8.26 The proposals within the operational boundary of the training centre also continue to make a strong contribution to the Green Belt purposes, set out in paragraph 143 of the NPPF. There is no conflict with those purposes.

### ***Outside the operational boundary of the training centre***

#### **(8) Café, Public Toilets, and Community Room at the Southern Clubhouse**

- 8.27 This element of the proposal involves the partial demolition of the Southern Clubhouse and replacement on previously developed land (refer to section 3 of this report) and Paragraph 154(g) of the NPPF is applicable. The proposals align with the remit of this paragraph. The new Southern Clubhouse will have a Gross External Area (GEA) of 449 sqm, representing a minor increase of 42 sqm compared to the existing building. The footprint and overall volume of the proposed structure closely align with the current building. The building is proposed to be of a similar scale to the current structure, featuring timber panels and timber louvres, which are considered in keeping with the parkland character of Whitewebbs. The proposals for the Southern Clubhouse are appropriate development. They would not cause substantial harm to the visual and spatial aspects of openness in the Green Belt. Southern Clubhouse proposals do not conflict with the purpose of the Green Belt in paragraph 143 of the NPPF, and align with the assessment in paragraph 8.36 of the Green Belt and Metropolitan Open Land Study, confining development to this southern cluster of previously developed land.

#### **(9) Historic Carriageway**

- 8.28 This element of the proposal includes engineering works and local transport infrastructure, which relates to paragraph 154(h) of the NPPF, which are appropriate, if they preserve the openness of Green Belt and do not conflict with the purposes of including land within it. The historic carriageway will change from a rural informal footpath, which does not accommodate vehicles, to a route to be upgraded and used by pedestrians, cyclists and vehicles. After reviewing the submitted Transport Assessment,

we acknowledge that the current trip generation to Whitewebbs House (Toby Carvery) from the northern access is 150 trips during the weekend peak hour (15:00-16:00 on Sundays) and 66 trips during the weekday evening peak hour (17:00-18:00). Following the reinstatement of the historic carriageway, it is anticipated that visitors to Toby Carvery will need to use this route instead of the northern access, and trip levels are expected to remain comparable to the current generation from the northern access.

- 8.29 The traffic generation would result in a low level of harm to the Green Belt, due to the increase in vehicles resulting in an impact on the spatial and visual aspect of openness and is therefore inappropriate development. The route is not visible from any views within or outside of the application site, being screened by mature trees.

**(10) Parkland and New Footpaths**

- 8.30 The restoration of the parkland includes new tree planting, footpaths, and minor park-related infrastructure such as bollards, benches, and bins. This element of the proposal involves the permitted change of use of the application site from a golf course to parkland both within Class F2, and paragraph 154(b) applies and this is appropriate development, and do not have any harm and preserve the openness of the Green Belt. The parkland and footpaths are compatible with the purpose of including land within the Green Belt, as set out in paragraph 143 of the NPPF.

**(11) Whitewebbs Pond**

- 8.31 This element of the proposal includes engineering works and paragraph 154(h) of the NPPF is relevant. Due to the scale of the works, officers consider they preserve the openness of the Green Belt, do not conflict with its purposes, and therefore constitutes appropriate development.

**(12) Existing Vehicular and Pedestrian Access to the Northern Clubhouse and Parking**

- 8.32 This element of the proposal includes engineering works relevant to paragraph 154(h) of the NPPF. The restriction of this access route to the proposed female training facility and the delivery and servicing vehicles for Toby Carvery is anticipated to reduce overall traffic levels following a review of the submitted Transport Assessment. The existing trip generation on this route during peak weekday evening hours includes 66 trips to Toby Carvery and 40 trips to the former golf course, resulting in a total of 106 trips. Whereas the proposed access route is expected to generate 24 trips to the proposed training facility and 30 trips to pitches, amounting to a total of 54 trips. The trips for delivering and servicing remain unchanged at this route. Overall, this represents a decrease in traffic compared to the current situation, suggesting that the proposed changes will lead to reduced vehicular activity on this route. Therefore, we consider this element of the proposal preserves the openness of the Green Belt and constitutes appropriate development. These engineering works are compatible with the purpose of including land within the Green Belt, as set out in paragraph 143 of the NPPF.

**(13) Operational Link**

- 8.33 This element of the proposal includes engineering works relevant to paragraph 154 (h) of the NPPF, to construct a suitable surface for slow-moving off-road vehicles. Given the scale of the proposed surface and the relatively low level of activity it is expected to generate, we consider that this development will preserve the openness of the Green Belt and constitute appropriate development. These engineering works are compatible

with the purpose of including land within the Green Belt, as set out in paragraph 143 of the NPPF.

### **Green Belt Conclusion (outside the operational boundary)**

- 8.34 There are a total of six elements which have been assessed outside of the training centre operational boundary, five of which are considered to be appropriate development. The historic carriageway is deemed inappropriate development, with a low level of harm to the spatial and visual aspects of the openness of the Green Belt when assessed in relation to paragraph 154 of the NPPF. The overall level of harm is **low** when applying planning judgement on the impact of both spatial and visual aspects on the openness of the Green Belt for this part of the proposals. Therefore, VSC are required to outweigh the harm caused by the inappropriate development.
- 8.35 The proposals outside of the operational boundary of the training centre also continue to make a very strong contribution to the Green Belt purposes, set out in paragraph 143 of the NPPF.

### **Overall Green Belt Conclusion**

- 8.36 There are four items within the proposals both within the operational boundary and outside the operational boundary of the training centre, which results in inappropriate development (refer to Table 2). The resultant harm to the spatial, visual and openness of the Green Belt has been weighted as low. Whilst the impact on openness is low, harm to the Green Belt by virtue of inappropriateness and impact on openness must be given significant weight. An assessment of the VSC submitted by the applicant has been undertaken below, to ascertain whether the VSC outweighs the harm caused by the proposals.

### **Very Special Circumstances (VSC)**

- 8.37 The applicant has provided information to support the VSC case, detailed in this section of the report. When these benefits are considered cumulatively, officers consider they outweigh the harm caused to the Green Belt through inappropriate development and a loss of openness.

#### **(1) Need for a dedicated women's and girls' football training facility**

- 8.38 The application identifies the need for THFC to establish a dedicated women's and girls' football training facility as one of the VSCs to justify the proposed development.
- 8.39 The applicant provided evidence that several premier league football clubs are actively investing in expanding their women's football programs and associated facilities. This includes, as referenced in paragraph 8.64 of the submitted Planning Statement:
- Manchester United opened a new elite women's facility for the 2023/2024 season at an investment value of £7m.
  - Manchester City recently submitted a planning application for a purpose-built women's training facility with an investment value of up to £10m.
  - Liverpool announced plans in June 2023 for a new women's training facility.
- 8.40 The application further outlines that THFC's women's and girls' teams currently train at a temporary facility located at the Western Field and this facility does not fully comply with standards set forth by the Football Association. This temporary training centre was granted planning permission under Application 21/03694/FUL, which is set to expire in January 2025. In September 2024, an application was submitted to extend the temporary permission until January 2028. This application is currently under review

and awaiting a decision. It is explained in the paragraph 8.63 of the Planning Statement that, should the temporary facility's permission expire, THFC will not have a permanent home for their women and girls' teams. In such a scenario, the club would be compelled to use public facilities, which are not of the standard required for elite-level training and development. Additionally, it was also explained that the current educational programme to younger players is delivered between the temporary training centre and the stadium in Haringey. This increases the number of trips which are unsustainable.

8.41 Officers consider this need driven by the increasing popularity and growth of women's football is clear and the level of information provided within the application is sufficient to demonstrate this.

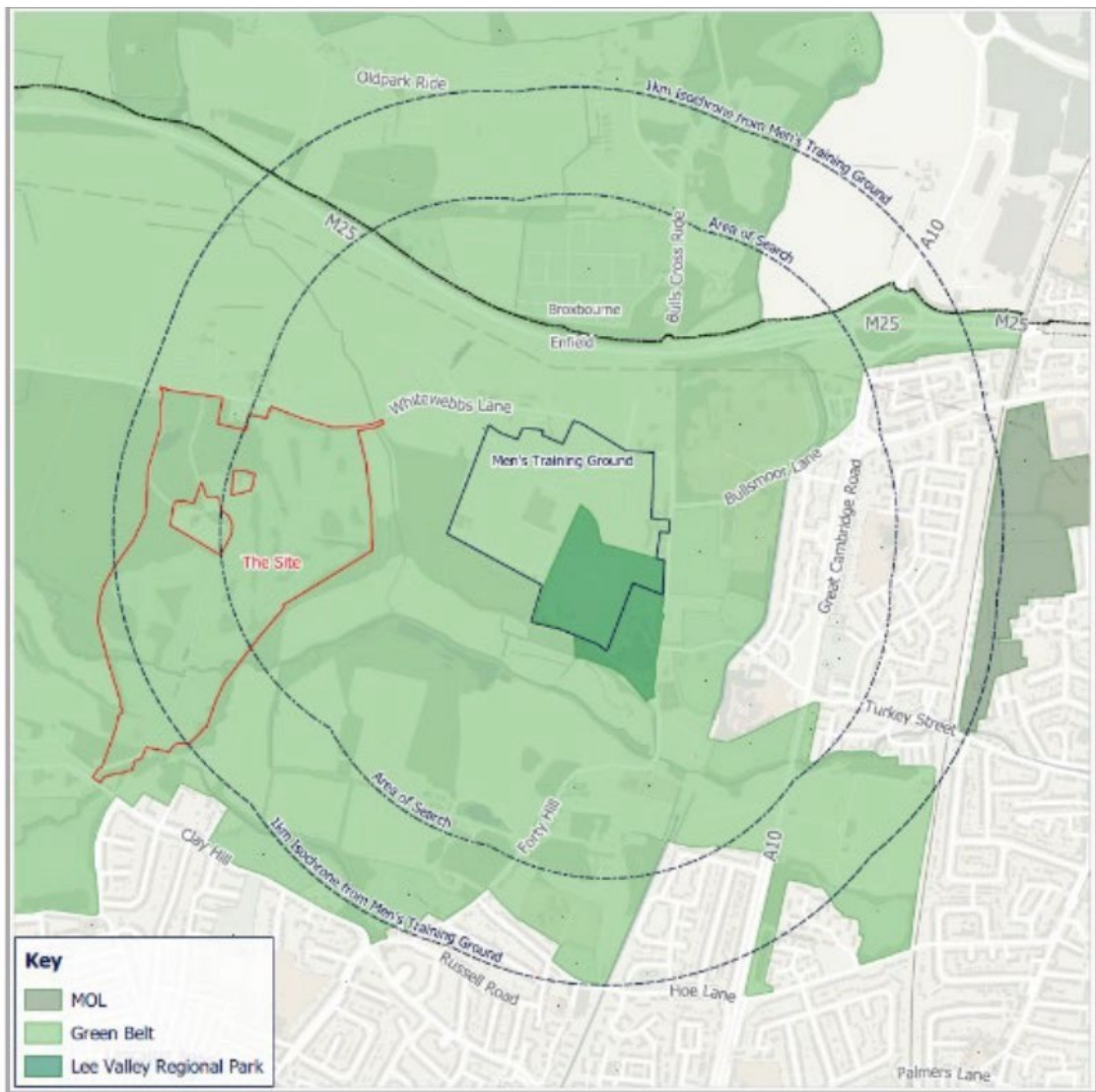
8.42 Table 4 provides the details of the community and educational programmes that the applicant will provide, specifically aimed at women and girls. The facility will develop both elite and grass roots football, seeking to promote and facilitate the growth in women's football. The Football Association support the proposals and this should be viewed positively, as the development of such a facility is expected to contribute to the continued growth of women's professional sports. Paragraph 5.5.5 of the London Plan also notes that specialist sporting venues and stadiums have a role to play in providing facilities and enabling wider access to sport, as well as having an important cultural value. The establishment of a dedicated women's training facility is anticipated to attract more women and girls within Enfield to football, encouraging active participation in sports. We consider the need to be in alignment with the objectives of the London Plan.

8.43 Overall, the need for an elite female football training facility is a relevant and compelling factor in support of the application, and **substantial weight** is afforded to the need.

## **(2) Lack of Suitable Alternative Site / Co-locating the Existing and Proposed Facilities**

8.44 The applicant has provided information in relation to the lack of a suitable alternative sites, showing a site search in Figure 8.2 of the Planning Statement. This site search was conducted within a radius that is equivalent to the distance between the proposed and the existing facility (approximately 800 metres), with an additional search of 1km radius. The mapping indicates that most alternative sites would be situated within the Green Belt or Metropolitan Open Land, which is equally not preferable in accordance with Paragraphs 152-160 of the National Planning Policy Framework (NPPF), Policy DMD 82, Core Policy 33, and Policy BG5.

**Figure 4 - Figure 8.2 in the Planning Statement**



8.45 There is a clear benefit of co-locating the two training centres in proximity to one another, enabling the shared use of several facilities, reducing the operational area required for the women's training facility, saving at least 1ha of land, as well as reducing the number of trips on the adopted highway. The application demonstrates that the following facilities within the existing training complex will be shared, as outlined in Paragraph 5.49 of the Planning Statement:

- Media Centre (531sqm).
- Indoor Pitch (3.642sqm).
- DEXA Scanner (27sqm).
- Cryotherapy Room (10sqm).
- Auditorium (95sqm).
- HR, Safeguarding and Legal Services (244sqm).
- Recreation Room (224sqm).
- Amphitheatre (129sqm).
- Outdoor Player Recreation Area (170sqm).
- Myddelton Lodge (player/staff accommodation) (3,980sqm).

- 8.46 The benefits of co-location are acknowledged in Paragraph 5.5.6 of the London Plan, which states that the co-location of sports facilities should be encouraged, particularly within new and existing schools, colleges, commercial schemes, and community centres. This approach aims to ensure that the appropriate mix of facilities is available in suitable locations to meet sporting demands and promote increased participation. We consider the co-location choice is clear and the level of information provided within the application sufficient to demonstrate this.
- 8.47 Overall, it is acknowledged there are no other suitable sites within the 1km radius, which is considered sufficient, in the context of the clear co-locational benefits, which carry **substantial weight**.

### **(3) Providing Community Access to Football**

- 8.48 Community access has been identified as one of the VSCs justifying the proposed development. The S106 legal agreement with the Council, will ensure the provision of a minimum number of hours during term time and holiday time dedicated to football-related programmes for mainly women and girls for the duration that the training centre is in operation. This will be reviewed annually to assess whether any modifications are needed to the proposed community and education programmes.
- 8.49 The community and education programmes have been developed in consultation with the Council's Parks, Leisure, and Culture team, and these are set out in **Table 4**. The programme includes a variety of activities, including different types and intensities of football games, coaching, and teaching. The activities will be conducted at the proposed training facility, as well as in local schools and community groups in Enfield and at the THFC stadium in Haringey. There is also a requirement to provide transportation from the eastern side of the Borough to the training centre.

**Table 4 - Summary of Programme in s106 Heads of Terms**

No	Activity	Target group	Description	Committed Delivery hours
1	Proposed Global Football Development (GFD) Premier Days	8-15 year old girls	<p>Providing unique access to the new Women's and Girls' Training Centre, GFD Premier Days are prestigious events which offer 8-15 year olds a unique insight into coaching methods and techniques.</p> <p>The new Women's and Girls' TC enables us to host 8 new GFD Premier Days each year exclusively for girls. Each session will have 100 participants taking part in 8 hours of coaching.</p> <p>GFD sessions are aimed at girls of varying ability. Premier Days specifically are designed to cater to a wide range of young players and provide the opportunity to train on Academy pitches giving young people experience of what it's like to train in a professional environment.</p>	<p>800 participants will receive 8 hours of coaching each year</p> <p><b>6,400 hours</b></p>



No	Activity	Target group	Description	Committed Delivery hours
			800 participants will take part over 12 months.	
2	Proposed Global Football Development (GFD) Centers	5 – 15 year old girls	<p>The new Women’s and Girls’ TC will enable THFC to deliver GFD Development Centers tailored for girls aged 5 – 15. This would operate in term time (approx. 40wks a year) from 4.30pm-6.30pm each Friday.</p> <p>Each session will have 60 participants taking part in a 6 week programme. 6 different groups of girls will participate each year.</p> <p>360 participants will receive 12 hours of teaching over 12 months.</p> <p>This provision will be new delivery at the Women’s and Girls’ Training Academy.</p> <p>As part of this programme, THFC will target the sessions for the residents in the Borough, with a focus on communities which experience the greatest level of social exclusion, notably in the east of the Borough.</p>	<p>360 participants will receive 12 hours of teaching each year</p> <p>4,320 hours</p>
3	Proposed Next Generation Girls	12-17 year old girls	<p>This programme, led by Tottenham Hotspur Foundation, targets the traditional age range ‘out’ of football.</p> <p>Operating a ‘turn up and play model’ with the opportunity to play in tournaments, attend Spurs Women matches and gain qualifications.</p> <p>The programme currently runs in various locations across the community, but the new Women’s and Girls’ TC will provide the opportunity to run a session on site once a week in term time for 2 hours.</p> <p>15 participants will receive 2 hours of coaching each week during term time.</p> <p>This programme will involve some of these sessions being held in locations in the Borough, to be agreed with the Council, aimed at raising the profile of the programme to all residents.</p>	<p>15 participants will receive 2 hours of coaching once a week for 40 weeks</p> <p>1,200 hours</p>

No	Activity	Target group	Description	Committed Delivery hours
4	Proposed Wildcats	5-11 year old girls	<p>Wildcats Girls' Football is an FA led initiative that offers non-competitive sessions for girls who want to give football a go for the very first time.</p> <p>These sessions will be run by THFC at locations across the Borough for one hour each week.</p>	<p>25 participants will receive 1 hour of coaching per week for 40 weeks</p> <p>1,000 hours</p>
5	Proposed GFD College Programmes	16 – 18 year old girls	<p>The Club has active partnerships with 3 local colleges e.g., Barnet and Southgate College, where local students have the opportunity to undertake football coaching lessons and graduate with a Btech qualification in Sport.</p> <p>This is currently delivered at Barnet and Southgate College, but the new Women's and Girls' Training Centre will provide the opportunity to welcome students and deliver teaching facilities in-house.</p> <p>This is an education programme with formal qualifications attached to it, hence the high number of hours. Students taking part in this programme are able to select from a number of full-time academic qualifications ranging from BTEC Level 1,2,3 or Level 3 Extended Diploma in Sport, A Levels, NVQ level 2 in activity leadership etc.</p> <p>The Women's and Girls' Training Academy provides the opportunity for students to gain experience within an elite sporting facility.</p> <p>Each partnership would take part in one full day (8 hours of teaching) per month.</p> <p>A total of 150 participants will receive 96 hours of coaching and Training Centre access each year.</p>	<p>150 participants will receive 96 hours of teaching at the new Women's Training Centre each year enabling them to learn consistently in an elite environment geared towards sporting excellence.</p> <p>14,400 hours</p>
6	Proposed GFD Coach Academy Open Days	16 – 18 year olds mixed gender	<p>GFD will run bespoke education events for key partners including local sports clubs and schools for those interested in learning more about coaching.</p>	<p>360 participants will receive 8 hours of teaching each year</p> <p>2,880 hours</p>

No	Activity	Target group	Description	Committed Delivery hours
			<p>Covering both practical and theory based sessions, a total of 30 participants will participate one full day each month.</p> <p>This provision will be new to the Women's and Girls' Training Academy</p>	
7	Proposed Women's Health Education Programme and annual roadshow event	Mixed gender group drawn from local sports Clubs and schools	<p>Tottenham Hotspur Foundation has ambitions to run an education programme centered around women's health.</p> <p>The programme aims to educate grassroots clubs and schools about women's health to ensure girls are properly supported to stay active as they approach their teenage years.</p> <p>It will include information about puberty and menopause and include 6 courses throughout the year. These courses will take place off site, but the women's and girls' training centre provides the opportunity to host one annual roadshow event each year to share learnings and promote the programme within the context of an elite sporting facility.</p> <p>The roadshow will rotate between stadium and TC, i.e. Haringey and Enfield.</p> <p>Participants would be drawn from local sports Clubs and schools.</p> <p>This would be delivered every other year</p>	<p>Up to 150 participants will be invited to attend an annual roadshow event at the Training Centre which will be one full day of 8 hours</p> <p>1,200 hours</p>
8	Proposed Primary Stars	Ages 5-11 mixed gender	<p>A programme which utilizes the appeal of Tottenham Hotspur Football Club to inspire children to be active and develop important life skills.</p> <p>The curriculum-linked teaching resources support English, Math, PSHE and PE, with flexible activity ideas, worksheets, lesson plans, assemblies, and exclusive videos.</p> <p>PSHE topics include resilience, diversity, self-esteem, and fair play.</p> <p>PLPS is a programme that is delivered in 6 week blocks to different classes / schools. The true number of PLPS delivery is in the next section, this additionality will bring</p>	<p>This is an externally based programme in primary schools. Our intention would be to use the Women's and Girls' Training Centre as an incentive and reward for KS2 classes. It is an expanded offer to the existing Primary Stars programme run by THFC.</p> <p>25 participants will receive 1 hour of coaching in the new Women's Training Centre once a week for 40 weeks</p>

No	Activity	Target group	Description	Committed Delivery hours
			<p>one class of children (approx x25) once a week to the WTC to hold tournaments x4 / year.</p>	<p>1,000 hours</p> <p>In addition, 25 participants will receive 2 hours of coaching at the Training Centre six times a year.</p> <p>300 hours</p>
9	Proposed PL Kicks	9 – 18 year olds mixed gender group	<p>Premier League Kicks is a series of free football and multi-sport sessions that provide positive activities through participation in football, workshops on important social topics, tournaments, qualifications, and volunteering.</p> <p>The new Women's and Girls' Training Centre provides the opportunity to host bi-monthly tournaments for Kicks participants as a reward and to keep those on the programme engaged.</p> <p>A total of 30 participants would take part in one full day every 2 months</p>	<p>30 participants will receive 8 hours of on-site coaching every 2 months</p> <p>1,440 hours</p>
10	Proposed Hosting school/regional grassroots football tournaments	Various participants with a range of ages	<p>The new Women's and Girls' Training Centre provides the opportunity to host various grassroots tournaments once a month.</p> <p>These will be linked to key campaigns, e.g., the Godwin Lawson tournament which diverts young people at risk of gang violence away from crime</p>	<p>On two half days each month a different school or other group will be hosted at the Training Centre. Approx 60 participants will receive 3 hours of access each month</p> <p>2,160 hours</p>
11	Proposed Women's Walking Football	Women aged 40+	<p>Targeting inactive females in a safe and fun environment. The aim is to create opportunities to participate in football – often for the first time – as well as socialize. Outcomes include improved physical and mental wellbeing.</p> <p>This programme will be delivered across Enfield in various locations, but the new Women's and Girls' Training Centre provides the opportunity to host 4 half day sessions a year</p>	<p>100 participants will take part in 4 hours of coaching each year</p> <p>400 hours</p>

No	Activity	Target group	Description	Committed Delivery hours
			A total of 25 participants will take part in each session	
12	Proposed Programme-Child Weight Management service (CWM)	Health services refer children and young people from the Enfield CWM services	Combining Fitness and Football, the service engages with a range of children and young people to get active, move more and manage their weight	After School 2hrs p/w

8.50 Upon review of the training programme for the existing training facility, officers can confirm that the proposed programme does not duplicate existing activities, a concern raised by Sport England. The Council is satisfied that these proposed programmes introduce new sessions or expands upon current offerings to women and girls.

8.51 The types of sessions included in the programme are varied and designed for women and girls across different age groups and skill levels. Additionally, the programme includes sessions for local schools and community groups within the Borough. This approach is considered an extremely positive aspect of the proposal.

8.52 The Council's Parks, Leisure, and Culture team would like to see more off-site delivery of programmes, closer to the community. However, they have accepted that much of the programme will be delivered at the proposed training facility. Officers consider this appropriate, as the proposed facility will offer higher-quality pitches and classrooms.

8.53 A key consideration is how these community sessions will be delivered. Drawings highlighting the area within the training facility that is available for the community have been submitted:

- Inside Operational Boundary Public Accessibility (Drawing Reference: WPTC-F3A-ZZ-EX-SC-A-039031)
- Northern Clubhouse – Proposed Ground Floor Plan Community Use (Drawing Reference: WPTC-F3A-NC-00-GA-A-032015)
- Northern Clubhouse – Proposed First Floor Plan Community Use (Drawing Reference: WPTC-F3A-NC-00-GA-A-032016)

8.54 Pitches AC2 (natural grass) and AC4 (synthetic) will be provided for community use, both of which are equipped with floodlights, allowing for evening activities. Two classrooms on the first floor, measuring 63 sqm and 54 sqm, will be available for educational initiatives. The community will also have access to two changing rooms, each equipped with showers, toilets, and lockers, measuring 52 sqm and 56 sqm.

8.55 Another important consideration is accessibility, particularly ensuring that the community can reach the new facility being located in the far west part of the Borough. Therefore, the Parks, Leisure, and Culture team have requested that the applicant provide transport services, such as coach rides, from the Borough's most deprived areas to the proposed

training facility. This would help ensure that the programmes are accessible to all residents, regardless of their location within the Borough. The transportation services are to be agreed and secured as part of the on-going commitment within the legal agreement. At present this is confirmed in version 4 of Appendix 6 'Community Outreach Programme', which states:

**“The Club will work with Enfield Council to identify transport strategies, including the use of transport funded by the Club, to give good access to beneficiaries of these programmes.”**

8.56 Officers consider that the level of information provided is sufficient for assessing the proposal and this commitment towards transport service will be included in the S106 legal agreement. Overall, the proposed programme directly promotes the participation of women and girls in sports and ensures that the proposed training facility is inclusive of the local communities. Officers consider this a significant factor in contributing to the VSCs that support the application and have afforded this **substantial weight** in the decision-making process.

#### **(4) Environmental and Sustainability Benefits**

8.57 The proposals include a range of environmental and sustainability benefits, which are site specific to the proposals, which are set out below:

1. An overall net gain in the number of trees within the application site, with new c.2000 new trees being planted across the site as a whole; 231 new trees would be planted within the operational boundary (equating to a net gain of 115 trees), 241 new trees within the operational boundary and c.1,800 new trees within areas of new woodland.
2. Introduction of electric vehicle charging points, in the northern car park and the southern car park for public use.
3. An increase in the provision of cycle stands to promote travelling sustainably.
4. A significant provision above the statutory 10% minimum requirement in Biodiversity Net Gain, (33% for habitats, 81% for watercourses and 17 hedgerow units).
5. Improvement works to Whitewebbs Pond, both environmental and from a safety perspective.
6. Ecological management of the application site, including part of the Ancient Woodland.
7. Enhancements to the existing 12 ha of woodland within the application boundary, with new diverse native planting within this area.
8. Restoration of the parkland, enhancing the footpaths, providing new street furniture, signage, and the ongoing management and maintenance of the parkland to a high-quality standard.
9. Formation of a new nature corridor connecting the application site with Dickenson's Meadow.
10. A contribution towards improving the public transport infrastructure in the north and south of the application site, including local bus stops, pedestrian infrastructure and cycle routes. This seeks to encourage sustainable forms of transport.

8.58 The above benefits have been given **substantial weight** in the decision making process.

#### **(5) Health and Social Benefits**

8.59 There are several health and social benefits derived directly from the proposals. These include:

- There are several and significant improvements to the parkland, publicly accessible open space in the local area, facilitating and encouraging walking, cycling, running and outdoor sports. These align with the LBE's Health and Well-being Strategy (2020-2023), which seeks to encourage active and healthy lifestyles, and being socially connected through public places. The improved access to nature and biodiversity have clear benefits to the health and well-being of users.
- The creation of a new Women's Training Centre, that will help support the growth and improve women's and girls' sports, in football.
- There is a clear direct benefit to creating healthier lifestyles for the local community, as well as those within the Tottenham Hotspur Female Football Club. This is evidenced through the provision of the community access the sports programmes, and by virtue of being able to hold sports activities within the new community hub.
- There is a demonstrable desire to attract all ages into the programmes and a wide-ranging demographic, to encourage a healthier, more active Enfield. The ability to participate in these activities and programmes seeks to encourage people to engage and meet, enabling community groups to grow and improve.

8.60 These benefits have been given **substantial weight** in the decision making process.

#### **(6) Economic Benefits**

8.61 In the construction phase, there will be an average of circa 212 full time equivalent (FTE) jobs, supported over the 27 month construction period, with approximately £29.4m in GVA during that same duration. At the operational phase, there are likely to be between 58-74 net additional FTE permanent, operational jobs, along with between £309,000 - £395,000 in employee spending per year, which will be available to local businesses. Additionally, between £3m and £3.1m per year in GVA, and between £1.7m and £1.8m in the form of wages per year.

8.62 As part of the proposals, there will be at least 1 apprentice/trainee to be employed per £1m of contract value, with apprentices to be employed for at least 12 months. These are being secured in the legal agreement.

8.63 These benefits have been given **moderate weight** in the decision making process.

8.64 The applicant has cited the wider financial benefit to women's football with a sixfold increase in commercial value over the next decade, reaching an annual value of €686 million in 2033, with Club sponsorship set to increase to €295 million in that time. Officers do not consider this to be specific enough to directly relate to the proposals and this is not a direct benefit of the proposals and not VSC.

#### **VSC Conclusion**

8.65 The proposal contains some inappropriate development. Therefore, the acceptability of the proposal as a whole is reliant on VSC meeting the threshold set out in the NPPF paragraph 153 "*when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of*

*inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*

- 8.66 Neither the NPPF nor the adopted Development Plan provide guidance as to what can comprise VSC, either singly or in combination. However, some interpretation of VSC have been provided by the Courts. The rarity or uniqueness of a factor may make it very special, but it has also been held that the aggregation of commonplace factors could combine to create VSC, i.e. ‘very special’ is not necessarily to be interpreted as the converse of ‘commonplace’. However, the demonstration of VSC is a ‘high’ test and the circumstances which are relied upon must be genuinely ‘very special’.
- 8.67 The benefit items detailed (1 to 6 above) are considered in combination to constitute very special circumstances sufficient to outweigh the harm to the Green Belt identified.

### **Loss of Open Space**

- 8.68 The application site is designated as Green Belt, an area of Local Open Space and partly within a Site of Metropolitan Importance for Nature Conservation (SINC) within the adopted development plan. Some weight is also afforded to the draft site allocation SA RUR.707 for nature recovery uses; professional sport, recreation and community sports/leisure uses, with ancillary related uses. Therefore, the proposal should be assessed in accordance with the relevant paragraphs of the NPPF; and LBE policies that relate to these site designations, as listed in section 6 of this report.
- 8.69 The proposal involves the change of use from the former golf course (Class F2), to use part of the site (16ha) for an elite female football training complex (Sui Generis). The proposal also includes the restoration of the remaining portion of the former golf course (23ha) to an historic parkland and preserves the existing 12ha of publicly accessible woodland.
- 8.70 The former golf course was permanently closed due to the lack of viable golf-related offers received through the tendering process and the ongoing financial losses associated with maintaining the facility. Full details of this exercise and the bids received were reviewed at the Overview & Scrutiny Committee meeting on 27 July 2023 and the committee report is available on LBE’s website. Therefore, officers consider that it is more appropriate to assess the former golf course’s current condition, as a recreational open space, and the application should be assessed based on its partial loss. Officers also acknowledge that the facilities of Whitewebbs could be re-used and opened for use as a golf course, without the need for planning permission.
- 8.71 When assessing the loss of the publicly accessible parkland, it is helpful to refer to the High Court judge’s decision in relation to the judicial review of the Agreement for Lease between the landowner and the applicant. The High Court judgment stated in paragraph 13 *“Members of the public were able to pass through and around the golf course as they wished, albeit that they did so on the basis that they did not interfere with play.”* Furthermore, paragraph 169 sets out that *“the Agreement and the proposed lease provide for the retention of 82% of the park as accessible public open space, an area that is in practice greater than was previously the case when the golf course was in operation.”*
- 8.72 Policy DM71 refers to the protection and enhancement of open space, requesting replacement in the same locality of better quality, or if it has been demonstrated to be surplus to requirement, development may be permissible, explaining *“essential structures and facilities that would support the enjoyment of, and maintain the openness of the open space will be acceptable provided that the size, siting, location, design and*



*materials would be sympathetic and proportionate to the operational requirements of the open space that it supports.”*

- 8.73 This is to be applied in conjunction with Policy CS34 where the Council will protect and enhance existing open space and seek opportunities to improve the provision of good quality and accessible open space through increasing the access to, quantity and quality of publicly accessible open spaces and supporting the community use of non-public open spaces, addressing areas of deficiency, particularly in the south and east of the Borough. LBE Parks & Leisure have reviewed and discussed at length the proposals with the applicant and provided a letter expressing their strong support for the application, stating *“it aligns with the Council’s Blue and Green Strategy, including those of promoting habitat conservation and sustainable land management. The proposed development will deliver significant and much-needed environmental benefits, particularly through the restoration and enhancement of Whitewebbs Park.”*
- 8.74 Furthermore, the letter outlines that the proposals would provide facilities to attract girls to engage in sport, which is identified by Sport England as having a 7% lower participation rate than boys under the age of 16. The applicant has also agreed to provide transportation from the eastern areas of the Borough to enable more deprived areas to have access to these elite facilities.

#### **Restoration of the Parkland**

- 8.75 In assessing the quality of the proposed parkland, the proposal will restore and enhance 23ha of the parkland and preserve the existing 12ha of woodland. The plans include new paths within the parkland, which is a positive feature, as it will improve access and movement through the space. The submitted Proposed Site Plan – Infrastructure Drawing (Drawing reference: WPTC-F3A-ZZ-EX-SC-A-089502) outlines the addition of various park infrastructure elements, such as bins, signage, benches, and lighting bollards. The application also includes the refurbishment of the Southern Clubhouse, together with the provision of new public toilets, café, a new community room (57sqm), and improved landscaping and seating, which is another positive outcome of the proposal.
- 8.76 Additionally, the applicant upon entering into the agreement for lease, will assume responsibility for managing the entire site for the duration of the lease period. Information about the parkland management is provided in the submitted Outline Parkland Management Plan (OPMP). The OPMP has been developed with input from the Council’s Parks, Leisure, and Culture team, as well as in consultation with the public. The plan includes commitments within and beyond the application boundary, such as tree planting, landscape maintenance, community engagement, and collaboration with the Council to further enhance the park and surrounding woodland. Officers consider the information supplied to be sufficient, and there is a requirement for a Full Parkland Management Plan to be submitted prior to the commencement of development, to be secured within the legal agreement, set out in **Appendix 2**.

#### **Enhancement of Part of Whitewebbs Woods**

- 8.77 The proposal includes the preservation and enhancement of the existing 12ha of woodland within the application boundary. There would be new diverse native planting within this area, including woodland shrub species such as hazel, hawthorn, holly and dogwood, along with native, locally prevalent woodland ferns, wildflowers and bulbs. The management of this woodland area would complement the wider management of Whitewebbs Wood. This includes the creation of woodland glades to allow woodland

edge habitat, including ground flora species to develop. Finally, the removal of areas of rhododendron and the replacement with native woodland understorey species, enhances the woodland area.

- 8.78 Therefore, while the proposal results in a reduction of publicly accessible open space of 16 ha, Officers consider the overall quality of the remaining area will be significantly improved, which aligns with Policy DMD 71. The enhancements of open space is considered to have a high level of benefit and substantial weight is afforded in the planning balance.
- 8.79 Overall, Policy DM71 and CS34 have been considered and addressed in full in the above assessment, and comply with enhancing the quality and quantity of publicly open space, and the principle of the Elite Female Football Training Facility Use is acceptable.

### **Archaeology**

- 8.80 The application site is located within an area of archaeological interest, specifically identified in the Local Plan as the Whitewebbs Hill, Bulls Cross, and Forty Hill Archaeological Priority Area. Consequently, Policy DMD44, Core Policy 31, and Policy HC1 and Paragraphs 206-214 of the NPPF are relevant.
- 8.81 Following consultation on the application, the Greater London Archaeological Advice Service (GLAAS) requested an archaeological field evaluation be carried out to inform their consideration of the application due to the large-scale nature of the proposed development
- 8.82 This informs the archaeological work currently carried out on site. Trial trench investigations of the application site have been conducted, with the approach being agreed in writing with GLAAS. A total of 21 trenches were excavated and subsequently filled in. The investigation revealed several post-medieval features, though these were found to have low archaeological significance and no further archaeological investigation is required.
- 8.83 GLAAS has reviewed the investigation has no objection, commenting:

*“The results of the archaeological field evaluation (PCA, 2024) completed in support of this application provide welcome information on the nature, extent and preservation of archaeological remains on the site. Limited positive results were gained and although further specialist study is required, it has been demonstrated that buried remains on the site in the Roman, medieval and post-medieval periods, most likely relates to peripheral activity at a distance from settlement during all these periods, probably associated with agriculture or land management.*

*The only concentration of features was located in and around trench 15, which under current plans will be built up to level the area for playing pitches. However, these remains are considered of low significance so no further archaeological investigation is recommended.”*

- 8.84 Therefore, Officers considered that the proposal will have a **neutral impact** on below-ground heritage assets. The application is therefore in compliance with Policy DMD44, Core Policy 31, and Policy HC1 and Paragraphs 206-214 of the NPPF.

### **Landscape**

- 8.85 The NPPF sets out the requirements to conserve and enhance the natural environment, in paragraphs 187 – 201, including landscapes. Policy G7 of the London Plan and Enfield Policies DMD 78 and CS 38 must be considered when assessing the proposals and the impact on the wider landscape both within and outside the application site.
- 8.86 All the viewpoints that have been assessed were agreed during pre-application meetings with the Council's Landscape Officer. Following assessment the LVIA was updated to provide additional information on the level of harm at year 1 (where there would be an adverse impact), a nighttime assessment and the sequential journey of receptors, rather than just describe changes to views. The refined LVIA therefore was more robust and comprehensive in addressing the comments made by officers.
- 8.87 Revised plans and supporting detail of planting mixes were submitted to adequately demonstrate that there would be mitigation in place by year 10. The proposed planting set out has been scrutinised by Officers in detail and discussed at length with the applicant. There is an agreement on the level of landscape visual impact over the period set out in the LVIA (years 1 – 10).
- 8.88 On this basis, Officers are satisfied that the proposed development will not result in residual adverse impacts and accords to Policy DMD 84, DMD 82 and DMD 81 and Core Policy 33 and 34. The Landscape Officer has **no objection**.

### **Arboriculture**

- 8.89 The NPPF sets out the requirements to conserve and enhance the natural environment, in paragraphs 187 – 201, including landscapes, which trees form an important part. Policy G7 of the London Plan and Enfield Policies DMD 78 and CS 38 must be considered when assessing the proposals and the impact on the trees within the application site.
- 8.90 The application is supported by an Arboricultural Impact Assessment (AIA) and a Landscape Statement. These have been reviewed and further information requested both at pre-application and during determination, by the Tree Officer. The Tree Officer has confirmed that no Category A trees will be removed or harmed by the proposals. The proposed pitches and Northern Clubhouse require the full removal of 22 category B trees, 46 category C trees, five category C tree groups and 19 category U trees. The Southern Clubhouse requires the removal of one category C tree. The historic access requires the removal of three category C trees, for which there is no objection, due to re-plating mitigation. The AIA has outlined a suitable rationale to show how the remaining trees will be protected throughout the duration of the development, with the use of cellular confinement specified alongside no dig within the area. The surfacing to be used is also permeable to ensure no disruption to the physiological functioning of the roots. Remedial works are outlined where needed where works are taking place.
- 8.91 The category B specimens are material considerations in the planning process and removal should be discouraged, unless there is sound design rational that demonstrates circumstances where they cannot be retained. The AIA has outlined detailed methodologies which explain the protection measures and these have been assessed by the Tree Officer and have been found to be sound.
- 8.92 The category C specimens are not considered to be a constraint on the development and therefore there is no objection by the Tree Officer to their removal to facilitate the proposal. Although there is no objection to the removal, the proposal must comply with Policy G7 of the London Plan (2021) which states: "*If planning permission is granted*

*that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed.”*

- 8.93 The proposed tree planting has been shown for this proposal on the Landscape Masterplan (drawing number 1441 001 Rev N), which shows the areas of new tree planting to mitigate against the loss of all trees to facilitate the development. The Planning Statement states that c.2000 new trees will be planted across the site as a whole; 231 new trees would be planted within the operational boundary (equating to a net gain of 115 trees), 241 new trees within the operational boundary and c.1,800 new trees within areas of new woodland. This tree planting seeks to mitigate the loss of the removal of the trees set out above.
- 8.94 Tree T52 is a veteran tree, that is at risk from this proposal, as it is situated adjacent to the proposed pitches on the west and south on the extent of the root protection area. A comprehensive protection strategy for this will be secured by planning condition. CV1-38 have been identified as candidate veteran trees 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 future succession of the irreplaceable habitats they provide. The AIA has stated the use of a no dig construction solution, and this is supported.
- 8.95 Overall, the Tree Officer has confirmed that the application is acceptable from an arboricultural perspective and there is **no objection** to the proposed development, subject to the conditions requested.

### **Ecology and Biodiversity**

- 8.96 The NPPF sets out the requirements to conserve and enhance the natural environment, in paragraphs 187 – 201. Paragraph 192 states *“To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*
- 8.97 The London Plan Policies G5 and G6 are relevant, alongside Enfield Policies DMD 78 and CS 38. The Review of Sites of Important Nature Conservation (November 2020) has been also been considered, which forms part of the evidence base for the emerging Local Plan.
- 9.98 The site has a number of statutory protected sites which are nearby, but not within the application site. These include the Epping Forest Site of Special Scientific Interest and the Special Area of Conservation is located approximately 5.7km to the east of the site. The Lee Valley Ramsar Site, Special Protection Area and SSSI sits approximately 3.5km to the northeast. The Chingford Reservoir SSSI lies roughly 4km to the east. There are no statutory designated sites of national importance within 2km of the site, the closest being Turnford & Chestnut Pits SSSI, which is located 3.5km from the site boundary and is part of the Lee Valley SPA / Ramsar site.
- 8.99 There are six Sites of Importance for Nature Conservation (SINC) within 2km of the site:
- Whitewebbs Wood - Partially overlapping the site

- Forty Hall Park & Estate - Immediately east
- Hilly Fields Country Park - 100m to the South West
- New River - 1km East
- Crews Hill to Bowes Park Railsides - 1.1km West
- Crews Hill Golf Course - 1.4km West

8.100 Whitewebbs Wood slightly overlaps the sites eastern boundary, while Forty Hall Park and Estate also has a small overlap with the proposed boundary. As for the status of the site in its current form, this is considered below having been assessed by an Independent Audit Report by a qualified Ecologist. The Audit Report was commissioned to provide an independent review of the ecological assessment and Biodiversity Net Gain assessment that were provided by the Applicant. The Audit does not make recommendations for or against the proposal, its purpose is to provide certainty to the Council that the information provided to inform its decision making is sound.

*Status of Grassland onsite*

8.101 The grassland has been significantly modified due to its previous management as a golf course. The sward contains horticultural varieties of grasses known for their drought resistance or hard-wearing characteristics. The grassland areas within the site, the only habitat that would be significantly impacted by the proposal, holds no ecological designation, as listed above. The sward is consistent with modified grassland.

*Status of the woodland – Woodland classification*

8.102 The woodland within the western part of the site is shown on Magic Maps as ancient woodland. The historic maps have been reviewed within the Heritage Assessment and it is noted that 19th century maps show the area north of Whitewebbs House to be open, with only groups or lines of trees or parkland with a mix of conifers present. This helps to explain why the woodland in this area does not contain features typical of ancient woodland and the presence of stands of largely even-aged trees, with large species varieties including conifers and species such as horse chestnut, not typical of ancient woodland being present. Irrespective of their classification the woodland would benefit from active management to remove the invasive species and to increase the structural diversity of the trees and creation of rides or glades. The woodland is of higher distinctiveness, such as the Priority Habitat lowland mixed deciduous woodland, and would benefit more from appropriate management. There would be no woodland lost as a result of the proposal.

8.103 On review of the application, officers consider that the proposals have minimal detrimental impacts on the ecological status of the site and its surroundings. It has been demonstrated that the proposal includes limited measures that will impact upon Whitewebbs Wood SINC, overlapping the sites eastern boundary, whilst effects upon wildlife would be minimised via a CEMP secured by condition as explained by the submitted Ecological Impact Assessment.

8.104 In relation to the Biodiversity Net Gain (BNG), the submitted information confirms that there will be an increase in BNG, by approximately 30%. This equates to 20% above the statutory 10% requirement. The long-term maintenance to secure the BNG uplift and ongoing management is secured both by planning condition and within the legal agreement. The ecological information provided by the applicant has been prepared in accordance with standard best practice and addresses the appropriate legal and

policy requirements relating to habitats and species that could be impacted by the proposal. As such, considering the evidence, officers are satisfied that the proposals are not detrimental to the ecological significance of the site and comply with Enfield Core Strategy Policy 36 Biodiversity and London Plan Policies G7 Trees and woodlands and G6 Biodiversity and access to nature.

8.105 Paragraph 4.2.2.6 of the submitted Ecology Impact Assessment (EclA) sets out the desk study results of species within the site. Appendices A – C provide the on-site surveys results undertaken, detailing specific population numbers for each species. A summary of the Ecological Impact Assessment findings is provided in Table 5 below. Section 5 of the EclA sets out the embedded environmental measures that will be delivered as part of the enhancement works to the parkland. These measures will be secured by condition and in the Full Parkland Management Plan and there are further requirements to be adhered to within the Construction Environmental Management Plan (CEMP) to be secured by condition, prior to the commencement of development.

**Table 5: Assessment of Potential Ecological Effects**

<b>Assessment of Potential Ecological Effects</b>	
Whitewebbs Wood SINC / Ancient Woodland	No significant effects on The Whitewebbs Wood SINC, the priority habitats within the SINC, or the ornithological community associated with the SINC are predicted based on the findings from protected species surveys, the Arboricultural Impact Assessment (AIA) and the implementation of the embedded measures and the proposed CEMP.
Woodland, scrub and individual trees	The loss of trees will result in a negative effect in the short to medium term. This will both reduce the amount of habitat present and the level of habitat connectivity present on an east / west axis. However, as large numbers of newly planted and translocated trees become established the number of trees will become greater than currently and the level of habitat connectivity (provided by the canopy) will increase. Therefore, in the medium to long term there will be a positive effect on this ecological feature. In the short to medium term the positive management of retained woodland and parkland trees will offset some of the negative effect. Overall effect on woodland, tree lines and individual trees will not be significant.
Bats	It is considered that with the environmental enhancements delivered as part of the proposed development, along with measures outlined within the LEMP, there will be no significant effect to the bat population within the Site.
Reptiles	It is considered that with the environmental enhancements delivered as part of the

	proposed development, along with measures outlined within the Outline Park Management Plan (OPMP), there will be no significant effect of the reptile population within the Site.
Great Crested Newt	It is considered that with the translocation exercise and environmental enhancements delivered as part of the proposed development, along with measures outlined within the OPMP, there will be no significant effect upon the great crested newt population within the Site.

8.106 In October 2023 when the proposals had been subject to an Environmental Impact Assessment (EIA) Screening Opinion, the Butterfly Conservation submitted an objection, querying whether a full EIA was needed. A letter responding to this matter was issued, setting out the detailed explanation that the development did not fall within the threshold criteria to requiring an EIA. Dialogue between the applicant's ecologist and the Butterfly Conservation has taken place, to ensure that the information submitted accurately recorded all varieties of butterflies.

8.107 There have been extensive discussions and engagement (both at pre-application and at determination stages) with the Council in relation to the information prepared to address the ecological and biodiversity sensitivities of the application site. At the request of LBE, new botanical, bat and bird surveys were undertaken. The findings of these have been accepted. Measures are proposed within the EIA to protect species and there is **no objection** to the proposed development. This has been confirmed by both the Ecology Officer and within an Independent Audit Report conducted to ensure that all information submitted by the applicant and representations received from the public were reviewed comprehensively.

### **Highways, Access and Parking**

8.108 The NPPF sets out in paragraphs 109 – 118 the requirements that authorities should refer to when considering new proposals and the impact on transportation. London Plan policies T1, T3, T4, T5, T6, T7 and T9 are relevant. LBE Policies DMD 45; DMD47; DMD48 and CS25 are all relevant for the proposals, which outline requirements for access, parking, and delivering safe routes for all users of the public highway.

#### **Access**

8.109 Section 4 of this report outlines the details of the three access points to the application site. Two of these are existing (northern access from Whitewebbs Lane and southern access from Beggars Hollow). The third relates to the reinstatement of the historic carriageway in the north, where an existing access from Whitewebbs Road is in situ. In summary, these allow access arrangements as described below.

- Historic Carriageway (Entrance 1)  
Gated entrance to this route, accessible in line with the opening hours for the Toby Carvery (8.00 – 22.00). This route is primarily for customers visiting the Toby Carvery. The width of the entrance from Whitewebbs Road onto the Historic Carriageway is to be widened to 4.97m, to create safe access and egress. Parking bollards are proposed near the entrance to prevent parking on the Historic

Carriageway. This carriageway will be managed and maintained by the applicant, secured within the legal agreement. The peak number of vehicle trips associated with the Toby Carvery and golf course use is recorded at 150, on a weekend (Sunday).

- Existing Vehicular and Pedestrian Access to the Northern Clubhouse and Parking (Entrance 2)

The existing northern vehicular and pedestrian access will remain in place, providing access for users of the Training Centre; commercial servicing vehicles for the Toby Carvery; the residents of The Limes, and also the public northern car park. There will be new security gates at this entrance, which would control access from dusk to dawn. In addition, there are another set of security gates for both the public northern car park and for the training centre northern car park, which will be managed by the applicant, to improve the security of the parkland. This security management is to improve the anti-social behaviour. The peak number of vehicle trips expected to use this entrance set out in table 6.6 of the Transport Assessment and is 52 trips at peak on the weekend.

- Existing Vehicular and Pedestrian Access to the Southern Clubhouse and Parking (Entrance 3)

The existing southern vehicular and pedestrian access routes remain with new gates proposed, to be operated from dusk until dawn. A 120% uplift in forecast use of this southern access has been applied and is shown in table 6.7 of the Transport Assessment. The peak number of trips is estimated at 86 trips.

- 8.110 The applicant has agreed to a planning condition that controls the access times of the entrance gates required for the public to use the parkland, in line with the times stated above. Subject to this, the access arrangements are considered to be acceptable on highway grounds.

### *Parking*

- 8.111 There are a total of four existing car parks, the southern café park is publicly accessible and table 6.8 of the Transport Assessment shows that the maximum occupancy for this is 85 on a weekend between 10.00 – 11.00. In the southern car park 95 car parking spaces will be available, with 6 accessible bays constructed on grasscrete. In addition, 4 long-stay cycle parking spaces and 28 short-stay cycle parking spaces will be provided. A total of 8 active EV charging points will be provided, with a further 8 charging points marked out for future provision.
- 8.112 The central car park for Toby Carvery has not been surveyed in terms of occupancy as this is a private car park for the patrons of this business. There would be up to 3 car parking spaces in the central car park that serves Whitewebbs House (Toby Carvery) removed where the historic carriageway marries to the car park. The proposals result in a net loss of 3 car parking spaces in total.
- 8.113 The public northern car park proposes 10 car parking spaces, which is the same as existing. There are objections from the public regarding the removal of this car park. For clarity, this car park will be resurfaced and remain open for public use. There are also replacement entrance gates proposed, which will be managed by security on site.
- 8.114 There are no specific parking standards for this type of facility but an assessment of similar facilities has been undertaken to review the requirements. The proposals include 87 spaces, which includes six accessible spaces and 14 spaces for the



grounds maintenance building, including one accessible space. These parking space numbers have been agreed with LBE Highways and accord with the expected parking demand for the Women's and Girls team. In addition, there are six accessible car parking spaces to be provided at the Northern Clubhouse, in line with Sport England guidance. 20% of all operational parking spaces will be provided with active EV charging points, with 80% passive EV in line with London Plan Policy T6.

8.115 Overall, it is considered that the proposals provide adequate parking for users of the parkland and the training facility.

#### *Highway safety*

8.116 There would be a separate informal pedestrian footpath that runs alongside the historic carriageway, which would have bollards with low-level lighting along its route, to ensure pedestrians are safe on this route. The width of the access point to the carriageway has been increased and allows for visibility to ensure safe access and egress from the entrance. The Highways Officer has requested a condition requiring details of the method of construction and material for the carriageway, to ensure it meets the standards to deliver highway safety. This route will be managed and maintained by the applicant, which will be secured in the legal agreement.

8.117 The Highways Officer has **no objection** to the proposed development. This follows lengthy discussions with additional information submitted to address officer queries both at pre-application and during determination of the application.

#### **Design and Appearance**

8.118 Paragraphs 131 to 141 of the NPPF provide direction to authorities on securing high quality and sustainable design. Local Policies DMD 37 and DMD38, require consideration of key design principal criteria, which include:

- **Character:** Locally distinctive or historic patterns of development, landscape and culture that make a positive contribution to quality of life and a place's identity should be reinforced;
- **Continuity and Enclosure:** Public and private spaces and buildings are clearly distinguished, safe and secure;
- **Quality of the Public Realm:** Safe, attractive, uncluttered and effective spaces and routes should be provided;
- **Ease of Movement:** Development should be inclusive, easy for all to get to and move around, connect well with other places, put people before private vehicles and integrate land uses with sustainable modes of transport;
- **Legibility:** Development should be easy to understand with recognisable and intuitive routes, intersections and landmarks;
- **Adaptability and Durability:** Development should be durable and flexible enough to respond to economic, social, environmental and technological change. Its design and materials should ensure long term resilience and minimise ongoing maintenance;
- **Diversity:** Where appropriate, development should provide variety and choice through the provision of a mix of compatible uses that work together to create viable places that respond to local needs.

8.119 At pre-application stage the proposals were presented to the Design Review Panel (DRP). The DRP made comments for the applicant to improve the proposals, including a new wayfinding strategy; justification for the loss and planting of trees alongside the

boundary treatments, and built elements of the training centre. Other suggestions included reducing the training centre operational boundary, to reduce the overall impact of the proposals on the openness. There was concern that the infill to the courtyard of the Northern Clubhouse would have a detrimental impact on the setting and historic significance of the heritage asset. The restoration of the Southern Clubhouse and Conduit House were both supported, and the principle of the historic carriageway. There was a further suggestion to reinstate the historic walled garden, to improve this heritage asset. These comments and suggestions have been addressed, providing amendments including one of the attenuation basins being publicly accessible, reducing the size of the operational boundary. The other heritage items are discussed in detail within the Heritage section of this report and have been fully considered by Officers. The VSC now presented, which was lacking in detail at the time of the DRP, have now been robustly set out which Officers afford substantial weight.

8.120 The proposed layout within the training centre operational boundary has been informed by numerous items, which include the following:

- Veteran and candidate veteran trees; Category A, B and C trees.
- The heritage assets (non-designated and designated).
- The boundary of the historic parkland.
- The watercourses within the site.
- The existing Public Rights of Way and bridleways.
- Maintaining key viewpoints throughout the site.
- The residential property The Limes.
- The Football Association Guidelines on Pitches (size, orientation, noise, lighting, topography).

8.121 The layout of the pitches are presented in an unusual plan form, with the orientation changing from horizontal to vertical across the training centre operational boundary. This unusual layout is directly informed by groups of high value trees and the need to protect and retain these trees, as well as the operational requirements to meet the Football Association and Premiership Standards, which are essential. Overall, there would be a neutral visual impact as a result of the football training centre facilities, with the tree planting resulting by year 10 post construction in a slight beneficial impact as detailed in the LVIA, as agreed by Landscape Officer.

8.122 The design of the Women's Training Centre has sought to be sympathetic to the heritage asset, which is referred to as the Northern Clubhouse, which historically was used as a stable block. The positioning of the extension at the rear, behind the prominent courtyard at the front, is articulated across a series of blocks, with gable roof styles, to reduce the scale and massing of the extension. A basement extension is included, to house a substantial amount of the Training Centre facilities but being below ground reduces the visual impact on the heritage asset and the Green Belt.

8.123 The proposed materials that are to be utilised for the Northern Clubhouse and the Southern Clubhouse have a strong use of timber, as a material that is commonly found in the locality. The use of timber as the predominant material, delivers a more natural and soft appearance to these buildings, which is welcomed. Discussions have taken place over the course of the pre-application and application stage to improve the design and materials palette. The Urban Design Officer has confirmed support for the proposals and raises no objection.

### **Drainage & Flood Risk**

8.124 The Council's Watercourse Officer has reviewed the submitted Flood Risk Assessment, which includes the drainage strategy. There is **no objection** to the proposals by the Council's Watercourse Officer, following dialogue both at pre-application and during determination to address requests for information. There are a number of conditions set out in **Appendix 1**, which would be imposed. It is also noted that the re-profiling of the land drainage solution has the attenuation basins positioned in the east and southeast, which create new water features, that will bring enhanced ecological and biodiversity value to the site.

### **Climate Change and Sustainability**

8.125 A BREEAM Pre-Assessment Report which indicates that the target rating of Excellent should be achieved, has been recorded at the pre-construction phase of the development. An Energy Strategy has been submitted and there are ground source heating and / cooling; air source heat pumps and photovoltaic panels proposed to deliver a green technology solution to reducing energy used by the proposed development. The submitted documents have been reviewed by the Climate Change and Sustainability Officer, and has confirmed:

*"The proposed development is estimated to achieve 21% improvement at Be Lean stage and a further 50% improvement at Be Green stage over Part L 2021 in compliance with Policy SI 2 of the London Plan 2021. The total emissions from the operation of the development are estimated at 10.2 tCO<sub>2</sub> and a £29,046 are payable into Enfield's New Development Carbon Compensation Fund (NDCCF). The proposed fabric efficiency measures are acceptable and the implementation of PVs and GSHPs are supported. BREEAM pre-assessment shows that the development is on the path to achieve 'Excellent' rating."*

8.126 As such the proposals are considered to meet the requirements of Policies DMD51-54 of the Development Management Document (2014) and Policy SI 2 of the New London Plan 2021.

8.127 The Whole Life Carbon Cycle Assessment submitted has been reviewed by the GLA and there are a number of clarifications being addressed and it has been agreed that these matters will be addressed, if a resolution to grant is reached, and the application is referred for Stage 2. This is being secured within the legal agreement.

### **Air Quality and Noise**

8.128 An Air Quality Assessment and a Sports Pitch Noise Assessment have both been submitted with the application. These have been reviewed by the Environmental Health Officer, and there is **no objection** to the proposals. The proposals therefore address the requirements Policy DMD65 and DMD68 of the Development Management Document (2014). Conditions relating to site investigation works are requested, to satisfy Policy DMD66 (see **Appendix 1**).

### **Fire Safety**

8.129 London Plan Policy D12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.

8.130 This application is accompanied by a Fire Safety Statement (August 2024) in support of the proposal. The statement has been reviewed by the Greater London Authority (GLA) and prior to Stage 2 the Applicant should provide the qualifications and experience of the author to confirm they are a suitable assessor. In order to meet Policy D12 Part B, this must be complied with.

### **Heritage Considerations**

8.128 Section 16 of the National Planning Policy Framework (NPPF) sets out a clear framework for decision-making to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development.

8.129 The NPPF identifies two types of heritage assets – designated heritage assets and non-designated heritage assets.

8.130 Designated Heritage assets in Enfield include Listed Buildings, Conservation Areas, Scheduled Monuments and Registered Parks and Gardens. A non-designated asset is defined as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. For example, one that is on the Council's Local Heritage List.

8.131 There are a number of designated heritage assets and non-designated heritage assets (NDHAs) identified outside of the operational boundary of the training centre that have the potential to be impacted by the proposals. The Council's Heritage officer has assessed the impact of the proposals on these assets and a summary of their comments is provided in section 5 (paragraph 6.14) of this report.

8.132 London Plan Policy HC1 requires development proposals which affect the setting of heritage assets (designated and non-designated) to be sympathetic to their significance and appreciate their surroundings. Harm should be avoided, and enhancement opportunities taken where they arise. ECP31 of the Local Plan requires that special regard be had to the impacts of development on heritage assets and their settings, Policy DMD 44 advises applications for development which fail to conserve and enhance the special interest, significance or setting of a heritage asset will be refused whilst Policy DMD 37 requires that development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Policy DE10 of the Emerging Enfield Local Plan requires development proposals to thoroughly assess the significance of heritage assets and their settings, including historical, architectural and cultural value. Proposals must clearly demonstrate how the design respects, conserves, and enhances these assets, contributing positively to their long-term preservation. Harm to heritage assets should be avoided or minimised, with substantial harm or total loss permitted only in exceptional cases where significant public benefits can be demonstrated. Proposals should use high-quality design and materials that respond sensitively to the historic context, enhancing local character. Cumulative harm to heritage assets must be prevented, ensuring that repeated or combined impacts do not degrade their value over time.

#### ***Impact on Designated Heritage Assets:***

8.133 The NPPF (December 2024 version) distinguishes two types of negative impacts on the significance of designated heritage assets. A total loss of the significance of an asset, such as complete demolition, is considered "*substantial harm*", whereas changes that

negatively affect the significance of an asset, are considered “*less than substantial harm*”. There are varying levels of less than substantial harm ranging from *very low* to *very high*, depending on how much a proposal would reduce the significance of an asset.

- 8.134 Paragraph 212 of the NPPF states that great weight should be given to a heritage asset’s conservation, and paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset “*should require clear and convincing justification.*” Paragraph 215 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, “*this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*”
- 8.135 The heritage assessment undertaken for the purposes of this report, examines whether there is any substantial harm, less than substantial harm, no harm, and any benefit to designated heritage assets arising from the proposals. Both the Council’s Heritage Officer and the GLA (in their stage 1 report) have made an assessment of the impacts, their conclusions are summarised in tables 5 and 6 below. A further detailed assessment is then provided, informed by their findings and the application submission material, which looks to weigh the harm identified against the public benefits, as required by NPPF paragraph 215.
- 8.136 Neither the Council’s heritage officer nor the GLA have identified any *significant harm*, but *less than substantial harm* is identified. Categories very low, low, moderate, high and very high are used to describe the varying degrees of less than substantial harm; the Council’s Heritage Officer has also used these categories to describe any public benefits.

**Table 6: Summary of LBE Heritage Officer Assessment on Designated Heritage Assets – *Less than Substantial Harm***

<b>Designated Heritage Asset</b>	<b>Harm</b>	<b>Benefit</b>
North Lodge – Grade II Listed Building	No harm	High level of benefit
South Lodge – Grade II Listed Building	High level of “less than substantial harm”	Moderate level of benefit
King and Tinker Public House – Grade II Listed Building	Low level of “less than substantial harm”	No benefit
Clay Hill Conservation Area	Low level of “less than substantial harm”	Low level of benefit
Forty Hill Conservation Area	Low level of “less than substantial harm”	Low level of benefit
Forty Hall – Grade II Registered Park and Garden	Low level of “less than substantial harm”	Nil benefit
Flash Road Aqueduct – Scheduled Monument	No harm	Moderate level of benefit
Barn at Whitewebbs – Grade II Listed Building	No harm or benefit	
Whitewebbs Farmhouse – Grade II Listed Building	No harm or benefit	

**Table 7: GLA Heritage Assessment on Designated Heritage Assets – Less than Substantial Harm**

Table of indirect (setting) impacts			
Heritage asset	Category of harm	Extent of harm	View reference
Elsyng Palace, Scheduled Monument	No harm	No harm	No view provided, asset is below ground
Flash Road Aqueduct, Scheduled Monument	No harm	No harm	View 10
Forty Hall, listed Grade I and associated Registered Park and Garden, Grade II	No assessment possible	No assessment possible	View 8
North Lodge, listed Grade II	Less than substantial	Low	Heritage Statement Para 8.5
South Lodge, listed Grade II	Less than substantial	Low	Heritage Statement Para 8.6
The King and Tinker Public House, listed Grade II	Less than substantial	Very low	Heritage Statement Para 8.9
The Rose and Crown Public House, listed Grade II	No harm	No harm	No view provided
Whitewebbs Farmhouse and associated barn, listed Grade II	No harm	No harm	No view provided
Forty Hill Conservation Area	No assessment possible	No assessment possible	Views 9 and 10, Heritage Statement Paras 6.44 8.12
Clay Hill Conservation Area	No harm	No harm	View 7, Heritage Statement Paras 6.24 and 8.13

*The North Lodge*

- 8.137 North Lodge is a Grade II Listed Building constructed in the nineteenth century. The Heritage officer considers that its special interest is derived from its architectural and historic interest as a Victorian Gothic entrance lodge designed to mark the northern entrance to the Whitewebbs estate and give the passer-by or visitor a hint of the quality of the family and its house.
- 8.138 The building is in very poor condition and is included on Historic England’s Heritage at Risk Register. The special interest of the lodge has been degraded through the deterioration of the fabric together with adverse changes within its setting. The physical connection between it and Whitewebbs House is compromised by vegetation which makes it difficult to follow the route of the original driveway. The immediate setting has also been negatively affected by the presence of large concrete blocks to prevent unauthorised vehicular access and the loss of the original gates.
- 8.139 The GLA consider there to be a *low level* of less than substantial harm to the North Lodge, which differs to *no harm* afforded by the Council’s Heritage Officer. It is not clear from the GLA Stage 1 report as to why this category has been given by the GLA.
- 8.140 The proposal will provide heritage interpretation boards for the North Lodge, reinstatement of the physical connection (also referred to as “the proposed historic carriageway”) between the North Lodge and Whitewebbs House and a decorative gate based upon historic photographs of the gate at South Lodge. The Heritage Officer considers that the historic carriageway in the manner proposed with hoggin surfacing,

minimal lighting, minimal width, and no parking, together with the decorative gate and interpretation boards would result in a heritage benefit.

- 8.141 It is considered a *low level* of less than substantial harm will occur to the heritage asset, yet the proposal will bring a *high level* of public benefit.

#### *The South Lodge*

- 8.142 South Lodge is a Grade II Listed Building constructed in the nineteenth century. Its special interest is derived from its architectural and historic interest as a Victorian Gothic entrance lodge designed to mark the southern entrance to the Whitewebbs estate and give the passer-by or visitor a hint of the quality of the family and its house.
- 8.143 The proposal will alter the historic footpath that provides a north-south route (also referred to as “the southern approach”) within the site. This footpath allows the public to experience the landscape by walking from the South Lodge to the Whitewebbs House and has been associated with the Whitewebbs Park since the late 18th century. While the proposal does not remove this route, the northern section will no longer be accessible to the public as it will be fenced off by the training centre operational boundary. A footpath is proposed to divert the walking route north-westward. A gate is proposed at the intersection of the proposed operational boundary and the southern approach so that this route will be visible. Additionally, an interpretation board is proposed at the intersection of the new footpath and the southern approach, which will explain the significance of the southern approach.
- 8.144 The Council's Heritage officer concludes that the South Lodge marks the boundary of Whitewebbs Park and derives its significance from its physical connection to Whitewebbs House via the southern approach. They consider that severing this route will compromise the significance of the setting of the house causing a *high level* of less than substantial harm. The GLA's assessment differs to this, with the category of a *low level* of less than substantial harm to the South Lodge, making no reference to the connection between this and Whitewebbs House.
- 8.145 While it is acknowledged that South Lodge remains associated with Whitewebbs Park, which is evident from its location and its name as a "lodge", the severance of the southern approach occurs approximately 600 metres away from the South Lodge itself. When standing near the South Lodge, the southern approach is still visible, while the severance is not. The physical connection can still be experienced, allowing people arriving at the South Lodge to perceive it as an entry point to Whitewebbs Park. Although the proposal will change the setting of this heritage asset, this change is considered (taking account of both the Council's Heritage Officer and GLA's assessment) to have a *low level* of less than substantial harm to the South Lodge.

- 8.146 The Council's Heritage Officer considers that the setting of the South Lodge will be improved through the landscape enhancements proposed as part of the application. This includes giving greater definition to the original route of the southern approach, amending the southern approach's surfacing to hoggin, and reinstating a decorative gate based upon historic images. Furthermore, the proposal will improve the architectural quality of the Southern Clubhouse, which is perceived as beneficial to the setting of the South Lodge by the Heritage Officer. The new heritage interpretation boards will also result in a heritage benefit. Therefore, the proposals will bring a *moderate level* of public benefit.

#### *King and Tinker Public House*

- 8.147 The King and Tinker Public House is a Grade II Listed Building thought to date from the seventeenth century with later eighteenth and nineteenth century alterations and extension. Its special interest is derived from its historic, architectural and communal interest as an early dwelling which became a public house and has subsequently been altered and extended in response to this use whilst retaining its domestic character.
- 8.148 The proposal includes the installation of 12 floodlights for pitches AC2 and AC4 (6no. floodlights each). The Heritage officer considers this will cause a *low level* of less than substantial harm to the Public House resulting from "skyglow". This will have a slight urbanising effect, eroding the rural, agrarian setting of the Listed Building. The GLA considers the proposal will cause a *very low* level of less than substantial harm to the Public House.
- 8.149 A Night-time Assessment has been submitted and the Landscape Officer agrees that the character of the site during the evening and night is predominately unaffected, as only one pitch will be illuminated at a time. A planning condition will be imposed restricting the extent and time of floodlights to manage the impacts on the night-time character and visual amenity.
- 8.150 The Public House operates as a pub and is subject to night-time lighting on the building and in its car park. The proposed floodlights will be only used in winter months and will be switched off after 20:30hrs, which means the impact of the floodlights will be constrained to a limited operational window.
- 8.151 Having regard to the above and the controls provided through condition, it is considered there would be *low level* of less than substantial harm.

#### *Clay Hill Conservation Area*

- 8.152 Clay Hill Conservation Area is located to the immediate south of the application site. The character, appearance and significance of the Conservation Area derives from its inherent historic value as a scattered linear settlement of medieval origin which features high quality buildings and has been shaped by the surrounding landscape which once formed Enfield Chase.
- 8.153 The Council's Heritage Officer considers that severing to the connection between Clay Hill and Whitewebbs House will cause a *low level* of less than substantial harm to the setting of the Clay Hill Conservation Area. The GLA considers the proposal will cause no harm to the Conservation Area.
- 8.154 Taking account of both assessments, and the more detailed assessment of the severance impacts undertaken as part of the assessment of the impacts to South



Lodge, which in part also apply here, it is considered that the proposals would cause a *low level* of less than substantial harm to the setting of the Conservation Area.

- 8.155 The Council's Heritage Officer has identified that the landscaping enhancement to the Southern Clubhouse car park will have a positive effect upon outward views at the edge of the Conservation Area resulting in a *low level* of public benefit.

#### *Forty Hill Conservation Area*

- 8.1.43 The application site is within the setting of the Forty Hill Conservation Area. In summary its special interest is derived from the evolution of, and interplay between three historic hamlets and three small country estates within a wider agrarian landscape.
- 8.144 The Council's Heritage Officer considers the tallest element of the proposed floodlights will be visible from the Forty Hall ferme ornée (also known as "Forty Hall Farm") during daytime and causing a "skyglow" effect for very limited periods until 08.30pm during the winter months. For these reasons a *low level* of level of less than substantial harm has been identified.
- 8.145 A viewpoint analysis that looks north towards the site from the raised walkways at the Forty Hall Farm is submitted in the LIVA Addendum. The analysis shows that only the very top parts of the proposed floodlights are visible from this viewpoint. Having regard to this, and limited operational use of the floodlights (controlled through condition), it is considered there would be a *very low level* of less than substantial harm to the setting of the Conservation Area.
- 8.146 The proposals include removing the existing layby on Whitewebbs Lane, together with planting a new mixed species hedgerow, and the inclusion heritage signage boards; this is considered to enhance the rural character of Whitewebbs Lane, having a positive impact on the setting of the Conservation Area and resulting in a *low level* of public benefit.

#### *Forty Hall Park*

- 8.147 Forty Hall Park is a Grade II Registered Park and Garden encompassing a late eighteenth century pleasure grounds layered upon earlier seventeenth century gardens and provides the setting for the Forty Hall mansion house.
- 8.148 The proposed floodlights will be visible from the Forty Hall Farm which forms the setting of Forty Hall Park and therefore the Council's Heritage Officer has concluded there would be low level harm on the significance of this asset. Having regard of the degree of harm and contribution of the farm to the registered park, it is considered the level of harm would be *very low*.

#### *Flash Road Aqueduct*

- 8.149 The New River was constructed between 1609 and 1613 to bring a supply of drinking water into London from springs in Hertfordshire. The Flash Road aqueduct was constructed in 1820 to allow the river to cross the Cuffley Brook. Despite later repairs and alterations, it survives well. It is a major survival of part of the New River watercourse, one of the most significant and ambitious developments in water supply in England. The proposal is unlikely to have a negative effect upon the Flash Road Aqueduct and no harm to this asset has been identified by the Heritage Officer or the GLA.

8.150 The proposal includes the creation of two publicly accessible routes that follow the route of the New River in the parkland area. The Heritage officer considers that this route will allow the public to follow its original route and thereby better understand the aqueducts position and role within the wider landscape, resulting in a moderate level of public benefit.

*Barn at Whitewebbs and Whitewebbs Farmhouse*

8.151 The two assets are located northside of Whitewebbs Lane and offer a level of visual detachment from the application site. No harm has been identified to these assets by either the Heritage Officer or the GLA in their assessments.

**Conclusion of impacts to Designated Heritage Assets**

8.152 A thorough assessment of the impact of the proposals on identified designated heritage assets has been undertaken, informed by the Council's Heritage Officer, the GLA and supporting material provided as part of the application submission.

8.153 The assessment has shown there will be varying levels of less than substantial harm to certain assets arising from the proposals. The NPPF requires this to be given great weight in decision making.

8.154 However, the assessment has also shown how the proposals will have varying levels of positive benefit to some of the assets which can be considered as public benefits for the purposes of assessment. The NPPF requires any harm identified to be weighed against these public benefits.

8.155 Having weighed the cumulative harm identified against the cumulative public benefits identified, it is considered that overall, there would be net heritage improvement resulting from the proposals. Therefore, the proposals are considered on balance to comply with the relevant planning policies.

*Impact on **Non-Designated Heritage Assets (NDHAs)***

8.156 Section 16 of the NPPF refers to NDHAs being afforded a lower level of protection than designated heritage assets. Paragraph 216 requires the effect of an application on the significance of a NDHA to be taken into account in decision making. It also confirms that *"a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

8.157 The Council's Heritage Officer has made an assessment of the whether the proposal would have any harm and benefit to the NDHAs. This is summarised in Table 8 and has been used to inform the further detailed assessment is below.

**Table 8: LBE Heritage Officer Assessment on NDHAs**

NDHA	Harm	Benefit	Net impact
Conduit House – LHL Ref: 256	No harm	Very high level of benefit	Very high beneficial
Whitewebbs Park – LHL Ref: 259	Very high level of harm	High level of benefit	Low adverse
Whitewebbs House – LHL Ref: 257	High level of harm	Moderate level of benefit	Low adverse
Whitewebbs Walled Garden – LHL Ref: 257	No harm	Low level of benefit	Low beneficial

Whitewebbs Stable Block – LHL Ref: 257	No assessment possible	No assessment possible	See officer comments below
New River Old Course	No harm	High level of benefit	High beneficial

### *Conduit House*

8.158 Conduit House is a non-designated heritage asset (NDHA), believed to have originated in the 16<sup>th</sup> century. It was historically used to control the water source and provide water to Whitewebbs House by its then-owner, a physician to Queen Elizabeth I. Despite alterations and its current dilapidated condition, Conduit House remains of high historic, evidential, communal and aesthetic interest.

8.159 The proposal would have no negative impact upon Conduit House. As part of the application, Conduit House is proposed to be conserved and reinstated, ensuring its long-term maintenance.

8.160 The Heritage officer has reviewed the method statement accompanying the application, which outlines a conservation-led approach and notes the need for further archaeological investigations to inform the final design. The approach outlined is considered to be appropriate and the commitment to secure the works will be secured through a planning condition. Additionally, proposed heritage interpretation boards will also be displayed.

8.161 Therefore overall, the beneficial effect is considered to be *very high* and should be given significant weight in decision making.

### *Whitewebbs Park*

8.162 Whitewebbs Park is one of several historic parklands in this part of the Borough, historically characterised by an open landscape. The Council's Heritage Officer considers it to have significant evidential and historic value, particularly in relation to its layout and development following enclosure. The park is a legacy of an old hunting landscape, retaining a link with a high-status recreational use of the landscape. The severance of the southern approach, the proposed operational boundary, the proposed infrastructure to support the operation of the football pitches, the installation of floodlights, and new tree planting in the southern part of the application site, will impact the parkland's open character, resulting in a very high level of harm to Whitewebbs Park.

8.163 Equally, the proposal results in several benefits, enhancing the significance of Whitewebbs Park that will bring a high level of benefit. This includes the following:

- The management of the woodland and former parkland - which includes removal of invasive species, tree management and legacy planting – this will have a positive effect upon the character of the landscape.
- Enhancement works to the Southern Clubhouse and associated car park will have a positive effect upon the character of the landscape.
- The reinstatement of southern gate and resurfacing the southern driveway will improve the legibility of the original approach and restore a lost feature.
- The addition of heritage interpretation will result in a heritage benefit.
- The conservation of Conduit House and its re-use as a community bird hide will be of very high benefit and secures the long-term future of the heritage asset.

- The creation of two east-west paths (partly within the red-line boundary and partly beyond) which follow the route of the New River will better reveal this feature of the historic landscape.
- Re-establishing the connection between North Lodge and Whitewebbs House in the manner proposed (hoggin surfacing, minimal lighting, minimal width, no parking) would result in a heritage benefit.

8.164 Therefore overall, the beneficial effect will be high and the adverse affect is very high which is considered to result in a net low adverse impact on historic significance of the park.

*Whitewebbs House*

8.165 The Heritage Officer considers that the operational boundary will divorce Whitewebbs House with the Northern Clubhouse and inhibit the ability to understand the relationship between them, having a harmful effect upon how the mansion is experienced within its designed landscape which was carefully curated. This together with severing the connection between the South Lodge and Whitewebbs House, will have an adverse impact upon how the mansion is experienced in the manner it was designed. The additional “skyglow” effect of floodlighting will also have a harmful impact upon the mansion due to its urbanising effect, resulting in a high level of harm to the significance of Whitewebbs House.

8.166 The proposed historic carriageway is however, considered to be positive re-establishing the connection between North Lodge and Whitewebbs House, and having a moderate level of benefit to the significance of the asset.

8.167 Therefore overall, the beneficial impact would be moderate and the adverse impact high, resulting in net low adverse impact.

*Whitewebbs Walled Garden*

8.168 The walled garden is located at the car park of the Northern Clubhouse. Despite their deteriorated condition, the upstanding remains are of heritage value as a coherent part of the Whitewebbs estate. The development includes the use of cobblestone paving to indicate the line of the walled garden together with the repair of the upstanding remains, which will result in a minor heritage benefit.

*Whitewebbs Stable Block*

8.169 The existing Northern Clubhouse is a former stable block, which is a non-designated heritage asset. The Heritage officer notes that the special interest of the former stable block is derived from its historic and architectural interest as a purpose-built stable block, which was constructed to reflect the changing requirements for stabling, together with changing aesthetic tastes.

8.170 The proposals reference restoration of the building including work to remove the non-original extensions and providing a more sympathetic extension. The Council’s Heritage Officer has raised concerns about the level of information provided making it difficult to understand whether the works would conserve the heritage asset.

8.171 Although the Council’s Heritage Officer has been unable to make an assessment of the overall impact, it is considered that securing a long term viable use for the heritage asset is positive and any concerns raised can be addressed through conditions. Overall therefore, it is considered that there would be a moderate heritage benefit.

### *New River (Old Course)*

8.172 The Council's Heritage officer considers the proposal will not cause any harm to the New River Old Course and a Management and Maintenance Plan will effectively protect any potential archaeological remains that may be found. As explained in the Flash Road Aqueduct section, the proposal includes the creation of two publicly accessible routes that follow the route of the New River in the parkland area. These paths will allow members of the public to follow the historic alignment of the New River and thereby better reveal its extent, significance and links to other heritage features such as the Flash Road Aqueduct, which overall results in a high level of benefit.

#### **Conclusion of Impacts to Non-Designated Heritage Assets**

8.173 A detailed heritage assessment has been undertaken to establish the impact of the proposals on NDHAs, this has been informed by the supporting information provided with the application and the assessment of the Council's Heritage Officer.

8.174 Varying levels of harm to the NDHAs have been identified having consideration to their significance, ranging from nil harm to very high harm. However, the assessment has also shown how the proposals will have varying levels of positive benefits. Weighing both, it is considered the proposals would result in a cumulative net heritage benefit to the NDHAs overall.

8.175 Therefore, the proposals are considered overall, to comply with the relevant planning policies.

#### **Overall Conclusion of Heritage Impacts**

8.176 The steps for assessing proposals affecting heritage assets are as set out in the NPPF in Section 16. The duty to pay 'special regard' or 'special attention', in sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 means that there is a 'strong presumption' against the grant of planning permission where it would cause harm to a heritage asset. Harm should be minimised and the desirability of enhancing the asset considered. Any harm to a designated asset requires 'clear and convincing' justification. For non-designated heritage assets there should be a 'balanced judgement' having regard to the scale of any harm or loss and the significance of the asset.

8.177 The assessment of both designated and non-heritage assets has identified varying levels of harm to the significance of heritage assets, however in weighing the cumulative harm against the cumulative public benefits identified, it is considered that overall, there would be net heritage improvement resulting from the proposals and so a minor positive position is reached. This weighs in favour of the proposed development in the assessment of this application. This has not been listed within the VSC benefits to avoid double counting of the benefits, in line with case law.

## **9 Delivering Benefits (outside of the VSC case) Arising from the Proposal**

9.1 As assessed in the various sections of this Report, the proposal will deliver various benefits to the local area, which are summarised below:

- **Enhancements to Heritage Assets:**
  - Preservation and enhancement of the conduit house.
  - Sensitive expansion of the Northern Clubhouse.
  - Reinstatement of the historic carriageway.

- Preservation and improvement of the setting of South Lodge (Grade II listed) through the introduction of a new soft landscaping interface with the southern car park.
- Development of a Heritage Management Plan.
- Creation of a Heritage Trail.
- **Providing buildings and public realm of high quality and good design:**
  - Provision of well-designed buildings and public realms, including the Northern and Southern Clubhouses and an attenuation basin.
- **Re-providing open space in the same locality and of better quality:**
  - Provision of open space in the same locality with improved quality.
  - Enhancements in the quantity and quality of publicly accessible routes.

## 10 Public Sector Equality Duty

10.1 The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act.
2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
  - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
  - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.

10.2 A comprehensive Equalities Impact Assessment accompanying the application concludes that, overall, the proposed development will have a positive impact on EDI-related challenges and trends for future residents and users of the proposal itself, as well as on the wider community.

10.3 The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. The equality considerations identified in this report include:

- Employment and training opportunities: The proposed development will provide job opportunities that are intended to be inclusive and accessible. The Applicant has committed to equal opportunity in recruitment, selection, and career development. The project is also expected to support local employment and contractors, with provisions for trainee and apprenticeship roles to facilitate skills development.
- Community facilities: The development includes a new café, WCs, and a multi-function community space, which will provide improved amenities for community stakeholders and visitors. The community space will be available for use by community groups.
- Health and well-being: The development includes facilities that aim to encourage participation in sports, particularly among women, girls, and children. The proposed Women's Training Centre and academy are intended to support engagement in football and promote physical activity within the wider community.
- Public realm and accessibility: Footpaths will be designed to be well-lit, firm, and even. Tactile paving, dropped kerbs, and shared surface treatments will be incorporated where appropriate to improve accessibility for individuals with mobility impairments.
- Open space and recreation: The restoration of Whitewebbs Park includes improvements to pedestrian, cycle, and equestrian routes, as well as features such as sensory trails, additional seating, and a raised deck to enhance accessibility for all users, including older people and those with disabilities.
- Inclusive building design: The development incorporates measures to support accessibility for disabled people, older individuals, and parents with children. Level thresholds, adequate circulation space, clear signage, and appropriately positioned fixtures such as switches and door handles will be included to facilitate ease of use.
- Public safety: Measures to enhance safety include improvements to security in certain areas, installation of emergency help points, and provision of defibrillators. Wayfinding signage will include tactile and braille elements where appropriate.
- Religious and cultural considerations: The multi-function community space is designed to be adaptable for various uses, including as a space for prayer or community gatherings.
- Transport and parking: The upgraded car parks will allocate accessible parking. Long-stay and short-stay cycle parking will include provision for adapted cycles and tricycles to accommodate a wider range of users.

10.4 Officers are satisfied that equality implications have been taken into account throughout the planning process and that Members have sufficient information to consider the equality impacts of the proposal in accordance with Section 149 of the Equality Act 2010 when determining whether planning permission should be granted.

It is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by the Equality Act 2010 compared to those who do not have those characteristics.

## **11 Planning Balance**

- 11.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 planning applications must be determined in accordance the development plan, unless material considerations indicate otherwise.
- 11.2 Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development and that permission should be granted unless: *“i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*
- 11.3 The proposal has been assessed against the relevant policies and officers are satisfied that the archaeological, landscaping, ecology and biodiversity, highways, design, flood risk, fire safety, air quality and noise impacts are acceptable, or can be appropriately mitigated through planning conditions and/or s106 obligations.
- 11.4 While elements of the proposed development are assessed as being inappropriate development within the Green Belt and would result in harm to the Green Belt which requires significant weight in decision making, it is considered that ‘Very special circumstances’ exist and the harm outweighed by the benefits of the scheme.
- 11.5 The assessment has also shown there will be varying levels of less than substantial harm to certain designated heritage assets arising from the proposals; the NPPF requires great weight to be given to this in decision making. However, as set out in the assessment, there are also considerable heritage benefits to the scheme which constitute public benefits and cumulatively when balanced against the harm, would result in a net heritage improvement. This weighs in favour of the proposed development in the assessment of this application.
- 11.6 A detailed assessment of the proposals has been undertaken, taking account of the relevant policies and legislation and the response to the public consultation. On balance, taking account of the national Green Belt policies, the presumption in favour and the weight to be given to development, it is concluded that the proposed development for the reasons set out within this report, has demonstrated ‘Very Special Circumstances,’ and when viewed overall, accords with the policies of the NPPF and Development Plan and other relevant material planning considerations including emerging policy. The application is therefore recommended for approval, subject to planning conditions, and contributions and obligations secured via legal agreement to mitigate the impacts of the development.

## **12 S106 Agreement and Planning Conditions**

- 12.1 Planning conditions and S106 financial and non financial commitments have been agreed with the applicant. These are necessary in order to make the development acceptable and mitigate the harm caused by the proposals. Full details of the



conditions are provided in Appendix 1 and full details of the S106 commitments (Heads of Terms) are provided in Appendix 2.

- 12.2 The Applicant has an agreement for Lease with the Council. However, the Applicant has yet to enter into a formal lease of the application site. The Agreement for lease provides that initial works are required to be carried out prior to the formal granting of the lease for 25 years. The Local Planning Authority has therefore imposed a Grampian condition to ensure that there is a restriction on the development (which amongst other works will exclude the initial works as set out in Schedule 1 of the Planning Permission) until the Applicant is able to and has entered into a Section 106 Agreement on the terms of the Shadow Section 106 Agreement to be attached to the planning permission.

## Appendix 1 24/00987/FUL Planning Conditions

### STANDARD PLANNING CONDITIONS

#### 1. Time Limit – 4 years

The development to which this permission relates must be begun not later than the expiration of four years beginning with the date of the decision notice

Reason: To allow community engagement within the pre-commencement conditions.

#### 2. Approved Plans & Documents

The development hereby permitted shall be carried out in accordance with the following approved plans and documents and in accordance with the submitted plans:

Site Location Plan	WPTC F3A ZZ EX ST A 08 9001 S2.P4
Site Block Plan	WPTC F3A ZZ EX ST A 08 9002 S2.P3
Existing Site Plan	WPTC F3A ZZ EX ST A 08 9003 S2.P3
Whitewebbs Park Proposed Site Plan	WPTC F3A ZZ EX GA A 08 9004 S2.P4
Site Sections AA& BB	WPTC F3A ZZ EX SE A 08 2601 S2.P3
Site Sections CC & DD	WPTC F3A ZZ EX SE A 08 2602 S2.P3
Site Sections EE & FF	WPTC F3A ZZ EX SC A 08 2603 S2.P3
Site Sections GG & HH	WPTC F3A ZZ EX SC A 08 2604 S2.P3
Existing Site Plan - Topographical Survey	WPTC F3A ZZ EX ST A 08 9301 S2.P3
Proposed Site Plan - Topography	WPTC F3A ZZ EX ST A 08 9302 S2.P3
Existing Site Plan - Infrastructure	WPTC F3A ZZ EX SC A 08 9501 S4.P3
Proposed Site Plan - Infrastructure	WPTC F3A ZZ EX SC A 08 9502 S2.P4
Proposed Site Plan - Operational Link	WPTC F3A ZZ EX ST A 08 9040 S2.P4
Existing Northern Access - Site Layout	WPTC F3A ZZ EX GA A 08 9503 S2.P3
Proposed Northern Access - Site Layout	WPTC F3A ZZ EX GA A 08 9504 S2.P5
Existing Historic Carriageway - Site Layout	WPTC F3A ZZ EX GA A 08 9505 S2.P3
Proposed Historic Carriageway - Site Layout	WPTC F3A ZZ EX GA A 08 9506 S2.P4
Existing Northern Clubhouse Road - Site Layout	WPTC F3A ZZ EX GA A 08 9507 S2.P3
Proposed Northern Clubhouse Road - Site Layout	WPTC F3A ZZ EX GA A 08 9508 S2.P4
Proposed Operational Link - Title Plan	WPTC F3A ZZ ZZ GA A 08 9509 S2.P2
Northern Clubhouse Existing Ground Floor Plan	WPTC F3A NC 00 GA A 08 2010 S2.P3
Northern Clubhouse Existing First Floor Plan	WPTC F3A NC 01 GA A 08 2011 S2.P3
Northern Clubhouse Existing Roof Floor Plan	WPTC F3A NC RF GA A 08 2012 S2.P3
Northern Clubhouse Ground Floor Demolition Plan	WPTC F3A NC 00 GA A 08 0910 S2.P3
Northern Clubhouse First Floor Demolition Plan	WPTC F3A NC 01 GA A 08 0911 S2.P3
Northern Clubhouse Roof Floor Demolition Plan	WPTC F3A NC RF GA A 08 0912 S2.P3
Northern Clubhouse Proposed Basement Plan	WPTC F3A NC B1 GA A 08 2013 S2.P4
Northern Clubhouse Proposed Ground Floor Plan	WPTC F3A NC 00 GA A 08 2014 S2.P4
Northern Clubhouse Proposed First Floor Plan	WPTC F3A NC 01 GA A 08 2015 S2.P3
Northern Clubhouse Proposed Roof Plan	WPTC F3A NC RF GA A 08 2016 S2.P4
Northern Clubhouse Proposed Entrance 1 Existing & Proposed GA	WPTC F3A ZZ ZZ GA A 08 9710 S2.P3
Northern Clubhouse Proposed Entrance 2 Existing & Proposed GA	WPTC F3A ZZ ZZ GA A 08 9711 S2.P3
Security Lodge Proposed Ground Floor Plan	WPTC F3A SL 00 GA A 08 2017 S2.P3
Security Lodge Proposed Roof Plan	WPTC F3A SL RF GA A 08 2018 S2.P3
Northern Clubhouse GA Elevation AA	WPTC F3A NC ZZ EL A 08 2510 S2.P3
Northern Clubhouse GA Elevation BB	WPTC F3A NC ZZ EL A 08 2511 S2.P3
Northern Clubhouse GA Elevation CC	WPTC F3A NC ZZ EL A 08 2512 S2.P3
Northern Clubhouse GA Elevation DD	WPTC F3A NC ZZ EL A 08 2513 S2.P3

Security Lodge Proposed Elevations GG, HH, LL & II	WPTC F3A SL ZZ EL A 08 2514 S2.P3
Northern Clubhouse GA Section AA	WPTC F3A NC ZZ SE A 08 2610 S2.P3
Northern Clubhouse GA Section BB	WPTC F3A NC ZZ SE A 08 2611 S2.P3
Northern Clubhouse GA Section CC	WPTC F3A NC ZZ SE A 08 2612 S2.P3
Northern Clubhouse GA Section DD	WPTC F3A NC ZZ SE A 08 2613 S2.P3
Security Lodge Proposed Sections GG & HH	WPTC F3A SL ZZ SE A 08 2614 S2.P3
Northern Clubhouse Proposed Basement - Fire Strategy	WPTC F3A NC B1 GA A 08 5810 S2.P3
Northern Clubhouse Proposed Ground Floor - Fire Strategy	WPTC F3A NC 00 GA A 08 5811 S2.P3
Northern Clubhouse Proposed First Floor - Fire Strategy	WPTC F3A NC 01 GA A 08 5812 S2.P3
Northern Clubhouse Proposed Site Layout	WPTC F3A NC EX ST A 08 9010 S2.P4
Southern Clubhouse Existing Ground Floor Plan	WPTC F3A SC 00 GA A 08 2020 S2.P3
Southern Clubhouse Existing Roof Plan	WPTC F3A SC RF GA A 08 2021 S2.P3
Southern Clubhouse Ground Floor Demolition Plan	WPTC F3A SC 00 GA A 08 0920 S2.P3
Southern Clubhouse Roof Demolition Plan	WPTC F3A SC RF GA A 08 0921 S2.P3
Southern Clubhouse Proposed Ground Floor Plan	WPTC F3A SC 00 GA A 08 2022 S2.P4
Southern Clubhouse Proposed Roof Plan	WPTC F3A SC RF GA A 08 2023 S2.P3
Southern Clubhouse Entrance 1 Existing & Proposed GA	WPTC F3A SC EX DE A 08 9720 S2.P4
Southern Clubhouse GA Elevations AA & BB	WPTC F3A SC ZZ EL A 08 2520 S2.P3
Southern Clubhouse GA Elevations CC & DD	WPTC F3A SC ZZ EL A 08 2521 S2.P3
Southern Clubhouse GA Sections AA & BB	WPTC F3A SC XX SE A 08 2620 S2.P3
Southern Clubhouse Proposed Site Layout	WPTC F3A SC EX ST A 08 9020 S2.P4
Groundskeeper's Shed Existing Ground Floor Plan	WPTC F3A GM 00 GA A 08 2030 S2.P2
Groundskeeper's Shed Existing Roof Plan	WPTC F3A GM RF GA A 08 2031 S2.P2
Groundskeeper's Shed Ground Floor Demolition Plan	WPTC F3A GM 00 GA A 08 0930 S2.P2
Groundskeeper's Shed Roof Demolition Plan	WPTC F3A GM RF GA A 08 0931 S2.P2
Grounds Maintenance Building Proposed Ground Floor Plan	WPTC F3A GM 00 GA A 08 2032 S2.P3
Grounds Maintenance Building Proposed Roof Plan	WPTC F3A GM RF GA A 08 2033 S2.P3
Groundskeeper's Shed Existing Elevations AA, BB, CC & DD	WPTC F3A GM ZZ EL A 08 2530 S2.P2
Grounds Maintenance Building Proposed Elevations AA, BB, CC & DD	WPTC F3A GM ZZ EL A 08 2531 S2.P3
Groundskeeper's Shed Existing Sections AA & BB	WPTC F3A GM ZZ SE A 08 2630 S2.P2
Grounds Maintenance Building Proposed Sections AA & BB	WPTC F3A GM XX SE A 08 2631 S2.P2
Grounds Maintenance Building Proposed Site Layout	WPTC F3A GM EX ST A 08 9030 S2.P3
Plant Room Proposed Ground Floor Plan	WPTC F3A PP 00 GA A 08 2040 S2.P3
Plant Room Proposed Roof Plan	WPTC F3A PP RF GA A 08 2041 S2.P3
Plant Room GA Elevations & GA Section	WPTC F3A PP ZZ EL A 08 2540 S2.P3
Site Wide Coloured Landscape Masterplan	1441 001 Rev N
Conduit House Public Access	WPTC-F3A-ZZ-EX-GA-A-08-9050 S2.P1
Operational Boundary Proposed Site Layout	WPTC-F3A-ZZ-EX-GA-A-08-9518 P1
Historic Underlay Proposed Site Plan	WPTC-F3A-ZZ-EX-GA-A-08-9519 P1
Whitewebbs House Public Access Site Plans	WPTC-F3A-ZZ-EX-GA-A-08-9521 S2.P1
Indicative Tree & Woodland Planting Mixes	1441 003 Rev C
Lightspill Plan	WPTC-F3A-ZZ-ZZ-GA-A-089024 S2.P1
Outside Operational Boundary Public Accessibility	WPTC-F3A-ZZ-EX-SC-A-039030
Inside Operational Boundary Public Accessibility	WPTC-F3A-ZZ-EX-SC-A-039031
Northern Clubhouse Proposed First Floor Plan Community Use	WPTC-F3A-NC-00-GA-A-032016 S2.P1
Northern Clubhouse Proposed Ground Floor Plan Community Use	WPTC-F3A-NC-00-GA-A-032015 S2.P1

Proposed Access Status of Routes	WPTC-F3A-ZZ-ZZ-ST-A-089524 S2.P2
Proposed Vehicular Access Gates	WPTC-F3A-ZZ-ZZ-ST-A-089525 S2.P1
Historic Access Large Car Passing Locations Forward Visibility	278880-ARP-WW-XX-DR-T-0026 P02
Demolition Plan Operational Link	WPTC F3A ZZ ZZ GA A 03 0940 S2.P1
Operational Link General Arrangement Layout	278880 ARP WW XX DR T 0022 P04
Operational Link Boundary Plan	278880 ARP WW XX DR T 0025 P01
Conduit House Application Drawings	WPTC F3A 001 ZZ GA A 08 2050 S2 P1
Private build up details	FWGC-WSP-XX-XX-DR-CV-960801 P02
<b>Documents</b>	
Planning Statement	Revision 3 dated Nov 2024
Health Impact Assessment	Revision 1
Social and Economic Benefits Statement	Revision 1
Design and Access Statement	Revision 3 dated Aug 2024
Design and Access Statement - Section 9 Access	Section 9: Access (Design and Access Statement)
Heritage Statement	Revision 1
Landscape and Visual Impact Assessment	Revision A
Landscape and Visual Impact Assessment - Addendum	August 2024
Landscape Statement	Revision C
Statement of Community Involvement	Statement of Community Involvement
Energy Strategy	Energy Strategy
BREEAM Pre-Assessment Report	BREEAM Pre-Assessment Report
Circular Economy Assessment	Circular Economy Assessment
Whole Life Cycle Carbon Assessment	Whole Life Cycle Carbon Assessment
Ecological Impact Assessment	Revision 1
The Statutory Biodiversity Metric (Calculation Tool)	Biodiversity Net Gain Metric: Updated November 2024
Arboricultural Impact Assessment	Revision 1
Transport Assessment	Revision 1
Framework Travel Plan	Framework Travel Plan
Flood Risk Assessment	Revision 2
Sports Pitch Noise Assessment	Sports Pitch Noise Assessment
Air Quality Assessment	Revision 1
Light Spill Assessment	FWGC-WSP-XX-XX-AS-SL-000001 Rev P04
Archaeological Desk-Based Assessment	Archaeological Desk-Based Assessment
Phase 1 Geo-Environmental Preliminary Risk Assessment	Phase 1 Geo-Environmental Preliminary Risk Assessment
London Planning Fire Safety Statement	15162BC Rev 05
Site Waste Management Plan	Site Waste Management Plan: October 2024 (Revision P05)
Outline Construction Logistics Plan	Outline Construction Logistics Plan
Site Construction Management Plan	Site Construction Management Plan
Outline Parkland Management Plan	1441-RP003 Revision B
Utility Statement	Utility Statement
Pre-Demolition Audit	Pre-Demolition Audit: March 2024

Pre-Demolition Audit	Pre-Demolition Audit: 16 October 2024 (Revision P01)
Navigating the Planning Submission	Navigating the Planning Submission
Security Needs Assessment	Security Needs Assessment Revision 1
Heritage Note on Additional Visualisation	Heritage Note on Additional Visualisation (ref: 0855) dated 7 Aug 2024
Whitewebbs LVIA Image	Whitewebbs LVIA Image (ref: 2235) dated 6 Aug 2024
Technical Note	Prepared by Arup dated 27 Aug 2024
Technical Note and Nighttime Active Travel Zone Assessment	Technical Note and Nighttime Active Travel Zone Assessment prepared by Arup dated 19 Aug 2024
Indicative Week in Life	Indicative Week in Life Version 3 dated 17 Oct 2024
Biodiversity Net Gain Assessment	13495A-30-01-BNG Issue 2 dated 11 Nov 2024
Operational Waste Management Plan	Operational Waste Management Plan: October 2023 (Revision P03)
GLA Carbon Emission	GLA Carbon Emission
Archaeological Trial Trenching Report	Archaeological Trial Trenching Report dated Nov 2024
Public Consultation Summary - Southern Golf Course	Public Consultation Summary - Southern Golf Course dated 4 Nov 2024
Community Use of the Southern Clubhouse	Community Use of the Southern Clubhouse dated 30 Sep 2024

## LEGAL AGREEMENT

### 3. Legal Agreement

No development shall take place on any part of the Site (save for operations described in Schedule 1 of the decision notice (hereafter referred to as "the initial works") and operations consisting of site clearance, archaeological investigations, investigations for assessing ground conditions, remedial work in respect of any contamination or other adverse ground conditions, diversion and laying of services, erection of any temporary means of enclosure, the temporary display of site notices or advertisements) unless and until all parties with (1) a legal interest to the extent it may enable them to carry out any part of the development in the relevant part of the Site and (2) a legal locus to enter a planning obligation pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended) have entered into such a planning obligation (unless otherwise agreed by the Local Planning Authority) in accordance with and substantially in the form of, the draft agreement appended to this decision notice ("Shadow S106").

**Reason:** The Council would have refused the planning application in the absence of the section 106 agreement and at the time of this permission being issued the applicant was not able to bind the legal interests in the development site under the section 106 agreement.

### 4. Use of the land

The uses within the operational boundary as shown outlined in yellow on plan WPTC-F3A-ZZ-EX-GA-A-089004) hereby permitted shall cease to be permitted if any occupier succeeding the applicant on the site ceases to be or is otherwise not bound by the (draft)

s106 agreement, or another agreement to substantially the same effect and as agreed with the Council.

**Reason:** In the event that the applicant ceases to occupy the site, that the permitted uses in the operational boundary will cease to be permitted unless any succeeding occupier is also bound by the terms of the s106 agreement.

## **HIGHWAYS PLANNING CONDITIONS**

### **5. Travel Plan**

Prior to occupation of the development hereby approved, a Full Travel Plan for the Training Facility and a separate Full Travel Plan for the Southern Club House, in accordance with Transport for London (TfL) Travel Plan Guidance, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details and include:

(i) Targets for sustainable travel arrangements.  
(ii) Commitment to effective measures for the ongoing monitoring of the Travel Plan, which include:

- Compliant TRICS SAM monitoring surveys at baseline (within six months of occupation), years 1, 3 and 5 and monitoring reports.
- Updates to the Travel Plan to reflect and adjust to the outcomes of the monitoring.
- Commitment to delivering the Travel Plan objectives for a period of at least five years from first occupation of the development approved.
- Effective mechanisms to achieve the objectives of the Travel Plan.

**Reason:** In the interests of sustainability and to ensure that traffic generated from the site is minimised and ensure the development does not adversely affect highway safety or the free flow of traffic on the public highway.

### **6. Car Parking Design and Management Plan**

Prior to commencement of development above ground, a Car Parking Design and Management Plan shall be submitted and approved in writing by the Local Planning Authority. The Plan should provide details of how proposed parking will be managed and enforced, including how initial and future provision of disabled persons parking spaces will be handled. They should include the following:

- a) where spaces (including electric vehicle charging infrastructure) will be located;
- b) details of the means of access to the parking and the operational management of the parking;
- c) details of how initial and future provision of disabled persons parking spaces will be made, managed and enforced.

The approved details shall be installed and permanently retained thereafter.

**Reason:** To ensure the provision of car parking spaces in line with the Council's adopted standards. In the interest of highway safety.

### **7. Historic Carriageway – Highways details**

Notwithstanding the approved plans, prior to the commencement of the works to the proposed historic carriageway, revised plans showing signing, lining, lighting and bollards to prevent parking onto the historic carriageway shall be submitted to and approved in writing by the local

planning authority. Works shall be implemented in accordance with the approved drawings and shall be maintained as such in perpetuity unless the approved female training facility ceases operations.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44. In the interest of highway safety.

### **8. Operational Link**

No work shall commence on the provision of the operation link identified on drawing number WPTC-F3A-ZZ-EX-ST-A-089040 revision S2.P3, until such time as a strategy for its delivery, management and maintenance has been submitted to and approved in writing by the LPA in consultation with the Highway Authority. The strategy shall include:

1. Measures to ensure the PROW and Bridleway access is maintained;
2. Measures to ensure the safety of all users of the highway, and PRoW and Bridleway, are maintained;
3. Long term management and maintenance arrangements and responsibilities whilst the operational link is in situ.

The operational link shall be provided in accordance with the approved details and shall not become operational until such time as the strategy for its management and maintenance has been approved. It shall thereafter be managed and maintained for the lifetime of the development, in accordance with the approved strategy.

**Reason:** To ensure the development does not adversely affect highway safety or the free flow of traffic on the public highway.

### **9. Operational Link 2**

In the event that the operational link is not delivered in accordance with drawing number WPTC-F3A-ZZ-EX-ST-A-089040 revision S2.P3, details shall be submitted of the treatment and layout of the northern boundary of the site and responsibility for its management. The works shall be completed prior to occupation and maintained in accordance with the approved details for the lifetime of the development.

**Reason:** To ensure the development does not adversely affect highway safety or the free flow of traffic on the public highway.

### **10. Operational Link – Boundary Planting**

Notwithstanding the approved plans, prior to the commencement of the works to the proposed operational link, revised plans showing the types of planting proposed between the segregated footway and Whitewebbs Lane, as shown in Drawing WPTC-F3A-ZZ-EX-ST-A-089040 shall be submitted to and approved in writing by the local planning. Works shall be implemented in accordance with the approved drawings and shall be maintained as such in perpetuity unless the approved female training facility ceases operations.

**Reason:** In interest of highway safety and protecting visual amenity.

The opening hours of entrance 3 (southern car park) as detailed on the approved plans shall be restricted to sunrise to sunset hours only.

**Reason:** In the interest of creating safer, secure, sustainable communities.

## **PARKLAND MANAGEMENT PLANNING CONDITIONS**

### **11. Publicly Accessible Routes**

Notwithstanding the details shown on drawing WPTC-F3A-ZZ-ZZ-ST-A-089524 S2P2 and prior to the commencement of the development, full details and drawings of the publicly accessible routes to be improved, repaired and/or constructed within both the site and its vicinity and their connections to the surrounding areas, including details of the precise alignment of routes, details of construction specification and material finish, shall be submitted and approved in writing by the local planning authority.

Upon approval, works shall be implemented in accordance with the approved details and drawings prior to the occupation of the training facility.

**Reason:** To ensure the routes are completed to an appropriate standard in accordance with Enfield Development Management Document (2014) Policy DMD 37.

### **12. Signage and Wayfinding – Management and Maintenance Plan**

Prior to use of the Southern Clubhouse commencing, details, drawings and materials of the proposed signage, public wayfinding and street furniture in the new parkland area shall be submitted and approved in writing by the local planning authority. Upon approval, works shall be implemented in accordance with the approved details prior to the occupation of the training facility.

**Reason:** To ensure a high quality of the public realm is delivered in accordance with Enfield Development Management Document (2014) Policy DMD 37.

### **13. Heritage Interpretation – Management and Maintenance Plan**

Prior to use of the Southern Clubhouse commencing, a scheme of heritage walking trails and interpretation boards of heritage assets within Whitewebbs Park and its settings shall be submitted to and approved in writing by the local planning authority. The scheme shall be developed in conjunction with local interest groups, including the Enfield Civic Society. Details shall include date(s) of installation and on-going maintenance. Upon approval, the approved works shall be implemented in accordance with the approved plans prior to the occupation of the training facility.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **14. New River (Old Course) – Management and Maintenance Plan**

No development shall commence until details of a Management and Maintenance Plan to protect, conserve and understand the remains of the New River (Old Course) have been submitted and approved in writing by the local planning authority. The plan shall:

- Include an audit of historic features associated with the New River (Old Course), which shall detail the location, significance and condition of historic features.
- Detail the methodology for re-landscaping, path laying and tree-planting, as well as assess the possibility for incorporation of SUDS features in what was previously a wet area.
- Include information on the re-interpretation of the New River (Old Course) within the proposed heritage trail.

No historic feature identified on the approved audit shall be removed or altered without approval in writing by the local planning authority. The development shall be carried out in accordance with the approved details prior to the occupation of the training facility.



**Reason:** To ensure the proper preservation and enhancement of the heritage asset, in accordance with Core Policy 31 and Policy DMD 44.

### **15. Use of Floodlights**

No floodlights hereby approved shall operate beyond 20:30hrs.

**Reason:** To preserve the visual appearance of the landscaping and protect local ecology.

## **CONSTRUCTION PLANNING CONDITIONS**

### **16. Construction Environmental Management Plan**

Prior to the commencement of works hereby approved, a Construction Environmental Management Plan (CEMP) shall be submitted and approved in writing by the local planning authority. The CEMP shall include:

- Risk assessment of potentially damaging construction activities.
- Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- Responsible persons and lines of communication.
- Measures to secure and protect all built heritage assets and archaeological features during construction works.
- Non-road mobile machinery
- Measures to control emissions during demolition and construction

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority. No built heritage assets and archaeological features shall be disturbed or removed temporarily or permanently except as indicated on the approved drawings or without the prior approval in writing of the Local Planning Authority.

**Reason:** In the interests of good air quality with regard to London Plan Policy D14 and the Mayor of London's Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition', In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **17. Construction Logistics Plan**

Prior to commencement of development, a detailed Construction Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority, which considers the impact of the development on the surrounding transport network. The plan shall be prepared in accordance with Transport for London's Construction Logistics Planning Guidance (Version v1.2, April 2021, or the most current version available). Once approved, the Construction Logistics Plan shall be fully implemented for the duration of any construction works.

**Reason:** In order to ensure that the impact of the development on the surrounding transport network is sufficiently assessed and where necessary appropriately mitigated in accordance with Policy DMD48 of the Enfield Development Management Document.

## **SUSTAINABILITY PLANNING CONDITIONS**

### **18. Whole Life Cycle Carbon Assessment**

Prior to the occupation of the development, the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance, and together with any supporting information, should be submitted to, and approved by the Local Planning Authority in writing.

**Reason:** In the interests of sustainable development and to maximise on-site carbon dioxide savings Whole Life-Cycle Carbon assessment in accordance with Policy DMD 53 and London Plan Policy SI 2.

### **19. Circular Economy Statement**

Prior to the occupation of the development, a postconstruction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance and submitted to and approved in writing by the Local Planning Authority.

**Reason:** In order to maximise the re-use of materials and in the interests of sustainable waste management in accordance with Policy DMD 57 and London Plan Policy SI 7.

### **20. Updated Energy Statement**

Within 30 days of the practical completion of the development, an updated Energy Statement shall be submitted to and approved in writing by the Local Planning Authority, reflecting the measures taken in practice in Be Lean, Be Clean and Be Green stages of the Energy hierarchy to reduce carbon emitted from the operation of a development and its services, as committed to in the design stage; and to identify whether an additional carbon offset contribution will be required to be paid.

**Reason:** In the interest of sustainable development and to ensure that the Local Planning Authority may be satisfied that CO2 emission reduction targets by renewable energy are met in accordance with Policies DMD51-54 of the Development Management Document (2014) and Policy SI 2 of the New London Plan 2021.

## **21. BREEAM**

The development hereby approved shall achieve a BREEAM rating of 'Excellent' or higher or an equivalent independent measure of energy performance and sustainability. Where the performance of the development is measured using BREEAM, it shall achieve not less than the total credits for each of the Energy, Materials and Waste categories in the BREEAM Pre-Assessment hereby approved. A post completion certificate (or equivalent certification) confirming that the development has been completed in accordance with the required BREEAM rating and has maintained or exceeded the approved total credit scores for each of the Energy, Materials and Waste categories, shall be submitted to and approved in writing by the Local Planning Authority within three months of first occupation of the development.

**Reason:** To ensure the development minimises operational carbon dioxide emissions and achieves the highest levels of sustainable design and construction in accordance with DMD51 of the Development Management Document (2014).

## **FLOODRISK AND DRAINAGE PLANNING CONDITIONS**

### **22. Groundwater Monitoring**

The development shall not commence until groundwater monitoring is undertaken to assess the potential impact of the training facility basement on groundwater flood risk has been submitted to and approved in writing by the Local Planning Authority. The groundwater monitoring should be undertaken over a period of at least 2 months between the winter period (between October and the end of March) with a minimum of 3 site visits at bi-weekly intervals. The results of the monitoring should be submitted in writing to the Local Planning Authority.

Following the results of the groundwater investigation, if significant groundwater is present on site, detailed groundwater flow modelling which will include an assessment of the impact of the proposed basement on groundwater, shall be submitted to and approved by the Local Planning Authority. This shall include appropriate mitigation measures including avoidance, changes to floor levels, appropriate drainage measures, and appropriate basement construction. For clarity, 'significant' groundwater is defined as a standing water level 0.5m or more above the surface of the London Clay or as identified (by the Local Planning Authority) to have the potential to cause groundwater flooding.

**Reason:** To minimise flood risk in accordance with Policy CP28 of the Core Strategy and Policies SI12 of the London Plan, DMD Policy 59, 60 and 62, the SFRA and the NPPF.

### **23. River Improvements**

The development shall not commence until details of river (Old River and New River) improvements has been submitted to and approved in writing by the Local Planning Authority. The details shall be in line with DMD Policy 63 Requirements and best practice guidance (TRFCC River Restoration Manual) and shall include:

- a) A Geomorphological Report including an options appraisal for river restoration activities
- b) Flood modelling of river naturalisation options and opportunities where relevant
- c) Robust explanation for proposed river improvements

- d) Specifications and information such as levels, planting, cross sections of proposed river improvements
- e) Management Plan for future maintenance

**Reason:** To ensure the protection and improvement of watercourses in accordance with Policy CP28 of the Core Strategy, DMD Policy 63, Enfield Blue-Green Strategy, Local Flood Risk Management Strategy, the Thames River Basin Management Plan and Policy SI5 of the London Plan.

#### **24. Sustainable Drainage**

Notwithstanding the details provided in the Flood Risk Assessment 13495A-30-R10-05, July 2024, the development shall not commence until a detailed Sustainable Drainage Strategy has been submitted to and approved in writing by the Local Planning Authority. The details shall include:

- a) Plans and maps of the existing drainage network and watercourses
- b) Detailed plans and drawings of the proposed SuDS Strategy including levels, sizing, cross sections and specifications for all drainage features, including plans to alleviate flooding on Whitewebbs Lane
- c) Details of the “smart” rainwater harvesting system, and how its operation will not reduce runoff to the beaver site during drought conditions
- d) Overland flow routes for exceedance events, including detailed information on flood storage compensation
- e) Management Plan for future maintenance

The approved details shall thereafter be implemented in full for the lifetime of the development.

**Reason:** To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy, DMD Policy 61, and Policies SI12 & SI13 of the London Plan and the NPPF and to maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value.

#### **25. Flood Risk and SuDS Verification**

Prior to use of the training facility, a Verification Report demonstrating that the approved Flood Risk mitigation and SuDS measures have been fully implemented shall be submitted to the Local Planning Authority for approval in writing. This report must include:

- As built drawings of the sustainable drainage systems including level information (if appropriate)
- Photographs of the completed sustainable drainage systems
- Any relevant certificates from manufacturers/ suppliers of any drainage features
- A confirmation statement of the above signed by the site manager or similar

**Reason:** To ensure the sustainable management of water, minimise flood risk, minimise discharge of surface water outside of the curtilage of the property and ensure that the drainage system will remain functional throughout the lifetime of the development in accordance with Policy CP28 of the Core Strategy, DMD 61, and Policies SI12 & SI13 of the London Plan and the NPPF.

## **HERITAGE PLANNING CONDITIONS**

### **26. North Lodge and South Lodge CR**

Prior to the installation of the gates to the North Lodge and South Lodge, additional drawings by section and elevation at scales of between 1:20 and 1:1 as appropriate, shall be submitted to and approved in writing by the local planning authority. These gates shall be constructed of timber to match, as closely as possible, to the original gates. Works shall be implemented in accordance with the approved details prior to use of the training facility commencing and shall be maintained as such for the lifetime of the development.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **27. Historic Carriageway and Southern Drive – Materials**

Prior to the commencement of the works to the historic carriageway and the southern drive hereby permitted, a 1sqm (minimum) sample panel of the proposed surfacing and edging will be prepared and made available for viewing, consideration and subsequent approval in writing by the Local Planning Authority. The panel (once approved) shall be retained on site until the completion of the works. The development shall be implemented in accordance with the approved details.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **28. Conduit House – Method Statement**

Prior to the commencement of the works to Conduit House hereby permitted, a full method statement and detailed schedule for the conservation, repair and replacement of all internal and external architectural features shall be submitted to and approved in writing by the local planning authority. This shall include large scale drawings by section and elevation at scales of between 1:20 and 1:1 as appropriate. Works shall be implemented in accordance with the approved details prior to use of the training facility commencing and shall be maintained as such for the lifetime of the development.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **29. Conduit House - Materials**

Prior to the commencement of works to Conduit House, samples of the materials to be used on the external and internal finishes shall be submitted to and approved in writing by the local planning authority. This shall include a sample panel of 1 sqm minimum to indicate brick size, colour, texture and bond together with mortar mix, joint size, colour and pointing profile. Upon approval the sample panel shall be retained on site for reference for the duration of works unless otherwise agreed in writing with the local planning authority. The works shall be implemented in accordance with the approved details.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **30. Walled Garden – Method Statement**

Prior to the commencement of the works to the Walled Garden hereby permitted, a full method statement and detailed schedule for the conservation, repair and replacement of brickwork shall be submitted to and approved in writing by the local planning authority. This shall include large scale drawings by section and elevation at scales of between 1:20 and 1:1 as appropriate. Works shall be implemented in accordance with the approved details prior to use

of the training facility commencing and shall be maintained as such for the lifetime of the development.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **31. Walled Garden – Materials**

Prior to the commencement of the works to the Walled Garden hereby permitted, a sample panel of 1 sqm minimum to indicate brick size, colour, texture and bond together with mortar mix, joint size, colour and pointing profile shall be submitted to the Local Planning Authority for approval in writing. Upon approval the sample panel shall be retained on site for reference for the duration of works unless otherwise agreed in writing with the local planning authority. The works shall be implemented in accordance with the approved details and shall be maintained as such in perpetuity unless the approved female training facility ceases operations.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **32. Northern Clubhouse – Method Statement**

Prior to the commencement of the works to the Northern Clubhouse (former Stable Block) hereby permitted, a full method statement and detailed schedule for the conservation, repair and replacement of all external architectural features together with alterations and extensions shall be submitted to and approved in writing by the local planning authority. This shall include large scale drawings by section and elevation at scales of between 1:20 and 1:1 as appropriate. Works shall be implemented in accordance with the approved details prior to use of the training facility commencing and shall be maintained as such for the lifetime of the development.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **33. Northern Clubhouse – Materials**

Prior to the use of the Northern Clubhouse, samples of the materials to be used on the external and internal finishes shall be submitted to and approved in writing by the local planning authority. This shall include a sample panel of 1 sqm minimum to indicate brick size, colour, texture and bond together with mortar mix, joint size, colour and pointing profile. Upon approval the sample panel shall be retained on site for reference for the duration of works unless otherwise agreed in writing with the local planning authority. The works shall be implemented in accordance with the approved details and shall be maintained as such in perpetuity unless the approved female training facility ceases operations.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

### **34. Northern Clubhouse – Basement Details**

The new casement windows shall be in timber, slim profile double glazed (max 14mm) with spacer bars to match external joinery colour, flush meeting within the frames, with matching joinery for opening and fixed casements, and without trickle vents or surface mounted glazing bars or gaskets. The windows shall be maintained as such for the lifetime of the development.

**Reason:** In the interest of preserving and enhancing heritage assets in accordance with Core Policy 31 and Policy DMD 44.

## **ENVIRONMENTAL HEALTH PLANNING CONDITIONS**

### **35. Site Investigation**

Prior to the commencement of development, a Site Investigation scheme shall be provided and submitted in writing to the Local Planning Authority for approval. The Site Investigation should provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site will be undertaken. The results of the site investigation should be summarised via a generic or detailed quantitative risk assessment with conclusions and recommendations for clear actions, where required.

**Reason:** To ensure that contaminated land is properly treated and made safe safeguard the health and safety of the future occupants in accordance with policy 2.1.8 of the London Plan (2016) and CP32 of the Enfield Core Strategy (2010).

### **36. Remediation Strategy**

In the event that contaminants are discovered, a Remediation Strategy shall be provided and submitted in writing to the Local Planning Authority prior to the commencement of development. The Remediation Strategy shall give full details of the remediation and mitigation measures required and how they are to be undertaken. It shall include:

1. A Verification Plan setting out the details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete to a satisfactory standard; and
2. A Monitoring and Maintenance Plan, setting out provisions for long-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

**Reason:** To ensure that contaminated land is properly treated and made safe safeguard the health and safety of the future occupants in accordance with policy 2.1.8 of the London Plan (2016) and CP32 of the Enfield Core Strategy (2010).

### **37. Verification Report**

The development shall not be occupied until a post completion remediation Verification Report, including results of sampling and monitoring carried out, has first been submitted to and approved in writing by the Local Planning Authority demonstrating that the site remediation criteria have been met.

**Reason:** To ensure that contaminated land is properly treated and made safe safeguard the health and safety of the future occupants in accordance with policy 2.1.8 of the London Plan (2016) and CP32 of the Enfield Core Strategy (2010).

### **38. Piling**

Piling or other penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority.

**Reason:** To ensure that contaminated land is properly treated and made safe safeguard the health and safety of the future occupants in accordance with policy 2.1.8 of the London Plan (2016) and CP32 of the Enfield Core Strategy (2010).

### **39. Foundations Works Risk Assessment**

Prior to construction of the foundations in development, a Foundations Works Risk Assessment for an area agreed in advance with the Local Planning Authority will be submitted to and approved in writing with the Local Planning Authority that will take account of previous consultations with the Environment Agency, and the conditions in which the remediation stage will leave the site.

**Reason:** To safeguard groundwater quality and human health in accordance with policy 2.1.8 of the London Plan (2016) and CP32 of the Enfield Core Strategy (2010).

### **40. Unexpected Contamination**

In the event contamination has not previously been identified or unexpected is found to be present during development, no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted an updated addendum remediation strategy specifically for the previously unidentified contamination to the Local Planning Authority detailing how it shall be dealt with and obtained written approval from the Local Planning Authority. The addendum remediation strategy shall be implemented as approved.

**Reason:** To safeguard groundwater quality and human health in accordance with policy 2.1.8 of the London Plan (2016) and CP32 of the Enfield Core Strategy (2010).

## **SAFETY PLANNING CONDITIONS**

### **41. Secure by Design**

Prior to the use of the training facility commencing details confirming that the development achieves a Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieves Crime Prevention Standards, shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Metropolitan Police. The development shall be carried out in accordance with the approved details and thereafter shall be fully retained and maintained as such for the lifetime of the development.

**Reason:** In the interest of creating safer, secure, sustainable communities.

## **TREES AND LANDSCAPE PLANNING CONDITIONS**

### **42. Tree Protection**

Prior to the commencement of the development hereby approved (including demolition and all preparatory work), a scheme for the protection of the retained trees, in accordance with BS 5837:2012, including a tree protection plan(s) (TPP) and an arboricultural method statement (AMS) shall be submitted to and approved in writing by the Local Planning Authority. Specific issues to be dealt with in the TPP and AMS shall be as follows:

- a) Location and installation of services/ utilities/ drainage.
- b) Methods of demolition within the root protection area (RPA as defined in BS 5837: 2012) of the retained trees.
- c) Details of construction within the RPA or that may impact on the retained trees.
- d) Full specification for the installation of boundary treatment works.
- e) Full specification for the construction of any roads, parking areas and driveways, including details of the no-dig specification and extent of the areas of the roads, parking areas and driveways to be constructed using a no-dig specification. Details shall include relevant sections through them.



- f) Detailed levels and cross-sections to show that the raised levels of surfacing, where the installation of no-dig surfacing within Root Protection Areas is proposed, demonstrating that they can be accommodated where they meet with any adjacent building damp proof courses.
- g) Specification for protective fencing to safeguard trees during both demolition and construction phases and a plan indicating the alignment of the protective fencing.
- h) Specification for scaffolding and ground protection within tree protection zones.
- i) Tree protection during construction indicated on a TPP and construction and construction activities clearly identified as prohibited in this area.
- j) Details of site access, temporary parking, on site welfare facilities, loading, unloading and storage of equipment, materials, fuels and waste as well concrete mixing and use of fires
- k) Boundary treatments within the RPA
- l) Methodology and detailed assessment of root pruning
- m) Arboricultural supervision and inspection by a suitably qualified tree specialist throughout the duration of the works at monthly intervals
- n) Reporting of inspection and supervision
- o) Methods to improve the rooting environment for retained and proposed trees and landscaping
- p) Veteran and ancient tree protection and management

The development thereafter shall be implemented in strict accordance with the approved details throughout the duration of the development works.

**Reason:** To ensure that adequate provisions for the protection of trees and the monitoring of their welfare during construction are established, in accordance with Policy DMD 80 and Core Policy 30, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

#### **43. Tree replacement**

Any trees, hedges or shrubs identified within the approved plans (both proposed planting and existing) which die, are removed, seriously damaged or seriously diseased, within a period of 10 years of being planted or in the case of existing planting within a period of 5 years from the commencement of development, shall be replaced in the next planting season with others of similar size and species.

**Reason:** To ensure that adequate provisions for the protection of trees and the monitoring of their welfare during construction are established, in accordance with Policy DMD 80 and Core Policy 30, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

#### **44. Soft and Hard Landscape**

Prior to the commencement of development a scheme of soft and hard landscaping for the site shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details and any planting shall commence within the first planting and seeding season (October - March inclusive) following the commencement of the development and shall be completed prior to the use of the training facility commencing.

- a. proposed finished levels and contours showing earthworks and mounding;
- b. location, type and materials to be used for hard landscaping including specifications

- c. minor artefacts and structures (for example furniture, refuse and/or other storage units, signs, lighting and similar features);
- d. proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features).
- e. written specifications (including cultivation and other operations associated with plant and grass establishment);
- f. planting plans;
- g. a schedule detailing species, sizes, numbers/densities and tree pit details of all proposed trees/plants;
- h. types and dimensions of all boundary treatments and
- i. specifications for operations associated with plant establishment and maintenance that are compliant with best practice; and
- j. programme for delivery of the above works.

**Reason:** To safeguard and enhance the character and amenity of the area, to provide ecological, environmental and biodiversity benefits and to maximise the quality and usability of open spaces within the development, and to enhance its setting within the immediate locality in accordance with Policy DMD 80, Policy DMD81 and Core Policy 30, Chapters 12 and 15 of the National Planning Policy Framework.

#### **45. Tree Planting**

A minimum of 2000 new trees shall be planted across the site as a whole, including 231 new trees within the operational boundary, 241 new trees within the historic parkland and the remainder within the areas of proposed new woodland.

**Reason:** To safeguard and enhance the character and amenity of the area, to provide ecological, environmental and biodiversity benefits and to maximise the quality and usability of open spaces within the development, and to enhance its setting within the immediate locality in accordance with Policy DMD 80, Policy DMD81 and Core Policy 30, Chapters 12 and 15 of the National Planning Policy Framework.

**Reason:** To safeguard and enhance the character and amenity of the area, to provide ecological, environmental and biodiversity benefits and to maximise the quality and usability of open spaces within the development, and to enhance its setting within the immediate locality in accordance with Policy DMD 80, Policy DMD81 and Core Policy 30, Chapters 12 and 15 of the National Planning Policy Framework.

#### **46. Details of Earthworks**

Prior to any works commencing on site, details of earthworks shall be submitted to and approved in writing by the Local Planning Authority. These details shall include the proposed grading and mounding of land areas including the levels and contours to be formed, showing the relationship of proposed mounding to existing vegetation and surrounding landform. The development shall then be carried out in accordance with those approved details.

**Reason:** In the interest of maintaining the amenity value of the area, in accordance with Policy DMD 81.

### **ECOLOGY PLANNING CONDITIONS**

#### **47. Construction Environmental Management Plan**

Prior to the commencement of development, a Construction Environmental Management Plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP (Biodiversity) shall include the following:

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements) including method statements and evidence that necessary licences have been obtained where relevant, for great crested newts, reptiles, nesting birds, bats and badgers.
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.
- i) Containment, control and removal of any Invasive non-native species present on site.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

**Reason:** To conserve protected and priority species and allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended) (Priority habitats & species) and in accordance with guidance contained in the National Planning Policy Framework (2024).

#### **48. Habitat Management and Monitoring Plan**

The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), has been submitted to, and approved in writing by, the Local Planning Authority. The HMMP shall include:

- (a) Verification of the biodiversity net gain and ecology measures to be implemented as part of the development in accordance with the approved Biodiversity Net Gain Assessment and Ecology Impact Assessment.
- (b) Management and monitoring arrangements for (a)
- (c) A programme for implementation of the above, covering a period of up to 30 years from the completion of development.
- (d) The roles and responsibilities of the people or organisation(s) delivering the HMMP.

The development shall thereafter be carried out in full accordance with the approved details.

**Reason:** To ensure the development protects, maintains and enhances the ecology of the site and achieves the required biodiversity net gain targets.

#### **49. External Lighting**

Prior to occupation of the development full details of all external lighting should be submitted to and approved in writing by the Local Planning Authority. The details of the proposed lighting and fixtures should be informed by the Light Spill Assessment prepared by WSP Lighting & Energy Solutions July 2024 (Application Document No. 21). The design should also respect the character of the site.

**Reason:** To preserve visual amenity and protect local ecology.

#### **OTHER CONDITIONS**

##### **50. Delivery of the Southern Clubhouse**

The works to the Southern Clubhouse hereby approved shall be completed in full prior to the uses within the operational boundary commencing.

Reason: To ensure delivery of essential community benefits required to support the development.

#### **INFORMATIVES**

1. The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:
  - on or within 8 metres of a main river (16 metres if tidal)
  - on or within 8 metres of a flood defence structure or culvert including any buried elements (16 metres if tidal)
  - on or within 16 metres of a sea defence
  - involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
  - in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.
2. Once the GLA's Whole Life-Cycle Carbon Assessment is approved by the LPA, the Applicant should provide this Assessment together with any supporting information to the GLA at: [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk).
3. Once the Post-Construction Monitoring report is approved by the LPA, the Applicant should provide the approved post-construction monitoring report and any supporting information to the GLA at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk)
4. The following British Standards should be referred to:
  - BS: 3998:2010 Tree work – Recommendations
  - BS: 5837 (2012) Trees in relation to demolition, design and construction – Recommendations
  - BS: 3882:2015 Specification for topsoil
  - BS: 3936-1:1992 Nursery Stock - Part 1: Specification for trees and shrubs
  - BS: 4428:1989 Code of practice for general landscaping operations (excluding hard surfaces)
  - BS: 4043:1989 Recommendations for Transplanting root-balled trees

- BS: 7370-4:1993 Grounds maintenance part 4. Recommendations for maintenance of soft landscape (other than amenity turf).
  - BS: 8545:2014 Trees: from nursery to independence in the landscape – Recommendations
  - BS: 8601:2013 Specification for subsoil and requirements for use 2 Landscape
5. In aiming to satisfy the Secure by Design condition the applicant should consult the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via [docomailbox.ne@met.police.uk](mailto:docomailbox.ne@met.police.uk).
  6. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

## SCHEDULE 1 – THE INITIAL WORKS

Item	Works	Area	Description
1	Parkland Restoration	<20.00Ha	Restoration of the southern part of the former golf course restored into expansive parkland setting with extensive new tree planting and wildflower rich grassland creation, referencing the historic landscape pattern. Proposals to be confirmed following further design development.
2	Dickenson's Meadow Link	Circa 1.89Ha	Creation of area of diverse, native woodland linking habitats within adjacent Whitewebbs Wood and Dickenson's Meadow. Proposals to be confirmed following further design development.
3	Eastern Bridleway Improvements	N/A	Repairs and physical improvements to the existing bridleway on the Landlord's retained land along the eastern boundary of the Premises (marked in green on Lease Plan 3). Proposals to be confirmed following further design development.
4	Footpath Improvements	N/A	Repairs and physical improvements to existing footpaths within the Premises along with the creation of new footpaths to maintain public accessibility. Proposals to be confirmed following further design development.
5	Permissive Path Upgrade	N/A	Upgrade of existing permissive path running east/west and as shown on Definitive Map to formal bridleway. Proposals to be confirmed following further design development.
6	Southern Clubhouse Development	N/A	Renovation and/or redevelopment of existing Southern Clubhouse to provide public café, visitor centre and WC facilities. Proposals to be confirmed following further design development.
7	Southern Clubhouse Car Park Improvements	N/A	Improvement/resurfacing of existing Southern Clubhouse car park to provide parking for new Southern Clubhouse facilities.

## **APPENDIX 2: 24/00987/FUL**

### **Heads of Terms for proposed Section 106 Agreement**

#### **1. Carbon offset payment**

Carbon Offsetting Contribution	means the sum of £29,046 (Index Linked) towards offsetting the annual residual carbon emissions of 10.2 tonnes of the development to be paid to the Council prior to the commencement of the development.(excluding the Initial Works)
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Prior to any works commencing on site excluding the Initial Works (attached at Schedule 1 to the decision notice) the applicant is to make the Carbon Offsetting Contribution payable to the Council.

The Section 106 will also need to capture that if there is a need for any additional contribution pursuant to submission and approval of updated energy condition (if the development does not manage to deliver the savings anticipated in the current energy statement and to be calculated pursuant to the above-mentioned condition) this contribution is to be paid prior to occupation of the Development.

#### **2. Journeys and Places Transport Contribution**

Journeys and Places Transport Contribution	Means the sum of £30,000 Index Linked towards general safety improvement, pedestrian and cycle infrastructure improvement to be paid to the Council prior to the Commencement of Development (excluding the Initial Works)
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Prior to the commencement of development excluding the Initial Works, the applicant shall pay to the Council the Journeys and Places Transport Contribution.

The Council will provide a breakdown of sums spent and will return any unused funds.

#### **3. Travel Plan**

Travel Plan Monitoring Contribution	Means the sum of £3,500 (Index Linked) per travel plan towards monitoring the implementation of the relevant Travel Plan both to be paid to the Council prior to the Occupation of the Development
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Prior to the occupation of development, the applicant shall make the Travel Plan Monitoring Contributions payable to the Council.

#### **4. Operational link**

Definition of the Operational Link	Means the road surface shaded in dark grey on drawing 278880- ARP-WW-XX-DR-T-0025 Operational Link Boundary Plan
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If a maintenance contribution is required to be paid pursuant to condition 10 of the planning permission such payment will be made as follows:

The applicant shall pay a sum of £10,600.00 per annum (Index Linked) to provide funds to the Council to carry out the ongoing maintenance works, for the Lifetime of the Development. The first payment will be needed on completion of works to deliver the Operational Link and with subsequent payments made each year thereafter

The Council will provide a breakdown of sums spent and will return any unused funds

## **5. Publicly Accessible Routes**

There are a number of different types of publicly accessible routes both within and outside the application site that the Applicant will repair (where appropriate), maintain and manage.

The routes are shown and described on Plan WPTC-F3A-ZZ-ZZ-ST-A-089524-S2-P2 and the various types of landscaping and surface materials are shown on the attached photographs.

Any routes within the application site and its vicinity on Plan WPTC-F3A-ZZ-ZZ-ST-A-089524-S2-P2 to be improved, repaired and/or constructed that fall within the list of initial works attached at Schedule 1 to the decision notice will be dealt with by condition. Any routes within the application site and its vicinity on Plan WPTC-F3A-ZZ-ZZ-ST-A-089524-S2-P2 to be improved, repaired and/or constructed that fall outside the list of initial works attached at Schedule 1 to the decision notice will be dealt with through the Section 106 and required to be constructed prior to the occupation of the training facility. Any maintenance of all the routes within Plan WPTC-F3A-ZZ-ZZ-ST-A-089524-S2-P2 (including the Initial Works) and the upgrade of Path E is to be dealt with via a scheme to be submitted to the LPA (and approved) prior to Commencement of the Training Facility. HoT also to require payment of commuted sum relating to the upgrade of Path E to a bridleway to be paid prior to occupation of the training facility.

## **6. Biodiversity Net Gain**

Works to secure BNG to be secured pursuant to conditions.

A commuted sum will be required to be paid in the event that the lease does not extend beyond 25 years and the calculation for such figure shall be to cover the final 5 years of the BNG statutory period and shall be in accordance with the Statutory Biodiversity Calculator formula or such successor tool and shall be paid to the Council no later than 12 months prior to expiry of the applicants lease term.

The Applicant shall submit monitoring reports to the Council for approval on the 1st, 2nd, 3<sup>rd</sup>, 4<sup>th</sup> 5<sup>th</sup>, 10<sup>th</sup>, 15<sup>th</sup>, 20<sup>th</sup>, 25<sup>th</sup> and 30<sup>th</sup> anniversary of the completion of the BNG Worksto the Council's satisfaction such reports to confirm compliance with the approved Habitat Management and Maintenance Plan.

If the lease terminates after 25 years, the applicant shall pay a sum to the LPA to cover the services of a third party to monitor the final 5 year period

The costs of the LPA reviewing any monitoring reports shall be met by the applicant such sum per review to be £1,375 per report and index linked. Such sum is to be paid at the time the monitoring report is submitted.

## **7. Parkland Management**

Prior to the commencement of development excluding the Initial Works , a Full Parkland Management Plan, setting out how the applicant shall manage and maintain the parkland area for public use for the duration of the operation of the training facility, shall be submitted



to and approved by the Local Planning Authority. The management of the Full Parkland Management Plan will be complied with for duration of the training facility.

The Full Parkland Management Plan shall include the management and maintenance arrangements for the following, and shall demonstrate compliance with the plans and documents approved as part of the planning permission and relevant details approved via planning conditions.

- All footpaths including the historic carriageway
- All planting including tree planting
- Ecological enhancements
- Furniture and lighting
- Publicly accessible swale
- Surfacing and facilities such as ECV charging and cycle charging within the northern and southern car park
- Provision of CCTV
- Way finding signage
- Access arrangements for the gates serving the parkland
- Whitewebbs pond
- Whitewebbs Wood
- Nature corridor connecting the application site with Dickenson's Meadow

The Plan shall include details of the community engagement undertaken to inform the Plan, the timetable for implementation of the management and maintenance arrangements and the monitoring fee to be paid to the Council.

A monitoring report shall be submitted to the Council on the 1st, 2nd, 3<sup>rd</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 10<sup>th</sup>, 15<sup>th</sup>, 20<sup>th</sup> and 25<sup>th</sup> anniversary of the approval of the Full Parkland Management Plan evidencing compliance with the Plan.

Monitoring fees shall be paid by the applicant to the Council at the same time as the monitoring report is submitted, the fee for which shall be agreed as part of the Full Parkland Management Plan.

## 8. Community and School Football Training

The applicant is to provide football training to the local residents and school children in accordance with the Schedule below.

The Club's community programmes are focused on impact and the creation of social value. They have been designed specifically to be delivered over a ten-year period. .

The applicant must submit an annual monitoring report to demonstrate that these programmes are being delivered, and these shall be reviewed in accordance with the committed hours, to understand whether these programmes need to be amended over the course of the operation of the training centre, to update and improve these programmes to ensure they are being effectively delivered.. At the end of the 10 year period the applicant will prepare and provide an impact report to the Council that analyses what difference the programmes have made, for example on levels of physical fitness and participation amongst women and girls in the borough. Following delivery of each impact report the Council and the Club may by agreement extend some of the programmes

A School / Education Community Engagement Plan (that details the educational programmes being offered and penalties for non compliance) must be prepared and submitted and approved by the LPA three months prior to the first use of the Training Centre

No	Activity	Target group	Description	Committed Delivery hours	Policy link
1	Proposed Global Football Development (GFD) Premier Days	8-15 year old girls	<p>Providing unique access to the new Women's and Girls' Training Centre, GFD Premier Days are prestigious events which offer 8-15 year olds a unique insight into coaching methods and techniques.</p> <p>The new Women's and Girls' TC enables us to host 8 new GFD Premier Days each year exclusively for girls. Each session will have 100 participants taking part in 8 hours of coaching.</p> <p>GFD sessions are aimed at girls of</p>	<p>800 participants will receive 8 hours of coaching each year</p> <p><b>6,400 hours</b></p>	<p>This programme aligns with the 'Thriving children and young people' objective identified as a priority in both <a href="#">Enfield's Joint Local Health and Wellbeing Strategy 2024 – 2030</a> and within <a href="#">Enfield Council's Investing in Enfield Council Plan 2023 – 2026</a></p> <p>Both plans identify that in 2022/23,43% of year 6 children in Enfield were overweight or obese, higher than the London average.</p>

No	Activity	Target group	Description	Committed Delivery hours	Policy link
			<p>varying ability. Premier Days specifically are designed to cater to a wide range of young players and provide the opportunity to train on Academy pitches giving young people experience of what it's like to train in a professional environment.</p> <p>800 participants will take part over 12 months.</p>		<p>They further highlight an ambition to <i>'Engage children and young people in positive activities'</i> and <i>'Improve nutrition, oral health and physical activity among children and young people'</i></p>
2	Proposed Global Football Development (GFD) Centers	5 – 15 year old girls	<p>The new Women's and Girls' TC will enable THFC to deliver GFD Development Centers tailored for girls aged 5 – 15. This would operate in term time (approx. 40wks a year) from 4.30pm-6.30pm each Friday.</p> <p>Each session will have 60 participants taking part in a 6 week programme. 6 different groups of girls will participate each year.</p> <p>360 participants will receive 12 hours of teaching over 12 months.</p> <p>This provision will be new delivery at</p>	<p>360 participants will receive 12 hours of teaching each year</p> <p>4,320 hours</p>	

No	Activity	Target group	Description	Committed Delivery hours	Policy link
			<p>the Women's and Girls' Training Academy.</p> <p>As part of this programme, THFC will target the sessions for the residents in the Borough, with a focus on communities which experience the greatest level of social exclusion, notably in the east of the Borough.</p>		
3	Proposed Next Generation Girls	12-17 year old girls	<p>This programme, led Tottenham Hotspur Foundation, targets traditional age range out' of football.</p> <p>Operating a 'turn up and play model' with the opportunity to play in tournaments, attend Spurs Women matches and gain qualifications.</p> <p>The programme currently runs in various locations across the community, but the new Women's and Girls' TC will provide the opportunity to run a session on site once a week in term time for 2 hours.</p> <p>15 participants will receive 2 hours of coaching each</p>	<p>15 participants will receive 2 hours of coaching once a week for 40 weeks</p> <p>1,200 hours</p>	As Above

No	Activity	Target group	Description	Committed Delivery hours	Policy link
			<p>week during term time.</p> <p>This programme will involve some of these sessions being held in locations in the Borough, to be agreed with the Council, aimed at raising the profile of the programme to all residents.</p>		
4	Proposed Wildcats	5-11 year old girls	<p>Wildcats Girls' Football is an FA led initiative that offers non-competitive sessions for girls who want to give football a go for the very first time.</p> <p>These sessions will be run by THFC at locations across the Borough for one hour each week.</p>	<p>25 participants will receive 1 hour of coaching per week for 40 weeks</p> <p>1,000 hours</p>	As Above
5	Proposed GFD College Programmes	16 – 18 year old girls	<p>The Club has active partnerships with 3 local colleges e.g., Barnet and Southgate College, where local students have the opportunity to undertake football coaching lessons and graduate</p>	<p>150 participants will receive 96 hours of teaching at the new Women's Training Centre each year enabling them to learn consistently in an elite environment geared towards sporting excellence.</p>	<p>This programme aligns with the <i>'Strong, safe, and healthy communities'</i> objective identified as a priority in both <a href="#">Enfield's Joint Local Health and Wellbeing Strategy 2024 – 2030</a> and within <a href="#">Enfield Council's Investing in Enfield Council Plan 2023 – 2026</a>.</p>

No	Activity	Target group	Description	Committed Delivery hours	Policy link
			<p>with a Btech qualification in Sport.</p> <p>This is currently delivered at Barnet and Southgate College, but the new Women's and Girls' Training Centre will provide the opportunity to welcome students and deliver teaching facilities in-house.</p> <p>This is an education programme with formal qualifications attached to it, hence the high number of hours. Students taking part in this programme are able to select from a number of full-time academic qualifications ranging from BTEC Level 1,2,3 or Level 3 Extended Diploma in Sport, A Levels, NVQ level 2 in activity leadership etc.</p> <p>The Women's and Girls' Training Academy provides the opportunity for students to gain experience within an elite sporting facility.</p> <p>Each partnership would take part in</p>	14,400 hours	<p>Enfield's Council Plan highlights an ambition to <i>'improve our leisure and sport opportunities to enable more active lifestyles'</i> and <i>'nurture our arts, heritage and creative sectors to connect people through culture'</i></p>

No	Activity	Target group	Description	Committed Delivery hours	Policy link
			<p>one full day (8 hours of teaching) per month.</p> <p>A total of 150 participants will receive 96 hours of coaching and Training Centre access each year.</p>		
6	Proposed GFD Coach Academy Open Days	16 – 18 year olds mixed gender	<p>GFD will run bespoke education events for key partners including local sports clubs and schools for those interested in learning more about coaching.</p> <p>Covering both practical and theory based sessions, a total of 30 participants will participate one full day each month.</p> <p>This provision will be new to the Women's and Girls' Training Academy</p>	<p>360 participants will receive 8 hours of teaching each year</p> <p>2,880 hours</p>	As Above
7	Proposed Women's Health Education Programme and annual roadshow event	Mixed gender group drawn from local sports Clubs and schools	<p>Tottenham Hotspur Foundation has ambitions to run an education programme centered around women's health.</p> <p>The programme aims to educate grassroots clubs and schools about women's health to ensure girls are properly supported to stay active as</p>	<p>Up to 150 participants will be invited to attend an annual roadshow event at the Training Centre which will be one full day of 8 hours</p> <p>1,200 hours</p>	<p>As above.</p> <p>We know that girls less active less active enter their teenage</p> <p>This programme aims to educate local sports clubs and schools across the Borough to prevent young girls stopping physical activity thus aligning with</p>

No	Activity	Target group	Description	Committed Delivery hours	Policy link
			<p>they approach their teenage years.</p> <p>It will include information about puberty and menopause and include 6 courses throughout the year. These courses will take place off site, but the women's and girls' training centre provides the opportunity to host one annual roadshow event each year to share learnings and promote the programme within the context of an elite sporting facility.</p> <p>The roadshow will rotate between stadium and TC, i.e. Haringey and Enfield.</p> <p>Participants would be drawn from local sports Clubs and schools.</p> <p>This would be delivered every other year</p>		<p>Enfield Council's ambition to <i>'enable more active lifestyles'</i></p>
8	Proposed Primary Stars	Ages 5-11 mixed gender	A programme which utilizes the appeal of Tottenham Hotspur Football Club to inspire children to be active and develop important life skills.	This is an externally based programme in primary schools. Our intention would be to use the Women's and	This programme aligns with the ambition set out in <a href="#">Enfield Council's Investing in Enfield Council Plan 2023 – 2026</a> that <i>'children and young people do</i>



No	Activity	Target group	Description	Committed Delivery hours	Policy link
			<p>The curriculum-linked teaching resources support English, Math, PSHE and PE, with flexible activity ideas, worksheets, lesson plans, assemblies, and exclusive videos.</p> <p>PSHE topics include resilience, diversity, self-esteem, and fair play.</p> <p>PLPS is a programme that is delivered in 6 week blocks to different classes / schools. The true number of PLPS delivery is in the next section, this additionality will bring one class of children (approx x25) once a week to the WTC to hold tournaments x4 / year.</p>	<p>Girls' Training Centre as an incentive and reward for KS2 classes. It is an expanded offer to the existing Primary Stars programme run by THFC.</p> <p>25 participants will receive 1 hour of coaching in the new Women's Training Centre once a week for 40 weeks</p> <p>1,000 hours</p> <p>In addition, 25 participants will receive 2 hours of coaching at the Training Centre six times a year.</p> <p>300 hours</p>	<p><i>well at all levels of learning'</i></p>
9	Proposed PL Kicks	9 – 18 year olds mixed gender group	Premier League Kicks is a series of free football and multi-sport sessions that provide positive activities through participation in football, workshops on	<p>30 participants will receive 8 hours of on-site coaching every 2 months</p> <p>1,440 hours</p>	This flagship programme has been inspiring children and young people to achieve their potential and wellbeing; working together to build stronger,

No	Activity	Target group	Description	Committed Delivery hours	Policy link
			<p>important social topics, tournaments, qualifications, and volunteering.</p> <p>The new Women's and Girls' Training Centre provides the opportunity to host bi-monthly tournaments for Kicks participants as a reward and to keep those on the programme engaged.</p> <p>A total of 30 participants would take part in one full day every 2 months</p>		<p>safer, and more inclusive communities.</p> <p>A targeted version of the programme works with young people at risk of becoming victims or perpetrators of youth violence.</p> <p>This programme aligns with the '<i>Strong, safe, and healthy communities</i>' objective identified as a priority in both <a href="#">Enfield's Joint Local Health and Wellbeing Strategy 2024 – 2030</a> and within <a href="#">Enfield Council's Investing in Enfield Council Plan 2023 – 2026</a>.</p>
10	Proposed Hosting school/regional grassroots football tournaments	Various participants with a range of ages	<p>The new Women's and Girls' Training Centre provides the opportunity to host various grassroots tournaments once a month.</p> <p>These will be linked to key campaigns, e.g., the Godwin Lawson tournament which diverts young people at</p>	<p>On two half days each month a different school or other group will be hosted at the Training Centre. Approx 60 participants will receive 3 hours of access each month</p> <p>2,160 hours</p>	As Above

No	Activity	Target group	Description	Committed Delivery hours	Policy link
			risk of gang violence away from crime		
11	Proposed Women's Walking Football	Women aged 40+	<p>Targeting inactive females in a safe and fun environment. The aim is to create opportunities to participate in football – often for the first time – as well as socialize. Outcomes include improved physical and mental wellbeing.</p> <p>This programme will be delivered across Enfield in various locations, but the new Women's and Girls' Training Centre provides the opportunity to host 4 half day sessions a year</p> <p>A total of 25 participants will take part in each session</p>	<p>100 participants will take part in 4 hours of coaching each year</p> <p>400 hours</p>	<p>This programme targets inactive adults which is a priority set out in <a href="#">Enfield's Joint Local Health and Wellbeing Strategy 2024 – 2030</a>.</p> <p>Pillar 2 of the 'Population Health' approach outlined within the strategy is 'Lifestyles and behaviours'.</p> <p>59.7% of Enfield adults are overweight or obese compared with 55.9% of the London average</p>
12	Proposed Programme-Child Weight Management service (CWM)	Health services refer children and young people from the Enfield CWM services	Combining Fitness and Football, the service engages with a range of children and young people to get active, move more and manage their weight	After School 2hrs p/w	

The following will also need to be provided.

- (i) A Community Transport Strategy detailing how transport is to be secured to provide above mentioned programmes free of charge shall be submitted to and approved by the LPA 3 months prior to the use of Training Facility
- (ii) Annual monitoring reports shall be submitted for both the School / Education Community Engagement Plan and the Community Transport Strategy to the LPA for approval providing evidence of take up to demonstrate compliance
- (iii) If any part of programme pursuant to School/Education Community Engagement Plan cannot be delivered in the given year evidence of provision needs to be provided and agreed with LBE. Undelivered benefits can only be transferred to next year (in agreement with LPA). If programme overall not completed and evidenced in the 10 year period, then any undelivered benefits may be transferred to the next year but if they are not provided by the next year then a financial penalty will be imposed to allow for LBE to deliver alternative sports and community benefits. The Penalty shall be equivalent to the cost of on-site delivery and index linked.
- (iv) The costs of each element of the programme will need to be provided and agreed as part of School / Education Community Engagement Plan

**9. The Southern Clubhouse**

A plan for the management of the Southern Clubhouse and community space (to cover the Café and WCs and the Community Space and address hours of operation; access and security; booking system and charges) called ‘the Southern Clubhouse Management Plan’ must be prepared and submitted and approved by the LPA three months prior to the first use of the Training Centre. Once approved the Southern Clubhouse management plan shall be complied with for the lifetime of the Development. Evidence of compliance should be submitted to the LPA for approval annually thereafter for lifetime of the development .

<p>Flexible Community Space</p>	<p>A fully decorated and serviced area of no less than 57m2 (GEA) will be provided by the Applicant for use by the community and Enfield Council.</p> <p>Enfield Council will be entitled to up to a minimum of 8 hours per week free usage of the space for the purpose of running Council-sponsored community programmes. The space will otherwise be made available to hire by the local community with hire rates to be set out in the Southern Clubhouse Management Plan, but with the intention that the hire fees only cover the Applicant’s cost of providing the space (e.g. utilities, insurance and maintenance).</p>
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	<p>The space shall be managed and maintained by the Applicant. Provision of the space is however subject to its appropriate usage and in consultation with the Council and the police, the Parties will review its provision in the event of repeated misuse, vandalism or anti-social behaviour.</p>
Café	<p>The Applicant is to provide a café of no less than 107m<sup>2</sup> (GEA) and WC facilities of 51m<sup>2</sup>.</p> <p>The café will be operated on a commercial basis either by the Applicant or its tenant. The public WCs are to be provided on a free of charge basis. The hours of opening are to be set out in the Southern Clubhouse Management Plan, but are intended to correlate with the park opening hours (i.e. dawn until dusk).</p> <p>The café/public WCs shall be managed and maintained by the Applicant. Provision of the café and public WCs is however subject to its appropriate usage and in consultation with the Council and the police, the Parties will review their provision in the event of repeated misuse, vandalism or anti-social behaviour.</p>

## 10. Employment and Skills

Consistent with the Enfield Section 106 Supplementary Planning Document (November 2016), the Applicant will provide and have approved prior to commencement of the Development (excluding the initial works) :

- An Employment and Skills Strategy, covering:
  - o Using all reasonable endeavours to secure 25% of the workforce during demolition/construction as local labour.
  - o Outlining how the developer will engage with local contractors/subcontractors to provide local goods and services.
  - o Outlining how many apprenticeships will be employed on site and how many weeks training will be provided per trainees.
- o At least 1 apprentice/trainee to be employed per £1m of contract value, with apprentices to be employed for at least 12 months in accordance with Enfield Section 106 Supplementary Planning Document .

## • 11. Energy Performance

The development shall comply with the following:

- a) Prior to each Building being occupied, the owner shall provide updated accurate and verified 'as-built' design estimates of the 'Be Seen' energy performance indicators for each Reportable Unit of the development, as per the methodology outlined in the 'As built stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance (or any document that may replace

it). All data and supporting evidence should be submitted to the GLA using the 'Be Seen' as-built stage reporting webform (<https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance-and-spgs/be-seen-energy-monitoring-guidance>). The owner should also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in the 'In-use stage' of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it).

- b) Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the 'In-use stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it). All data and supporting evidence should be submitted to the GLA using the 'Be Seen' in-use stage reporting webform (<https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance-and-spgs/be-seen-energy-monitoring-guidance>). This obligation will be satisfied after the Owner has reported on all relevant indicators included in the 'In-use stage' chapter of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it) for at least five years.
- c) In the event that the 'In-use stage' evidence submitted shows that the 'As-built stage' performance estimates derived from Clause a) have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures identified in Clause b) shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.

## **12. S106 Monitoring fees as per S106 SPD**