

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

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.

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:
 - o Preservation and enhancement of the conduit house.
 - o Sensitive expansion of the Northern Clubhouse.
 - o Reinstatement of the historic carriageway.
 - o 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.
 - o Creation of a Heritage Trail.
- Providing buildings and public realm of high quality and good design:
 - o 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:
 - o Provision of open space in the same locality with improved quality.
 - o 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.