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The fight for our beautiful park is not over—far from it! The “Decision” has not yet been made.

Although Enfield’s planning committee authorised the Head of Planning to grant planning permission this is subject to various conditions and to referral of the application to the Mayor of London and to the Secretary of state for Housing, Communities and Local Government.

The Councillors for the Whitewebbs Ward have already sent letters to the Mayor and to the Secretary of State asking that the decision be called in. <https://enfielddispatch.co.uk/khan-and-rayner-urged-to-use-powers-to-prevent-spurs-building-on-whitewebbs-park/>

The Public Interest Law Centre on behalf of the Friends of Whitewebbs and the CPRE wrote to the Secretary of State with a similar message

Action Now—we all need to:

Write to the Mayor asking for the Mayor to reject the planning application OR call it in.

You may have submitted your objections to Enfield Planning Committee but please send a copy of these to the Mayor. Following the planning committee meeting you might wish to add further objections.

If you have not submitted objections please do so now. The more objections that the Mayor receives the better.

Make sure that you include Whitewebbs and the reference 24-00987-FUL in your letter or email

Page 2 contains background information on the process and how to contact the Mayor

Pages 3 and 4 contain suggestions as to what you might want to include in your letter.

Stage 1 Background information

Once an application has been submitted, and if it meets the [Mayor of London Order](#), the local planning authority is required to refer it to the Mayor. The Mayor has six weeks to provide comments on the application, assessing whether it complies with the London Plan policies. This is a consultation response known as stage one.

The application is then considered by the local planning authority at its planning committee, where it decides whether to grant or refuse permission. This happened in February when the Planning Committee authorised the Head of Planning to make the final decision once factors such as section 106 arrangements had been made. At the time of writing this decision has not been issued.

Following the decision, the local planning authority is then required to refer the application to the Mayor for his final decision, known as a **Stage 2** referral. The Mayor has 14 days to make a decision to allow the local planning authority decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority. More details on these powers can be found below.

Under article 7 of the [Mayor of London Order \(2008\)](#), the Mayor has the power to direct that he will become the local planning authority for an application. These are commonly referred to as 'call-ins', 'public hearings', 'representation hearings' and 'Stage 3s'.

To be able to take over an application it would have to meet the following three policy tests; as set out in the order:

- the development would have a significant impact on the implementation of the London Plan
- the development would have significant effects that are likely to affect more than one London borough
- **there are sound planning reasons for intervention.**

This link gives information about the Mayor's role in the planning system

<https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning-applications>

How to contact the Mayor

The online Portal <https://planapps.london.gov.uk/planningapps/24-00987-FUL>

By email : mayor@london.gov.uk

By Letter: The Mayor City Hall, Kamal Chunchie Way, London E16 1ZE

NB for email and letters make sure that you include Whitewebbs Park and the planning reference 24-00987-FUL

It would be a good idea to cc your MP so that they can see the strength of feeling.

Feryal Clark (Enfield North) feryal.clark.mp@parliament.uk

Kate Osamor (Edmonton and Winchmore Hill) kate.osamor.mp@parliament.uk

Bambos Charalambous (Southgate and Wood Green) bambos.charalambous.mp@parliament.uk

Plus our GLA representative Joanne McCartney Joanne.mccartney@london.gov.uk

It is also very helpful to send a copy to whitewebbspark@gmail.com

What to write

It is always best to write using your own words. You should include your objections to the planning application but you should also demonstrate your strength of feeling and your personal involvement with Whitewebbs.

Key Issues

Green Belt—a beautiful historic landscape held in trust for the people of Enfield

The open nature of the landscape

The proposal will flatten part of a historic parkland landscape

The massive reconstruction of 16 hectares is permanent and irreversible.

The “Special Circumstances” relate only to the commercial interests of an offshore corporation.

The community benefits claimed are for a tiny percentage of the eligible Enfield population and for most of these amount to just a few hours a year.

The economic benefits are minimal for Enfield and London’s economy (Spurs’ own Environmental Impact Statement)

Important* landscape views will be lost. (important according to Enfield Council’s own Local Plan)

Some broad headings and ideas can be found on the next page of this newsletter and on www.whitewebbspark.org.uk

Please do not delay.



1. **Local Plan Not Approved:** The application depends on changes to the Local Plan, which have not yet been approved.

2. **Green Belt Land & Public Park:** Whitewebbs Park is Green Belt land, purchased with public money in 1931 for the people of Enfield. The default use of the land is open space and recreation, not golf. Golf was a temporary measure to cover costs. Current annual running cost of the park is only £40k (A figure from Enfield Council)

3. **Park Usage Increased:** Since the golf course closed in 2021, the area has become open public space, just like the former cricket pitch. The council closed the golf course before completing the bidding process, and since then, park usage has grown significantly. Current estimate well over 1000 visits a week in winter. **The Park is Needed:** The high level of public use and support shows that the park and its facilities are not surplus to requirements. Over 150,000 person hours a year

4 **Ecological Concerns:** There are serious doubts about whether the correct procedures for protecting Whitewebbs Park's biodiversity (SINC) have been followed.

5. **Local Heritage Site:** The entire park is locally listed for its historical, archaeological, and landscape value. It maintains much of its original parkland character. The old course of the New River, now also a local heritage site, runs through it. **Loss of Historic Land:** The proposed development would enclose or make inaccessible 16 hectares of historic 19th-century parklands and beautiful open space

6 **Misleading Restoration Claims:** The developers claim they will restore the 19th century parkland, but historical maps and aerial photos show that their plans do not match the park's original open design and long scenic views. Instead, the development would block open space and **limit views.**

10. **Harm to Green Belt Land:**

The landscape changes would be **irreversible.** The character of the park would be **permanently altered.**

*Barriers and tree planting would **block internal and external views.** *Public access to half the open space would be lost.

* A semi industrial facility for professional football will be created on the epitome of Green Belt Open Space.

* 15 hectares of land would be fenced off with high hedges, metal barriers, bunds and dense vegetation.

*Floodlighting is visible 2Kms away in conservation area * Large artificial lakes would replace meadowland for pitch drainage.

* Unlike the golf course, which was designed to fit the land's natural shape, this project would **permanently damage the landscape** which is inappropriate anyway but especially for a 25 year lease. * The openness of this Greenbelt land will be lost forever

11. Preserving a Natural Treasure: Middlesex County Council bought this land for the people of Enfield, recognizing it as **"one of the most beautiful areas in the county."** Thousands of people still enjoy it today. Enfield Council has called the view from the northern footpath "important." Tottenham Hotspur FC (THFC) dismisses these views as insignificant glimpses, which is misleading. **The development will block all these views.**

12. Biodiversity Destruction vs. Restoration Claims: The application contradicts itself. It cannot destroy biodiversity in the construction area while also claiming to restore the 19th-century landscape. The necessary replanting would damage the park's openness and character just to meet notional and untested BNG targets.

13. **THFC's "Very Special Circumstances" Argument is Weak:**

• Their promised community benefits may sound good but, in reality, offer little. As Justice Mould pointed out, "the football academy... is not a facility that will be meaningfully accessible to the general public."

• THFC's argument is essentially: "This is what we want, it's convenient for us, and Enfield Council is letting us have it cheaply."

• **The supposed "benefits" to the community are minimal and some are harmful:**

o Loss of public land o a few benches and signs o A car park with less capacity than the current one

o A café (which the excellent current café owner would happily develop with a 25-year lease)

o A net loss of 3km of pathways o A noticeboard and a dog-washing tap

o A remote facility for small elite one sport group o No sports facilities for the general public

o Insignificant economic benefits for Enfield residents

14. **Unsuitable Construction:** Even THFC's own consultants admit that the large buildings in the plan are **inappropriate for Green Belt land.**

15. An Alternative Site Exists: There is another more suitable location nearby, but THFC would have to spend more money to use it. It has all the qualities of Grey Belt rather than Green Belt

Changes in Enfield's parks team

The Director of Leisure, Culture and Public Realm is Alice Davey

The head of Urban Green Spaces is Lisa Smart previously Country parks manager in Essex with a masters degree in ecology.

Charlotte Ellinas is the Community Engagement Officer for Parks and Open Spaces

Reporting issues in the parks

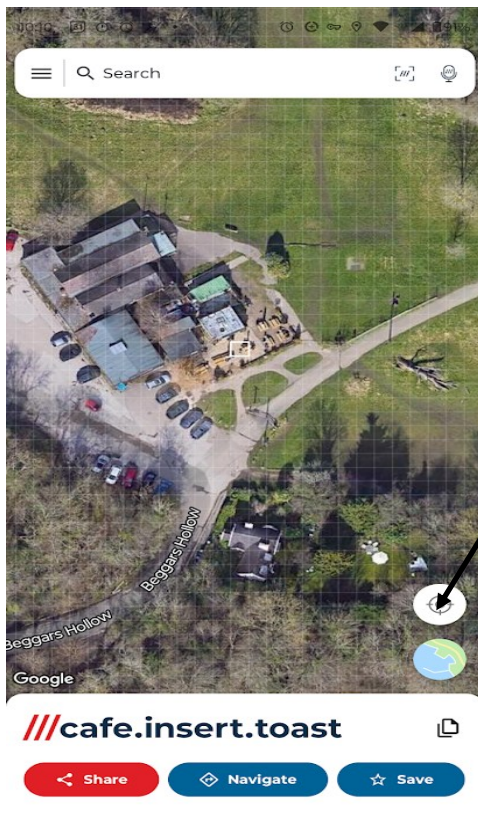
Trees in a dangerous condition or blocking formal pathways - TreeGroupMailbox@enfield.gov.uk

Fly tipping— <https://be.portal.uk.empro.verintcloudservices.com/site/enfield/request/Flytippingshort>

Beggars Hollow is EN2 9JN The Toby Carvery is EN2 9HQ

To give precise locations use What3Words on Android and Apple smartphones. This app is useful if there is an accident in any open space or woodland as it is accurate to about 3 metres and is used by the emergency services.

A couple of examples are shown below, using the “photo mode” in the app.



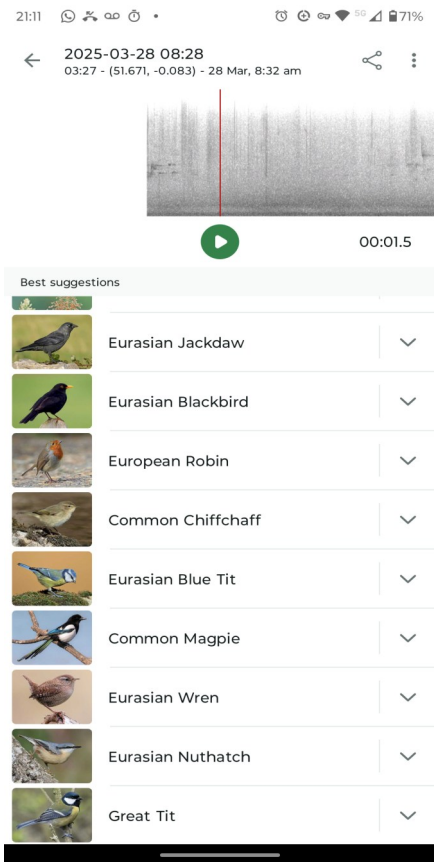
Tip: press the refresh button to confirm the location



The café could not have asked for a better what3words location and Rapid Limbs Frock should help you locate the half buried mini on the old golf course.

Birds, Spring, Guides and Activities, The Cafe

Over the year there are about 80 bird species that inhabit Whitewebbs. There is a display of some of the more common ones near the café. If you want to identify birds by their song download Merlin for your smartphone (Iphone and Android). It is accurate, sensitive and free. Just make sure that you download the British and Europe-



Buzzard rescue from Peta

This poor bird was found near the King and Tinker last month and taken to the Trent Park Rescue Centre. (Not the one earlier in the year)

“If you heard reports about an injured 'owl' at Whitewebbs near the King and tinker today, it was actually a buzzard and I scooped it up (understatement of difficulty) and I took it to Trent Park wildlife rescue. The person with the biggest dog at the park, rescuing the biggest bird at the park. I've had easier mornings”



The good news is that the eye has been operated on successfully and was released back into the wild.

You can see a video of its release here.

<https://www.facebook.com/share/r/1AdiU2J9Bn/>



<https://www.wras-enfieldwildlife.org.uk/>

Spring at Whitewebbs

The paths are dry, time to explore all the signs of spring in the park—the wild cherry and blackthorn blossom, the greening of the woodland, the wildflowers blooming, the bumblebees and the butterflies



Guides and the Café

The Café is not only providing great coffee, cakes and pastries but has made space for the Friends of Whitewebbs guides to the park. The most popular is the guide to the Old Course of the New River (Now on the Council's local heritage list) The guides change according to the season. Any ideas for new ones should be sent to whitewebbspark@gmail.com

The Café has its own Instagram - it's [@whitewebbscafe](https://www.instagram.com/whitewebbscafe)



Trees in Whitewebbs—Ancient woodland, Ancient trees, venerable and notable.

It would be good to think that all our beautiful trees in the park are protected. We have oaks that are hundreds of years old together with hornbeams, horse chestnuts, beeches, hawthorns, maples, silver birch and the towering Wellingtonia. Our trees are home to thousands of animal species, birds, bats and insects

Five years ago there had been no effort to register our most distinguished trees. Since then, thanks largely to Mark Saunders, over 100 have been placed on the Woodland Trust's inventory of ancient, venerable and notable trees. <https://ati.woodlandtrust.org.uk/what-we-record-and-why/>



Does this give our trees protection?

Sadly, very little. Today, the majority of important trees are unprotected and not just in Whitewebbs.

"The UK's ancient trees have no automatic right of protection..... They often remain completely unprotected from destruction." The Woodland Trust.

If they are in a conservation area, if they have a tree preservation order (TPO), if it can be shown that protected species such as bats live in them— this can help but it is a long way from absolute protection.

The local planning authority (Enfield Council) is responsible for making and enforcing tree preservation orders. It is unusual for TPOs to be used on local authority land. The Tree Officer should authorise all tree removals and maintenance.

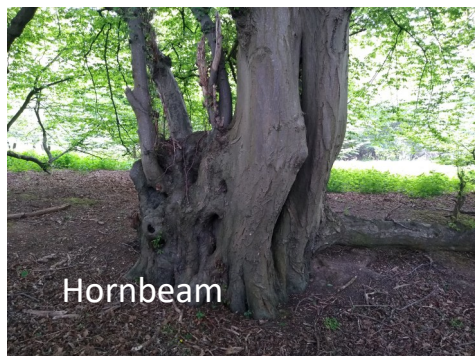
Woodland requires maintenance—back in the 1930s a former director of Kew Gardens praised the way that Whitewebbs Ancient Woodland was managed.

An "ancient" oak at the southern end of the Carvery car park was severely cut back a week ago. At the moment the reasons for this are unclear. It could be a case of public safety, or extreme pollarding in the hope of new growth. The land is leased from the Council but there should be strict terms in the lease covering tree protection. The Carvery land is contiguous with the ancient woodland

Please write to the leader of the Council asking that all ancient, veteran and notable trees in all of Enfield's parks receive Tree Preservation Orders to prevent further damage leader@enfield.gov.uk



A veteran oak



Hornbeam



Extreme pollarding, public safety, ill considered destruction? There is now a TPO on this stump.



View photos

About the tree		Show more
Species:	Pedunculate oak <i>Quercus robur</i>	
Form:	Pollard	
Standing or fallen:	Standing	
Living status:	Alive	
Girth:	6.10m at a height of 1.50m	
Veteran status:	Ancient tree	

A leaflet with a map showing the location of the ancient, veteran and notable trees is available at the cafe

The Local Plan

The Planning Inspector has notified us of the Stage 2 hearings which will be in the middle of June

These are some extracts from the letters and appendices—if you intend to make representations please read all the 23rd April documents carefully see <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>

“I intend to move on to considering the allocations in the Plan; starting with those currently in the Green Belt, followed by the other ‘placemaking’ areas and then all other allocations. These discussions will set the context for other issues, including considering the overall housing and employment land supplies.

Given the number of allocations in the Plan, and to manage the process as efficiently as possible (including the drafting and receipt of written statements), the Matters, Issues and Questions (MIQs) and programme for remaining policies or issues will be published in due course.

Any representor may submit a written statement or statements in relation to these questions. However, it is also not absolutely necessary to submit statements, as I have the original representations before me. Where statements are submitted, these should only be in response to questions that relate to their original representations. Representors’ statements should set out the key points from their original representations against relevant questions and not introduce new arguments or evidence.

As noted above, there are some matters from ‘stage 1’ that I intend to revisit. Statements for these should refer to the new or updated information only and not seek to revisit or expand on issues that have already been discussed. I shall, of course, have regard to all previous matters discussed in coming to my conclusions on these matters.

Some objectors were not notified at Stage 1

As noted in document IN7, a number of representors were not informed of the ‘stage 1’ hearing sessions. I understand that the work done on the representation database may have highlighted additional representors who are in this situation. 16. I shall ask the Programme Officer to contact these representors to invite them to submit written statements in relation to the ‘stage 1’ MIQs, where relevant to their original representations. They will also be given the opportunity to exercise their right to be heard on those matters, if they so wish. They will clearly also be notified and informed about the ‘stage 2’ hearings and all subsequent steps and invited to participate as normal.

Any representor may submit a written statement or statements. However, these should only be in response to questions that relate to the representations made under Regulation 20 (ie during the consultation held from March to May 2024).

Statements should set out the key points from your representation against the relevant questions, and not introduce new arguments.

Statements from representors should be concise and focussed, and in any event must contain no more than 3,000 words for each Matter. If statements are longer than this, I may ask the Programme Officer to return them. (No appendices and declare any use of AI in preparing the documents)

Note that Stage 2 covers Matters, Issues and Questions (MIQs) relating to many aspects of the Draft Local Plan—Housing needs and supply, Green Belt, Enfield Town centre.....

To see all the MIQs download Appendix 1 from the site above. The next page relates only to Whitewebbs Park

Allocation RUR.07 – Whitewebbs Golf course and Land at Tottenham Hotspurs Football Club Training Ground

The Council are not proposing to remove RUR.07 from the Green Belt. This was discussed in broad terms under Matter 4.3. Following this, the Council were invited to draft suggested modifications to address the concerns identified. The following provides an opportunity to consider the specifics of each relevant allocation.

Q4.71. The allocation refers to existing uses as golf course and football club training centre. Are all of these existing uses within the Green Belt? Are they intended to be redeveloped or incorporated as part of any proposed development?

Q4.72. The allocation is for nature recovery uses and could provide professional sport, recreation and community sports/leisure uses, including ancillary related facilities. Notwithstanding the actions set out in document IN7, is it justified or consistent with national policy to allocate land in the Green Belt for development may include significant built form? How would this relate to national policy's expectation that appropriate facilities for sport and recreation should preserve the openness of the Green Belt?

Q4.73. Further to the above, the Council has acknowledged that it has not carried out any assessment of compliance with national Green Belt policy. Is it justified to allocate land for development in the Green Belt without any such assessment?

Q4.74. Has the Council addressed the issues raised in document IN7 in relation to RUR.07? If so, would the suggested modification be effective?

Site Location and Selection

Q4.75. Is RUR.07 suitably located, having regard to the Plan's spatial strategy and national policy's aim of promoting sustainable development? Is there any substantive evidence to suggest the site should not be allocated based on one or more of the following factors, where relevant:

- biodiversity
- green infrastructure or agricultural land
- landscape quality and character
- heritage assets
- strategic and local infrastructure including transport
- the efficient operation of the transport network and highway safety
- contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk

Development Requirements

Q4.76. Are the development requirements set out in Appendix C for allocations RUR.07 consistent with national policy and justified and would they be effective in securing sustainable development? In particular:

- a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?
- b) Infrastructure requirements.
- c) Design principles.

Q4.77. In relation to the above, are the suggested main modifications in document E6.1 necessary to make the Plan sound?