

Application name	Comment name	Original text	Stance	Site address
2024/0390	a07Q5000010e6Yz	I love football, but more football pitches is not a good enough excuse to butcher more green space. If this were used for social housing, I could get over it, but it isn't. It's used for more corporate, capitalist gain that benefits a minuscule population.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGaQ	This proposal is an absolute slap in the face in regards to the enormous and catastrophic biodiversity loss we have seen in the UK. How can something of this scale be proposed on what is such a biodiverse and species rich piece of parkland which additionally provides countless social benefits to local residents. There should be absolutely no development happening here which threatens the existing biodiversity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGSd	I object because I cannot condone the destruction of an important natural habitat due to corporate greed. The plans show that 50% of the mosaic/neutral/acid grassland would be lost to monoculture football pitches and astroturf. These habitats are so important and must be protected, not to mention the fact astroturf has a large carbon footprint and the potential to devastate wildlife further during use, shedding microplastics into soil, drainage systems, rivers and seas. 137 trees are due to be felled at a time we need trees more than ever, due to the climate crisis. Even the decaying trees should not be touched, as these are crucial habitats for a number of species. GiGL have noted that not only is Whitewebbs Wood an ancient woodland, but that it houses uncommon examples of coppiced hornbeam trees, London rarities such as spurge laurel, broad-leaved helleborine and cyperus sedge. The breeding bird life includes marsh tit (extremely rare in London) and the declining lesser spotted woodpecker, which is on the red list. The specially-protected great crested newt is also present. To destroy their habitat would be a travesty.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFRa	Whitewebbs park is part of London green belt	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCbe	This is a green land and it is not only tennis players or developments that have rights. This land is for nature and people. If any change is permitted this should be to make the place even more nature diverse (not in the long run but now!) and more beneficial to the people that live around it. In a country (and world) in which biodiversity and ecosystem services are being degraded quickly and nature emerges as a key benefit for mental health and welfare , any proposal such as this one should be condemned as damaging and greedy. It appears like the developers are attempting to take the cheapest route that essentially deprives everyone else so they can maximise their profit	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eC6F	I object most strongly to this planning application and request that the Mayor of London either refuse to grant planning permission or call in the application. This planning application is for a highly inappropriate development on a public park within the London Green Belt. The entire park, including the former Golf Course to which this planning application relates, is locally listed and loved for its historical, archaeological, and landscape value. The proposed development will a) enclose and remove a part of the park from public access and b) cause environmental damage and loss of amenity that cannot be meaningfully mitigated and will be difficult, if not impossible, to reverse. Whitewebbs Park is Green Belt land, a beautiful, nature-rich, historic landscape, purchased with public money in 1931 for the people of Enfield. When Middlesex County Council bought this land for the people of Enfield, they recognised it as "one of the most beautiful areas in the county". The land is held in trust by Enfield Council on behalf of the people of Enfield – the Council are NOT beneficial owners of the land. The default use of the land is open space and recreation, and it was never intended that any part of it should be taken over by a private enterprise (in this case, Tottenham Hotspur FC (THFC)) for their own use. The proposed development by THFC (to whom Enfield Council have sold a 25-year lease on a good half of the park), will severely damage the open nature of the landscape, flatten part of a historic parkland landscape, and cause long-term ecological damage*. *For example, a recognised, ecologically-important area of rare (for London) acid grassland on the northern 16 hectares of the site will be destroyed. Thousands of people enjoy the park today, but THFC's plan will remove public access to the northern 16 hectares of the park. The proposed massive reconstruction on that site will be permanent and effectively irreversible. Given that only around 20% of London's Green Belt is public open space, any loss of such space is not acceptable; building a professional sports ground on part of Whitewebbs Park would definitely constitute such a loss. Important landscape views (as recognised by Enfield Council) will be lost. The proposed plan claims that the 19th century parkland, will be restored, but this proposed "restoration" does not match the open design and views revealed in old maps and aerial photos. It would instead, block existing open space and limit views – merely trees planted en-masse as poor mitigation for the destruction of habitat and landscape resulting from hard landscaping and building construction in the northern part of the park. In more detail, the park would suffer at least the following harms: a) Irreversible landscape and ecological changes. b) Permanent alteration to historic and visual character of the park. c) A semi-industrial facility for professional football despoiling an excellent instance of public Green Belt open space. d) Barriers and tree planting blocking internal and external views in the park. e) Loss of public access to half of the open space – 15 hectares of this space fenced off with high hedges, metal barriers, bunds and dense vegetation. f) Floodlighting visible 2Kms away in a conservation area, disturbing important wildlife. g) Beautiful meadowland will be replaced by large artificial pitch drainage lakes. ~~b) Permanent damage to the landscape (as a consequence of open Green Belt space effectively lost forever), highly inappropriate for a 25 year lease~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eCU5	Dear Mr Mayor, Re Whitewebbs 24/00987/FUL 2024/0390/S2 35 years ago I was one of hundreds of people who campaigned so save Whitewebbs . I'm greatly saddened that a large part of it is in danger. It is such a unique place giving so many people a space to breath and enjoy the wonderful views and wildlife. It is beyond believe to me that such a beautiful place with so many protected species in London has been put at jeopardy. It maybe thought that because it was a golf course people were not allowed to roam freely. This has never been the case . People have always used the whole area.and there were never any problems just co-operation. The golf course was never over managed.. I have been walking in Whitewebbs for 45 years and visited when I lived further away in Edomonton before that. For the past 10years I have been photographing and recording the wildlife and magnificent views and had many a heartwarming moment at times of ill health and bereavement which have greatly aided my recovery. I know many people feel the same way of all different ages. People have also told me that relatives ashes are spread in the area in question and I have seen a memorial tree. Please do not let this wonderfull place and it's many protected species be destroyed by banks, fences, pitches herbicides and loss of views During covid it was a great safty valve for a very large area where people came to get some fresh air and cars were parked well beyond the car park capacity in local roads If this planning goes ahead it will be irrepairable, destroy trees, protected species habitat,ancient animal runs and wonderfull views which all people of all ages currently enjoy . The whole community will not benefit whatsoever but will be extremely saddened. What we need right now is great ecosystems not plastic pitches. It may not be the done thing to say this but I have lost sleep and cried many times over this. Rembering the people who cared so much about it in the past who have now passed themselves. I am greatly honoured to know the great variety of people who have worked so very hard to save Whitewebbs this time of all ages and backgrounds. It is such an asset and now used even more with guided nature walks and talks and painting under the trees to name a few. Please, Please save it as is is now for future generations to enjoy. Yours sincerely [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eD3d	Although I accept the proposal including green initiatives it will not outweigh the impact of this development on the area.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF8M	We don't need another vast monoculture business asset, football clubs should be offsetting the space they already have, which is plenty, with wild, nature rich spaces.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e7sb	Dear Mayor Khan, I am writing to formally object to Tottenham Hotspur's proposed redevelopment of Whitewebbs Park for a women's football academy. The plans to enclose and develop this cherished public parkland represent a profound breach of community trust and a disregard for both environmental and public interests. Whitewebbs Park is a vital natural space with ecological, recreational, and historical value — and its protection should be paramount. Loss of Public Land and Community Access The proposed development would see 40 acres of public parkland fenced off and flattened to make way for ten football pitches, including two floodlit pitches, an astro-turf pitch, and substantial new buildings and private roads. This land was purchased for public use and benefit. Its transformation into a private training complex would deny the community access to nearly half the park. Damage to Nature and the Environment Since the closure of the golf course in 2021, Whitewebbs has been undergoing a natural rewilding process, creating a haven for diverse wildlife and supporting local ecosystems. The proposed development threatens this progress. It would result in the loss of 207 mature trees and 50% of existing grassland, leading to an estimated 9,119 tonnes of carbon emissions. These impacts are irreversible and completely at odds with the Mayor's stated environmental goals. Violation of Green Belt Principles The Greater London Authority has itself described Spurs' proposal as "inappropriate" development on Green Belt land. There are no exceptional circumstances that justify the destruction of this protected landscape for private, commercial use. The openness and natural character of the site will be irreparably lost. Misleading Claims of Community Benefit Spurs already possesses 17 training pitches — more than any other Premier League club — and can already accommodate a women's academy within their current footprint. The lease they hold on the park is reportedly worth just £80,000 per year, compared to a weekly wage bill exceeding £2 million. This project is not about community need — it is about corporate expansion at public expense. The academy could be built at the recently failed Sunset Studios. Only a few miles up the A10. This would also provide better access to cars and coaches. Whitewebbs Lane is not able to accommodate heavy traffic and often floods. Neglect of Heritage and Conservation Duties <i>This proposed development would destroy protected views and contradict local regeneration area principles. The historic character of the park would be</i>	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010elli	This area is a beautiful green space in which I spent a happy childhood. Big business should not be allowed to monopolise this area to the detriment of the general public. Spurs has a perfectly adequate training ground in Cheshunt and are unlikely to win anything as a result of this application.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e6TC	Whitewebbs is not just a green space—it's a vital part of our community's heritage, ecology and well-being! The planned development threatens to destroy ancient woodland, disrupt wildlife habitats and permanently alter a public space held in trust for future generations. Once it's gone, we can't get it back. This proposed development offers no real benefit to the people of Enfield or nearby residents. It is designed as an exclusive facility—an elitist club for elite sportswomen. Only those skilled enough to play for a Premier League team or represent England would even be allowed access. Furthermore, Enfield Council cannot simply dismiss the public's right to full access across the entire site of Whitewebbs Park. We are all beneficiaries of the public trust in which this land is held. Being offered access to only a small corner of the park is not acceptable—it goes against the very principle of land held in a public trust! Whitewebbs deserves to be protected—not handed over to private interests. Hear what a local Enfield resident has to say about the proposed development in this short video: https://youtu.be/5Dkt1NZRPWA And see for yourself what will be lost if this unjustified development goes ahead: https://youtu.be/aezjCBEono4 We must act now to stop this development!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eIAe	Please don't allow building over this beautiful wildlife area. We need to preserve wildlife in the greenbelt. Thank you.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFoL	I would like to say we walk whiteheads park birthday daily and everyone on our. Walks love it without any change. This is such a beautiful area for wildlife and is very easy to access on 456 bus rout We would be devastated if Whitewebbs was changed or built on. It should stay for the public use.e	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e39s	This much used and loved green space was left in perpetuity many years ago for the use of Enfield residents.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8bM	Dear Mayor Khan I must point out that I'm most unhappy with the on going situation With Whitewebbs and the wanting of Spurs to destroy the remains of a once great forest. As you will be aware that a 500 hundred year old tree was hacked down recently for what true reason we will never know. But, to enclose the area with a group of enclosures which will hinder the larger species which rely on the open space to hunt for survival does not beggar belief. But such a large established group should want to destroy what is a large public open space so near to London. You, as Mayor should look at Whitewebbs as a jewel in London's crown and what with the trains direct from London is a great day out besides Hampstead. If you do not stop the destruction of Whitewebbs and protect what is best of London, what future does London have to offer its many visitors wanting the best of night life, theatres, galleries and yes, the countryside a great time in the vastness of London and it's surrounding area? I would be most grateful if you would reconsider this planning application and have Spurs look into what I believe in other areas local and allow Whitewebbs to continue to be one of the few remaining lungs of a great metropolis called London.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGLu	Dear Mayor Khan I must point out that I'm most unhappy with the on going situation With Whitewebbs and the wanting of Spurs to destroy the remains of a once great forest. As you will be aware that a 500 hundred year old tree was hacked down recently for what true reason we will never know. But, to enclose the area with a group of enclosures which will hinder the larger species which rely on the open space to hunt for survival does not beggar belief. But such a large established group should want to destroy what is a large public open space so near to London. You, as Mayor should look at Whitewebbs as a jewel in London's crown and what with the trains direct from London is a great day out besides Hampstead. If you do not stop the destruction of Whitewebbs and protect what is best of London, what future does London have to offer its many visitors wanting the best of night life, theatres, galleries and yes, the countryside a great time in the vastness of London and it's surrounding area? I would be most grateful if you would reconsider this planning application and have Spurs look into what I believe in other areas local and allow Whitewebbs to continue to be one of the few remaining lungs of a great metropolis called London.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9JQ	Temperatures have been rising! We need the green belt to help with air quality and temperatures. Less green space for our children. Destruction of natural habitat. I am disgusted with Enfield council and if this goes ahead Labour will lose my vote in local and general elections. I have voted Labour my whole life but their insistence on destroying green belt land instead of many other options open to them goes against everything I believe in.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBmL	A beautiful space, well loved by residents. It is used by people for exercise and recreation. It is good for physical and mental health and will be a great loss to the community Surely Tottenham Hotspur could build training grounds on a brown field site.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dtjg	I am writing to strongly object to the proposed development of Whitewebbs Park by Tottenham Hotspur Football Club, which seeks to enclose and convert a significant portion of this much-loved public green space into private-use artificial pitches. My objection is not just based on policy and environmental concerns, but on deeply personal grounds. ██████████ Whitewebbs became a lifeline. It offered me a peaceful, natural refuge where I could begin to process my grief and reconnect with the world around me. The ability to walk freely among the trees, hear birdsong, and feel a sense of continuity in nature quite literally saved me. It helped me keep going at a time when nothing else made sense. I am not alone in this. Parks like Whitewebbs are essential, and often overlooked, parts of our public mental health infrastructure. They quietly support people through grief, depression, anxiety, and isolation—offering something no artificial sports facility ever can. Once this land is enclosed, and that peace is lost to noise, lights, fencing, and development, we can never get it back. Mental health is a growing crisis, especially in urban environments. We need more spaces for quiet reflection and nature connection—not fewer. Losing access to Whitewebbs risks making things worse, not just for me, but for many others in Enfield who rely on it as a sanctuary. This proposal also threatens vital habitats for wildlife and removes a rewilded space that has become increasingly important as we face climate and biodiversity emergencies. Turning this precious, green-belt land into private, artificial surfaces undermines our collective responsibility to protect what little unspoiled land remains. For all these reasons—mental health, personal well-being, environmental integrity, and community access—I urge you to reject this application. Whitewebbs must remain a place of healing, nature, and public value.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dhCX	This land belongs to the people of Enfield to be used as recreational space. During Covid, this park was an essential part of the community for many people, providing access to open space and long walks. It is also home to an abundance of wildlife including deer, rabbits, foxes, voles, many species of birds and butterflies and many more. Not to mention the ancient trees and woodland. There will be very little if any benefit to the local community from this development, and there is already such a substantial amount of land already available to Spurs on their current site, there really is no need for them to take more.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e5rF	Dear Mayor of London/ GLA Planning Team, I am writing to you regarding the planning application for White Webbs. It will be a tragedy if planning permission is granted for this piece of land. It is an area that is rare to find in London, untouched wild and natural beauty, and it is appreciated by many, to say nothing of the overall benefits it has for the surrounding area and environment. It is rich in biodiverse grasslands, ancient woodland and home to many rare and endangered species. It is also Green belt land so should be protected by law. Surely given the fact that under the planning proposals the people who would be using this land will arrive in cars, it makes more sense to find another site locally that is "brownfield land", thereby making good use of land that does not have the negative impact losing White Webbs would have. As we know once this natural habitat is lost it can never be regained. Let's look to the future and protect what we have rather than the evermore shortsighted destruction of natural environments which we know has so many positive impacts. I really hope after reflecting on this you will see fit to deny planning and instead enforce protection of this land, for now and all the generations to come.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e6TA	I think this will be a devastating loss to the general public and more importantly to nature. This area is one of outstanding natural beauty with many rare and diverse species, which will be destroyed. Areas like this aren't made and cannot be replaced. We should treasure it and care for it as not only does it benefit the people that use it, it also plays a part in holding back climate change which we are hearing about everyday. The devastating impact projects like this are having on the world must be addressed before it is too late. Why use an area like this when there are no doubt plenty of brown/ scrubland/ industrial areas that would benefit from development. Please don't destroy this beautiful area purely for convenience, as that is what will be for, as each and every person that will use this area (should it go ahead) will have arrived by car anyway!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q500000R7kDI	This is the worst idea, the proposed development is out of character and will inflict an industrialised form of leisure in this glorious open landscape. The views will be greatly impacted, there is no provisos for parking at the North end of the park. It's going to destroy the ecology of the area. So much wonderful galore and fauna and the destruction of wildlife habitats.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEXJ	We visit this area regularly it is a much needed green space in Enfield. We are losing too much green belt land. Although it would not be developed as such Spurs will be destroying a much loved recreation area for the very built up borough of Enfield. We have many friends who live in this area and they are very upset about the loss of their park, Surely Spurs have enough space there already, or are they taking the land to speculate with it?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eFsy	Whitewebbs Park ,was a childhood sanctuary. A place where I could run and play freely and made the connections with nature that are with me still today ,over 50 years on. Our wildlife is depleting along with our green sanctuaries. Growing up in a towerblock in Enfield ,I know who important our green spaces are to our wellbeing, especially our mental health . Access to green spaces in the Greater London area is becoming harder, especially for those who do not have any outdoor space attached to their homes. Whitewebbs is a not only sanctuary for wildlife ,it is a sanctuary for humans too , it aids mental well being , reducing stress ,anxiety and depression. A place where the air is cleaner even though being close to the M25 . With this in mind the plants and trees in this area also lower carbon emissions coming from the motorway. In short . The park as it is gives back so much more ,already,than the short term financial gain of Tottenham Hotspurs training ground.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGVc	This is an invaluable space for wildlife and as a green space for local people. I have visited to carry out surveys of the plant and insect life for my own enjoyment, when theres a biodiversity crises we shouldn't be putting a load of plastic grass over this sort of place!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8rX	I live close to the new Tottenham stadium, and am a Spurs supporter (my partner is a long-time season ticket holder) but the destruction of the open space at Whitewebbs to create a bigger training ground is just wrong. There are so few open spaces like this left, vital wildlife habitats that are also freely accessible to walkers, horse riders, and ALL members of the general public and it would be a huge loss both environmentally and for the local population (including those such as myself who are not in the immediate area but value it hugely as a green space to escape to). Trees and plants grow at Whitewebbs have existed for longer than any of us can remember and CANNOT just be replicated / replaced, no matter how much money is thrown at them. Saplings in no way offer the same habitat as mature trees and even if 100 were planted for every tree destroyed this would not be the same in any way. Please do not let this go ahead.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3Bw	It's hugely important to retain this as a rewilded area - for the mental and physical health of the people who visit, for its flora and fauna biodiversity, for the established woods and trees which help protect against carbon pollution and climate change. Surely space can be found on an old brownfield site which can be transformed into Spurs' training pitches? Maybe a little more work for them, but retaining Whitewebbs Park in its current state benefits so many more people and the environment too. We only have one planet. Every little thing we can do to help turn back the clock on climate change helps.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e43O	Please consider the loss of this land on the local population, the loss of biodiversity (forever), the visual impact of the lighting and buildings and loss of land given to the enfield residents for amenity use. There is plenty of grey belt to the north so they can surely use this land they just need to pay for it so would rather get it for free. Nb there are sites of urban scientific interest adjacent.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4K1	The loss of this space to the public. The detrimental affect on wildlife and mature trees will be devastating. I have used this space for over 40 years as a horse rider and dog walker. I am disgusted that Enfield council are continually selling destroying our green space and public areas	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAJs	It would be a sin to change Whitewebbs, there will be no where left for the children who are not interested in sport but want to get out and play, explore and use their imagination!!! Whitewebbs is the perfect place for all that...	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAaQ	I have visited this area and as an ecologist it is of significant ecological importance and should be made into a reserve	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9B1	This green space should be retained for the local community.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9Si	I do not believe local green space should be converted into a football training centre. There is already a football training centre there for Tottenham Hotspurs. There is lots of local wildlife that will be negatively affected by these proposed plans.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eE3c	Give Whitewebbs back to the community keep whitewebbs for eveybody	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e2C4	The golf corse was a community asset and an inexpensive introduction into a healthy outdoor sport for our youngsters, As well as being a freely accessed asset for local people who could walk their dogs and wander freely The proposed football academy will be an eleatist aria for a few people for the Benifit of a multi million pound organisation. This land belongs to the local people of Enfield and should be for their benifit alone	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eFxr	To loose this green space which supported so many people during lockdown would be terrible. The green impact on the environment and nature is irreversible. There is so much history around the area which should be held onto and not given over to private corporate companies which have no regard for the area. The commitments they made during the first build of the current training centre have not been upheld and the government haven't held them accountable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDbO	I object to this proposal as this will destroy green space that is so needed in London. To concrete over a rewilded space , that is used by so many and provides a lung for London is criminal and clearly based on financial needs only . My fear is that many people will have no green area that is peaceful and alive to visit. This is a special, healthy environment for nature and animals, insects, birds to live , generating eco systems that continue to benefit all Londoners.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDUp	Whitewebbs is a such a rare and special landscape within the city. I have seen species on walks there that I have otherwise never seen in london. What a shame and waste It would be to throw this away all for some Astro football pitches.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q500000R1iFN	North Enfield residents are horrified at Spurs' plans for this stunning publically owned greenbelt space, and at Enfield Council's apparent willingness not just to allow, but to invite a private company to do this. Whitewebbs is a space for nature, and for local people, not for a private corporation to monetise. 200 trees, many over 90 years old will be lost as part of Spurs proposals, acres of rich grassland habitat for birds, insects and mammals lost, public access denied and high fences erected, spoiling cherished views and historic parkland. I urge the Mayor's office to intervene and invite him to come and view this incredible rewilding project for himself.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9tJ	Leave this beautiful green space as it is. Please do not let Spurs destroy this amazing bit of land. They have enough space in their current training ground. Leave this for our children.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFRc	Hello, Due to the recent weather and effects on the environment we have to safe our green spaces to keep the area livable for the future even more! I am scared of the environmental impact of the policies to destroy green spaces. Everybody has to do his bit to safe it for the future. We need nature to live with the effects of climate change. Walking regular along the existing Tottenham trainings ground and it doesn't seem to be that busy....why give them more? Especially for that price!? Thank you for reading! ██████████	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e6IX	If this application goes ahead a large green space with abundant wildlife and which is well used by local residents to access nature for their wellbeing will be fenced off and no longer ne open to the public, and be covered with plastic (astro turf) removing vital habitat for wildlife, a tragedy in our current climate and biodiversity emergency. Please see more details in attached file.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9KI	I completely object this planning based on the fact that this will hugely impact biodiversity and green space. This is historic and ancient parkland that will be desecrated because of the greed of Tottenham Hotspur Football Club. They already have 17 pitches in North London, and this is a completely unnecessary application to acquire more land for their own benefit, Our parkland is sacred and our greenbelt must be protected at all costs. We have a number of veteran trees in this area which will be uprooted and will disturb ecological balance. The noise pollution and disruption to our wildlife will be highly damaging and our wildlife must have priority over any application that wishes to displace their homes and young. This parkland is a public space to be enjoyed by all and having a football pitch located inside this space will be highly damaging and disruptive. I ask for this planning application to be called in and rejected by Sadiq Khan.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCFK	please please don't let this space be taken away	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8HF	Please save this incredibly rich nature reserve island from complete devastation, for us and for future generations!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eBSL	Spurs should not be Able to do this it's ruining the local area there will Be extra traffic what used to be a lovely place to walk in the countryside will Be ruined not everyone cares about football what's wrong with you Enfield council?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDNY	I am a regular user of Whitewebbs Park and the loss of this beautiful green space is devastating, particularly in the knowledge that it has been given to a wealthy corporation for a pittance. It is a great loss of accessible green belt alongside further planned development on Enfield's green belt.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHzR	This area is well used for leisure, walking keeping fit and maintaining wellbeing. It has several beautiful trees, birds and a variety of other plant and wildlife and I regularly use it for all of the above reasons . Putting the football stadium/training ground on its golf course will 1. Stop golf being played 2. Increase traffic and pressure on parking 3. Diminish the visual beauty of what is now quite wonderful. Please rethink and place the football facility closer to where it is now.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4Hr	This will be a devastating loss to the community and there is no way these pitches will be for the women. Tottenham do not fully support their women's team as it is so no one is going to believe the pitches will be used for them. This area needs to be kept for the locals to use and for the wildlife to be left alone and allowed to continue on in their natural habitat	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAaO	Whitewebbs is rich in biodiversity and should not be developed. Insect, bird, reptile and mammal populations would be destroyed during the works and would be unlikely to recover. Plant life which includes beautiful ancient trees would also disappear. New trees take decades and even centuries to become the efficient carbon sinks we need. This is not the time to destroy mature trees and the creatures who live in and rely on them. For the local human population, Whitewebbs has been a place of peace, a place to walk and exercise, a place away from traffic and buildings. It is a valuable resource for thousands of people in Enfield and surrounding boroughs. To take it away from that huge number of ordinary citizens in order to provide training space which is already fully available to footballers is giving priority to a privileged few over the needs of many. Enfield should prioritise the needs of their residents rather than the demands of a rich football club. This development would mean the loss of a beautiful area of wildlife and recreation which once gone cannot be recreated. Please leave Whitewebbs as an open space for use by all the human and non human residents. It will never recover from the destruction involved in the building process once the plant life and animal life have been disrupted.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEDr	I'm disappointed that a very large part of Whitewebbs, which is an absolute haven for wildlife and people alike, is to be long term leased to an elite football team who wish to develop it. I have enjoyed this open and woodland space for many years. A large part of this precious and beautiful and necessary habitat will be destroyed and wildlife impacted and displaced. I believe we have a responsibility to look after our wildlife and its habitat for our future generations. Nature conservation is vital for the well being of humans, wildlife and the environment. We are being encouraged to increase the number of trees and spaces to assist Biodiversity. This area plays a vital part of the "lungs" that London needs to offset all the pollution that is generated. I also believe there may be a more suitable location very near by close to their current training ground which would not have the same negative impact as already flattened, and better transport links could be made available. Please protect our historic and beautiful parkland before it is lost forever. Can this planning be called in please? [REDACTED] [REDACTED] [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eI94	Protection of green spaces, particularly in a densely populated area of London is paramount, not just for the wellbeing of the local population, but also for the protection of wildlife, and to help in reducing the impact of global warming. The development of a training ground for a wealthy premier league club, on a site that currently benefits the local community in so many ways, will not, to my mind, benefit the local community in any way and will only add to the sadly growing list of wild green spaces being lost forever, in an area that needs this space. It would be far better to start planting trees on the site to develop an area that supports more wildlife and benefits the community.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eC6B	Local countryside will be lost for generations. The Enfield plan will cause a loss of green belt, this development will add to the loss with no benefit to the residents of Enfield. We are at a stage in history where community needs are being neglected.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dusy	We will lose a beautiful space for all Londoners to use for recreation to a private company who - as is their right - have made it clear in their proposal that their primary motivation is making money. Money that will go to a private company (ENIC). We've seen very close links between Enfield Council and representatives from THFC over the last few years. We've seen the wanton destruction of a deeply precious tree in Whitewebbs at the hands of a private company carrying out work on behalf of Toby Carvery (majority shareholder = ENIC). How can any of this be right? How can you say this is in the best interests of the local populace?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHuT	We have a beaver enclosure next to Whitewebbs. Has any study been done on the ecological impact of Tottenham's use of fertilizers/chemicals? The proposed plans will surely risk harmful weedkiller etc seeping into the beavers' brook.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010ei90	We have a beaver enclosure next to Whitewebbs. Has any study been done on the ecological impact of Tottenham's use of fertilizers/chemicals? The proposed plans will surely risk harmful weedkiller etc seeping into the beavers' brook.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGLx	This development would be a devastating loss not only to the local community and many others who regularly travel from far afield to enjoy and spend time in this unique space, but also to the wide variety of plants and wildlife that it supports. The large number of ancient trees and rare grassland habitats will be impossible to replace. To build football training pitches in its place would significantly harm biodiversity and reduce public access to a crucial environment that offers such a vital opportunity to engage with the natural world.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eH3a	As a regular visitor to Whitewebbs Park I am utterly dismayed by these proposals, mainly because of the environmental damage and degradation that will inevitably ensue and the loss of wildlife and biodiversity, but also because these spaces are so crucially important to the health (both mental and physical) and wellbeing of visitors such as myself. This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF). The required "Very Special Circumstances" (VSC) do not exist to justify overriding Green Belt protections. 2. Environmental and Ecological Destruction ~~50% of Whitewebbs Park's biodiverse grassland and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGiX	Nature is 24 hours. Training is not	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eAfT	Increased traffic even after building is complete will have an environmental impact. The football pitches will damage biodiversity, close off access to the whole community and limit community interaction with nature.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGx1	I am actually appalled at what they are suggesting for this piece of beautiful parkland it has so much wildlife and is loved and used by many people in the borough young and old I'm sure that Tottenham has enough space in the rest of whitewebbs lane Mr levy seems to own quite a lot in the area already why does he need more and I am a long standing supporter of about 50 years please leave this beautiful space for the community it actually means so much to the people of the borough it breaks my heart to what they propose	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFjG	I strongly object to this proposal. Turning a public green space into a private football training centre reduces community access to nature, harms local wildlife, and increases traffic and noise. Whitewebbs is valuable as a peaceful parkland, not a commercial facility	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eB1j	Leave green spaces alone. We're already one of the most nature depleted countries in the entire world. Just stop.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dahL	It will not stop here and the land will not be looked after. The public, and nature, deserve open spaces.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eH70	For the past two and a half years I have been visiting whitewebbs park frequently. It is a rare place within London. A place of rewilded beauty. An escape from the chaos that cities bring. Considering that we are suffering from high heat in the UK and other cities are looking to plant more trees and increase biodiversity I find it incredulous that a London council is looking to lease an area of green space that can never be returned to its original state. Destroying old trees and replacing with new does not allow the same levels of carbon to be absorbed. The GLA has worked hard to try to improve the health of Londoners through creating carbon emission zones reducing cars yet without areas of land with old trees those carbon emissions are likely to increase again. There are thousands of insects there, sadly something not seen so frequently these days. There are birds that are on the RSPB red list, house martins and swifts, that visit over the summer months. The UK is severely nature depleted and sadly getting worse. We desperately need to protect the remaining spaces that we have. The proposal, from Tottenham Hotspur's only helps a small amount of people, whereas keeping whitewebbs as a public space protected from development benefits not only local Londoners, but London and the UK on the whole, as an example of protecting our dwindling biodiversity and helping to improve our communities mental and physical health through connection to nature. The loss of this space to a private company would be devastating.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBuY	Please consider my comment with the increase in health inequalities, living close by to road which can not be good for children or people with breathing issues. These areas are a goldmine for people to use. To get some fresh air from nature. Please do not take this from them and from London. As you do not have good grounds for it. Thanks	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAwR	Public space is being turned into private land which will no longer be accessible. The current training ground is completely blocked off from the public with no opportunities for the local population to use the area any more. This will happen again with this new development.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eILt	I object to this plan as it will cause a lot of damage to biodiversity in and around the development area	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIOz	A highly oppose this planning application. Selling out public green spaces for the benefit of a football club is unfair and a loss for nature biodiversity and the wider community.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e7Vc	The borough will have no where for people to enjoy the local countryside. Just greed on Tottenham Hotspur.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eIFS	Dear Sir I ask the Mayor to please reject this proposal outright. This is Metropolitan Open Land that should have been given a SINC designation that would have given nature the protection it needs. Please show people that Labour care about the natural world and protect our open green spaces so important to our health and well-being, for all to enjoy. Thank you Yours faithfully	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dfPL	This sounds like a good idea to me, o can't see why people are against the proposals	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eC6H	Whitewebbs Park was bequeathed originally for the townspeople of Enfield to enjoy. It is also a valuable wildlife habitat , the likes of which we are losing rapidly in London. Walking in Whitewebbs park encourages both physical and mental wellbeing and is there not just for people in Enfield but for lots of other people who come from further afield to relax and benefit from nature. I am against Tottenham Hotspur taking over any part of this land to build football pitches, even with their promises to enhance other parts of the park. It amounts to environmental destruction. We need to retain all this land and protect it for the future for both people and wildlife. Env	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3k	You must refuse this application. The devastation it will cause to nature is shocking. I visit every day and find it the most beautiful, tranquil space. The thought of months of bulldozers destroying the landscape is just too upsetting.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEXB	This is totally an unethical development, we do not need any more 'training pitches', which is probably just a smoke screen for the for the NFL. So 1000s of local people are going to lose their access to the beautiful space for a few elite people and make Daniel Levy and his shareholders even richer than they are already. I beg you to reconsider this absolutely horrendous proposal for the good of the local people	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dxOg	Dear Sadiq Khan I have just tried on a number of occasions to post my objection on the planning portal but it seems to have crashed and others are confirming this. So instead I am sending this to you by email. I've just seen the video of you answering a question by Alessandro Georgiou and I'm horrified to hear you completely dismissing the value of Whitewebbs Park because it is not currently being maintained by Enfield Council. This is totally outmoded thinking as it is well recognised that land left to nature will eventually create a thriving biodiverse ecosystem and this is exactly what has happened at Whitewebbs over the last 5 years since the closure of the golf course. In answer to his question you brushed aside this 240 acres of stunning, irreplaceable landscape - ancient and veteran trees, rare grasslands and scrub - stating that ... "not all Green Belt is green and pleasant". This is truly shocking as it is obvious from your comments that you have never actually visited the site because it would be impossible to say this with any authenticity if so. In comparison there are at least seven forward-thinking councils in the UK that are currently choosing to rewind their ex-golf courses, one of them is Beckenham Place Park in London. Your colleague Mete Coban, London Deputy Mayor for Environment and Energy, said of the scheme: "This outstanding project showcases how improvements to green space can help Londoners to access and enjoy nature, improve biodiversity and mitigate the impacts of climate change. Earlier this year you stated ..."Delighted to launch my new £12m Green Roots Fund during London Climate Action Week—supporting greener, healthier and more climate-resilient spaces across our city... In too many cities nature is in retreat. We've worked hard over the last eight years to make London an exception. We were the first city in the world to win National Park City status and I will build on this progress with a new plan to drive forward London's rewilding revolution.... Green spaces and nature should be available to all Londoners, regardless of income. So I will give Londoners the power to make their neighbourhoods more naturerich, and healthier, by providing the money and tools to improve communities. People know best what their street or community would benefit from, so this will be done through a new London Green Roots Fund, with councils and communities able to bid for funding to pay for trees, wildflower meadows, parklets and other new green spaces." None of this adds up, if these are your Green Roots policies then why is a public park to be leased for a paltry fee to the wealthy corporate company Tottenham Hotspur Football Club, to block public access with an industrial site, obliterating all wildlife on the land they take over? Surely Whitewebbs Park is a prime candidate of the 'Green and Resilient Spaces Programme' - "to create a greener London for all." Will the fate of Whitewebbs be on the right side of history?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFwx	██████████ spaces should be preserved for the public	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e6lm	Dear Mayor of London/GLA Planning Team, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dy9U	Dear Mayor Khan, ██████████ and I'm writing to say how strongly I object to Spurs' plans to build on Whitewebbs Park. This park means a lot to so many people, including young people like me. It's one of the few wild, peaceful places left where we can walk, explore nature, and just breathe. Taking away 40 acres of this public land — just to build more football pitches and buildings for a private club — doesn't feel right. Since the old golf course closed in 2021, nature has been coming back to the park. I've seen deer, birds, and even young oak trees starting to grow. It's helped me with my mental health, especially during hard times. Green spaces like this are so important for young people, and we're already losing too many of them. Spurs already has 17 football pitches — more than any other Premier League club. So why do they need to take more land from the public? The park was meant for everyone, not just for a football club's private use. Once it's gone, we won't get it back. The plans would destroy over 200 mature trees and half the park's grassland. That means more carbon in the air, fewer places for animals to live, and less space for us to enjoy. It would also completely change how the park looks and feels. I've read that even the Greater London Authority called this plan "inappropriate" for Green Belt land. There's been so much anger and upset over this. Thousands of people have signed petitions, gone to protests, and spoken out. It feels like no one in power is listening. Please help protect Whitewebbs Park. Don't let it be turned into something that only a few people can use. Let it stay wild, free, and open for everyone — especially for the next generation. Thank you for reading this. Yours sincerely, ██████████	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDdl	Please do not approve. This would be very bad on multiple levels for the locals, and nature, and benefit an elite that already have substantial assets.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eDRS	It's truly heart wrenching to think that public land could possibly be sold to a multi-billion pound business focused on profits. Whitewebbs Park is a pillar of the local community, as well as the local ecosystem - with countless flora and fauna existing within the grounds. On multiple levels, our society is hurtling towards an impending doom - so I am not surprised by this state of affairs. However, I hope I am proven wrong and the right decision is made here for Whitewebbs, and for the greater good.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBWY	How dare Tottenham Hotspur take over Whitewebbs Park like this? This is a public park — not a private asset to hand out. My brother struggled with serious mental illness, and walking in Whitewebbs was one of the only things that helped him stay grounded. This park is a lifeline for so many people. You have no right to hand it over to a football club. It belongs to the public — not to profit.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eB6f	Key Issues Ref. 24/00987/FUL Whitewebbs Park was bought for the people of Enfield in 1931 as public open space for recreation and public (not private or professional) sport. Part of the park was used as a public golf course until 2021, open to all members of the public for a modest fee. There were no restrictions on general public access to the land other than consideration for those playing. The proposals would exclude physical and visual public access from 16 hectares of Green Belt public parkland. The new Draft Local Plan proposes that Whitewebbs Park be given the same allocation as the existing (THFC) men's training ground i.e. use by professional sport as well as leisure and nature recovery. This plan has not yet been approved and is subject to ongoing hearings by HM Planning Inspector. Permitting professional sport to own and develop this land is inconsistent with NPPF Green Belt protection. Permission relies on para 154 (b) but this only applies where the built form preserves the openness of the Green Belt. The requirements of professional football are much more demanding than those of a public golf course in terms of landscaping, security, privacy and the built environment. Green Belt—a beautiful historic landscape held in trust for the people of Enfield. Only a small part of London's and Enfield's Green Belt is public open space. This Planning Application will further reduce public open space and public access to the Green Belt. Whitewebbs Park is locally listed for its heritage value as an example of 19th Century parkland. The open nature of this Green Belt landscape will be irreversibly changed by this proposal. The character of this landscape will be irreversibly changed by this proposal. The proposal will flatten part of a historic undulating parkland landscape. The massive reconstruction of 16 hectares is permanent and irreversible. The scale of the built environment within the plan is wholly inappropriate to this area of Green Belt. The "Special Circumstances" relate only to the commercial interests of one 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 remoteness of this location and the lack of public transport make meaningful community use impossible. PTAL rating 0. In comparison to the current allocation as open space, professional sports use represents a reduction in public access to the Green Belt which does not comply with NPPF Para 151 or NPPF Para 103 which protect public open spaces. The economic benefits are minimal for Enfield and London's economy (Spurs' own Environmental Impact Statement). There are serious doubts about the SINC analysis of the park and the BNG proposals are incompatible with the heritage, character and landscape protection considerations. Important* landscape views will be lost (*Important according to Enfield's current and new Draft plan Local Plan). A detailed analysis of the planning application, based on the report of Enfield's Head of planning is attached. For the reasons summarised above and those in the detailed analysis, The Friends of Whitewebbs Park request that the Mayor deny this planning application.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eGNb	Dear Mayor of London/GLA Planning Team, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF).	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAty	The loss of so much space open to the public with all the benefits that brings outweighs the financial benefit to Enfield council.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEZD	Taking away a beautiful open space, rich in biodiversity for unnecessary use	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dvLG	Unnecessary development being railroaded over vital site for biodiversity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eECR	The Mayor of London has a duty to protect green spaces and this precious habitat. Once gone, it's gone forever! I strongly object to this proposal	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e0rT	I strongly oppose the closure and sale of Whitewebbs Park to Tottenham Hotspur for the development of private football pitches. This proposal is deeply flawed, short-sighted, and against the public interest. Tottenham Hotspur is a commercial entity, and their plans do not include providing publicly accessible sports facilities for local residents. This is not an investment in the community — it is the privatisation of public land for corporate gain. Whitewebbs is more than just a park — it is one of the few remaining green spaces accessible to the local community, and home to ancient woodland, vital biodiversity, and precious wildlife habitats. The sale of this land, under questionable legality, is a breach of public trust and an attack on our environment. The destruction of green space in an already nature-deprived borough is unacceptable. Furthermore, the added pressure on already overstretched local transport and road systems will only worsen quality of life for residents. The benefits of this sale are exclusively for a private football club, not the public. This is a disgraceful misuse of public assets. I urge the council and all decision-makers to stand up for the public good, uphold environmental protections, and reject this damaging and unjust proposal.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eIAId	I strongly object to this planning application. As a regular visitor to Whitewebbs, where I walk my dog, I am deeply concerned about the irreversible impact this proposal will have on the historic landscape. Whitewebbs is held in trust and not owned by Enfield Council, to ensure that the people of Enfield and beyond can enjoy this public open space. It is a peaceful place that needs to be treasured. The environmental damage caused by flattening parkland will be utterly detrimental. The proposed reinstatement of the historic carriageway by the pond will introduce disruptive noise, undermining the current tranquillity of the area. I am highly sceptical of Spurs' commitment to reinstating the land once their proposed lease expires. The open space and scenic views will be permanently lost if this development proceeds. There are no benefits to this proposal. It is crucial to preserve the trees and wildlife for everyone's enjoyment. Given that Spurs already have pitches for the women's team at their Bullsmoor site, it is unclear why additional space is necessary. The Green Belt must be protected at all costs and not encroached upon.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFxs	Would significantly impact local green spaces	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eINV	This is so selfish	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q500000eLDxX	Written Representation for Planning Application 24/00987/FUL STANCE: OBJECT Commenter Type: Campaign Group I am writing on behalf of the Guardians of Whitewebbs. This is our written representation (WR) for the planning application 24/00987/FUL, concerning Whitewebbs Park. Whitewebbs Park Definition: When referring to Whitewebbs Park, we mean THFC's lease area, including the open space/grassland, of which circa. 50% would be lost to the proposed training centre, and the portion of the ancient woodland around Whitewebbs Lake, which would be seriously reconstructed. (Site Wide Coloured Landscape Masterplan.) 1. Overview (A) Inappropriate Development: The Greater London Authority (GLA) concluded in their Stage 1 Planning report GLA/2024/0213/S1/01 (GLAS1R) that Tottenham Hotspur Football Club's (THFC) proposed development "would not preserve the openness of the Green Belt compared to what is existing" due to the visual impacts of the training ground boundaries, fencing, floodlights, buildings and extensions (para. 16). The GLA states, therefore, it is "inappropriate development within the Green Belt" and "very special circumstances" would have to exist for the scheme to be approved (GLAS1R, paras. 13-17). Although the GLA didn't mention the 5 purposes of the Green Belt, we also believe that THFC's proposed development is out of line with NPPF para. 143 (d) and (e). (B) Very Special Circumstances (VSC): The NPPF states that "substantial weight" should be given to any harm to the Green Belt and that '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" (para. 153). In its Planning Statement (PS) paras. 8.59-8.129, THFC set out the factors which they consider constitute the VSC of its proposed development. We consider each of these below, why each is misleading, and why the factors fail to meet the standards in NPPF para. 153. 2. Environmental, Sustainability and Ecological Benefits	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q500000R1itR	This is my objection to the planning application "24/00987/FUL". There are many points stated in Tottenham Hotspur's (THFC) plan that I feel are unsound when referencing the National Planning Policy Framework, Sites of Importance for Nature Conservation (SINCs) and Metropolitan Green Belt laws. 1. Changes to the Landscape and Character of the Land There will be a significant change in landscape to approximately 50% of the former golf course. THFC will build 2 metre high fences, which will impact on the openness and character of the park. Dense tree plantations and hedges both around these fences and across the park will further harm the feel and design of the park as it was intended. These proposals will obscure panoramic views from Whitewebbs Lane looking south and south west; views from the current footpath through the centre of the former golf course looking north and north east; dense tree planting will obscure views from the south of the park, near the café, looking north west. The metal fences will not be in keeping with the natural character of the Green Belt land. Obscuring views and the impact this has had are also already evident in their current training grounds - THFC have blocked the view from Whitewebbs Lane with similar approximately 2 metre high fences and hedges. For these reasons, I believe the plan is unsound as THFC will destroy view Important Local View "6. Whitewebbs Lane" which is protected in Policy DE5 of Enfield Council's Local Plan. In addition to obscuring views, the 21 metre tall floodlights THFC propose will be out of keeping with the character of the land too. THFC propose to level out the land, which changes the character and landscape of the Park. They will build attenuation ponds, which are also out of keeping with the natural landscape. In and around the lake and north eastern Whitewebbs Woods area will also be seriously reconstructed (see point 6). 2. Rescheduling of Land The disposal plans for Whitewebbs are not consistent with the "statutory purpose" of the land, which is to be held as open space land on trust for the public (a purpose for which it was acquired using public funds when it was purchased in 1931 by Enfield Council using public money). The lease and plan will extinguish public rights to access these facilities, and therefore is unsound: see NPPF para. 154 (b). This planning application is not in line with Enfield Council's current draft Local Plan (see NPPF para.: 006 Reference ID: 21b-006-20190315), as in this plan, Table C1.184 Design Principle A states that development on the site (i.e. Whitewebbs Former Golf Course) "must maximise publicly accessible space". Since there will be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park, THFC's planning application is unsound. THFC also fail to take into account NPPF para. 103 - neither section (a), (b) or (c) are met for this planning application. 3. Change of Use for Private Usage	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q50000R1mDE	This is my objection to the planning application "24/00987/FUL". There are many points stated in Tottenham Hotspur's (THFC) plan that I feel are unsound when referencing the National Planning Policy Framework, Sites of Importance for Nature Conservation (SINCs) and Metropolitan Green Belt laws. 1. Changes to the Landscape and Character of the Land There will be a significant change in landscape to approximately 50% of the former golf course. THFC will build 2 metre high fences, which will impact on the openness and character of the park. Dense tree plantations and hedges both around these fences and across the park will further harm the feel and design of the park as it was intended. These proposals will obscure panoramic views from Whitewebbs Lane looking south and south west; views from the current footpath through the centre of the former golf course looking north and north east; dense tree planting will obscure views from the south of the park, near the café, looking north west. The metal fences will not be in keeping with the natural character of the Green Belt land. Obscuring views and the impact this has had are also already evident in their current training grounds - THFC have blocked the view from Whitewebbs Lane with similar approximately 2 metre high fences and hedges. For these reasons, I believe the plan is unsound as THFC will destroy view Important Local View "6. Whitewebbs Lane" which is protected in Policy DE5 of Enfield Council's Local Plan. In addition to obscuring views, the 21 metre tall floodlights THFC propose will be out of keeping with the character of the land too. THFC propose to level out the land, which changes the character and landscape of the Park. They will build attenuation ponds, which are also out of keeping with the natural landscape. In and around the lake and north eastern Whitewebbs Woods area will also be seriously reconstructed (see point 6). 2. Rescheduling of Land The disposal plans for Whitewebbs are not consistent with the "statutory purpose" of the land, which is to be held as open space land on trust for the public (a purpose for which it was acquired using public funds when it was purchased in 1931 by Enfield Council using public money). The lease and plan will extinguish public rights to access these facilities, and therefore is unsound: see NPPF para. 154 (b). This planning application is not in line with Enfield Council's current draft Local Plan (see NPPF para.: 006 Reference ID: 21b-006-20190315), as in this plan, Table C1.184 Design Principle A states that development on the site (i.e. Whitewebbs Former Golf Course) "must maximise publicly accessible space". Since there will be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park, THFC's planning application is unsound. THFC also fail to take into account NPPF para. 103 - neither section (a), (b) or (c) are met for this planning application. ~~3. Change of Use for Private Usage~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e1AM	Dear Mayor of London and GLA, You've heard from me a lot, but I am going to reiterate that this proposed development is so out of line with national and London planning policy that your only option is to reject this. We await the Mayor's stage 2 response and sincerely hope he will listen to the public whom he is serving. I think you will see quite clearly from the views of the commenters what people believe the decision should be. Thank you. Yours sincerely, [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e6T9	Dear Mayor of London and GLA Planning Team, I am writing to you on behalf of Guardians of Whitewebbs concerning the planning application 24/00987/FUL (London Borough of Enfield). From an Environmental Information Regulations (EIR) request that we made on 3rd April 2025 (Enfield Council reference 101001439049), it has come to our attention that the ecologist (Giles Sutton) contracted by Enfield Council to provide "advice and ecological support throughout [the application], including advice on EIA screening, pre-application advice and advice on the full application (including a review of any Biodiversity Net Gain calculations)." Giles was commissioned to undertake an independent review (document titled "ECO2332") of Tottenham Hotspur Football Club's Biodiversity Net Gain (BNG) figures. He expressed serious doubts concerning the applicant's figures, and in particular the baseline. We consider Giles Sutton's consultation response and associated advice should have been included both in the Council's Planning Officer's Report and background material presented to the planning committee (we have had confirmation that the only papers made available to the committee are "the committee reports and application documents on the Council's website and planning register and the attached brochure provided by the applicant"). In this independent review, Giles Sutton compares THFC's BNG report conducted by Logika with Denis J Vickers' ecology report of Whitewebbs Park. Enfield Council then contracted another ecology company (PlumbAssociates) to do an "independent audit" (also attached) of this independent review. It is evident that in the document titled "ECO2332", Giles Sutton appeared to agree with Denis J Vickers' assessment of the ecological value on multiple occasions, e.g.: "It would be counterintuitive to conclude that the development would result in the significant (33% above the baseline) BNG that the applicant claims given that a large proportion of the park (around 40%) would be lost to the new development. We do not have an agreed baseline for the site as there are inadequacies in the applicant's BNG report and differences in the classifications between the two ecologists who have both surveyed the site (in my opinion Mr Vickers better reflects the habitats on the site, particularly for the woodland)." It is also notable that Enfield Council appeared to persuade Giles Sutton's advice/views, when Giles wrote: "I am not sure if or how to respond to this, I disagree with the bullet point statements below, and many of the points made in the memo and it doesn't change my previous advice." Giles also raised concerns over the Council's conduct in relation to this matter: "I must say that I was concerned by your conduct at our meeting last Friday with the applicant and their ecologist. You contradicted me in front of the applicant and publicly disregarded my advice..." and goes on to explain. Additionally, Giles Sutton raises concerns about specific surveys, including reptile surveys. We then submitted a further EIR to try to obtain the advice memos referenced in this correspondence. However, the response to this EIR neither	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eCi6	Dear Mayor of London and GLA Planning Team, I am writing to you again on behalf of the Guardians of Whitewebbs regarding the planning application 24/00987/FUL (London Borough of Enfield). Local Plan and Development Management Stage Land Designations In relation to the Draft New Enfield Local Plan (NELP), and with particular note to local nature recovery strategies in Section 102 para. (5) (2A) (a) of the Environment Act 2021, Quod, on behalf of THFC, submitted a request (see attached document titled: "Evidence - 3827 THFC New Enfield Local Plan Reps - Sept 2021 (1) (3)") to merge site allocation descriptions at the Regulation 18 Stage (https://www.enfield.gov.uk/__data/assets/pdf_file/0023/12668/ELP-2039-Reg-18-for-consultation-Planning.pdf) in 2021. Quod requested that the site allocation for Whitewebbs Park (SA57) should be changed from Enfield Council's designation as "Nature Recovery" to "Professional Sport, Recreation, and Community Sports/Leisure Uses", and that the Former Whitewebbs Golf Course was incorporated into the SA62 Site Allocation (Land at Tottenham Hotspur Football Club Training Ground), thereby extending SA62 to the West. Enfield Council subsequently implemented THFC's request into its Regulation 19 Stage (https://www.enfield.gov.uk/__data/assets/pdf_file/0031/55669/ELP-Reg19-Appendix-C-Site-Allocations-Planning.pdf). Implementation - Regulation 18 Site Allocation Title (Tottenham Hotspur Training Ground): "SA62 Land at and within the vicinity of Tottenham Hotspur Football Club Training Ground, Hotspur Way, Whitewebbs Lane" - Regulation 18 Site Allocation Description (Tottenham Hotspur Training Ground): "Sporting" - Regulation 18 Site Allocation Title (Whitewebbs): "SA57 Whitewebbs Golf Course, Beggar's Hollow, Enfield" - Regulation 18 Site Allocation Description (Whitewebbs): "Nature Recovery" - Regulation 19 Site Allocation Title: "SA RUR.07 WHITEWEBBS GOLF COURSE AND LAND AT TOTTENHAM HOTSPUR'S TRAINING GROUND" - Regulation 19 Site Allocation Land Use Requirements: "The site should provide nature recovery uses and the site could provide professional sport, recreation and community sports/leisure uses, including ancillary related facilities." Essentially, the 2 site allocations (SA57 and SA62) in the Regulation 18 stage have been merged in the Regulation 19 stage (SA RUR.07). The fact that Enfield Council implemented Quod and THFC's requests (contrary to Enfield Council's original Draft Local Plan and to the current/original lease agreement of Whitewebbs Park) in its Regulation 19 stage is a potential conflict of interest, since both Quod and THFC are interested parties. The	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eEaS	Dear Mayor of London and GLA Planning Team, I am writing to you on behalf of the Guardians of Whitewebbs regarding the planning application 24/00987/FUL (London Borough of Enfield). I wish to add to my previous objections by disputing Tottenham Hotspur Football Club's claim that there was restricted public access when the site operated as a golf course. The land was purchased by Enfield Council in 1931, and was given to the public, and held in Public Trust in perpetuity, on a term of 999 years. As can be seen from the attached photographs taken in January-February 2020, the public were free to roam across the Park when it operated as a golf course. The lease stated that if the golf course was to close, the Park would revert to public usage, which is what happened when the golf course officially closed in 2021. Additionally, even when the site was more managed, it still held great ecological value, for example from the multiple veteran and many mature trees, and the acid grassland belt. The applicant fails to take full account of the regeneration and rewilding processes that have taken place since the golf course's closure. There is an ongoing rapid proliferation of species, biodiversity and ecological value which isn't reflected in Spurs' BNG survey or ecological impact assessment, for example. In addition, there is a lack of detail about the harm to the countless invertebrate species as a result of this proposed development, for example THFC did not conduct any invertebrate surveys. We have recorded the nationally scarce hoverfly mimic <i>Pocota personata</i>, as an example of many. The applicant proposes to fell 207 trees and transplant 40, and the acid grassland belt would be destroyed as it is within the proposed pitch area. I wish to reiterate that while the applicant denies it will fell any veteran trees, this can be proven false by the fact that the Woodland Trust Ancient Tree Inventory lists multiple veteran trees within the applicant's proposed football pitch areas (https://ati.woodlandtrust.org.uk/tree-search/?v=2779753&mi=map&z=15&nwLat=51.690271922502106&nwLng=-0.12184448922118563&seLat=51.66408626382825&seLng=-0.028889853601068438). The information that we provided to the Council on this matter ought to have been given weight in the Council's decision making, and again, we would request you take this into account when making your decision on this application. Furthermore, we believe that the Arboricultural Impact Assessment should be redone or revised to take this issue into account. The site, even when it operated as a golf course, would certainly have met the criteria to be designated as a Site of Importance for Nature Conservation, not only due to its rich environmental value, but also due to the site acting as a wildlife corridor linking three existing Metropolitan SINCs (Hilly Fields, Forty Hall and Whitewebbs Wood). As described in detail in our previous objections and our January 2025 complaint REF 101001267200 and February 2025 complaint escalation (reattached), it is an anomaly that Whitewebbs Park (former golf course area) was not designated as such considered for inclusion in Enfield Council's 2020 SINC review. The Council only conducted a review of existing SINCs and	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dahF	We need to protect our green spaces and allow nature to thrive	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eHGZ	Dear Mayor of London and GLA Planning Team, I am writing to you on behalf of Guardians of Whitewebbs regarding the planning application 24/00987/FUL (London Borough of Enfield). We refer to the letter submitted by Public Interest Law Centre on behalf of Guardians of Whitewebbs, Friends of Whitewebbs Park, CPRE London and London Parks & Gardens dated 3rd April 2025. This letter regards excavation work, construction and engineering, and separately includes a professional opinion from Philip Ridley, MSc (Town Planning), PGDip (Heritage). We made an EIR Request to Enfield Council on 25 April 2025, asking for "Enfield Council's correspondence with the Greater London Authority (GLA) after the Council formally referred the planning application 24/00987/FUL for the Mayor of London's Stage 2 process". As you will be aware, a member of the GLA Planning Team was concerned that information requested in para. 77 of the GLA's Stage 1 Report for this application was not included in the Council's Stage 2 Referral. We have now been provided with multiple documents, and notably the Whole Life Cycle Assessment Spreadsheet. We consider this document contains data which adds significant weight to the points made in the letter above. Particularly, the development will result in a: - Net total of 9,119,283 kg of carbon emissions (Modules A-D incl. B6-B7); - 7,040,000 kg of excavation works; - 2,838,194 kg of concrete and rebar substructure (i.e. we believe this must include underneath the proposed football pitches); - A total of 11,659,149 kg in material quantity. In deciding this application, we request this information be considered by the GLA alongside the points made in our above letter. And given this, plus the points made in Sam Gracie Tillbrook and the Guardians of Whitewebbs' numerous other objections (see our written representation re-attached), we believe this application must be refused. Please see the following documents attached: - WLC GLA Spreadsheet-TH WTC - Letter to Enfield Planning Service 03.04.25 - Earthworks and EIA.pdf - Opinion of Philip Ridley 02.04.25 - Earthworks and EIA.pdf - 24/00987/FUL Written Representation for Tottenham Hotspur's Planning Application for Whitewebbs Former Golf Course - Guardians of Whitewebbs	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHY7	Loss of green space would be tragic.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e7Ve	Just want it to be good for the community	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3QW	Whitewebbs Park is so very valuable to the people of Enfield . The UK has a obesity problem with adults and children and taking away yet more green space from enfield . I use the whitewebbs lane opening to whitewebbs or walk through forty hall both of which appear not to be accessible once thfc take over. The side of Enfield on whitewebbs lane have little to none green space available to us . Please do not take this delightful green space away from us when thfc have enough money to build a ground elsewhere	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e6In	I OBJECT	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eH0E	I understand this means we'll loose public access to this area. Please don't do this - these open spaces are vital for our community. I have two young children and use this space a lot.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eGti	Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings at Whitewebbs Park, Enfield, Middex, be called in by the Mayor of London, under Article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I write as a regular visitor to the Park and area, having moved here in 1967 and then lived in the area for many years before moving. I believe it should be refused for the reasons set out below. Fundamentally, this development does not conform with the London Plan and is, indeed, deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides benefits to just one group of individuals, ie. The Club's own football team. Nature Conservation assessment As you will be aware, the "Guardians of Whitewebbs" have recently made a formal complaint (COM 101001267200) against Enfield Borough Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020. This is a potential conflict of interest insofar as it is now being proposed that land designations would be changed through the New Enfield Local Plan. The Borough is now rushing this planning application (24/00987/FUL) through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings, presumably to avoid scrutiny of the application during those hearings (which are, I understand, yet to commence). Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under both Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. In my view, therefore, the Borough's assessment of the planning application has potentially been prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. I understand that The Guardians of Whitewebbs have recently escalated their complaint to the Borough to the internal review/Final Stage. Summary of why I believe the application should be called in and refused: ~~Let me state the case for this planning application. The area is part of an historic greenland which contains a range of older trees and its surrounding~~ Whitewebbs is an important and unique local amenity. It is open to all greenbelt widely used by the residents of Enfield for restful recreation. More flats and houses are being built all the time in Enfield and the surrounding area, including the plans for Crews Hill, and it is very important that sufficient green spaces exist for the mental and physical health of the local people. It is also one of the few local spaces with a full range of wildlife, and there is no justification for removing their habitat. Finally, the views across Whitewebbs are stunning and should be preserved - it is not right that these are stolen from the people of Enfield. The land belongs to the people of Enfield and once gone can never be reclaimed for current and future generations. The proposal should be rejected.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q500000aDL3o	Whitewebbs is an important and unique local amenity. It is open to all greenbelt widely used by the residents of Enfield for restful recreation. More flats and houses are being built all the time in Enfield and the surrounding area, including the plans for Crews Hill, and it is very important that sufficient green spaces exist for the mental and physical health of the local people. It is also one of the few local spaces with a full range of wildlife, and there is no justification for removing their habitat. Finally, the views across Whitewebbs are stunning and should be preserved - it is not right that these are stolen from the people of Enfield. The land belongs to the people of Enfield and once gone can never be reclaimed for current and future generations. The proposal should be rejected.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8gX	This area is an oasis for biodiversity. Why build on and disrupt the site? You can't replace established biodiversity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEdq	Whitewebbs Park and woods have been part of my life for the best part of 25 years I first went there with my young family to walk and to enjoy the beautiful natural environment. The very idea that a large part of this wonderful publicly owned amenity will be permanently damaged beyond repair by a rapacious company who care little or nothing for the place is incredibly sad and distressing; not just for myself but for the whole community! In recent years Whitewebbs has been an important element in my recovery from two major health events in my life by providing that peaceful, contemplative environment in which to de-stress, exercise and walk. Mental Health, the environment, biodiversity and the retention of our dwindling green spaces in this country have become major issues for not only my generation, but for future generations; given the mayor's promises and policies towards these things in London the preservation of the rewilded Whitewebbs Park should be an important part of this agenda. If indeed, mayor Kahn and his planning officers believe in his stated vision for the health and welfare of the citizens of London - that includes access to the unfettered enjoyment of the natural environment- then it follows that to allow a precious, and bio-diverse public amenity to be sold off, and irreparably damaged, and inevitably lost is in direct contradiction to those visions and aims!!! Future generations will be the judges of whether, politicians, local government, and national governments, cared more for their citizens' health and happiness, or bowed down to the unending quest for profit and power of the corporate world!!!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF09	We have so little quality wild habitat left in London. This reason alone is enough to save this vital wildlife space. However there are a multitude of other reasons not to allow this planning. Spurs have shown they can't be trusted to keep promises to the community. This is public land, Spurs have no right to it, but the public does. Quality green spaces are a lifeline for city dwellers for the mental and physical wellbeing - and healthier and happier communities save the council money in the long run. Please don't take away another precious green space with all its value for Londoners.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eDpn	Very poor value deal for local residents and tax payers. 150 acres of open park land will be permanently lost to local residents with the building of plastic pitches & concrete for a very low financial benefit [£80,000 per year equates to <25p per resident of Enfield]. The applicants business had a turnover in 2022 of £443 million. If they want to extend their training facilities then they can afford to access land at commercial value at another site.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIQq	This application involves public green space in Green Belt being enclosed by a private company & excluding public access. The bulldozing & concreting of 17ha of mature trees and grassland to create plastic football pitches is completely incompatible with London plan policies on climate change, Biodiversity, Green Belt and public health. There is no public benefit, only private gain. Either this application is rejected or the GLA admits it has no intention of implementing its climate change strategy, its nature recovery plan or it's public health strategy. Spurs claims are greenwash nonsense as any serious scrutiny reveals. Obviously Spurs want the land. The question is why would any public planning authority give it to them on the basis of this unmeritorious and fundamentally flawed sales pitch?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eA2O	Whitewebbs is a beautiful green space for us to visit. My son played golf there as a junior, we love the grounds there. Building on this area will be some detrimental for the local community & wildlife. It is a great place close to town that offers peace and nature to the community.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3vP	Appalling. The site is much loved and well used by local people; it is one of Enfield's real treasures. To ruin it like this, for a paltry sum of money, is just an abdication of responsibility, and spits in the face of local people - now and in the future.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dzAo	Why would you want to take away a precious green space ?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8fL	I'm devastated that a very large part of Whitewebbs, which is a haven for both wildlife and people alike, is to be long term leased to an elite football team. My family and I have enjoyed this public park for over 50 years and it was an important reason for moving here. A large part of this precious and beautiful habitat will be destroyed and wildlife traumatised and displaced. I believe we have a responsibility to look after our wildlife and it's habitat for our future generations. Nature conservation is vital for the well being of humans, wildlife and the environment. I also believe there may be a more suitable location very near by close to their current training ground which would not have the same negative impact and better transport links could be made available. Please protect our historic and beautiful parkland before it is lost forever and call in this application.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCqw	Losing crews hill/Whitewebbs park will be a massive loss to Enfield, a lot of people walk the Whitewebbs trails, myself included. There are viable business throughout crews hill, and homes that will all be affected by building on this land. It's green belt for a reason. There are so many empty spaces that can be built on ahead of greenery (the old b&q on the a10 for example).	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyQ6	My family and I have been using Whitewebbs Park as local green space amenity my whole life. My father's cricket team played, in the 1960s, in the now re-wilded meadow adjacent to the woods. I believe the park was gifted to the Enfield public in perpetuity and it is not for the local council to sell or lease. Also... the proposed derisory and uncommercial rate for such suggests that the council were wholly outclassed (unsurprisingly) by Tottenham Hotspur's negotiators. The enterprise clearly benefits Spurs and not the local people of Enfield who will feel the loss of a significant proportion of a beautiful, well-used, natural park for generations. This cannot be fair or thought through. Please do not approve it.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIU1	This appears a very poor deal with the lost of the environmental space, public access and loss of biodiversity in exchange for a small sum from Spurs for access to the land. If Spurs are willing to pay £70m for a player with then the agreement between Enfield and Spurs is clearly wrong. So little for the destruction and loss of access to public land	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAFy	At a time when nature is massively being depleted this space should at least maintain it's current biodiversity if not work on plans to improve it. The last thing you should be doing is to destroy nature for the sake of a football team that is already an industry that is inherently environmentally unfriendly	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGts	I do not live locally but bio diverse green spaces and trees are important to all of us. Established trees are the lungs of the planet, we cannot survive without them. The developers may promise new trees but they will be small, and who is going to water them? As he climate is getting hotter new trees will not survive like established ones will. If the trees and wildlife habitats are turned into a training ground they are lost forever. This football club already has lots of 'dead' space, environmentally unfriendly training grounds, they should utilise the time better on these for these instead of making more. There will come a time when the inconsiderate human race will have to but nature first, but it could be too late if plans like this go ahead.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyZa	I object to the proposal particularly due to the environmental impact this will have for the benefit of few. It will increase traffic and noise pollution levels	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDmP	The Whitewebbs area should not be thought of as 'former golf course' but as an thriving and important urban site of biodiversity, much needed in this era of climate change and wildlife extinctions. The planning application is extremely worrying in its vagueness, allowing for an encroachment on vital (and increasingly rare) meadowland and woods without further checks. The claim that the football club will remediate all habitat loss is absurd. You cannot remediate a felled tree or a manicured meadow.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eHpj	Since the golf course was removed Whitewebbs has developed into a wonderfully wild and naturally diverse space, so greatly needed here, as it should anywhere urban for that matter. A paradise for dogs and walkers. For the council to have caved into Spurs for peanuts is a disgrace. And let's down the whole community. And I'm a Spurs supporter	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCZS	An amazing open space. Being taken from us by rich football club. Khan etc think they are on the right side of history. They aren't. An abuse of power on his part.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFuX	Hi, I moved to Enfield last year and one of the main draws to the area was its green spaces. I visit Whitewebbs several times a week and it is a special place, unlike no other in the borough. It needs protecting so that the community can continue to access it rather than being flattened. Spurs' proposal not just destroys the area that is being built on but ruins the quality of the remaining areas of the park to the public. The role of any public authority should be to look after its people rather than big business. I plead with you to stop this proposal.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBjN	In these days of critical pressure on natural resources we need to preserve London's breathable air and walkable parks.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3MM	I like many use the area for walking in nature with my dogs - it is a beautiful area that means a lot to so many people - Tottenham's self interest is not a reason to destroy an environment in this way	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGk6	I do not blame THFC for trying to snatch a valuable area of land for the pittance reported, but I'm appalled at Enfield council for giving away public land that is not theirs to offer. I know it is only a lease for 25 years, but, inevitably, once relinquished, that land will never be available for public use again, whatever promises are made by council or Tottenham Hotspur. THFC already have training facilities quite large enough for both men and women, this is profiteering at the expense of Enfield residents and visitors. Deception and/or incompetence all round. This development must be refused.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDNZ	Huge shame to tarnish the history and environmental impact of Whitewebbs on the Enfield area.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGAb	I have visited Whitewebbs Park frequently for many years as it is a wonderful parkland space easily accessible from my home in North London. It has always struck me that it is so well used by walkers and runners. The cafe is just the right size to serve people but not impact on the rural landscape. I was devastated to learn about the proposed development. I cannot believe that this is the best use of public land. Tottenham Hotspur are a very wealthy club so can afford to look elsewhere for their development plans not benefit from cheaply developing public land. I am a keen supporter of Women's football and its aims to bring football to the next generation of young women but I have to question both the scale of this development and its siting on this irreplaceable area of Green Belt.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyWT	I visit Whitewebbs park regularly. The park is an important habitat for nature and plans submitted would damage the environment.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEtg	This is green belt land, designed to contain the expansion of London for the good of the population and wildlife. Why is it that a football club is able to overcome the objections of the people who live here. If this scheme is allowed it will mean the destruction of our countryside.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4Zr	It's essential Green Spaces remain exactly that. There are other sites far more suitable for this plan.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHQ6	Strongly object to multinational offshore organisation taking control of public parkland given to the people of Enfield nearly a hundred years ago. Council being taken for a ride by spurs with no Benefits to the people of Enfield only to an elite few potential female footballers. All this nonsense for a paltry sum of money over twenty five years. Please stop this charade	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHpe	This land was bequeathed 'in perpetuity' for the benefit of the locals of Enfield.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eE7G	This is a beautiful park in which I have spent many happy hours. It is essential that it maintains full public access as one of the principal green spaces in the area. It is also important that the biodiversity of this area is protected and not compromised by excessive development.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eDHT	Important to retain as much green space as possible in the current environment.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHZX	Effect on mental wellbeing removing green spaces	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dxOb	As above	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dqOW	We should not be constantly chipping away at our public spaces which are supposed to be for the whole community not just football fanatics.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGnM	Building on Whitewebbs Park, part of the Metropolitan Green Belt in Enfield, would have several significant impacts: Loss of valued green space: Whitewebbs provides woodland, parkland, and public access for walking, recreation, and wellbeing. Development would reduce this open, natural environment. Damage to biodiversity: The area supports rich wildlife, including deer, birds, and ancient woodland species. Building would fragment or destroy these habitats. Undermines green belt purpose: The development weakens the green belt's role in preventing urban sprawl and protecting the countryside around London. Community opposition: Local residents value Whitewebbs for its heritage and public use. There has been strong opposition to proposals for private development (e.g., the lease to Tottenham Hotspur). Increased pressure on infrastructure: New development could put strain on already limited local transport, schools, and services. Sets a precedent: Approving development at Whitewebbs risks opening the door to further building on protected green belt land in Enfield and beyond. While proponents may argue that parts of Whitewebbs (like the closed golf course) are underused and suitable for redevelopment, the broader environmental and community costs are substantial.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFY9	I oppose this plan as it's unnecessary for Tottenham to build ANOTHER training centre less than a mile from the one they have and which stands empty after lunchtime . Let the women use the pitches there . Leave Historic Whitewebbs for the people and abundant wildlife to enjoy !! Thank you .	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eAAX	Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below. This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAwt	This is a change of Public Open space to Private open Space . The Football training pitches will not be a Public Amenity and this open space will be lost to private enterprise . The only reason the Golf course became redundant was that Enfield Council closed it during covid and then never reopened it or maintained the area .Previously it was a well used Public amenity .	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFsv	I support the application on the grounds that it will return much of the previous golf course back to general public use rather than a minority passtime.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGSi	We need more public green spaces.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAQo	Please do not allow this change in the use of White Webbs park. It would be a tragedy.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eD0O	Stop allowing big business to destroy native woodland and green spaces. Reject this application until it is reduced and protection is put in place for old trees.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFsr	I don't think it right to keep encroaching on public land and on our green belt. Before long there will be no green belt, the rate things are going everywhere will be taken over. It's the thin edge of the wedge.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF5Z	Please save this wonderful green space , beneficio for everyone, wild life and people . London needs to protect it's parla for heath and perservabtion of diversity	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eCU2	Dear Sir Sadiq Khan I am writing to ask you to refuse planning permission for the Tottenham Hotspur FC proposal to build a training ground in Whitewebbs Park. I am particularly concerned about the environmental effect such a development will have. The massive reconstruction of the area, once completed, will be irreversible and result in the loss of Green Belt space for ever. In addition, the Park is important to many members of the public who, like myself, make use of its facilities several times a week. It should be remembered that Whitewebbs Park was purchased almost 100 years ago for the people of Enfield, and the Council has no rights to permit a development that will deny them access to it. ██████████ ██████████	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBJQ	Please leave the area as it is. It's home to wildlife and enjoyed by many who use it. It would be a terrible loss to the surrounding heavily built up areas which are there already. This last space is a place for all to enjoy and connect with nature. This helps with our mental health and well being. Leaving us with a designated small urban Parks is not the way to help keep society sane.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGR5	There surely is no need for such a large area to be taken for a training pitch. The impact on the abundant wildlife is unthinkable. If this goes ahead the local people will miss out on the benefits of being able to wander at will in such a wonderful place, essential for mind and body. This must not be allowed.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e206	There appears to be a real disregard and double standard by the Mayor of London and the local council. With one breath they preach environmental and climate change wasting tax payers money by implementing LTNs, putting planters into the middle of roads and ultimately damaging communities and local business. On the other hand they are selling local green spaces under market value so as not to trigger a committee review for development. The loss of these greens spaces cannot be replaced by street planters and the shady manner in which the local council and the mayor have recently conducted themselves, particularly in relation to trent park and whitewebbs, should be investigated!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dnOW	Dear Mayor Khan, ██████████ I'm writing to tell you that I really don't want Tottenham Hotspur to build on Whitewebbs Park. Whitewebbs is one of my favourite places to go. It's peaceful, full of trees, and feels like proper nature. Since the golf course closed, it's been even better. There are deer, birds, snakes and loads of space to explore. I've been there with my family, and sometimes just to walk and clear my head. It helps me feel calm. If Spurs build their football academy there, half of the park will be gone. They'll put up fences, dig up the land, and cut down over 200 trees. That's really sad. The trees take years to grow and animals live in them. They're part of what makes the park special. Spurs already have 17 football pitches. Why do they need more? I play football too, but I don't think it's fair for a football team to take land away from everyone else — especially a place meant for the public. Once the park is changed, it can't go back to how it was. It's not just about football — it's about saving nature and keeping places where people (and kids like me) can go for free and enjoy the outdoors. Please don't let them take Whitewebbs Park away. Please help protect it for kids now and in the future. Thank you for reading my letter. Yours sincerely, ██████████	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBRI	Objection due to significant loss of habitat	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eH1y	This is public land and therefor should remain that way.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e9Jd	It will have a negative impact on biodiversity and will privatise a beautiful communal space	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dkYO	Spurs (ENIC) can well afford to buy private land for this venture. There is no guarantee the community will have any access to the "academy" nor that it won't be repurposed whenever they choose. Look at the broken promises made to engage with the community when they were given their current facilities.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e32w	I use this area every day. It belongs to the public and is a precious accessible open green space for London. How can it just be handed over to a private concern? You saw the outcry when just one ancient oak tree next to it was felled - and an enormous amount of money has been spent developing a new Beaver habitat adjacent to it. You cannot just take the public's precious lungs of London and destroy them. This space means my husband and I can safely walk every day for a good distance - and without car fumes. If you want to further support the NHS - don't ruin activity sites.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAVk	This cannot be allowed to go ahead. It would do unthinkable damage.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dxd	This is very well used public green space with an abundance of wildlife. Loss of it is extremely detrimental to the community and the wildlife species living here	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDJL	Whitewebbs Park is an invaluable part of London's green space, with huge benefits to wildlife and local amenity. Although a Spurs supporter, I must object to this planning application most strongly.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEop	This is a totally inappropriate change of use of open space which has for many decades and is currently available to the general public. The former Enfield golf course has naturally re-wilded since the golf course was closed. the Spurs proposals will ruin the natural environment of this area and turn it into an environmental wasteland, destroying wildlife habitats as well as blocking community access to an open space which belongs to us all. Spurs have huge funds available to them and have large training grounds elsewhere. They can easily accommodate their women's training there/ Furthermore they has been offered the lease of this land at a ridiculously low price and any contribution to Enfield Council's finances will be insignificant. At the end of what I understand is a 20 year lease there will be no useful facilities to be returned to the Enfield public. Furthermore Spurs have, not as far as we are told, committed to make any financial contribution to health and fitness programmes and facilities for the local residents, either here or throughout the borough. They have made no commitment to us the Council tax payers of Enfield. . One wonders why Enfield Council have decided to give away a valuable community asset. What is the motivation? Finally, the Spurs-associated business already in the park have been guilty of serious environmental vandalism; the 500 year old oak tree they destroyed was not a danger to the public. They did not ask Enfield for permission or give the required 6 weeks notice to do work on the tree let alone to destroy the tree completely.Nor did they it seems use qualified "Tree Surgeons". Whoever did the felling was not prepared to have their name on their equipment. Spurs must take responsibility for this vandalism. Spurs certainly cannot be trusted and would destroy the natural environment and act with no consideration for Enfield Residents/. ,	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8dQ	Attached is an objection to Planning Application 24/00987/FUL	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eALu	please reject this application. Whitewebbs is an extremely important asset to Enfield. It is a public park which should be open to everyone. It has re-wilded itself in the past few years making it a very valuable area for wildlife. It is imperative that we wake up to the fact that these beautiful areas need to be protected. As someone who has mental health issues, I find it invaluable to helping me retain a balance in my life. There are countless others who are also helped by walking here. Thank you for listening.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eA42	This objection is based on the following: Loss of public open space. Impact on local biodiversity. Environmental / sustainability impact. Importantly, I don't understand how the local authority unilaterally handed over the land for a very low cost? I might have misunderstood but would have expected detailed consultation with the local community for this to have been agreed with Enfield residents? Also why are spurs able to develop on Greenbelt land whilst other planning applications have failed due to this policy? Many thanks, ██████	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEVc	I am writing to express my firm and heartfelt opposition to the proposed redevelopment of Whitewebbs Golf Course into additional training pitches for Tottenham Hotspur. This plan is not only unnecessary, given that the club already possesses a vast, gated training complex nearby, but also deeply damaging to our precious greenbelt. The redevelopment would: - Destroy irreplaceable green space - Result in the felling of mature trees - Displace wildlife and damage local biodiversity - Restrict public access to land that has long served the community - Increase traffic and strain local infrastructure As a local resident who regularly walks my two dogs in this area, I am deeply saddened by the prospect of losing public access to what has long been shared, open space. Tottenham Hotspur should be giving back to the community, not taking more from it. We do not need more private football pitches, increased traffic, or further urban sprawl in this area. What we need is leadership from our local council to preserve and protect the green spaces that make this borough a vibrant and healthy place to live. I urge the council to reject this proposal and to stand with residents in defending the long-term value of our greenbelt for people, for wildlife, and for future generations.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4Hs	Why is the default on "Support"? I will always reject this....i assume it's a big club, Tottenham? Spending large amounts of their money on a project that has no consideration for the impact on the nature and wildlife and the people who enjoy it....just the building of it will take years, impacts on local traffic, local people. I help run a youth football club and would never dream of building in this area. Desperately sad if it goes ahead. And if it does, it's purely about money.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyTF	Losing a large part of this newly rewilded space will be a significant loss in terms of biodiversity and also the mental and physical health of local residents.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGXS	As a born Londoner, shortly to be returning to London after 50 years away, it's hard to express the pleasure I've found in the changed management routines for London parks. Where once grass would have been manicured to the millimetre, & bedding plants ripped out and replaced 4 times a year, nature is being allowed to return. One of my great pleasures during hawthorn blossom time this spring was the walk along the Turkey Brook to Whitewebbs Park, through several miles of green wooded landscape and clean flowing water, accompanied by birdsong. So I was devastated to hear that there are plans to interrupt this continuous landscape of recovering nature with sports training facilities. Sir John Lawton has stated that we need more spaces for nature, that are bigger, better and more joined up. Agreeing to this proposal would take us in exactly the opposite direction.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eDDG	As a Londoner I value our local green spaces, not just for recreation but for their vital contribution to nature recovery. I therefore believe there are serious legal and environmental shortcomings in Enfield Council's handling of this application and associated conservation policies. Should the planning permission for Whitewebbs Park be upheld by the Greater London Authority, a completely detrimental precedent will be set for all parks and green spaces across the capital. The Public Interest Law Centre has even concluded that there will be 'no real protection in law for public parks'. I therefore request that this application should be refused under article 7 of the Mayor of London Order (2008).	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eD3h	I visit whitewebbs on a weekly basis to spend time with family and friends through walks and horse riding. London is rapidly losing its green space to development and this is yet another example. Approval of this proposal leaves other green public spaces open to development and further loss of green space, which would be devastating to the people of London and the wildlife that would also lose their homes.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHUP	██████ as a child frequently visited WHITEWEBB'S PK AND LOVED EXPLORING THE STREAM, OBSERVING ITS TINY CREATURES - BIG INFLUENCE IN MY ██████████. ██████████, so not been to Whitewebbs for that half century but happy memories.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyQ0	This is a beautiful wild area which many local people love for its untamed nature. We need green spaces! The proposal is crass, poorly designed and will destroy our heritage	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDRM	I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below. This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF). The required "Very Special Circumstances" (VSC) do not exist to justify overriding Green Belt protections. 2. Environmental and Ecological Destruction	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4zz	This proposed site will adversely impact biodiversity for decades to come. Moreover, it will create a floodplain onto Whitewebbs Road which already regularly floods. It is beyond comprehension that we would willingly destroy this ancient woodland when there are numerous other sites available to Spurs within a 2 mile radius. Appalling!!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eH73	Loss of golf course - loss of green space especially as the rest of the park has become completely overgrown - rent is far too cheap	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dyWR	I strongly object to the Spurs plans for Whitewebbs Park on multiple grounds including: TRAFFIC Horrendous to agree to this plan where traffic - therefore pollution - would increase significantly. Completely unacceptable. Ditto re the mouse pollution that wd be introduced to the nature reserve. I object to any increase in traffic and how it would raise pollution levels in the strongest terms. A SIGNIFICANT CHANGE in the atmosphere or ambience of the nature reserve: Spurs plans would alter the whole feel of this unique space. Whether by uptick in noise levels, parking congestion, degrading air quality, general increase in footfall round the proposed site, tranquility ruined, significant reduction in wildlife present, both short-term and long-term and generally a very unacceptable degradation of the ecological calibre of Whitewebbs. ENVIRONMENTAL impact: Unforgivable degradation of the unique and precious ecological status found in Whitewebbs. Precious Acid grassland, that I believe would be reduced by around 17 hectares. With such precious grassland - home to site specific plants including grasses - it is certainly not only plant life that would be decimated but the ALREADY struggling insects (populations in steep decline), that depends on the grassland. As well as associated important fungi, lichen etc. Acid grassland 'specialists' such as Linnet, Green woodpecker and Meadow Pipet would be greatly impacted. As would Green hairstreak butterfly and the Small Copper butterfly. One could devote pages and pages to the immense lifeforms found and often specifically dependant on acid grassland. Solitary bees would be adversely affected by disruption of the sand banks where they dwell. I think there is particular wild bee here that is quite rare, but I'm unable to recall the name. But any disruption, removal of dwelling habitat for bees or insects is completely outrageous for the sake of kicking balls on plastic AstroTurf. AstroTurf itself ought to be disallowed as a material throughout London given the leaching of plastic into our rivers and soil long-term. To introduce AstroTurf to a nature reserve is unthinkable and inexcusable. I cannot convey how strongly I object to all of such impacts that would result from the proposed Spurs plans. Please do not allow this proposal to go ahead. By any measure (other than that of business interests and increasing Spurs local commercial dominance) this proposal should go no further. I am entirely opposed to the proposals for Whitewebbs.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3TI	I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open spaces.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eBZe	Another example of putting profit over the planet.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3MH	A wonderful space for people to walk and enjoy , surrounded by nature , wildlife and trees , which support the environment and the many people who enjoy these surroundings , destroying it will have a massive impact on the area , biodiversity, the environment , the wildlife that inhabit this area . We need more places like	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFmc	This area is partly an abandoned golf course which is now a thriving nature park full of invertebrates and wild flowers, as well as mature trees, bushes and a lovely place to be to walk, picnic and enjoy nature. The destruction of Whitewebbs for Tottenham artificial pitches and other building construction will involve noise, tons of concrete and a total annihilation of a rare rewilded nature reserve in a densely populated is totally unconceivable and is devastation on a large scale. I believed that the London planners London, having so many beautiful parks, would cherish such a precious and loved beauty spot. There are many old industrial areas in Enfield which can be used for artificial pitches, buildings, including housing that do not affect the delicate balance in which our environment is struggling. Please consider my plea to reject the application made to use Whitewebbs and surrounding areas. Thank you.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9eF	This application does nothing for local enfield residents taking a well used green space and reducing access to a privileged few.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDmY	The ecological and environmental value of the site has been clearly demonstrated. The proposed scheme would be a huge loss.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIKM	I strongly object to this proposal. The removal of green space will impact the local community, increase mental health issues and have an adverse effect on the environment harming wildlife and increasing traffic and pollution. Taking away our green spaces to provide a training ground for an elite football club is unacceptable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3vR	I strongly object to the council giving away land to a private concern that was left in trust for public use. The destruction of the existing natural habitat for much wild life is nothing less than criminal.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGM3	The people of enfield have objected to this plan all along and the council has been ignoring them. Whitewebbs has a large reptile and amphibian population including protected species such as the greater creasted Newt and when asked about the council never gave me a satisfactory answer on what will be done to help protect them.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e4Hq	The proposed plans give the impression of being misleading & misrepresenting likely impact, employing buzzwords to make them sound in alignment with some healthy goals whilst avoiding addressing important questions. Please view these claims in the context of the past actions of those involved in the development & their failure to comply with promises in respect of those past developments. I endorse the following message & its concerns: I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCFG	Losing this space will have both an incredibly negative effect on the local community and bio diversity which in the current climate encouraging bio diversity and facilitating community engagement with open spaces is integral. Save Whitewebbs for people and nature. Thank you.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eBBO	The Right Hon.Mayor himself, knows and understands the importance of creating an environment that is befitting the legacy we OWE future generations-it was one of his points in his signing in speech in 2021 @ The Globe theatre - remember? So how does selling off of an extremely significant publicly owned green space to a Premier League Football Club sit in alignment with that? This proposal does not and cannot pass the test for exemptions (as outlined in the updated National Planning Policy Framework ,13. Para 142-160) and neither can it provide' very special circumstance', in either spirit or letter. It also runs counter to the Spatial development strategy (SDS) in multiple areas. Many of my fellow residents, have already pointed these out and I will not repeat here. THFC / TH Ltd simply cannot provide benefit to the public that clearly and overwhelmingly outweigh the unavoidable harm to this already wild and naturally rewilded, richly biodiverse, green rural public land, that their plan proposes. How is harm even to be calculated? I'm sure that is, in reality, an impossibility. Even if we could put numeric values onto the alleged 'benefits'; How do we put numeric value onto elements of multi-faceted, permanent and irretrievable harm to Whitewebbs, an important place for the public and for environmental reasons-a place that needs to be preserved NOT dished out to an international FC Mega Corp. under the leadership of a council who are consistently disregarding residents interests as well as the London Plan. (Indeed: Why DID they, (LBE Councillors under Nesil Caliskan) one day sitting in their Council towers decide; "Whitewebbs needs to GO"? What did it profit them, to assign such a significant public amenity to an entity that should simply be buying up private land at ordinary market prices if it indeed just wanted an extension to their training centre?) LB of Enfield is a barren deprived Borough, in many aspects, whose green space options are mostly by way of small, local, dull parks with little appeal, the loss of free unfettered uncontrolled access to Whitewebbs for, not just current residents but for all future generations (since the likelihood of this long lease ever reverting back to public hands would be slim to none) is, catastrophic and wholly unacceptable. This plan proposes to take over the majority of the land that is completely accessible and regularly enjoyed by humans (THFC/ TH Ltd are, I'm aware, continually attempting to minimise it by calling it 18% of the entire estate including the woodlands-but in reality, it is much more significant as anyone who uses Whitewebbs is aware; as the ancient forests is not the part that is accessible to all, the rewilded areas, paths and pond are -and THFC/ TH Ltd will be taking the vast majority of this) This plan would therefore massively reduce equality of access to green space. Myself and my dog (now an old boy) have utilised Whitewebbs regularly for more than a decade travelling to it by short car journey from Ponders End-where my local park (Durant's Park) provides an extremely dismal alternative. To imagine Whitewebbs being controlled by THFC is nightmarish and a massive downgrade for the Borough. This plan is not in line with the SDS in reducing health inequality and promoting health of Londoners and the inclusivity at the heart of the Mayors framework. Whitewebbs is within short transport of a huge urban population inc. significant deprived global majority communities most of whom have little access to natural open spaces. The mayor's vision of inclusivity and fairness does not sit well with selling off of these rare types of spaces. ~~Health, both physical and mental, is a critical need and natural outdoor spaces like Whitewebbs which are free to access and not in private ownership are~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dahH	I object to the environmental impact this would have with its effect on nature, diversity and the loss of accessibility of green/open space. The remains of our natural surroundings should be enhanced and encouraged, not chopped up to fit in with a mere cheap means for the council to offload their failure of care.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyZc	Please reject this application and allow the community to continue to benefit from Whitewebbs Park as the essential green space that it is. I've been walking through Whitewebbs for decades. The space and green that it provides has helped me (and, I'm sure, many others) through some difficult times. Throughout the COVID pandemic the park was a real breath of fresh air, both literally, and also for my mental health. Whitewebbs has been rewilding since it stopped operating as a golf course and it is more beautiful than ever. The sounds and sights of wildlife are wonderful. It really is a revitalising place, a big green set of lungs, with a community feel, a place to meet people, or enjoy space and time alone. Please don't allow the land to be taken and turned into pitches, destroying and disrupting habitats and removing a large chunk of this vital local resource.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e2cu	Objection to a change in use as I visit this beautiful space with my grandson and family, this will be a devastating loss of beauty open space and biodiversity	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010el2Z	It would be a really devastating blow to wildlife to lose this park. Spurs already have nearly 20 training pitches and the most of any other premier league club. They do need need more at the expense of this area.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dsVa	I strongly object to this change of use. It will be at high cost to our local environment. There are many well established and thriving ancient trees that would be removed. The fields and hedges are home to precious wildlife. It will cause congestion on our roads and increase pollution levels. There is not the infrastructure so it will put extreme pressure on our already overloaded doctors, hospitals and schools. It is part of our heritage, it is the parks and open spaces that makes Enfield so popular.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eFgD	I urge you to reject this application. Whitewebbs is a beautiful open space which is becoming more and more beautiful though natural re-wilding. It is a 'lung' in Enfield. Please don't allow it to be taken away by multi-millionaires for the use of a few. Please think about quality of life, not money.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGgr	The climate is in breakdown, thanks to human intervention. Given that truth, why not fell a couple of hundred mature trees, pave a large area with concrete, destroy many acres of greenbelt, evict the legitimate residents, the flora and fauna - and be happy we have more room to kick a ball about?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFeb	We have been loosing the battle to keep the planet a safe place to live, so many measures to try to keep London more "green"... and then a private company taking over such a massive area to have they own football pitches? Please be reasonable and just say NOOOOOO	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEvO	Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit, I wanted to write to you in regard to the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club. On a personal note, Whitewebbs Park has offered me wild nature, similar to what might be found in the Countryside, the spacious type to get lost in, comparable in character to Hampstead Heath or Richmond Park. Whitewebbs Park has been my sanctuary since moving back to my hometown of Enfield in 2021. Witnessing a green space naturally restoring and renewing itself has brought me respite and a glimmer of hope against the climate change anxiety that weighs so heavily and a welcome contrast to the treeless main road I live by. Enfield Council do not see the value of the incredibly rare and beautiful space that Whitewebbs Park is. I have no future plans to leave London and am wholly committed to the thriving of my Town and Borough. The proposed privatisation of 50% of the open grassland of Whitewebbs Park casts a dark shadow over Enfield's future. As local residents, we are meant to be represented by our Councillors, we have not felt heard. We need to know that we can live in London and easily and freely access and continue to roam in our existing, open public land which we have become intrinsically attached to and part of. The flattening of the land, building of football pitches and fence boundaries will drastically alter the open views and cause ecological damage to the rewilded grassland, this would be a major loss to all. Sam Tillbrook, who represents the Guardians of Whitewebbs, has brought to your attention further aspects of the planning application which outline specific points for dispute. I want to say I agree with all that he has raised and echo his request that this planning application be called in and rejected for the benefit of all, not just the few. [REDACTED] [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEs9	Yet another public green space being developed under the current council - please stop	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFjM	Please do not let multimillion companies start buying up our spaces for all of us. Please read my short attached letter.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8UD	I object because I cannot condone the destruction of an important natural habitat due to corporate greed	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIAc	Since it was left to rewild, the former golf course has become one of the best open spaces in North London, a wonderful haven for wildlife - birds, insects, wild flowers and trees. It rivals Hampstead Heath for its mix of open meadows and woodland, and forms a continuous area of open land linking Archers Wood with Whitewebbs and Forty Hall. This proposal would completely ruin that, driving a wedge of unnecessary development right through the area. It might be different if it was much-needed housing, but football training grounds? For a huge commercial entity? The loss of amenity, biodiversity and green space seems in no way worth it.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGAh	It is completely unacceptable to build on this green open space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e3kF	•I have collaborated with the Woodland Trust in a voluntary capacity on ensuring the valuable trees within Whitewebbs Park are protected for the future through the Ancient Tree Inventory ("ATI"). •On reviewing the planning application documents, I was concerned that the extent of damage to ancient woodland and other irreplaceable habitats including veteran trees was significant but not easily identifiable in one place within the documents. •I have prepared the attached table as a visual aid to demonstrate the significant impact the proposed development will have on irreplaceable habitats. •The data in the table is taken from the Tree Survey Schedule at Appendix 1 of THFC's Arboricultural Impact Assessment (July 2024). •I have collated the information for and added the following columns: o"Likely Impacted": the likely impact on the tree of the proposed development, which the following options: x = no impact, Impacted = impacted but retained, Removed = slated for removal as part of the application. o"ATI No.": the tree's identifier number on the ATI. o"ATI Status": status on the ATI: veteran, notable or ancient. o"Within Ancient Woodland": indicates whether the tree is located within Whitewebbs Ancient Woodland ("WAW"). •The information from the additional column "Likely Impacted" is taken from the "Tree Implications" section of the Assessment, at 4.5-4.99. The information on ATI status is taken directly from the ATI. •The Logika Ecology (2024) surveys for the site indicate that 11 bat species are present within Whitewebbs Park. This includes bat species such as the Daubenton's bat that feed on the woodland lake surface, the species is likely to be under represented in the non-water side surveys undertaken. •Whitewebbs Park is adjacent to two Metropolitan Sites of Importance for Nature Conservation. The Whitewebbs parkland is likely to make up part of a core foraging area (the Core Sustenance Zone - CSZ). This area provides the food that bats need to feed their young without having to commute large distances. Loss or reduction of this foraging area could therefore result in a loss of a roost. •The proposals are likely to impact on species found that are supported by the habitats that exist at Whitewebbs Park and in the Metropolitan SINCS that are adjacent to the proposals. The table exists as an excel document; uploads are only permitted by certain file types. A PDF version is uploaded. An excel file is available if requested. •I would request that this table is considered as part of the planning application, alongside the objections of the Woodland Trust and others in relation to the damage to veteran trees, ancient woodland, and historic parkland, and that the application is refused because of the impact the proposals will have to these irreplaceable habitats.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eDmJ	Dear Secretary of State, Re: Whitewebbs Park, Enfield https://planapps.london.gov.uk/planningapps/24-00987-FUL The marketing of the park by Enfield Council included the following comments. "In these times of austerity, the Council needs to be creative about how to keep spaces like Whitewebbs sustainable for continued public leisure use...The Council is seeking leisure providers to submit creative bids for the use of the site and will ensure the use demonstrates a wider and inclusive benefit to the local community...As part of any agreement, the council will require the current level of public access across the park to be maintained." The proposed Women Training Facilities by Tottenham Hotspur do not ensure public access to the land as outlined in the original 'tender' and will result in the public not being able to access the land. The proposals will result in the public preventing from accessing a public park. The public part status means that the public have always had access to the site. Therefore, there has been no need to ensure that public footpaths, permissive paths and rights of way have had to be enforced. Currently members of the public have access, north – south across the site from Clay Hill to Whitewebbs Lane with its status as a public park. With the changes that are proposed then the public access from Clay Hill to Whitewebbs Lane will no longer be available to members of the public. The public have had this access since the 1930s when the public park was created. The plans stop this access for members of the public. Access across to the site for public recreation will no longer be available with the proposed plans to provide extensive fencing, security lodges. Very special circumstances are required for building on this area of the green belt. Planning permission is required to provide Section 106 arrangements. These section 106 arrangements are aimed at benefitting a very small number of service users linked to the women's training facility e.g. school groups. These do not benefit the wider community and are targeted at those invited to play and participate at the training facilities. These Section 106 agreements are not legally binding, other members of the local community will not be able to participate in using the private training pitches, the current training pitches at the current centre could provide these proposed Section 106 agreements. Extensive redevelopments on site, include expanding the current built space, including an indoor swimming pool and 5m high ball stop features in addition to the fencing and security required. The openness of the green belt at this site will be lost with this enclosure for the training facilities. The area is part of the rural parklands as noted and is within the designated Are of Special Character and a local heritage asset. The AOSC was designated through the 1994 Unitary Development Plan following recommendation by the Countryside Commission, English Nature, English Heritage and the London Ecology Unit based on its combined landscape, historical and nature conservation interests. The AoSC recommends and considers Whitewebbs an important asset, ranking alongside 9 other distinctive areas within Enfield that should be protected for their 'exceptional landscape' character traits. There are undulating views across the Whitewebbs Parkland, extensive tree planting across the site to meet BNG targets will destroy these views. ~~The proposals for fencing and ball stop features will also impact upon these views.~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDTY	Recent Logika Biodiversity surveys for the site note that 11 bat species are found in the locality from the surveys. This includes records for the Barbastelle Species. Page 89 of the document. The Forty Hall Management Plan indicates that a record for the Barbastelle bat was found in Forty Hall Surveys. Please can this be considered by the Mayor when considering the planning. Could the importance of this site for Bat Activity and the wider landscape also be considered. Floodlights and 5m tall ball stops are planned for the site which may impact on these species. What impacts will this have on the species found at Whitewebbs Park and in Forty Hall. Research indicates that in order for a bat roost to survive bats need to have access to foraging within a core distance from their roost. This core foraging area (the Core Sustainance Zone - CSZ) provides the food that bats need to feed their young without having to commute large distances. Loss or reduction of this foraging area could therefore result in a loss of a roost. Please could these records and species present within the wider country parkland be considered, along with the impacts of the proposed plans on the species in and around this parkland.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eEbi	. Re: Whitewebbs Park, Enfield https://planapps.london.gov.uk/planningapps/24-00987-FUL The area is a well used local public asset that Enfield Council have tendered for public use due to financial issues. The marketing of the park by Enfield Council included the following comments. "In these times of austerity, the Council needs to be creative about how to keep spaces like Whitewebbs sustainable for continued public leisure use... The Council is seeking leisure providers to submit creative bids for the use of the site and will ensure the use demonstrates a wider and inclusive benefit to the local community... As part of any agreement, the council will require the current level of public access across the park to be maintained." The proposed Women Training Facilities by Tottenham Hotspur do not ensure public access to the land as outlined in the original 'tender' and will result in the public not being able to access the land. The proposals will result in the public preventing from accessing a public park. The public park status means that the public have always had access to the site. Therefore, there has been no need to ensure that public footpaths, permissive paths and rights of way have had to be enforced. Currently members of the public have access, north – south across the site from Clay Hill to Whitewebbs Lane with its status as a public park. With the changes that are proposed then the public access from Clay Hill to Whitewebbs Lane will no longer be available to members of the public. The public have had this access since the 1930s when the public park was created. The plans stop this access for members of the public. Access across to the site for public recreation will no longer be available with the proposed plans to provide extensive fencing, security lodges. Very special circumstances are required for building on this area of the green belt. Planning permission is required to provide Section 106 arrangements. These section 106 arrangements are aimed at benefitting a very small number of service users linked to the women's training facility e.g. school groups. These do not benefit the wider community and are targeted at those invited to play and participate at the training facilities. These Section 106 agreements are not legally binding, other members of the local community will not be able to participate in using the private training pitches, the current training pitches at the current centre could provide these proposed Section 106 agreements. Extensive redevelopments on site, include expanding the current built space, including an indoor swimming pool and 5m high ball stop features in addition to the fencing and security required. The openness of the green belt at this site will be lost with this enclosure for the training facilities. The area is part of the rural parklands as noted and is within the designated Area of Special Character and a local heritage asset. The AOSC was designated through the 1994 Unitary Development Plan following recommendation by the Countryside Commission, English Nature, English Heritage and the London Ecology Unit based on its combined landscape, historical and nature conservation interests. The AoSC recommends and considers Whitewebbs an important asset, ranking alongside 9 other distinctive areas within Enfield that should be protected for their 'exceptional landscape' character traits. ~~These arrangements, including extensive tree planting across the site to meet BNG targets, will destroy these views.~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eD3f	The proposed development of public land by a private corporate body is, primarily, illegal. This is an outrageous calumny perpetrated by so-called public servants (Enfield Council) in cahoots with a shady multi national corporation(ENIC). It flies in the face of all current thinking On matters environmental. I trust Mr Khan will make the only sane decision and veto this disgraceful prospect.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dxC6	The Whitewebbs oak is already lost. Please do not tear up public open space and put it behind fences.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4kq	I object to this plan because of the detrimental impact it will have on the environment and flora and fauna of the area and its surroundings - I know this area and I hope you will take these issues into account.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCyt	This should remain as public space. I am a Spurs fan and season ticket holder but still believe that they have enough space already and residents will be missing out. Please protect this amazing space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBQD	Half of Whitewebbs Park's naturally rewilded biodiverse grassland and over two hundred trees, including veteran trees (as verified by The Woodland Trust ATI), stand to be lost (and a further 40 transplanted) with this project eliminating habitats for priority species. London's Green Belt Review has been 'accelerated' in Enfield, risking a rushed process that fails to adequately assess the value of the Green Belt, not just to the borough, but as a vital green lung for London during a climate and ecological emergency. Piecemeal, partial and rushed assessments are inadequate in such circumstances; risking the loss of some of the capital's most nature-rich sites, contrary to your stated objectives in the London Plan. Please let nature thrive, we desperately need to value nature above economic interests!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dwTQ	I object to the planned proposal of Tottenham Hotspur Football Club's planning application. Whitewebbs Park, a 240-acre public open space in Enfield, North London, is part of London's Green Belt and has been a public recreational area since its purchase by Middlesex County Council in 1931 for community benefit. The park, which includes ancient woodland, streams, and a former golf course that closed in 2021, has naturally rewilded, becoming a biodiversity hotspot with species like bats, newts, grass snakes, and rare bees which all need to be protected. The Guardian of Whitewebbs vision of an inclusive hub aligns with the park's original 1931 purpose as a public recreational space, opposing developments that would restrict access through fencing or elite-only facilities. We need to preserve and protect these areas not destroy and build upon them.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDBL	Dear Sadiq Khan, Please step in and stop Enfield council from leasing most of Whitewebbs park to Spurs football club. The detrimental effect on the environment will be immeasurable and irreversible. This park is unique and needs to be protected at all costs. Please make this possible. Yours Sincerely, [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e1AN	This cannot go ahead	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eC9N	Whitewebbs is not for lease it was given to residents to enjoy and Enfield Council are guardians not for them to lease it out. We need our green spaces also wildlife do as well. Not to be covered in artificial grass denying insects etc their habitat. Please think long and hard what you are taking away . Enfield Council folks who work there has no history but us residents do and we don't want our green spaces taken away by a football club who should look at their own town Tottenham to progress the women's football	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e5kH	Taking away a public amenity where there is plenty of other non public land in the immediate vicinity	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3sw	Spurs has enough pitches, the wildlife should be left as it is and Whitewebbs should remain a green space for the community to enjoy. So many rare species have returned to the park. It is a disgrace that the space is even being considered for development. Let nature rebuild itself for once. Stop putting profit over nature.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIKO	Whitewebbs is an important site for biodiversity in a part of London that doesn't have a huge amount of green space. At a time when nature is under threat across the UK, it would be a real tragedy if it was developed.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dxjk	Whitewebbs is a beautiful much loved area of incredible natural beauty with an amazingly diverse rewilded area that thrives with nature: birds, bees, bats, beavers and more. The ancient woodland and hundreds of mature trees that also grow on the area Tottenham Hotspur football club is proposing to take over, are irreplaceable, and provide a wealth of benefits for the surroundings and the borough as a whole. Whitewebbs is a place where residents can walk and exercise in peace - invaluable for health and wellbeing. Whitewebbs is the lungs of Enfield, a borough with three heavily congested polluting roads: the A10, the A406 and the A105 as well as the M25 to the north. The trees here go some way to neutralise the carbon those roads produce! This is public land and should not be handed over to Tottenham Football club for a pitiful fee that will do very little to help the council financially. Mayor, please reconsider this terrible deal. Keep this beautiful park safe for the people of Enfield! Note: If you support it going ahead, I urge you to reconsider and insist of a renegotiation of the deal and there needs to be much more compromise with nature and a real plan to safeguard and look after the land for the people of the borough for future generations.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eEs3	Multiple reasons for objecting. Damage to existing wildlife and habitats. The destruction of trees (137 to be felled), grassland (50% to be replaced by monoculture football pitches and astroturfing) and sand bunkers, will destroy an ecosystem that houses an abundance of birds, insects and wildlife. Loss of much loved green and open space. Enfield Council's current draft Local plan states that development on the site "must maximise publicly accessible space". There will, in fact, be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park. Any Green Belt destruction is out of keeping with the Mayor of London's (Sadiq Khan) London Plan 2021 policy. Change of Use for Private Usage Whitewebbs is intended for recreational and leisure use already and should not be rescheduled for private use by professional elite athletes. Please don't destroy our beloved Whitewebbs.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEdh	There is no need for this. They can utilise pitches in existence already. The negative impact on nature both wildlife and habitat is unwanted. The area is used by many as an open space to relax and enjoy nature. With the local plans for the building of thousands of houses on greenbelt land near by means open green space is at a premium. We need to keep as much of open recreational spaces that we can. Whilst the area needs maintenance, surely this can be achieved by other and more environmentally focused means. Destroying ancient trees to plant new ones makes little sense. Uprooting nature for a select few tp benefit seems illogical. Let everyone/nature enjoy all of the space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFZU	Firstly Tottenham already have a number of pitches adjacent to this site. By taking a small piece of land they could build changing rooms, etc for women if they cant share facilities already in existence. Next, they wish to take public land away from the public and give it to a select few. Enfield council have plans to bulid thousands of homes roughly half a mile away on "greenbelt" land removing thriving businesses. It is known that us humans value open spaces for recreational purposes. Where will these additional residents be able to get their open space if the current space of reduced for private venture? Nature is abundant in this space currently. Destroying habitats, removing mature trees and grassland will have a devastating effect on nature. Sure things will recover eventually, but dont we need to preserve the situation rather than rip it up and start again? Building football pitches cant really be seen as preserving public open spaces for the use of all. Currently horse riders, dog owners/walkers. Families, walking groups. Nature groups, individuals of all types use the area as a resource. Bringing disruption to a tranquil area in London appears contrary to building a better environment in my view.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8qN	The destruction of such an important and valuable existing ecosystem should not be considered. It's not possible to reproduce these conditions. The loss to biodiversity would be far too great in a city already so lacking.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyR6	I trust you to consider the extensive, articulate and extremely serious objections raised to this plan, over a long period by local residents, ecologists, environmentalists and the huge, Whitewebbs community Please make the right decision to reject this planning application. Thank [REDACTED] [REDACTED] [REDACTED] [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFUp	Please ensure that Whitewebbs remains a biodiverse and community space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eCqj	Dear Mayor of London, GLA Planning Team and Secretary of State, Planning Casework Unit, I am writing to formally request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons identified below. A report already commissioned by the Greater London Authority (GLA), concludes that the proposed development constitutes "inappropriate development" within the Green Belt. I would like to draw your attention to the Stage 1 response (REF: GLA/2024/0213/S1/01). It then goes on to state that "very special circumstances" must be demonstrated to justify the development and it is my firm belief that that the application fails to do so and will result in a net loss rather than any perceived gains. I strongly oppose this planning application. The proposed development contradicts the purpose of Green Belt protections. A consequence of this would be irreversible ecological damage and imposed restrictions on public rights of access in a much more intrusive way than was ever the case even when operated as a golf course. As it stands currently Whitewebbs Park is fully accessible. I have been walking in Whitewebbs Park for as long as I can remember from a very young age. It is my view, and I don't doubt that of many others, a gem at the edge of Enfield. I find it a place of tranquillity where I can unwind and clearly my thoughts while being surrounded in nature. It is one of a few places I truly enjoy visiting. The Covid-19 pandemic reinforced how important spaces like these are for mental health and social wellbeing, yet the social value of the park has been widely ignored in this proposal. It's worth remembering that when Whitewebbs Park was originally purchased under the then Middlesex County Council in 1931, being acquired for the benefit of the public and not the interest of private entities at the expense of public access. Ever since Enfield Council first announced its intention to lease out the site, I have been deeply concerned about the future of Whitewebbs Park, then after it was publicly announced, that it would be leased to THFC further fuel my anxiety. From looking to their existing football academy, imposing steel fences with privacy screens provide a clear insight into how Whitewebbs Park may look. An enclosed space that erodes the open characteristics of scenic views, an element that should be preserved in line with the Enfield Local Plan. A counterargument is that the operational boundary only covers around 20% of the leased area however this overlooks a critical point, the precedent it sets for enabling future expansion thus further loss of public space. Not forgetting the intensive groundworks required on the naturally sloping site to accommodate 11 football pitches. The area is a common site for rabbits and red kites flying overhead. Last but by no means least is the 207 trees that will be felled under these proposals, several of which are classified as veteran. The long-term implications will be both visual and physical, exceeding far beyond the 25-year agreed lease. The Forty Hall Beaver enclosure sits no more than 10 meters away from the proposal site and will experience increased noise levels during and after the landscaping works have been completed. In the long term it increases the risk of the beavers becoming distressed, which could have knock on consequences for their overall health. I acknowledge that for years the area served as a public golf course since its formal closure in 2021, but most indicators of this prior use case have been removed. Since then, the land has been given the opportunity to naturally rebuild itself. Fortunately, I have had the pleasure of witnessing	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAlj	I am Enfieldian born and bred and am proud of Enfield's green spaces especially Whitewebbs Park the Lungs of Enfield but am sad that a multi million pound premier league club wants to destroy the park me and my ancestors have grown up using. A premier league club like Tottenham Hotspur have the money to buy land elsewhere why do they need destroy ancient woodland for plastic pitches for 'women's football' when we all know that they really need more pitches to cater for NFL teams to train on when the play at Tottenham Hotspur Football stadium, please Sadiq Khan do not let this application destroy our greenbelt, our Park which was gifted to the people of Enfield, and our nature and biodiversity it will never recover if their habitat is destroyed, and how this will effect our Beavers too. Ask yourself what's in it for the people of Enfield if you approve this application? absolutely nothing from Tottenham Hotspur the only people who will benefit are the Enfield Labour councillors who get given freebies from Tottenham Hotspur to sweeten the deal, with no benefit to the local community at all. Please do the right thing and reject this application.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAkc	I am appalled by the plans to lose this incredibly biodiverse space, which simply will be lost with the new work suggested. It should be protected as a nature reserve, which is currently has the capacity to be with its abundance of wildlife across the whole site, and retained as a public resource. We have to protect nature as we are eroding it and causing irreversible damage. Please support the green space that we all so desperately need not just now, but in the future as a refuge and for pollinators who will provide us with vital Food sources in the future.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyrB	Since being left unmanaged, the former golf club has naturally re-wilded and offers a space for nature to recover and flourish. If thought about creatively, the space could be connected with other nearby parks to create a wildlife corridor. The UK's biodiversity is under serious threat and in a rapidly changing climate we need to do everything we can to improve nature's resilience. Going ahead with this proposal would provide very little benefit either to London or the local community but would have a significant and negative environmental impact, whereas if the land was left and protected as a nature reserve, it would have a a huge and lasting positive impact. The recent destruction of a mature tree shows how the developers assurances to "offset" the harm of th3 development can't be trusted. I strongly object to this proposal	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyTE	I whole heartedly object to this proposal. Whilst I'm sure sufficient palms have been greased to ignore not only the objections but also and primarily the devastating impact this proposal will cause, I state my objection none-the-less.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e208	I'll admit, I only visited Whitewebbs for the first time recently, but I was blown away to see nature recovering on this former golf course. Tiny oaks trees growing up through the grass, and an abundance for butterflies and damson flies. London needs as many of these pockets of biodiversity as possible. Not only is it essential to tackle the ecological crisis, but it's also important for human health. Many studies show that time walking, cycling and running in green spaces has benefits for both mental and physical health. We need proper big open, sometimes messy, green spaces, where nature can thrive. Not manicured, tidy green spaces where trees are put in convenient locations, "weeds" are sprayed with chemicals and commercial interest take priority over allowing nature to recover. I'll definitely be back to this park. I just hope it is kept as a space for nature.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCMM	I use this area for running and the loss of such a large part of it would be a big loss. The area should be kept as a full green space for all to use and enjoy. Tottenham Hotspur have enough pitches at their training ground.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFRn	OBJECTION to planning application 24/00987/FUL Dear Mayor of London/GLA Planning Team, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). I have friends in the area who I stay with frequently. I am worried about a dereliction by councils to do their duty with regard to natural resources and resilience particularly when faced with applications of this magnitude. I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. It also sadly appears to have been aided by Enfield Council; a proposition backed up by the council's lack of due process in regard to biodiversity assessments necessary to consider the application This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. In 2020 Enfield Council failed in its obligations to satisfactorily fulfill procedures when carrying out its most recent SINC review. Guardians of Whitewebbs formally complained that this created or formed part of a conflict of interest in regard to the change of land designations in the new Enfield Local Plan. There was also extreme concern that Enfield council then rushed the application (24/0987/FUL through the Development Management Stage, with an eye on completing before Stage 2 Enfield Local Plan hearing took place. This is unacceptable At a time when local government as well as central government must quite rightly take legally binding 2030 biodiversity targets majorly into consideration, this failure to do so constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, as well as a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be seriously considered to be prejudiced. ~~In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eF5Q	This application must be rejected because the whole proposal, a pet project of the previous Council Leader, was fraudulently based on massively misleading financial data. In March 2021 the Council claimed that the former golf course had lost £1.3M over the previous six years and must be closed. The financial accounting figures were questioned by the opposition but the Council Leader insisted that this loss was real. I submitted a complaint, pointing out that according to accountancy training Financial Results must not be used to justify this sort of decision. In reality the financial loss of operating the golf course over this period was only £0.1M (reasons: the Financial Result included an irrelevant capital adjustment of £0.1M, fictitious depreciation of £0.6M and an arbitrary allocation of Overheads of £0.4M). The Council vehemently denied this to me and later to the Ombudsman. However, after I made a complaint to the qualifying accounting body (CIPFA) for each of three successive Directors of Finance the response of one admitted that when working on my FOI request in June 2021 the Council had to admit to itself that the real loss was indeed only £0.1M. The Council did not inform me of this admission, nor did it inform the misinformed decision makers of three months earlier or the employees working in the 9 jobs cancelled. More importantly, for five of the six years, the course had been using ancient motorised equipment which made profitability impossible. This 13+ year old equipment was belatedly replaced in 2019, the huge financial benefit of this change (increased revenues) appeared in 2020 when the much-improved course was operating before and between lockdowns. A conservative forecast from this data indicates an ongoing profitability of over £0.14M/year. This is more than the 6-year historic loss above and, allowing for inflation, more than three times more than the £2M revenue from the proposed 25 year Spurs deal. A reopened golf course (a very realistic option according to my professional contacts) would provide much more money for ongoing maintenance and improvements to the park with none of the horrendous disadvantages of the Spurs deal. Unlike most golf courses this one has always been open to the public to walk around. I have documentary proof of all the above (and much, much more). so I have relevant accounting knowledge.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDBK	I am objecting to the construction of this football training academy by THFC at Whitewebbs Park. The site should not be available to be converted for private use, in this case for a restricted number of elite sportswomen. The environmental damage should not even be considered an acceptable price. As custodians of the planet we should be protecting the nature we are lucky enough to have in our borough, Whitewebbs has a plethora of significant wildlife, particularly flora. This planning application fails on all levels. I don't even comprehend how it has progressed thus far. This planning application should be denied.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAex	I lived here most of my life and my family still do. I was brought up with visits to whitewebb regularly, my grandad was a keen golfer and loved the place! It is a stunningly beautiful landscape and should be looked after and appreciated for years to come by the general public.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010kW6c	This is green belt and should be kept as natural green space for everyone to enjoy.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010doOe	Please stop this loss of public access to park space and destruction of biodiversity on parkland. Love this park and cannot understand your reasons for destroying it and covering it with inaccessible astroturf for hardly any rent. The damage to the local environment will be permanent please reconsider. Thanks	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9o0	Loss of park land available to public. Flood lights. Environmental impact from naturel habitats to fake grass, and football pitches	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEZL	The whole area requires an environmental survey as it is full of bird, insect and plant life. One protected tree has already been felled, how many other trees in white webs should be protected. Football pitches will not maintain any wildlife so you will loose the hedgerows, trees and grasses which home many creatures. It is one of the few big Green spaces left in Enfield and you are going to take it away from the millions of people who use it daily and enjoy the non built up space. The rest of Enfield is grey and built up don't take this away also! Our children and children's children should be able to keep this special place, I have walked visited here with my grandparents and I don't want to loose it.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eE7F	I visit this parkland at least 3 times a week for my mental health. This place is both peaceful, green, calming a natural open space that connects to Forty Hall Estate. It is a green corridor and essential for wild life, insects and nature. Since it had been rewilded we have seen many benefits. It's an absolute must for ecology and our local environment. It was left to the People of Enfield to enjoy by a local philanthropist, and we have been making use of it for decades. Tottenham Hotspur do not need this land, they have adequate space for women's pitches at the site behind white webbs where the men train. No other women's training ground has 11 pitches. Spurs could easily find other land that isn't local parkland. The pitches astro turf will pollute and ruin the land. The plastic has been proven elsewhere where to seep into the ground beneath, this would run into the river that connects to Forty Hall where Beavers are being rewilded. The lose of our local green spaces would have a devastating impact on the local community and for what? Half of white webbs would be desimated for eternity. Pollution irreversible. Trees cut down, landscape cut up. Light pollution from the pitches and floodlights. This would be seen for miles. Disturbing wildlife and local residents. Tottenham must not be allowed to grab our parkland. It is a land grab and the council are giving it to them for a token amount? Once gone this land will never be given back to us the residents to whom it was left too and we cherish it immensely. Large corporate Businesses should not be allowed to take our green belt. This must be stopped or you will use this as a precedent and no green spaces will be left only concrete and plastic. Pollution will increase, air quality diminish and where will the local people go when they need to be in nature, walk, run, meet friends, go with families somewhere they can be without spending large amounts of money. This land is our land, it's part of Enfield. If you allow Tottenham Hotspur a multi million pound business to take it, it will mean 50 per cent of our land will no longer be accessible only there for the few to use. Trees will be cut down and land flattened it is a crime against ecology and humanity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEtB	Over 204 ancient oak trees will be felled by these plans. Numerous bat species, birds, bees, deer, flora and diverse plants will be impacted negatively. The area is an ULEZ zone near the M25. Pollution and drainage to the area (already often flooded in the rain), will be exacerbated. All of this doesn't take into account the impact on the community who use it for mental and physical health support. It also seems counter intuitive when the environment is due to hit 4% warming by the year 2100 (according to latest IEA report) with loss of 95% biodiversity that such a plan to destroy acres of ancient trees and greenery could even be considered. It seems even more counterintuitive when acres of flat and unused brown field land lies unused less than 0.6 miles away at the site of the abandoned Netfix site that could be used by Tottenham Hotspur's. It seems grossly negligent to the environment to go ahead to destroy this parkland in these circumstances.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGFf	This loss of this area would be catastrophic for biodiversity and an impact to the environment (loss of ancient trees, flora and fauna). It would dramatically increase the impact of CO2 emissions from the close by M25. Once lost, we cannot replace these trees that are hundred of years old nor the homes for many diverse species including several bee varieties not often now seen in the UK, bat species, rare birds and birds of prey. This decision will have an impact for hundreds of years to come.... All for the sake of satisfying the immediate greed of a football club. If the land were being used for schools, hospitals or social housing... it would be more understandable. But for acres of Astro turf? That would be absolutely not understandable and would seem cavalier in the extreme.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dzQT	This decision will have such a detrimental impact on biodiversity, loss of space for the community and most of all will have such negative consequences for the environment. This adds zero to the local community but it takes away so much, not only in terms of immediate access for leisure and access to nature, but more importantly for decades to come in terms of the irreversible impact on biodiversity and the local environment. Please please please rethink this!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3MN	Tragic and will be felt for years to come if this mindlessly goes through. Please think long and hard.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9Wd	Why destroy a rewilded golf course to extend an already huge and state of the art football training ground, felling 265 trees, when there is an abandoned relandscaped space less than .5 miles away	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFct	I have so many reasons to object to this planning application. This is a public open space. Spurs already have a training ground adjacent to this site. There is high security, tall earth mounds and fencing on the boundary and huge spot lights, absolutely no access to the public, visual or physical. They plan to develop our precious Whitewebbs in a similar way, destroying the natural landscape, replacing it with football pitches and buildings, with no respect to the environment of wild life. We have recently seen an example of the lack of importance Spurs show to nature in the cutting down of the ancient oak, in Whitewebbs. This tree was in close proximity to the 'ancient carriage way' that Spurs plan to 'restore', my concern is that this restoration would result in what is now a footpath being turned into a 'carriage way' for today's vehicles. An exclusive woman's training ground, for Spurs, is not an acceptable plan for our Whitewebbs.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDy2	This shouldn't go ahead	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dreh	You must reject this application, this proposal would be devastating for the community and for the natural world, biodiversity and the environment.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dtps	I strongly oppose planning application 24/00987/FUL for the proposed development by Tottenham Hotspur at Whitewebbs Park. This plan represents the loss of something that should never have been up for negotiation—public land, ancient woodland, and open access to nature. Whitewebbs is not just a pleasant park; it is a vital green space that serves the mental and physical wellbeing of thousands of residents, including families, carers, older people and children. It is free, accessible, and deeply valued by the local community. The proposed development would strip away public access, damage a protected and irreplaceable ecosystem, and hand over a community resource to private interests. Over 200 trees could be lost, ancient oak root systems disrupted, and critical wildlife corridors destroyed. The scale of environmental harm is alarming and, frankly, irresponsible in the current climate crisis. There is no justification for removing access from the public, restricting entry, managing car parks for profit, and disrupting a fragile natural habitat—all for the benefit of a private football club. Once the damage is done, it cannot be undone. This sets a dangerous precedent for the loss of other green spaces across London. I urge you in the strongest possible terms to reject this application and protect Whitewebbs Park—for nature, for the community, and for the generations to come.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCiA	Objection	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9Sm	Public access to green spaces must be protected; please prioritise people and animals over corporate greed.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBmO	Unhindered public access to green spaces is vital and must not be ignored. Please put people and biodiversity over profit and privatisation.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBJP	I want the Planning Application 24/00987/FUL to be rejected. Should this application be approved, I believe the outcome would inflict an immense amount of distrust, outrage and anger amongst the local community. I have been amazed by the oppositional response of the local community, voiced mainly through groups such as Guardians of Whitewebbs and Friends of Whitewebbs Park, to this planning proposal. Equally, however, there are many Enfield residents, including many friends of mine, that are misinformed or unaware of the proposed application and how it may affect them. Common statements I hear made when I bring up this topic include the untrue belief that the area Spurs want to lease – a former golf course – encompasses an existing private area. Consequently, this belief implies that there is no difference between the handover of private land to another private entity. These sorts of statements are far from the truth; but are understandable given both Tottenham Hotspur Football Club (THFC) and Enfield Council's lack of transparency regarding this issue. As I am sure many have already commented on this PlanApps site, the site that THFC are aiming to purchase has been in public ownership since 1931, when the Council purchased the space for the benefit of community and nature. This has always been the case since then, even when there was a functioning golf course, which still allowed both people and wildlife to cross over when there was no golf being played. The original lease for Whitewebbs Park, which was agreed on a term of 999 years, said that if the golf course were to close, the Park would revert to public use. This application would disturb these original terms. Despite the misconceptions of some, as this campaign has become increasingly popular, many people are furthering their understanding of how the application, predominantly liaised between THFC, it's subsidiaries and Enfield Council has been negotiated in such a way that really pushes at the borders of legality. The most blatant recent example of this has been the outright illegal felling of a 500-year-old oak tree, growing near the vicinity of the Toby Carvery in Whitewebbs Park. As I am sure you will have seen if you are reading this, this story reached national headlines and, as it stands, a petition named 'Justice for the Whitewebbs Oak' has received over 50,000 signatories. Despite this grievous harm inflicted on a valuable, living organ of local heritage, justice has not been enacted as the Metropolitan Police regards this issue as a civil matter. This is in spite of the fact that the Toby Carvery has openly admitted to knowing who was responsible for the felling of this tree, but still no further investigation can be made due to the status of the case as a civil matter. These details sit very uncomfortably when spelled out alongside the fact that the Toby Carvery chain is a subsidiary of Mitchells & Butlers PLC, a company of which Joe Lewis, one of the owners of THFC, is the largest shareholder. Even more alarming is the fact that, as the application shows, THFC are making a claim for the land encompassing the Toby Carvery, with aims to	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eFoG	We absolutely love this space, we take our two young children up there often and we really love connecting with Our local community in this lovely green space. Whilst I'm a big advocate for women's football I really oppose it being on this old , locally used piece of land	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dydD	This application was brought to my attention via save The Whitewebbs Oak tree campaign. I object to the destruction of the ancient tree just to make way for something whose 'life' is limited by way of concrete and tarmac. Trees of this kind are home to so much diversity of life. Animals, insects, birds, lichen, moss. Mature trees themselves provide clean air by filtering impurities from the atmosphere, which concrete and tarmac can never do. I suggest and hope that common sense will prevail in the decision for the future of this tree and all the others that are within the boundaries.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4K0	I ask that the planning application 24/00987/FUL (LB Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is refused. I'm not going to repeat a lot of what you've read already, but Mr Khan, you need to know that the land is being used as a public park for the enjoyment of all, and the football club is trying to Enclose it, so that only they can use it. I've heard that the Football club say the land is of poor quality (IMO not so! and who is the judge of 'poor quality'?) and that they would only take half of it and improve the rest. I was there on Sunday 22nd June and saw a whole lot of plants and animals. My records are available on iNaturalist, where my name is [REDACTED] should you wish to see them. It's a fine park and lots of people were enjoying it. I can't think of what the football club could do to improve the rest of the park. Were THFC to go ahead with enclosing the land they would need to provide access to the complex which I'm sure would involve heavy plant traffic, congestion, new roads being built, noise & dirt to annoy residents, sewers built, trees chopped down; all those so-unpopular happenings. I see from the map, that Whitewebbs house will be in the middle of a load of football pitches. Perhaps it's planning to do lavish dinners & drinks for footballers & WAGS. Dear Mr Khan, I implore you! Refuse THFC the right to steal Whitewebbs park away from Londoners. Thank you for considering my request. Yours sincerely. [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eElk	This would be an absolute travesty. The former golf course has effectively rewilded itself since before Covid and together with the 100+ year old forest adjacent to the golf course and to Forty Hall currently provides a green oasis for all Enfield residents. It is currently well used by walkers, horse riders, cyclists, families, children, local residents and untold numbers of birds, bats, wildlife. Why would it be better for the environment to hard landscape, car park & build on that??? Given the climate emergency & current heatwave, surely repurposing brownfield sites is the best way to provide a facility to Spurs, not destroying historic & currently vital green spaces. Keep the carbon in its natural form & habitat please.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3MW	Save whitewebbs nature	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDwN	Tottenham already have 15 grass pitches and 1.5 artificial pitches. I see no reason why these can't be better utilised so that this green space cannot be retained for the local community and maintain the reworded habitats now living there.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dyMC	Objection to Tottenham Football Club's plans for facilities at Whitewebbs Park by the undersigned community groups. Dear Mayor of London, We are urgently writing to you regarding the decision by Enfield Council to grant planning permission to Tottenham Hotspur Football Club for the construction of commercial and industrial scale facilities on Whitewebbs Park in the Metropolitan Green Belt. This decision is deeply concerning for all Londoners who enjoy their local green spaces, including those with Metropolitan Open Land, Green Belt and Public Trust designations that should be protected by law for the benefit of the public. Green public spaces enhance the health and well-being of us all. Vast swathes of public land should not be reallocated for exclusive use by elite professional clubs or players. Tottenham Hotspur Football Club already owns seventeen private pitches and facilities at its existing football academy in Enfield which could easily be shared with its women's team (for example, Arsenal owns a total of ten shared pitches). These facilities were constructed on Green Belt land north of Myddelton House in the Lee Valley Park. The Very Special Circumstances case that Enfield Council's Planning Officer presented recommending the granting of planning permission to Enfield Council's planning committee was misleading, inadequate and unsound. The Greater London Authority agrees that Very Special Circumstances are also necessary to outweigh the harm to the Green Belt and its purposes from developments otherwise considered inappropriate. Whilst the benefits of the application were exaggerated, there was a complete failure to assess the significant adverse and permanent impact upon the openness of this cherished Green Belt site. The massive re-landscaping, earthworks and construction required by the applicants would permanently and adversely alter the park's historic character. This is not just a few grass pitches; it is a large-scale industrial construction with significant built form. As well as omitting key visual and landscape impacts, there were also very significant omissions in the planning application relating to ecological impacts, including on protected species. If it is accepted that such a flawed justification can be used to enable private development of such a large area of currently publicly accessible open space, then it appears that no green and open space in London is safe from privatisation, inappropriate development and irreversible loss. The land in question was purchased by Enfield Council in 1931 for the benefit of the people of Enfield, is held in Public Trust, and should have been protected by a 999 lease ensuring the accessible golf course area would revert to full public use in the event of closure. If the new lease arrangement with THFC was to be signed, the football club would control all access to the park and it would 'extinguish' existing legal public rights of access. There are alternative and more suitable sites nearby, for example the extensive, now abandoned, brownfield Sunset Studios site. Private businesses should not take over public land; they ought to acquire private land if they want to extend.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eA2I	Destruction of precious trees and wildlife for astro-turfed football pitches? It's criminal...	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHuU	To Whom It May Concern: Re: Whitewebbs Park, Enfield PLEASE consider reversing the application by Tottenham Hotspur Football Club to take over management of this public park. They are proposing building women's football pitches, which I am in favour of in theory, but not on public land. Whitewebbs provides a much needed wildlife space and area of biodiversity for nature and local community enjoyment. It is used by many on a daily basis. Please keep this public land for sole use by the people, not leased for private means. Thank you for your consideration. Yours sincerely, [REDACTED]	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCU1	For over a century Enfield/Middlesex councils have fought hard to protect our greenspaces for the use and enjoyment of all residents. These precious spaces belong to each and everyone of us and are not for sale.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eBLh	Our family have visited Whitewebbs Park many times over the years, it's such a lovely peaceful area with an opportunity to enjoy and appreciate nature. For families it's a very cost effective option for an afternoon out and helps them reconnect with nature, which also brings substantial wellbeing benefits. I am shocked at these proposals to close off this area to the public. I visited this park with my parents and since with my own children and the opportunity to immerse yourself in nature was amazing - collecting bonkers, leaf rubbing and identifying the varied species of trees and birds and having the opportunity to be within a natural haven. Once lost it will be gone forever! No wonder when we keep taking away free access to nature and also losing biodiversity, there are such issues with climate change and health and wellbeing in this country. Long-standing sites like Whitewebbs have a hugely positive impact for many families and need to be retained.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEaW	We need more biodiversity in the UK, not more monoculture behind private fences	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGIY	Though not a local please can I respectfully suggest that this proposal does not show proper regard for impact on the environment and consequently the local population. The value of woodland is now recognised and needs maximum protection.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eG7R	This should not be approved.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF5W	This is a crime against the natural world. This historic Oak tree must be preserved for future generations.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDy1	I lived in London for all of my adult life, and moved to Enfield recently. I was brought up in the countryside but yet I was entirely blown away when I realised how beautiful Whitewebbs park and the surrounding land was. I have never known anything like it, I hear birds and see animals that I don't when in more rural areas. To be able to live so close to the park, while living in London, is magical, and keeps myself and so many others healthy. The development by Tottenham Hotspur will PERMANENTLY DAMAGE THE LANDSCAPE. Personally, I love football and despite being a woman, i've been told i'm quite good, however, "They'll be no football on a dead planet....what we are up against is the bloated monster that is the football Premier League with its unfortunate economic might." Quote from Chris Packham, who has a lot to say on the subject...https://www.mirror.co.uk/3am/celebrity-news/chris-packham-war-tottenham-hotspur-33149205#ly4xkbbq42jvt9b8gim Amongst all this idiocy, we have also seen the town dunce in the form of Toby Carvery, who attempted to chop down a 450 year old oak tree, in the style of the jokers who massacred the 150 yr old Sycamore gap tree in Northumberland.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010donY	Please do not allow spurs to build on this irreplaceable land and habitat. Once built on, this land is lost to all of us - humans and wildlife alike. This would be another devastating blow to us and we need to be protecting these spaces for our future. Spurs do not need more training pitches. They already have 17 which is the most of any premier league club. We need this green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e896	Email sent on Feb 20th 2025 Dear mayor and government officials, I am writing to implore you to consider rejecting the application for Spurs to build on Whitewebbs park. It would be a devastating loss to the community and to nature. It is irreplicable habitat. I also believe it is a huge failure to the people you represent selling off public land to private buyers, more lost to billionaires. There are many of us who are intensely concerned and looking for your help. Many thanks, [REDACTED] [REDACTED] reference to planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC).	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eDNQ	I cannot believe that a proposal to destroy a natural environment and replace it with buildings and astroturf could even be considered in this day and age. We do not need more plastic grass damaging our planet, and need to protect all trees and natural habitats from needless destruction and damage. We do not need more football facilities, we need to save the planet and protect all living species. Please save whitewebbs	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDmZ	Loss of habitat, destruction of wildlife and green space. Damage to the environment. Restriction of public access.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFoN	This will have terrible consequences for the local environment, wildlife and heritage of the site.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3MO	This would simply be a conscious decision to sacrifice local wellbeing and biodiversity for the convenience of off-shore corporations - at a time of the intertwined triptych of biodiversity, climate and mental health crises. This simply hasn't been handled properly, and it is clear that - yet again - corporate interests are given absolute priority, whether 'temporary' or not.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCZL	I don't believe that this application should be allowed as it means a loss of a public green space that should be enjoyed by the many, not by the few.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAc6	We've lived here for over 45 years and in London 70+ years. It's terrible that a football club can get land and ruin the environment. Our London is changing dor the worse.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEZJ	Whitewebbs Park is a beautiful space. We should be protecting it for nature and for people who live nearby to enjoy. Green spaces are repeatedly built on, once this habitat is lost along with its creatures you will never get it back! Another one bites the dust!!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDY3	The area is a well used local amenity, known for its biodiversity. There are already about a dozen football pitches and other training facilities in the adjoining area already ceded to the applicant. Should planning be approved then an investigation into negotiations for the pepper corn rent should be initiated.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eInJ	Please would you reject this proposal Mayor Sadiq Khan. The negative impact to the biodiversity these changes will have will be felt for generations to come. These natural lands were here many years before Spurs and will hope to be there many years after anyone even remembers who Spurs are. Thank you.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eC9P	I know the mayor understands the importance of hanging on to green space, allowing nature, providing breathing space for London's residents. This is an important resource for local people and we have to start resisting the onward march of bigger bigger developments which encroach and gobble up land - please please consider the objections made by so many people and resist the pressure you are doubtless under. to say yes.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGk5	This development will result is a huge loss of diverse and nature rich land much loved and used by local people.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDpu	I believe it is crucial this space is preserved for the local community. There is very little green space in the area and to remove this vital space from public use would hugely reduce options for essential exercise and experience of nature for the local community. To me it is unthinkable that such an area of natural beauty should be paved over at all but particularly when there is so little green space available already.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFoM	I am concerned about the impact on local wildlife. My family enjoy this space and it would be a shame to have less green space to play on for our kids.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF5B	Please halt the leasing of Whitewebbs Park to Spurs. This park is a beautiful open area used by the people of Enfield. Its should not be fenced off. We should not lose access to it. They should not dig up the trees and plants to create football pitches. They should not destroy the habitat of the creatures which live there. Please please halt this planning application and keep the park open for use by the people of Enfield	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIQn	I love this wild open space. In a time when we are losing so much green space in Enfieldk to sanitised development I find it totally objectionable that yet more beautiful green land will be handed over to developers to build a football training ground. This land was delivered to the residents of Enfield all those years ago as a recreational space and Enfirkd Council as custodians of this fragile and beautiful ecosystem shouldk be ashamed of themselves for considering this plan. I say NO to development	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dwsN	Whitewebbs was left specifically for the enjoyment of the people of Enfield. It is against the interests of local people who use the park frequently, to limit accessibility. Green spaces are essential for health and well-being, as was evidenced during the COVID epidemic, and Whitewebbs is a much valued resource, and should remain so.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFRc	This is an amazing area that nature flourishes in. It is a disgrace that it can be dug up and replaced with fences and artificial surfaces. There are plenty of other areas which could be used. It is hypocritical the way the council is funding and looking for recognition for the creation of the new area for the Beavers whilst a few feet away a massive natural habitat will be dug up and the nature lost	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8gU	Dear Mayor of London/GLA Planning Team, I do not believe that Green Belt land is sacred, I do believe the use of some parts can be reviewed and the land use appropriately modified. There is an urgent need for a detailed review by the GLA of all London's Green Belt as it's entirely possible Londoners could get more from the Green Belt as a recreational facility/ access to green spaces if the Green Belt was better managed to allow greater access by the the public. It's also entirely feasible the GLA with the support of Londoners should consider releasing small areas of the Green Belt for much needed housing development within the constraints the GLA already champions eg close to public transport. However I firmly believe that the current proposals by Enfield Council to allow Spurs to develop Whitewebbs is not a change in Green Belt land use which will have anything other than detrimental impact on the vast majority of the local population and the impact on the environment and biodiversity will be a travesty. I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e06X	Whitewebbs is the most beautiful and wonderful place to walk. We go there all the time with our dog. It is unique in the area for its beauty and abundance of wildlife, ancient trees and habitats much of which will be destroyed by the construction of the huge football pitches. The local cafe in the park is independent and full of character but I understand this will be lost too. The idea that all that biodiversity and a beloved community green space can just be sold off, apparently for a relatively small amount is deeply upsetting. One of Enfield's green spaces policies is protecting pre existing green spaces. Words that obviously mean nothing in the light of this sell off. I beg you please fully investigate this and read in full the Whitewebbs campaign material. It would be an absolute tragedy if this sell off was allowed to happen.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010uftO	I have always voted for Sadiq Khan and fully support his transport policies and his policy of not building on green belt. I even support his view that some green belt is not worth saving because it has limited environmental benefit. However I'm the case of Whitewebbs, I do not concur : building on it would represent a huge loss to the environment. Sadiq needs to visit the area himself to assess the situation. I believe he would change his mind	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGH2	This is a public park, why should it be sold off for a football club to use? This deal reeks of corruption. There are many alternatives to this proposal. This green space is a haven for wildlife and a space for recreation. It has mental health benefits for all. This precious space needs protecting for future generations.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010elqX	Natural environment used by many	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e8qO	I object to to this proposed change of use as it limits public access to what is and has been a public space, open to all citizens of the Borough and beyond. The proposal by Spurs will remove public access to part of the park altogether which is unacceptable. I object to the creation of an elite football academy on public parkland and that Enfield resident will be fenced out of their local green space. I don't believe reserving access for elite athletes is in keeping with the intended use of public open spaces. Since the golf course closed the area has effectively been refilled and any change to this would reduce biodiversity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e5rK	This green space should be for the benefit of the environment with trees, animals and nature not for a barren mown sports complex.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFRh	Please do not allow the destruction of another open green space in London. I've grown up enjoying this park and it means a great deal to me and the rest of the community. Spaces like these are vital for both biodiversity and the mental wellbeing of local residents and the removal of them will no doubt be linked to a loss in quality of life for locals. Please object to the building of any training grounds!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e87D	██████████ I cannot stress enough how important is it and will grow in importance as the mental health crises unfolds, that young people have access to and even just seeing expanses of nature can help. This is a precious, free resource we must use our integrity here and not destroy this area. Please try very hard to save it. Thank you. ██████████	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHfy	One of the main reasons we decided to move to Enfield was Whitewebbs Park. It has become an amazing and diverse wildlife habitat, even more so since the re-wilding which has taken place since the gold course was decommissioned. The colossal impact of the proposed development by THFC would be an environmental disaster for the local area and would completely contradict any claims by Enfield Council of being environmentally aware. There are plenty of other suitable sites around the area which could be considered, such as the abandoned Sunset film studios site along the A10 road which would be perfect. Maintaining the park would no longer present a huge cost to the council now that there is no gold course. Whitewebbs Park was gifted to the public in 1931 when Enfield Urban District Council and Middlesex County Council purchased the estate for that purpose. The land was intended to be used as public open space and for recreation. A portion of the land was later designated as a public golf course to help cover the park's maintenance costs. Therefore, Enfield Council had no right to offer it on a lease basis at all, let alone for such an ill-advised project as this. If this is allowed to go ahead I give you my word as a lifetime Labour voter, that Labour will never get my support again as long as I live, as that is how strongly I feel about this. And any mention of wanting to support the environment will be dismissed as just lip-service and greenwashing.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHbA	Please could you object to these proposals, because building over on this precious green space would spoil the environment and habitat for nature. Please save this beautiful park!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCwa	This beautiful open public space is an asset to Enfield and is well used by residents. The environmental impact of this proposal is shocking. The football club already has extensive facilities that are not used to capacity and this expansion is not needed. Enfield residents should not lose out because of the wishes of a few. Astroturf NEVER increases biodiversity. If the club cared about others, they would be adding to their locality now, rather than only as a result of expansion. Our local councillors have let us down again.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010drOh	Please give this your utmost consideration - this beautiful green space belongs to ALL of the people of Enfield. Our biggest fear when spurs were given the land for their training ground was that they would spread and we were all assured this would never happen. We trusted them but here we are fighting for the right to keep Whitewebbs park which was given to the residents of Enfield. It's not the council's to give away for a pittance - in fact for any amount of money. We don't want a plantation or plastic grass we want it to remain as it is - a beautiful area for us all to use.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyWP	We use this area regularly for walking and the loss of habitat for the wildlife and the green space for walking in would be devastating. Especially with the car park at forty hall being chargeable and therefore less accessible	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e5dV	There is too much lost to the environment that will never get replaced. The impact is too great in relation to the perceived gain. The plan needs to be reduced in scale.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEID	The development plans benefit no one except Big Football. If Spurs want to really invest in women's football they can buy private land, but it's cheaper to pay off corrupt local officials with back handers and steal public land that way. The wild life and natural beauty of the site is breathtaking, I urge any decision makers to visit before letting this amazing resource which belongs to local people be raped by greedy business men. I'd honestly prefer it to be developed for housing, at least that would be useful and something people actually need, rather than pointless football pitches when they already have 19 of them over the road.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e3kH	The park was given to the people of Enfield for recreation and enjoying and supporting nature. Spurs taking half of the open grass land and building pitches and fences and controlling the rest of the estate including ancient woods and a lake takes away a benefit for thousands of people . The council have sold the lease for £2 million pounds from 25 years ; that is 2 terraces houses in Enfield . Spurs have taken precious open space for next to nothing . The impact on the people and nature is immense and cannot be replaced by £2 million pounds. The local plan is supporting the government's drive for more housing where tens of thousands of homes will be built on green belt nearby in the Crews Hill area. Where will these people enjoy open space for exercise and nature ? Spurs have got the money to build pitches elsewhere and not destroy a significant part of Enfield The Mayor must stop the planning application and call it in.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAkh	I am writing to register my strong objection to the proposed planning application submitted by Tottenham Hotspur Football Club to construct a training ground on the site of our cherished local parkland. This proposal threatens to destroy a vital green space that has long served as a sanctuary for both people and wildlife in our community. The park is not just a patch of grass — it is a biodiverse haven, home to a wide array of flora and fauna, including many species of birds, insects, and small mammals. Mature trees, wild meadows, and natural habitats would be lost, replaced by buildings, artificial turf, floodlights, fences, and car parks. The environmental consequences of such a development are severe. Removing this green space will increase air pollution, reduce natural drainage (thus increasing flood risk), and contribute to the heat island effect in an already urbanised area. The loss of biodiversity would be irreversible, and no amount of landscaping or mitigation efforts could replace what will be destroyed. Moreover, the park plays a critical role in the health and wellbeing of local residents. It is a space where families walk, children play, older adults exercise, and neighbours connect. It provides a rare piece of nature amidst the concrete, especially important for those who cannot afford to travel elsewhere for recreation. Turning it into a private sports facility would strip the community of a much-needed shared resource and erode our quality of life. The proposed development benefits a private entity at the expense of public good. This is not just about land use — it is about protecting what little remains of our natural heritage and ensuring that future generations inherit a world with trees to sit under, birdsong to listen to, and wild spaces to wander. I urge you to reject this planning application. Once we pave over nature, we do not get it back.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eELr	This natural park is such a valuable asset for people from the local areas and further afar. Please don't let it be spoiled by a private company! We need more nature and biodiversity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dxOa	Dear Sir/Madam, The technical element to this submission is a template, but please understand this email is sincere and comes from a place of concern for our local and national environment and passion for the benefits to our communities in having access to nature. Whitewebbs Park is a vital community asset, and a much-needed natural space for people, wildlife and flora. I live in Hackney, not far away, and I go there regularly with my family. Please please preserve this natural space for generations to come! Many thanks, Jonathan Perugia. I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". ~~An assessment of any planning application could therefore be prejudiced~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dzQO	This is a beautiful public space, with ancient trees and rare wildlife. It should be preserved for community use. There are other local sites that could be used for Spurs' project. Shame on Enfield Council for approving this....it makes no sense!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e43N	Whitewebbs Park is currently a beautiful mixture of open meadowland and woodland. It is a wonderful resource and unique green space for people who live in the area. Spurs are trying to enclose large parts of a public park that benefits large numbers of the local community. Enfield Council has failed to listen to the concerns of local people worried about the potential loss of this natural and richly biodiverse space should this development proceed on this site. Tottenham Hotspur's planned training area would dramatically change both the landscape of the park and the public's access to the current green space. The surfacing over of meadowland with astro turf and monoculture pitch grass would profoundly impact the park's biodiversity, which currently is very rich and unique for a natural space within the city. The new landscaping proposed by Tottenham will dramatically reduce the views which are currently open and expansive. Areas that are currently available for all the public to use will be fenced off and inaccessible for those not able to pay for access. Tottenham plans to balance the negative impact of their pitches through landscaping and tree planting. However their planting design will dramatically reduce the current open views. Nature is currently thriving within Whitewebbs, which is a vital biodiversity corridor and a sanctuary for the rich collection of plants, birds, trees and insects that currently inhabit it. We are living in a time of dramatic climactic change and massive ecological losses where natural ecosystems are collapsing because of our incessant impacts upon them. These are systems that we depend on; without pollinators, we have no food. Already farming in the UK is being profoundly impacted by the changing climate that we have caused. We now need to do everything that we can to protect biodiversity and the natural world we depend on. This is an industrial scale development on a site which is currently a thriving natural asset to the local community. Whitewebbs Park is a vital resource and sanctuary where nature can thrive and a loss on this scale would be immeasurable. Tottenham Hotspurs is a private business and it should not be allowed to exploit the natural resources that are owned and paid for by the people of Enfield through their Council taxes. Football can bring immense benefits to our community and Tottenham Hotspurs is one of the richest football teams in the world. They already have extensive training football pitches, but if they feel they really do need to develop more, they should pay for a site that is not a prime natural resource. Every planning decision that is made by councils on our behalf must now take the ecological emergency we are in into consideration. Whitewebbs is a unique sanctuary and should be protected for all of our benefit.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEil	The area is worth more than the £2 million paid to the council in terms air cleaning, social green space, exercise areas for all ages including wheelchair bound individuals, and the numbers kept out of hospitals and mental healthcare expenses.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010tyYN	This would be a devastating loss to the community of the surrounding area, if this was to go ahead.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3Xm	Whitewebbs is one of the most biodiverse rich green spaces in London. Thousands of people have created deep and meaningful relationships with this space. It has become an important example of nature connectivity and immersion offering a true slice of wildness aa opposed to "green" spaces of cut grass and amenity. This area must not be turned into astro turfs. It must not be privatised. In a time of such ecological crisis standing by the wildlife and ecology of this precious space is of upmost importance and stands as a symbol of our protection and respect for the natural world. Please oppose the privatisation of this important space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEVb	Green Belt is Green Belt, no other use should be allowed. Keep our green spaces	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e9Ax	As an ecologist with over ten years of experience working in nature, working nationally and internationally, I see Whitewebbs Park as something magical, an area that has quietly rewilded itself, becoming a haven for both wildlife and people. I have attended Whitewebbs monthly nature walks, where I have enjoyed not just seeing the vast expansive of nature it has to offer, but it has helped me mentally, being outside in nature within an urban area and as well on a social aspect. Whitewebbs is more than just a green space; it's a living system, full of birdsong, insects, herpetofauna, mammals, and wildflowers that have found their way back over time. I was surprised to see how the habitats were being scored within the BNG metric, with focus on some of the habitat classifications of the grassland, these do not seem to match the habitat classification present onsite. I am also concerned about the reptile survey methodology and how the surveys were undertaken, below temperature guidelines, undertaking with a large amount of human disturbance present. As such it may have missed important remnant reptiles populations within fragmented habitats. As well is there any light mitigation in place for light sensitive bat species recorded on site? It's important to remember that ecology is not just about ticking boxes, it's about understanding how everything interacts within a living system. When we consider whether development on this site would be beneficial, the simple answer is no. Once this kind of space is built on, it's gone forever. No amount of landscaping or 'offsetting' can bring back the richness and quiet balance that's grown here naturally, it cannot be recreated. We need to keep places like Whitewebbs wild, not just for biodiversity, but for people too. It offers a chance to slow down, to reconnect, and to remember our place in the natural world.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBea	This land should not be built on. It kills nature.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eI2Y	Loss of green space, including mature trees, flora and fauna enjoyed by the general public for years. I was born in Enfield and have regularly used this open space over the years. Big business should not be allowed to use this space to the detriment of the public. It will be grassed over and or sown with synthetic grass and fertilisers and weedkiller will be used which is not healthy for the local environment. No public space should be sold to big business on the cheap when there are sites which are available at the true market value.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGKK	I know why, after being born in Enfield, I have lived in Norfolk for over 20 years - we still have grass and trees here, although even they are constantly under threat of development.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e6le	The park has been in Enfield council's care to provide green open space for everyone this planning application if successful will blight the views and impact on wildlife that have been living in this park for many years it's really planning for the few not everyone	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8wV	Please see the following observations and many objections Green Belt—a beautiful historic landscape held in trust for the people of Enfield and should not be offered to a multi billion company for a pittance to then destroy the area for their own purposes . there is no consideration to remove the pitches and structures and return the space to what we have now at the end of the lease . 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) 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 are essentially: “This is what we want, it's convenient for us, and Enfield Council is letting us have it cheaply.” “ You won't see the damage we have done because it will be hidden behind trees and bushes” • The supposed “benefits” to the community are minimal and some are harmful: Loss of public land / a few benches and signs / A car park with less capacity than the current one A café (which the excellent current café owner would happily develop with a 25-year lease) A net loss of 3km of pathways A noticeboard and a dog-washing tap A remote facility for small elite one sport group No sports facilities for the general public	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e4Qi	This is a wonderful resource for quiet escape from urban life. For enjoying nature, running, walking, dog walks. We need to preserve our wild spaces and spaces for people to roam. We need to preserve biodiversity and allow humans to appreciate and observe it. This plan would impact all of that so I oppose it.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9RB	This expansion of a commercial training centre into a rewilded section of the park and destroying a portion of ancient woodland by creating new access route is unacceptable. It would irredeemably destroy the historic character of the park and the natural space present there. It would take away a long standing space dedicated to the public. This proposal comes in a time when publicly accessible open space is diminishing, with ever growing population, and at a time of catastrophic biodiversity and species decline. I most strongly object to this proposal.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eB6e	This is currently an open space for use by various members of the public ... ie multi generational, dog walkers, families...accessed free of charge and the pathway is fab for those with disability. There is space for games, to observe nature and to enjoy peace and tranquility. It is a vital community space that has served many a generation. How would this change serve the community? The local council should be respecting their community, the rich biodiversity and historical and cultural richness of whitewebbs	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGE9	An area of green open space that is used by lots of residents and different groups to exercise and enjoy outdoor spaces for health and mental wellbeing	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAyS	In a city like London any open green space is invaluable, necessary to the physical and mental well-being of the entire community. The loss of any such green space has repercussions which stretch beyond the immediate into the wider community. So far Tottenham Hotspur's professed desire to contribute to the well-being of the immediate community has not been seen to amount to much and if Whitewebbs Park is concreted over, most ordinary members of the community will completely lose confidence in the veracity of any future undertakings to protect the environment and contribute meaningfully to the local community.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDg5	Please don't go ahead with this as it would be a great loss of green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFYL	It is unacceptable to take re generate this green space. It is a well used public area with an abundance of wildlife	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dkYP	The whole site has a unique natural character which will be destroyed by the development and will not be replaced by the compensation/re-creation works, which will be obviously artificial and un-natural.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eC4w	The whole site has a unique natural character which will be destroyed by the development and will not be replaced by the compensation/re-creation works, which will be obviously artificial and un-natural.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eD8L	Dear Mayor of London/GLA Planning Team, After reviewing the plans and application I would strongly add my objection to this proposal. I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. ~~In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIYq	Spurs already own a substantial area of training ground for the male side. Why can not the female side share the same amenities. A substantial area of Archers Wood, which is, natural ancient woodland, had already been removed to build this training ground. What happen to the training ground north of the M25. The golf course was always open to the public to walk across or cycle along the paths. The club house was open to the public to use. A substantial amount of spoil not just top soil, also sub-soil and the natural deposits to level the ground to build the training pitches so that they are level will have to be removed. How is the management of the removal of the spoil going to work. Without choking up the lanes with muck away lorries. The Beaver Enclosure is quite close to the site, these creatures do not like being disturbed.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dw9E	This is a public open space for the benefit of the public and their enjoyment It should remain so and not be fenced off for the exclusive use of others.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3iv	I note with alarm the loss of public spaces where children and families are able to come into contact with nature and learn about it. It is so easy to lose this heritage and I would urge you not to approve these plans. They would cause irreversible damage in my opinion	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eBP3	I strongly object to this application for the following reasons: Green Belt Protection: This site is part of protected green belt land. The proposed development undermines its status and opens the door to further inappropriate development, contrary to national and local planning policies. Loss of Public Amenity: The site has historically been a public open space enjoyed by walkers, families, and local residents. This proposal reduces public access and disrupts the community's connection with the green space. Traffic and Highways Impact: The access roads to this site are already narrow and dangerous. Additional vehicle movements, especially from heavy-duty construction vehicles and future operational traffic, pose a serious safety risk and will increase congestion in surrounding residential areas. Ecological Impact: Whitewebbs Park is home to valuable wildlife and biodiversity. Development would irreversibly damage natural habitats and disturb local ecosystems, which have already been under pressure. I urge you to refuse this application and preserve this important green space for the benefit of future generations.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDJF	I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below. This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF). The required "Very Special Circumstances" (VSC) do not exist to justify overriding Green Belt protections. 2. Environmental and Ecological Destruction	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCZU	I object to this application. This land should be kept for local people to enjoy the historic grounds and nature. This ancient woodland is for the community and is green belt land. There is no other park like it for local Enfield and Hertfordshire residents. This sort of land would take hundreds of years to establish as it is currently. It also would create an environmental catastrophe, replacing trees and a natural environment with football pitches. I go back to the park to enjoy walking through it even though I have moved away, as it is a beautiful space but is also special to me: I have a connection to it, as a relative used to be a park keeper. I consider that football pitches can be moved or established elsewhere; if needed, to land that was previously concrete. Ancient woodland does not need to be decimated for football pitches to be built. I hope you will consider this planning application carefully and consider the local community, the historic nature of the site in question and the environment.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eCOx	Don't build on green belt	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3QU	I am disgusted that Enfield Council has sold the beautiful historic woodlands, so rich in biodiversity. When saving green spaces is of such vital importance this decision is truly baffling. The area is loved by dog walkers, parents, children and all who visit. The last thing we need is astroturf football pitches cutting through the heart of the woodland. Please I beg you to step in and reverse this decision.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDwO	The proposal would result in significant loss of green vital space for the community, hisitors and biodiversity	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e7Cu	Please don't let Spurs negatively impact our local green space. Whitewebbs was purchased for the people of Enfield. They already have football pitches in the area and have significantly lower biodiversity than the area they want for their women's teams. The number of pitches suggested as much larger than expected. Please don't put this green space in their hands.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHWM	Spurs will destroy this park. They will remove 207 trees and replace with 40. The replacements will not be as big as some of the lost trees and this will have a massive impact on the environment. Please stop this. Their turf includes plastics. No more plastic please. This area is really enjoyed by the residents for recreation and wellbeing- please help us to continue to do so.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e5sW	Please safe this site for wildlife. I know it means so much to so many local people.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9RA	The development of Whitewebbs park will create emissions of over 9 million kg of carbon. This will add to the overall environmental destruction of biodiversity in this well loved green space which is central to the community. If the council's policy is truly to protect the environment, then planning permission must not be given in this case.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEdi	With the plans for building in Crews Hill this will be another way of taking green belt countryside away from the residents of Enfield. This needs to be reconsidered when looking at the demise of crews hill as we know it. With the M25 next door to Whitewebbs we need the trees and shrubs to clean the polluted air. Football pitches won't provide that.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e7Vf	I strongly object to this proposal. Turning a public green space into a private football training centre reduces community access to nature, harms local wildlife, and increases traffic and noise. Whitewebbs is valuable as a peaceful parkland, not a commercial facility. So many people use this parkland for leisure. Families, dog walking, cycling, riding, bird and nature watching to name a few	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e7sc	Spurs want to enclose a public Park; this Park belongs to all of us, not to a private club. The mayor has the power to overrule Enfield Council, who are allowing Spurs to destroy nature. The Council has failed to protect the space and listen to locals; we need to defend our precious park for a better future for wildlife and our community! An industrial scale facility is not compatible with this wild area - since the public golf course's closure in 2021, the Park has been naturally rewilding, and the public has continued to enjoy this beautiful green space. This wonderful ecosystem is a tonic for people of all ages. It's sickening to realise that this local community stands to lose half of the open space of a public Park to a multi-billion pound business. We are witnessing the violation of Green Belt Protections, Environmental Destruction, damage from excavation, tonnes of carbon emissions, public health impacts of synthetic pitches which cannot be recycled and which shed microplastics - plus chemicals such as glyphosate which would seriously harm plants and wildlife in this thriving habitat; loss of species in real terms (the tired old justification of a "net gain" in biodiversity is flawed, given the development chiefly causes destruction to nature); and planting thousands of young trees to try to justify this "net gain" is ignoring the importance of the grassland for wildlife and is also ignoring the abundance of already naturally regenerating tree saplings. Surely private businesses shouldn't take over public land; they could buy their own already private land if they want to extend. The Park was bought by Enfield Council in 1931 with public money for public benefit in perpetuity. The new development removes half of the open space, blocking public access. Spurs' community benefit claims are misleading, because the facility will predominantly serve an elite sports group of a very limited demographic. Spurs also has an appalling history of failing to deliver on community promises, such as the creation of an education centre and nature reserve to justify overriding Green Belt protections for its existing training centre in 2008/09. No Premier League club has more than 17 pitches. At other clubs, women and men share facilities. Spurs could easily do the same, but are instead attempting a land grab of a valued community asset. The proposals would destroy protected heritage- in this case, panoramic views throughout the Park, and contradict the Forty Hill Conservation Area Appraisal which criticised past Council developments for urban sprawl and damage to historic landscapes.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAbw	Whitewebbs is such an important rewilded area that is full of biodiversity. It is a vital open space that many people use for leisure and to get close to Nature. Whitewebbs oak has been illegally felled and there are many other veteran trees that would be lost under Spurs scheme. I often visit Whitewebbs with my family to walk my dog and it is such a beautiful area. It's my favourite park. I absolutely object to Spurs taking any more of Whitewebbs. They could use the very large site that is now not going to be used for a film studio.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHOF	Please don't. At what point will the nature be astrourfed? Footballers don't need nature as we do. They require surfaces and pitches that will be the same day in day out ... week in week out ... Why despoil nature for this end? Please listen. Please don't rubbish our nature.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF8N	We should protect the natural lands because of the unique biodiversity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e2C2	This cannot be allowed to go ahead	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eD8N	To have true wild space in the UK is a rarity. To have it inside the M25 is a joy and should be something that is observed and fostered to allow future generations of Londoners to see what the wild UK looks like. With hugely diverse insect groups covering many soil types at white webbs this a truly unique space for London. Tottenham Hotspur can find somewhere else no problem. Perhaps develop a new park, rather than destroy what's turned out to be a rare piece of UK wilderness.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e0ra	I have lived in Enfield all my life and Whitewebbs has been a beautiful local resource for all my 70 years here. As a child we walked and played there with my parents and loved the lake and its wildlife. I then walked and played there with my own children and hope to do so with my grandchildren. To think that part of this wonderful local amenity will be taken over for use as a football training ground is totally unacceptable especially as this parkland was purchased for the people of Enfield and has been there for us for almost 100 years. Not only will this be a significant loss for local people and others who use the park but a decision in favour of this change of use sets a dangerous precedent for other green areas in London. The development should be refused for this reason alone but of course the loss of amenity, the damage to wildlife and the impact on regular users of the park is the overriding reason that I am asking you to reject this proposal. [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8qG	Whitewebbs Park is a beautiful, tranquil and vital habitat for wildlife. It is one of the very few parts of Enfield that is accessible to residents. We should leave Whitewebbs to be a public park for the generations to come.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3TH	I lived in Enfield for many years and often went to this lovely open space. I think it is absolutely criminal to take this away from our wildlife and heritage.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIvN	This space is part of what makes Enfield desirable. Surely there are other non-green spaces places that can be used without the need to destroy a thriving open park space. The old B&Q site on Southbury Road is lying in waste. Just the other side of the M25 junction along the A10 there is uninhabited, green space unused by the public, why destroy the biodiversity of such a beautiful wild place in Enfield? I've not spoken to one person who thinks that this is a good idea, we love that Enfield is a borough with enough green space to serve everybody but the council seem hell bent on carving away at it against the wishes of the residents it is supposed to be here to serve.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q500000RDbIN	This is open park land gifted to ALL the residents of Enfield.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000011BzTL	To build on Whitewebbs would be totally unacceptable this is such a beautiful place for local people to walk there dogs come to a quiet place and relax also the animals here it's there home please do not let it be built on	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCi7	Our green belt land was set aside by our forebears who had witnessed what unrelenting development had done to the natural environment. This was at a time when the population was much lower than it is now and when the environment was less threatened. The lesson is that we need to protect and preserve the environment more than ever and that this protection needs to be strengthened, not relaxed. Whitewebbs has already been naturally rewilded and it is now a beautiful place with a vast amount of biodiversity which is a joy to experience. Future generations will not be forgiving if we allow this to be destroyed.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFuc	This is a popular park regularly used by locals. When I visit my Aunt, who lives locally, I often take her here. We sit in the tranquility and just talk and enjoy the atmosphere. We would both miss this if it were to become busier and noisy.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGFJ	Whitewebbs and the reference 24-00987-FUL. Dear Mayor of London, Having lived in the borough of Enfield all of 67 years, the proposed loss of open green space is distressing. The borough population is growing and it must be a priority to preserve green spaces in Enfield. Whitewebbs is a beautiful and historic landscape with open views and ancient woodlands. It was purchased and held in trust for people living in Enfield, how can it be possible to develop this green belt space - it makes no sense. The proposed plans will destroy vast areas of the parkland, have a devastating impact on nature and biodiversity and, if built, would be irreversible. The proposal only benefits Tottenham Hotspur Ltd and those allowed to use their facilities, there are no benefits of any significance for Enfield residents. Please reject the proposal. Yours sincerely, [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHJB	Save Whitewebbs as it is.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eCna	Whitewebbs is a fantastic case of natural rewilding of a former golf course. Many rare and threatened invertebrates have been found at this site and the area is an ecologically important mosaic of old woodland, veteran/ancient trees, standing deadwood, grasslands, parklands and open mosaic habitat. Development will remove public open space, negatively effect wildlife and the installation of plastic turf pitches goes against environmental and climate policies including flood risk, nature recovery, biodiversity. I'm addition plastic grass has been linked to cancer in athletes and children who play on it. It's simply a bad decision based on poor science. It will be impossible to deliver statutory biodiversity net gain on this scale if the site is developed as the habitats being lost are some of the most valuable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyPz	This proposal is a disgraceful repurposing of land, and will be significantly detrimental to wildlife. It should therefore be denied and blocked.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dz4P	I am told the proposed training centre, comprising 10 pitches and multiple ancillary buildings, would require 7 million kg of excavation, use over 11 million kg in materials (including concrete and rebar pitch substructure) and would emit a net total of over 9 million kg of carbon. Moreover, it seems that Tottenham Hotspur would also manage the rest of the grassland area and also the woodland round Whitewebbs Lake, leading to further destruction of natural wild and rewilded areas down the line with inevitable expansions of construction. This is unacceptable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eD5N	It is very nice nature there with a lot of wildlife. I spend there almost every morning and I think it should remain for the public use. The trees are old and I can't see why they have to be cut for something like this.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e0Xv	Taking away green space for the community. Please please don't do this.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e981	Whitewebbs is a truly sacred space. To sell it off to a private company like Spurs when it is a public space, given to the people of Enfield, is a disgrace. We will not give up the fight for what is our land. Find a different area, not rich in biodiversity. We don't want Spurs on our land.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEXI	Unacceptable disruption to the environment and possibly more to come.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eE7B	This public land has become very popular now it is open for all types of activity. The fact that is is re-wilding has created a unique space for people to enjoy and improve their mental health. I am shocked that a commercial activity is being allowed to take two thirds of this incredible piece of public land. I even more shocked that the plan is to rely on a football organisation to develop wildlife..... This stinks of corruption or monumental stupidity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDzL	Whitewebbs Park was bought by Enfield Council for the benefit of all the people of. Enfield. The proposed football development will only benefit very few Enfield residents. It is a beautiful area enjoyed at the moment by so many people. Also wildlife is flourishing at Whitewebbs. Please do not let all this be ruined by allowing the proposed development.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9J1	I object to the application	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dyrE	I object to this planning application on the following grounds: This is a proposal for a private, commercial training ground on what is currently Public Trust and London Green Belt Land (bought for the public by Enfield Council in 1931). When the golf course associated with the park closed in 2021, as per the lease, the land reverted to public use. A private entity such as THFC should not profit from the destruction of public land that has invaluable and nationally important biodiversity. Indeed, public land should never be considered for the use of private entities, and especially private commercial entities, on a matter of principle. If that isn't enough, if THFC's proposal is supported and development goes ahead at Whitewebbs Park, its naturally rewilded area of land - a vibrant mosaic of grassland, shrub and ancient woodland and particular associated fauna - will be irrecoverably depleted and its historic character destroyed (including its unique panorama) through construction work and altered use. The development would undermine conservation efforts and likely constitute a violation of regional and national policies related to Green Belt and public open space policies. The proposed private training grounds and associated development would make a large proportion of public use land inaccessible to the Public. Indeed, 50% of the current accessible area - grassland with rich biodiversity - will be built on. This is the equivalent of losing a local public amenity almost twice the size of Enfield Town Park, a travesty in a time of continued negative climate change and species demise, precipitated by anthropogenic activity. The associated THFC lease would mean there is a high possibility that access to the publicly accessible area of the development area could be revoked or never approved by Tottenham Hotspur. The outcome would be a further depletion of Public access to already diminished greenbelt land as well as erosion of public trust and respect for entities such as THFC, Enfield Council and the Greater London Authority. The argument for building on Green Belt Land constitutes a lack of imagination and foresight to protect the health of people and planet. In legal terms, there is a possible dereliction of responsibility by Enfield Council in relation to the failure to carry out correct Site of Importance for Nature Conservation procedures during its recent SINC review (2020). The push to landscape and build through Whitewebbs grassland and areas of ancient woodland will increase carbon levels through the destruction of carbon sinks such as soil and ancient woodland trees (which can sequester many tonnes of carbon per hectare), and by way of hydrocarbon pollutants created whilst levelling the land and constructing pitches and ancillary buildings. When London's air quality continues to create a high burden on its population's health and is known as a cause of mortality, conserving green spaces, maintaining green corridors and working to restrict urban sprawl is a vital mitigation strategy against negative anthropogenic actions. THFC should also understand that their athletes would benefit from clean air as much as anyone else. (Contributing to the destruction of a green space ~~that represents nature and an important ecosystem for the wildlife associated with it, as well as a green space for the community~~)	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBkk	Whitewebbs Park has a very important ecosystem. These proposals make no recognition of this and are concerned purely into making the pitches and surrounding area work better for people. Without any plans to improve and sustain the current ecosystem the impact on nature and the environment will be huge. The UK is one of the most nature depleted countries in the world and these proposals do nothing to improve this.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010elaP	It's dreadful that Enfield Council don't listen to the thousand of local residents that don't want Spurs wrecking WhiteWebbs Park with their tarmac pitches. Obviously there are brownfield sites for this. Why is the argument still going on. The land was handed to Enfield Council for safe keeping and not to be fenced off. I will contact Prince Charles as I cannot see he will be pleased to know what Spurs are up to. They are an untrustworthy conglomerate that won't confirm they will try to grow the site with other buildings or sell it off. Of course still is wrong and no doubt being allowed to Enfield Council can money grab from Spurs.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e1AK	This precious public open parkland with established grasslands, mature woods and scrub with associated flora and fauna, enjoyed by public for mental/physical health and to reconnect with nature, should not be lost to a private company, ie Spurs, for private/elite use, monoculture football pitches; alternative sites are available in the vicinity without destroying green belt land. We are most nature depleted country in Europe/Enfield Council already been very neglectful to fail to protect the 500 year old oak cut down by Toby Carvery recently. EABowles of Middleton Gardens would turn in his grave if he knew how the parkland was being sacrificed. I enjoy visiting Middleton House and the park frequently	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFoQ	This beautiful wild, biodiversity, Public Parkland should not be replaced by Football pitches. We live in an age where the majority of UK children cannot identify an Oak leaf or a bumble bee--we must keep the few remaining green spaces we have in order to restore our connection and understanding of nature as though many don't realise we can't survive on this world without it.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAtw	Please, please don't sell our public green space, it is so important for the health and wellbeing of ordinary people. I visit every weekend and it is heartbreaking to think we are going to lose this beautiful, and useful, place.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFbB	Objection. How can we allow our beautiful green space to be turned into a commercial space for a large organisation? Surely there is some previously industrial space that could be repurposed instead of a thriving green area that supports local community wellbeing?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eAWz	This land is being sold illegally, admitted by Enfield Council, and is not available for sale. This is public land. This is important part of local heritage and green space enjoyed by thousands of local residence. This ugly, corporate and money-making scheme exists only to make Tottenham Hotspur richer. They have ample training ground locally, as well as state of the arts stadium worth millions in Haringey. This is not a necessity to Tottenham Hotspur and will bring no economic growth for the local area, only more strain on local roads and on the already limited public transport systems. However, this is an essential community hub, place of biodiversity and natural beauty for local residence. This area is important to local residence. This area has ancient woodland, as well as local wildlife, critical for clean air. We ask Mayor of London, Sadiq Khan, to please do right amongst London residence, and not by the billionaires. We need this space more than them.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dxU9	50% of Whitewebbs' grassland and 207 trees (including mature and veteran specimens, verified by the Woodland Trust) would be lost (40 more would be transplanted), harming many species. The decision to plant thousands of young trees across the site to try to justify this "net gain" ignores the importance of the grassland for wildlife; ignores the abundance of already naturally regenerating tree saplings; ignores the loss of mature and veteran trees across the site as a result of the proposals; and ignores the fact that the tree planting would alter and lose the wonderful views across the open landscape. The Greater London Authority has stated that the proposals do not meet planning policy and are "inappropriate" within the Green Belt. This would be a huge loss for the people of Enfield and North London. The park should be kept in public use for everyone, not for THFC who already have a monopoly over space in Tottenham and Enfield.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBSK	Many years ago I worked in Enfield, as it happens for Enfield Council. Whitewebbs Park is a beautiful old open space and was enjoyed by many people from all situations. Nature, biodiversity, beauty, heritage, room to breathe at the far edge of London. Value these precious spaces, once they have gone they have gone. Just like the Whitewebbs oak, a shocking act. Was it connected to this? I ask the question, I don't know the answer. Football training grounds are a low priority in the grand scheme of our green spaces and future. Women's football is to be applauded, but green open spaces such as this should not be sacrificed for an individual, very wealthy club. Perhaps more support would be gained for a smaller community based open to all outdoor facility. I object to this proposal. [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dren	Looks like this public park is about to shrink massively to accommodate this private football training facility. Plus who's paying for all this work, new car park, trebled parking charges. New cafe, treble prices all to recover the construction costs quickly so the private financier gets his money back and soon starts profiting. Another public rip off ! In the meantime, what about the wildlife that use this area, or is it planned to destroy their habitat and irradiate them, a very bad move. All Lives Matter.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e5rL	This is such a wonderful area that we walk over twice every day, the trees, wildlife and open space is nature at its best. Enfield Council and The Mayor of London are always telling us to get out in nature and how good it is for our health and especially our mental health. They also tell us about all the projects they spend money on with planting new trees and creating new green spaces in the borough. Therefore why on earth are they considering letting Tottenham Hotspur cut down all our beautiful trees and grassland to accommodate a handful of elite football players when the training ground they currently have has ample space for all their training needs. We also know that this area is not for the ladies football but instead it's going to house the NFL (American Football) which is where the big money will be paid. Please put the thousands of local people and their families inc dogs that use this park everyday before the likes of the billionaire Daniel Levy and his shareholders and a handful of elite footballers that don't even live in the Borough of Enfield. Let's hope you see sense and reject this application	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAWu	Please protect this hugely important biodiverse, much loved & used green space. It must remain as is.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eDUn	I am a local resident in Enfield for 40 years and absolutely appalled and disgusted by the council's lack of respect for the community and the environment. Whitewebbs is a unique habitat that has amazing biodiversity that is about to be damaged irreversibly to serve a corporate land grab. The UK is one of the most nature depleted nations in Europe and London has specific urban challenges. Giving away this valuable asset is completely unjustified and a dereliction of duty to serve the people of Enfield. I am an academic in health psychology and know the positive impact green spaces has on mental health and wellbeing. Those deprived of this natural asset suffer and is particularly impactful for young people and those from lower socioeconomic backgrounds. The work of Kathy Willis (Oxford University Professor of Biodiversity and cross bench peer in the House of Lords) clearly demonstrates the serious damage poor urban green planning can have to the detriment of people and the environment. The worse offender can be over managed green spaces (particularly football pitches) because of the damaging chemicals used in routine management, worse still is plastic grass. Tottenham don't need this public space and could afford to be situated anywhere, with their current site already accommodating women's football central to their argument. Please do what's right thing for Enfield, for London and the environment and stop this plan.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEqb	Dear Mr Khan, I am writing as a supporter of CPRE, the Civic Society and all London's open green spaces to object most strongly to the proposed training ground at Whitewebbs; my main objections from those highlighted above are these: 1. Loss of residential amenity: Yet again public space is being taken away from the people who value quiet enjoyment of green space in their area and people who use that space in considerable numbers. Professional sport is not inclusive of the vast majority of people who do not play sports professionally. 2. Impact on nature/biodiversity: The inevitable floodlighting and noise will cause major disruption to nature in the area. 3. Loss of green/open space: Building of larger buildings, security fencing, access roads etc. will mean the loss of green space. The park was purchased with public money for the people of Enfield, so how can some private enterprise be permitted to exclude those people? 4. Impact on heritage: Whitewebbs is an historic park, and it should all be preserved as such. The wanton destruction of the Oak was bad enough; this proposal is equally destructive. The plans do not respect the historic nature of the park. I urge you to call in this proposal and reject it. [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4g3	This planning application must be rejected. This land is crucial both to wildlife and the wellbeing of the community. The two go hand in hand. The land is surrounded on three sides by SINCS and should itself have been reviewed as to whether it should have SINC status, providing an essential part of a wildlife corridor. The land is teeming with important species and biodiversity. It brings joy to many humans as well as providing sanctuary to wildlife in what is already a very built up area. Personally it has played a big part in maintaining good mental health for me, although there are other parks, the wildness and size of Whitewebbs is so special. To take a huge chunk and cover it in astroturf, destroying many habitats, works be devastating. The noise and the light pollution from the practice grounds for Spurs would also have a devastating impact on the rest of the land left. The benefits Spurs are suggesting they would bring would not outweigh the damage done by their presence. The land should be left open for all the people of Enfield to enjoy, rather than closed off for the few.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAJq	I am appalled by the decision to allow Spurs to build even more pitches on this beloved nature site. The green spaces we have left should be preserved in a terrifying age of nature and climate breakdown and this would be a highly questionable move which basically sets the profits of commercial companies over the rights of nature, the rights of the local communities, residents, walkers and nature lovers as well as other visitors to have access to green space. The repercussions of the building work and carbon footprint will be felt in the area for years to come. We already lost one ancient oak, I believe Spurs had something to do with this - but can't corroborate it obviously - but it remains highly suspicious. The carefree act of ecocide gives us a window into many other acts of destruction which are guaranteed by this work - over 100 trees will be felled, perhaps many more. Are you really a green forward thinking GLA with a green mayor. Do the right thing and please reject this highly contentious and problematic application.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAes	In every possible way this is bad. Taking away much needed green space from the people of Enfield, trashing a much loved park with football pitches, trashing biodiversity and unique wildlife, allowing corporate greed to trump social need. It's absolute madness. If you have any sense of community or empathy with ordinary people you will call in this abomination.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFEY	I am concerned that the tranquility of Whitewebbs will be lost. An investment into making this public space accessible for more people, not less, is what Enfield need to be thinking about.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dzQS	This is a great space for the people of Enfield and building on it will take away so much of the natural beauty and wildlife	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEth	As Enfield becomes ever more densely populated, it is even more pressing to preserve these green spaces. These plans will massively reduce access to green space for local people and decimate the biodiversity. Tottenham Hotspur already have so many facilities. But I suppose money talks.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eALq	One of the major reasons we moved to this area was the accessible green space while living in London. Whitewebbs is such a gem and we visit the area frequently for walks and to enjoy nature. To lose such a vast portion of the land for this new sports facility is such a loss to the local community in terms of the environment, green space, and general enjoyment of Enfield. I strongly oppose this planning application.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dhCV	I don't believe this planning application fulfills Enfield's commitment to protect and restore nature in the borough. This undermines the Enfield chase afforestation projects connection to the east of the borough.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFxu	I dont think more green space should be lost because of business needs over the availability of green space to the detriment of peoples health and wellbeing	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFGN	This would be such a shame to take this open and very much used public space from the local area for minimal return to the council. It makes no sense and will be to the detriment of the local area and residents who use this space. I started visiting in lockdown and loved the space as did my kids. We have continued to visit and enjoy the peace, tranquility and nature. It will be a shame for this to be taken away.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e897	How on earth can a multi million pound business like THFC be allowed to bulldoze part of a public park? They have other and better options elsewhere. This is not a much needed housing scheme, which i would be more likelyvto support. It is highly questionable on environmental, social, moral and financial groundd. Please do not give away crucial green space, necessary for nature and local wellbeing. This is absolutely not in anyone's interest othervthan THFC. I urge you please do the right thing, and do not sell out our valuable local space. Regards, [REDACTED]	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDNS	Another disgrace by this Council. Space given away on the cheap. Loss of open green space for locals and wildlife. Profit making for the good of the few and certainly not the many.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8dY	as a north londoner with no garden white webbs is a place i can easily access to enjoy peace and nature. The impact of the training ground on this precious green space is an act of vandalism. this would never be attempted at the royal parks. I understand the need for a training ground but they are so many empty green fields with no bio diversity why not build them there why destroy mature trees and a public space for the people which is desperately needed for our mental well being places such as white webbs. Please reconsider and think of our green legacy for future generations, just as the victorians did and all those campaigners who fought for our spaces like the hampstead heath.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAJt	The development, if allowed to go ahead, would have detrimental impact on biodiversity, result in a serious loss of green space and have devastating impact on the local environment.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGCj	Save the biodiversity and nature within the beautiful park and area!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDZX	This was left to the people of Enfield and is not the Councils to lease to anyone. The impact on the nature will be so bad. The country is obese and we are told to exercise yet you are taking away our open spaces which will also affect peoples Mental Health. Its not even that something is being put there for all. It will only be for the elite not for the whole borough to enjoy. Also the Council had things that needed to be done on thier part. One was to advertise so objections could be submitted by a certain time. What they done was advertised in a paper but it was only the metro, advertised in houses but only the ones adjacent to the place, posters in libarys and in cafe and toilets in Whitewebbs but during covid when people were isolating and all the above were closed. To them they ticked the boxes to thier advantage. Disgusting.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eI7O	I have been visiting and walking this area for over40 years, going to forty hall and walking round with my children. It would be a disaster that this area was lost to future generations. Save Whitewebbs !!!!!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIFU	This training ground will hugely impact wildlife and the local community who live nearby, myself included. It's a real shame that money can be used as a means to destroy our environment and affect the local residents and people who enjoy coming to Whitewebbs to enjoy the scenery and green spaces, myself and my family included. I hope that this objection, as well as all the others, will be considered before a decision is made.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFWS	Please I beg. You to stop this.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFRg	This land was left to the people of Enfield for their enjoyment, which it has for many years. To sell part of it, for an elite few, at way below its market value is blatantly wrong. Plastic football pitches, surrounded by fencing, is not in keeping with our cherished land. It is all a ruse to allow Spurs to expand their already sizeable training ground. They already own nearby parcels of land, which could accommodate a women's academy. Why on earth do they want to own a lake? It is because they will eventually turn the Toby Carvery, in which they already have a financial interest, into a state of the art, luxury spa/ health facility in splendid grounds including the lake. Prime Real Estate in a prime location with excellent road transport connections with the M25. The Toby Carvery is a fine building of considerable merit, that was once owned by the council, and used as a home for the elderly. All of the above has been handed to Spurs by lease, for a derisory sum thereby denying the residents of Enfield what was rightfully theirs.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eHOM	They do not need more space essentially that will impact the wildlife that lives here	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e06Z	I am very unhappy about the change from a sedate golf-course, which allows nature to exist alongside it, to a far more developed area, which would mostly preclude wildlife and the natural world. I feel that the scale of the development is too big, in what is currently a nature-friendly site. Thank you.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eH56	Look harder for alternatives not destroying genuine biodiversity	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3iu	The Land should be for the locals to enjoy	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGSb	As an Enfield Local with Whitewebbs on my doorstep. It will kill the local landscape and bio diversity. And the council have not leased this land for market rates to a premier football club which can afford land elsewhere.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGyZ	Totally inappropriate development for private profit, the people of Enfield will gain nothing from millionaire footballers speeding through the security gates on their way to training.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHTG	Disgraceful that Spurs are even thinking about this ! Wrecking habitat and impacting on biodiversity just because they can pay to do this. Absolutely disgusting and I do not support this at all! Shame on you Enfield council and Spurs	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBax	This application should be rejected, Whitewebbs is of such value to the locals, its visitors, nature and the wildlife that inhabits it. It is such a positive place for myself and so many, This proposed action would be devastating and unrecoverable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eE24	This application should be rejected, Whitewebbs is of such value to the locals, its visitors, nature and the wildlife that inhabits it. It is such a positive place for myself and so many, This proposed action would be devastating and unrecoverable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGOy	This application should be rejected, Whitewebbs is of such value to the locals, its visitors, nature and the wildlife that inhabits it. It is such a positive place for myself and so many, This proposed action would be devastating and unrecoverable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHo2	This application should be rejected, Whitewebbs is of such value to the locals, its visitors, nature and the wildlife that inhabits it. It is such a positive place for myself and so many, This proposed action would be devastating and unrecoverable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e207	This is unnecessary and will not only disrupt the lives of the local residents and take away their outdoor space, but will use a disgusting amount of materials, cause an awful amount of carbon emissions and no doubt have a lot of waste. DO NOT DO IT	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eJ0D	Whitewebbs Park should be left for the public and wildlife to enjoy. Building on this area would be harmful	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dpN0	The proposed use of this space for THFC's training ground feels both unnecessary and avoidable. Surely there are numerous alternative locations where such a facility could be built—places that wouldn't pose a threat to the environment, local wildlife, or natural landscape as this one does. Since lockdown, this area has flourished and rewilded beautifully, becoming a haven for a wide variety of wildlife. It's also become a cherished space for the community—a place where people and their dogs can enjoy the outdoors and benefit from the wellbeing it offers. To restrict public access to this land, which many feel a rightful connection to, seems deeply unfair. Especially when a club with THFC's resources could easily invest in developing training facilities on brownfield sites. Preserving greenbelt land—spaces that offer far more value to the wider public than private sports grounds—should be a priority	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e1Xu	The proposed loss of this space to THFC for a training ground is both unnecessary and deeply concerning. Surely, there are numerous alternative locations where such a facility could be built without causing significant harm to the environment, nature, and local wildlife — unlike this site. Since the lockdown, the area has naturally rewilded, creating a rich and diverse habitat that now supports a wide variety of wildlife. It has also become a vital green space for the local community — a place of wellbeing and peace for countless people and their dogs. To take this away, fencing people out of an area that has become a shared sanctuary, feels both unjust and avoidable. With THFC's financial resources, they are more than capable of developing on brownfield sites, thereby preserving precious green belt land. Spaces like this provide far greater long-term benefit to the public than another football training ground ever could.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eG97	Hi. I don't all live locally but felt the need to object to this. It is clearly going to be terrible for the local community and the environment, and it will cause even more biodiversity loss in a country which is already massively devoid of nature. Even if you were to replace anything of value to nature with BNG aspects, this would still wreck what is already a thriving ecological landscape for humans, animals and insects. BNG cannot replace beneficial and established natural populations. Please reject the plans for this development and think about the bigger picture and the future of the planet. With kind regards and thanks.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	Emma Halstead	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] do you live? Enfield Do you have any accessibility needs? No Your message Have you contacted us about this issue before? No What type of enquiry is this? Other What is your message about? The former Whitewebbs Golf Course, Enfield Message details I would like to draw the Mayor's attention to a planning application relating to Green Belt public parkland in Enfield, which the Enfield Council is intent on leasing to Tottenham Hotspur for the paltry sum of £2m over 25 years. Local residents are extremely unhappy but the rogue Council, so desperate to seek or lease anything they possibly can, listen to no one. It's a beautifully rewilded former golf course, now a valuable habitat with many interesting trees and much valued by local residents. There was an informative and full article published in the Guardian about the proposals.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eG2l	This would be a terrible loss to the community. We need this park, the ancient trees and the biodiversity more than ever. Please do not let this happen.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eB1d	I strongly object to any plans to build on Whitewebbs Park. Whitewebbs is a cherished green space that holds immense environmental, historical, and community value. It plays a critical role in preserving local biodiversity, providing a home to wildlife, and offering vital access to nature for thousands of residents who rely on it for recreation, wellbeing, and connection. Building on this land would cause irreversible damage to a much-loved public asset. Once it is lost to development, it can never be recovered. The people of Enfield have made it clear time and again that they want Whitewebbs to be protected, not sold off or built over. I urge decision-makers to listen to the community and protect this important part of our natural and cultural heritage. Whitewebbs must remain a public park, not a development site.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e0Y1	Please don't allow this to go ahead. Whitewebbs is a beautiful, ancient park. Since the golf course has been allowed to re-wild it has become a brilliant example of nature healing itself. To cover over public land with plastic grass is an absolute travesty. You only have to look at the national outcry at the chopping down of the oak tree in the Toby Carvery car park to see how much the public want our natural landscape to be preserved.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHJD	We can't afford to lose this vital green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHY6	This is an objection to this application as it would devastate the local wildlife. We visit regularly and enjoy the centres which have been there for many years and love the green spaces and rewilding that has taken place.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8gR	This would be a devastating loss at a time when we cannot afford to lose any more green spaces especially one as important for biodiversity as Whitewebbs. Its loss would be a complete disaster.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGtq	In view of the Mayors idea to get people out of their cars and exercise why does he think it's okay for a professional football club stopping access for the public to use the facilities already there? It seems the mayor is only interested in non car use when it suits his purpose ie to make money from the public. The Labour Council in Enfield is sure to lose the local election next year with all these proposals. Thank you Sadiq Khan for persuading me to move out of Enfield as soon as possible. The Mayor is acting as a dictator ignoring what residents want from their open spaces. Consultations act as a tick box exercise for him and the local council. They ignore and over ride opinions when it doesn't fit with their plans.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dxU8	This is a beautiful place which we visit frequently. The amount of wildlife that will be displaced or destroyed is unacceptable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEs6	I'm so sad that this application has got this far. It is completely counterintuitive to even consider these plans as a possibility given the current state of UK nature and environmental crisis. Whitewebbs is such a beautiful place and should be protected. Please consider that: - the GLA has already stated that the application doesn't meet the criteria for plans for Green Belt land. - the work to create these new pitches would completely destroy a site with huge natural and scientific significance including vast habitats such as the grasslands and historic trees which cannot simply be replaced by the planting of new saplings, a place that is valued by and utterly necessary to the public for recreation, mental and physical health benefits and learning about and appreciating the natural world. - the environmental cost of the site being developed, including the huge carbon emissions that would be produced and lack of natural resources to then take that carbon out again. - the negative effects of the end result of the proposed development, including displaced wildlife and people, increased pollution (including light and noise), and increased heat due to the artificial materials used for the pitches.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF06	This development should not go ahead	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEDs	I object based on the impact to biodiversity and an unnecessary lease of the land. I happen to care deeply about nature but also support Spurs, especially women's football, and still object to this. I do not understand why they cannot use the other training ground. Previous building by Tottenham Hotspur's have not lived up to biodiversity gains and I believe this is greenwashing. It is clear to me that Whitewebbs is incredibly important to local people as access to greenspace and wildlife	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCqk	I'm very concerned about the loss of a valuable green space and the impact of such a large scale and invasive construction project on the environment and biodiversity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e2Po	I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below. This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections • The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. • Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF). • The required "Very Special Circumstances" (VSC) do not exist to justify overriding Green Belt protections. ~~2. Environmental and Ecological Destruction~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEdo	A very important space for walks woodland nature . LEssential for mental wellbeing to have it locally .	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHub	I completely object to public land being taken into private ownership for the benefit of commercial gain. What is being proposed takes away a priceless heritage for the community and once lost it is not replaceable. Why should the public assist a private company for their benefit. I do not know any locals who agree with this scheme. We have already had the felling of ancient tree by local public house with commercial connections to Spurs. It seems there is much to uncover for the media. Please stop this scheme.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHbM	It would be hugely regrettable to allow this beautiful green space to be abused; loved by local people who live in Enfield because of our proximity to green open spaces, green belt land and to be able to enjoy and protect the environment around us. Not only do we need to protect and look after spaces like this that offer so much to a growing population who need to be able to explore our landscape from the confines of poorly designed housing and to explain to our children the importance of protecting the environment for a sustainable future. For this to be allowed would be devastating to the biodiversity of the area let alone the future impact upon our green spaces and our human responsibility for the world around us. When will enough be enough? At what point do we put a moral ethical decision above money, and protect spaces like this?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHo7	I object to the destruction of the Whitewebbs park. We are in a nature crisis and have a duty of care to protect green spaces for the benefits of all.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDdH	We should be striving yo keep open green space with each access to residence and local community. Natural, environmental and mental health impacts.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q50000c8Tn0	Changes to the landscape Whitewebbs Park would change from:- An open access Green Belt land, having been left to nature for three years, to a highly restrictive and intensively managed industrial sports training ground. A thriving ecosystem in a scrubland landscape supporting biodiverse flora and fauna to a turf monoculture with some plastic-grass pitches eradicating almost all present and future wildlife. Wildlife connectivity over the whole site to 40 inhospitable acres blocking access on surrounding sides. Changes to the character Existing Landscape Currently the scrubland landscape of Whitewebbs Park is a thriving, biodiverse habitat supporting a great range of birds, mammals, reptiles, insects, wildflowers, grasses, shrubs and trees. The land is currently capturing and storing carbon, boosting biodiversity and assisting natural drainage through a mosaic of open grassland/plant/shrub/tree layers. Trees in particular also help to reduce ground and air temperatures with shade and by 'transpiration cooling'. It is a place where the local community and others can go to relax, enjoy and connect with nature, helping to contribute to an increased sense of wellbeing, resilience and optimism. Proposed Landscape The planned industrialised sports area will hugely degrade this land with the construction vehicles digging, scraping and levelling the land and removing trees in order to construct the monoculture turf and plastic-grass pitches. Herbicides and fertilisers will routinely be used and the combination will result in the eradication of almost all wildlife and beneficial vegetation within the compound. Floodlighting will also be detrimental to nocturnal creatures such as owls, hedgehogs, moths and bats as well as disorientate the natural day and night time rhythms of birds, mammals and reptiles over a much bigger adjacent area. It is vital to emphasise that astroturf/plastic-grass is hugely harmful to the environment. It has a huge carbon footprint in terms of manufacturing, transporting, installation and lack of recyclability as well as the devastation it causes to wildlife while in use. Questioning the plastic fibres and rubbers	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q50000cWHTh	Changes to the landscape Whitewebbs Park would change from:- An open access Green Belt land, having been left to nature for three years, to a highly restrictive and intensively managed industrial sports training ground. A thriving ecosystem in a scrubland landscape supporting biodiverse flora and fauna to a turf monoculture with some plastic-grass pitches eradicating almost all present and future wildlife. Wildlife connectivity over the whole site to 40 inhospitable acres blocking access on surrounding sides. Changes to the character Existing Landscape Currently the scrubland landscape of Whitewebbs Park is a thriving, biodiverse habitat supporting a great range of birds, mammals, reptiles, insects, wildflowers, grasses, shrubs and trees. The land is currently capturing and storing carbon, boosting biodiversity and assisting natural drainage through a mosaic of open grassland/plant/shrub/tree layers. Trees in particular also help to reduce ground and air temperatures with shade and by 'transpiration cooling'. It is a place where the local community and others can go to relax, enjoy and connect with nature, helping to contribute to an increased sense of wellbeing, resilience and optimism. Proposed Landscape The planned industrialised sports area will hugely degrade this land with the construction vehicles digging, scraping and levelling the land and removing trees in order to construct the monoculture turf and plastic-grass pitches. Herbicides and fertilisers will routinely be used and the combination will result in the eradication of almost all wildlife and beneficial vegetation within the compound. Floodlighting will also be detrimental to nocturnal creatures such as owls, hedgehogs, moths and bats as well as disorientate the natural day and night time rhythms of birds, mammals and	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFdA	Dear Sadiq Khan I voted for Labour in the last election for all the promises made to support wildlife and enhance the environment and I feel severely let down as one by one they get dropped or quietly forgotten. I also voted for you Sadiq Khan as you stated there would be protections for Metropolitan Open Land and Green Belt as I believed there was a London Mayor who understood that ambitious Green goals and actions were essential to enhancing the life of Londoners and also to have any chance of meeting net Zero by 2030. My levels of trust have been completely shattered as one by one Green policies are replaced with the flawed concept of growth at any cost. However, I hugely appreciate your emphasis on improving London's air quality and surely maintaining this wonderful thriving ecosystem that is Whitewebbs Park, which forms a green corridor to surrounding land, totally aligns with this thinking? There are many examples of other comparable global cities introducing green spaces to help cool the increasing temperatures and providing habitat for wildlife and so making these urban landscapes more resilient and attractive places in which to live. London already has Whitewebbs - a remarkable landscape of ancient and veteran trees, rare grasslands and scrub, all vital to supporting it's current biodiverse flora, fauna and fungi. It's no good saying new spaces will be created to replace Whitewebbs, they can't possibly provide the wealth of diversity of landscape that has taken years, decades and centuries to create. Whitewebbs is public land and must not be handed over to the wealthy private corporation of Tottenham Hotspur Football Club for their own economic gain. If so it will become a barren industrial site covered in plastic grass with routine use of herbicides and will destroy almost all of the vast wildlife population that is currently living there. The site will be used to train elite athletes and so there will be virtually zero benefit to residents of Enfield and Londoners generally. Whereas this hugely popular open space is frequented by many seeking calm, comfort or energy that the connection with nature can bring. Intelligent joined-up thinking is urgently needed to address the Climate Emergency we are in and to protect the riches of Whitewebbs Park from development would be the very best decision London could make for Enfield to become a sustainable, liveable neighbourhood for present and future generations. Will the final decision be on the right side of history? Kind regards 	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eHY5	Whitewebbs should be protected. Full of Nature, history, wildlife and community spirit which will be destroyed if this goes ahead.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eG2i	Please find another location , spurs have built in enfield enough.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBJM	The long term impact on having more plastic pitches and tearing down trees that currently home our wildlife as well as the impact when they start work in unmeasurable. For what, nothing for the locals apart from more people travelling here to stand outside waiting for autographs. Ridiculous waste of our beautiful green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGRA	NO MORE BUILDING ON GREENBELT!!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFsq	As a London-based landscape designer I believe passionately in the importance of public green spaces for the mental and physical benefits they provide to people, and the crucial roles they play in providing resources and habitat for biodiversity, particularly in urban areas. These things are essential for a thriving metropolis that strives to protect the crucial links between people and the environments they inhabit. In an age of climate change and increasing biodiversity loss, the creation of more green spaces in urban areas is essential in order to face the challenges of the future. The many ways they do this includes, reducing the urban heat island effect through shading by trees, mitigating water runoff through the soil, reducing pollution and increasing clean air by plants. The documented health effects of parks and gardens to citizens has become well known, particularly since the pandemic. Conversely the loss and destruction of green spaces is extremely detrimental to a healthy city. It is with this latter point in mind that I wish request your intervention in the current planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, to the effect that it is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). Further to the general importance of green spaces cited above, I believe that there are procedural issues that mitigate against the granting of this application. This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. The co-opting of public space by Tottenham Hotspur Football Club (Spurs) through a leasehold agreement with Enfield Council, which is far from reflective of market prices, in order to fence off and flatten 40 acres of public parkland to build 10 football pitches (including two floodlit and one astro-turf pitch), large buildings, and new roads, for private/elite use, is contrary to the values of civic, social and environmental best practices. The proposal constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Enfield Council failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' formal complaint and the Local Plan Stage 2 Hearings. Whitewebbs Park meets the ecological criteria for a Metropolitan Importance SINC but was excluded from designation, reducing its legal protections. These failures raise serious legal and environmental concerns regarding Enfield Council's handling of conservation policies. ~~The park is of great importance to the local community and a heritage asset, yet the voices of dissent against this proposal continue to be neglected.~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDpy	Whitewebbs park is great for walking my dogs meeting up with like minded people, having a coffee at the local cafe in the park , it's great for mental health and keeping fit. Whitewebbs park holds alot of wildlife to take this from the public is a tragedy, spurs have enough money to buy elase where	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eD0Q	Our biodiversity is on its knees and will not improve if we continue to pave over it at the whim of private interests. Whitewebbs proves how nature can rejuvenate and thrive. The nature walks are legendary and it's Guardians are passing on their unmatched knowledge to its future generations. The possibilities of using the wild beauty here to help mental wellbeing and turn around lives with engagement in nature far outweigh yet more sterile, unneeded pitches and the enticement which are unlikely to materialise.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFGQ	I object as it will have an environmental impact and loss of green/ open space	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eILx	I strongly object to any development on this site unless it includes full protection and preservation of other suitable park trees, following the shocking, illegal butchery of the Whitewebbs Oak. See full information on that below. The Incident: An ancient oak tree, estimated to be 500 years old, was felled in Whitewebbs Park on April 3rd 2025 The felling of the ancient Whitewebbs oak tree in Enfield has sparked outrage and an ongoing investigation While the pub chain Toby Carvery, owned by Mitchells & Butlers, admitted to felling the tree, citing safety concerns, Enfield Council has reported the incident to the police as criminal damage and placed a Tree Preservation Order on the remaining part of the tree. There are calls for a full criminal investigation, independent investigation, and for all suitable trees in Whitewebbs Park to be protected. Breakdown - The Reason for the Felling: Toby Carvery stated that contractors advised them the tree posed a serious health and safety risk due to a split and dead wood. The Response: Enfield Council: The council was not informed of the felling until recently and has reported it as criminal damage to the police. They have also placed a Tree Preservation Order on the remaining part of the tree. Mitchells & Butlers (Toby Carvery): They have apologized for the distress caused and acknowledged a need to improve their protocols. They also stated they followed advice from contractors regarding safety concerns. Public Outrage: Many residents and environmental groups are outraged, calling for a full investigation and stronger protection for other trees in the park. Ongoing Investigation: The police are investigating the incident, and there are calls for a full criminal investigation, including an independent investigation commissioned by the council. Future Protections: There is a push for all suitable trees in Whitewebbs Park to be protected by Tree Preservation Orders. Calls for Justice: ~~There are calls for those responsible to be brought to justice.~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGKN	I am utterly appalled that this application has even reached this point because it should not have even been a consideration in the first place. I wholeheartedly oppose this application due to the impact that it will have on the local community, environment and flora and fauna that exists there. Does the community need a specific female training ground at the whim of Tottenham Hotspur's at the expense of the WHOLE community that use Whitewebbs regularly-at all times, simultaneously providing green space access to both maintain and improve mental health and wellbeing for ALL. I cannot condone this application and I do hope that someone will actually consider this from our perspective and not make a decision based on how much money can be made-a miserly return for the money Enfield council will receive and so foolishly agreed to. We should protect what we have-once it's gone we will never regain this land regardless of the 'lease' terms. It will take years beyond our lifetime to see any kind of reemergence and by then it'll be too late for our future generations. Just imagine the destruction and devastation it will cause, through the process and the final outcome. Undulating land, flattened and smothered in fake grass, historical trees- felled forever along with the benefits they bring to our air quality, the biodiversity they support and the anti carcinogenic properties they provide. I could go on... PLEASE, make the right decision-there are many other places that this could be constructed brownfield site for example.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eElg	This area is a much loved green space. To surrender it to private interests is to act as if climate change and loss of biodiversity is a "good thing". We have already lost much of the Whitewebbs oak - which once provided habitat for a good deal of wildlife. To further decimate the wilder green areas is a crime against nature and runs counter to local feeling. We need to nurture green spaces, not build on them - once lost these spaces cannot be regained. There is no local 'need' for this development, it is solely a way for private interests to make money.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBeY	I have lived in Enfield all my life and regularly visit Whitewebbs. The impact to the environment and all who enjoy this beautiful space would be hugely detrimental. This land was given to the local people to enjoy and should not have plastic pitches built on it! This would be a travesty if planning goes ahead. It has naturally re wilded over several years and is a sanctuary for so many birds, animals and people. It would be a national disgrace if Spurs were allowed to build on this land. I urge the Mayor to do the right thing and reject this proposal.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eGNS	I strongly object to the planning application. I have been a resident of Enfield all of my life and am a frequent visitor to Whitewebbs. It is an extremely valuable area of green and beautiful space which is enjoyed by so many for recreational and health purposes. It isn't acceptable that a business is allowed to enclose public space. Building on the land for the use that has been proposed will reduce public access and with the proposed structure radically change the landscape of this land forever. Green space is important for so many in the area and this proposal will destroy so much natural space having a huge impact on flora and fauna and all at a time when the London Mayor has set targets to increase the amount of wild space. So many trees will be destroyed and wildlife affected. 50% of grassland and 207 trees would be lost. This would be devastating. Whitewebbs should remain a public park with full public access. It is a travesty if this planning application is approved. It will be devastating for so many and the reality is that a relatively few 'elite' footballers will benefit from the new facility. I cannot express strongly enough by objection but I hope and pray that justice will prevail.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEVa	Leave our heritage alone	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF08	This application must be rejected if we are to preserve our open spaces. My wife's grandfather was the last resident park keeper who helped keep the park open and looking good on a very small budget. The land and the wider environment will not benefit from this development. If approved, these proposals will result in the loss of open space for the people of London and beyond. A loss which will never be regained. Tottenham Hotspur already have extensive facilities which more than meet their requirements; 14 pitches and excellent facilities. They can accommodate all their needs already. Tottenham have a track record of occupying sites for a short period before relocating and allowing their former facilities to be developed for housing. If this were to be approved, what would stop Tottenham from moving out of their current facilities to enable further development on that land? The people of Enfield already own this park. It must be preserved for future generations.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDBM	The loss of this public open space and the wildlife is not to be underestimated. There is enough space already owned by Spurs for football. Selling this land to the highest bidder negates the rights of the people of Enfield to access this land. Please do not allow this to continue.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eA2L	I used this area initially for golf and that was taken away, now i use it for walks and again they want to take it away, NO!!!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDq0	I strongly object to this planning application by Tottenham Hotspurs F C to takeover a large portion of much loved Whitewebbs park, which was left to the people of Enfield in perpetuity. We all realise that after the 25 year lease expires it will not be returned to us. Spurs already have more than enough training pitches/ facilities just up the road at Bulls Cross. In my opinion it is all part of a land grab by Spurs of green belt land, which should not be allowed. I am long time member of a number of wildlife conservation charities, including RSPB, BTO, and very concerned about the loss of habitat that the plans will entail, also including the use of plastic pitches and illumination lights. Whitewebbs park is a valuable green open space for all Lononers at the moment and you don't realise what you've got till it's gone, in the words of Joni Mitchell.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010elk6	This is the most corrupt form of politics I have witnessed. The environmental, social and health impact of this scheme is horrific. Whitewebbs is used by residents and visitors no matter of their social, economic or cultural standing. To concrete over our beloved space that has been left to Enfield residents is abhorrent. Levy is rapidly taking over north Enfield with planning agreements not being upheld, an ancient tree being destroyed for no reason and with no benefits to the local community. The training ground is for the elite, with no economic, social or environmental benefit locally or for London. Corruption and financial gain of a few should not be allowed.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8bK	I urge you to refuse this planning application. Especially after the criminal damage to the 500-year-old Whitewebbs Oak, this would be a much-needed win for Nature and the Community who love this site, and for all the wildlife that call Whitewebbs home. We are in a climate and ecological crisis, how is it rational to destroy the environment for football? There is no good reason. I trust you will act with integrity as the planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBRK	Utterly appalling loss of local, open green space. This would be an irreversible decision for short term financial gain but at a deeper cost for generations to come.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eD8l	I should point out that selling off public land to private enterprise and business rarely ends up benefitting the greater good and general public. The idea that Enfield Council is willing to simply sell off land at a discounted price is quite unbelievable, and unnecessary. Their promised community benefits 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". It feels like the council can't be bothered to spend more time and effort on preserving and improving Whitewebbs, and will instead give it away and hope for the best. Additionally, it doesn't feel like this decision is in the best interest of local residents or the general public. Instead it's a great business arrangement for Tottenham Football Club, and someone in the council is benefiting from the proposal. The supposed "benefits" to the community are minimal and some are harmful: the loss of public land and to the detriment of local people, like the café owner. I understand that the Mayor has the power to override the decision by Enfield's planning committee given it's a decision that is of potential strategic importance affecting Green Belt or Metropolitan Open Land. I would strongly ask for the Mayor's Office to step in and stop this questionable planning from proceeding. Instead, local business and the community might be able to support the funding of the preservation of such a green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3Xn	This is the most beautiful and useful local Open space resource and has been used by myself, my partner and my dog for years. We are devastated that this plan for change of use is even a consideration. This space has been a part of my life for 15 years in so many capacities. I have walked here everyday for as long as I can remember and without I along with many will be lost. Please see sense and reverse this absolutely insane idea to take away from the public one of the most amazing spaces in the whole of London.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dxOd	It would be a loss for this to just become another football pitch, which would only get used on the weekends, and the existing wildlife would suffer	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAQn	The use of of this beautiful green open space will be restricted, Loss of public space, leasing over half of the Green Belt parkland to a private football club undermines the park's role as a public amenity. The development will cause habitat destruction, reduced biodiversity, and disruption from construction and increased traffic. This deal deal disproportionately benefits a wealthy football club while limiting access for local residents, especially with the removal of a northern car park and limited public transport options. The council is also proposing the charge for parking in the joining Forty Hall open space. I urge the Mayor to reject the Spurs Football club bid to develop this civic amenity space	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8HG	This area is so important to so many people in the area, it's absolutely heartbreaking to lose it. Tottenham Hotspur FC already have a huge area with multiple pitches available for the men's teams, why do the women's teams need more pitches, why can't the area be shared? The loss of Whitewebbs to the public is devastating!!! The consultation with Enfield residents has been poorly conducted and we have been ignored..	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eDdD	The loss of Whitewebbs to a huge conglomerate, is not in keeping with the original purpose of the space being for the use of the residents of Enfield. The neglect since the pandemic has resulted in a beautiful open space for all to appreciate and nurture as an environmental space. It's 'lease' to Spurs at what is virtually a peppercorn rent just to service the councils bad debts is beyond belief. I will be devastated if I cannot access a space I have walked in since I moved to Enfield in 1988	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e1t5	The people of Enfield have enjoyed Whitewebbs for centuries. The pride of Enfield used to be it's greenbelt land. Stop allowing the sale of public land for financial gain.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8wX	biodiversity and green space in the city must be protected - not eliminated at the behest of a corporation	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8Tz	I object due to above reasons.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGAg	To Whom it May Concern Please note my objection to the large scale development proposed by Tottenham Hotspur Football Club on naturally rewilded parkland that was Whitewebbs Park Golf Course and part of the Green Belt Although not local to Enfield I have friends nearby who I visit and have walked with them on several occasions around the affected area that will be destroyed. Following the closure of the golf course the park has enjoyed a period of natural rewilding that has produced a rich mosaic of grassland, scrub and woodland habitats and a home to an array of flora and fauna, which includes rare and protected species Briefly my objections are based on :- 1). Destruction of a recovering habitat with loss to flora & fauna, including 50% of Whitewebbs' grassland and 207 trees which according to the Woodland Trust comprises mature and veteran specimens 2). Ongoing issues with the maintenance of the grass covered football pitches with the use of potent and dangerous weedkilling chemicals i.e. glyphosate, which, even with the best intentions used while being applied, will spread beyond the new fences contaminating the surrounding area - including people 3). The massive CO2 burden that the development will generate. This does not fit with the Mayor of London's major new push to accelerate the capital's journey to net zero by 2030 ? 4). Loss of public access following the development, degrading the local environment with all the associated detrimental effects on the local population's mental wellbeing and health 5). Enfield Council are planning to allow large scale environmental damage to occur on Green Belt - hugely important designated areas around London to help people maintain some kind of connection with the 'natural world' in this densely populated city, again to positively improve mental wellbeing and health 6). The developments lease has clearly been poorly negotiated given the industrial size of the proposed plans, £2 million / 25 years i.e. £80k / year, for a Premier League club spending over £2 million / week ? 7). Spurs have viable alternatives to this development of 10 additional pitches, already having 17 pitches adjacent to the park. No other Premier League club has more than 17 training pitches so why can't Spurs facilities be shared between the men and women teams as the other clubs do ?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEQx	This is a public space they have enough training space it looks like a land grab.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dxYj	Short term profit over the long term future of people and planet. Shocking proposal	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eELo	Absolutely disgusting that such a developer should be allowed and nothing but corporate greed.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eC9Q	At a time when housing development is being permitted on green spaces including arable farming land, woodlands and meadows, it is vital that ALL green area are protected and this proposal is merely for sporting use. I am making my objection on these grounds and in support of all the local people who do not want yet more development in a Green Belt area.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e0AR	We need more not less space for our mental health and wellbeing.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF04	We need more not less space for our mental health and wellbeing.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eI5q	I totally object to this appalling proposition which is being driven entirely by money. The "benefits" to the sporting community are miniscule compared to the devastating effect to this wonderful area, a haven for birds, animals and billions of insects, before even considering countless human beings, local and not local, who enjoy the peace and tranquillity that is Whitewebbs Park. I myself regularly make the 35 minute drive to walk here in all seasons and weather, and the benefit to me and my walking partner in terms of our mental health and general well-being, not to mention exercise, are immeasurable. The same must apply to thousands of others. It's the most beautiful and calming place I know. The damage that would be caused by this project are irreversible and avoidable. Everybody supports our sportswomen of course, but this is not the place. The impact on our quality of life, and life itself when considering the environment, is too great a price to pay. Thank you.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFmh	I am a lifelong Spurs supporter, but object strongly to this proposed development. There would be in my view an unnecessary loss of green / recreational space and a consequent loss of vital wildlife habitat. The proposed "mitigation" measures go nowhere near far enough to compensate for the anticipated losses to nature (including humans).	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9Uh	I think it is disgraceful that public land will be lost to a huge financial institution. I object to this land being lost to walkers, dog walkers, Cyclists et cetera. It doesn't seem that the views of the public are being listened to. The court proceedings have been a shambles. If it were to go ahead, surely the local council ought to be able to exact a serious amount of rent from Tottenham Hotspur. What the council will receive is a little more than you would expect an average footballer to earn in one week.!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8Wl	Whitewebbs is home to so many birds and butterflies and such a valuable green space for everyone living close and far. I have seen hundreds of meadow browns whilst walking through the park. The recent unlawful felling of the ancient oak shows how valued nature is by the people. Do we want to let greed win? We need more skippers and kestrels not plastic lawns and fences.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dk8m	This area should remain open as a public green space, not turned into a private closed area with loss of biodiversity	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDHn	Whitewebbs was designated as an area for public use and it should remain this way. Spurs building a training centre would deny the public use of the land. It would be an eyesore destroying the natural landscape. A large number of wildlife habitats would be destroyed which would mean future generations would not be able to enjoy this wonderful area. Spurs don't need a new women's training ground their men's training ground is as large as Arsenal's and many other teams where the men and women share facilities. If they want a separate area other sites are available within a few miles. This area would be greatly missed by myself family and friends. We walk our dog there virtually every day. Please let us keep this wonderful area as it is for ourselves and future generations.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4GA	We cannot afford to lose more and more trees and green spaces which are so important to our health and well-being. If you are unable to look at it from an environmental standpoint then also understand that green spaces make neighbourhoods more inviting and in demand. Give this community the gift of a vibrant and thriving green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFRI	Enfield needs more green open space for residents, this was a commitment in previous public consultations. So why remove this existing established area with all its natural wildlife? It will not benefit all people of Enfield - only those playing women's football and of course THFC. We don't need yet another training ground as well as the existing men's facility.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e1Xw	No just no	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eA8z	No just no	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9kd	The reason many of us moved to Enfield is to enjoy the green spaces available. These are being utterly destroyed and this proposal is one area where this is intended. This beautiful woodland, along with the wildlife within it should be treasured and preserved and readily available to the public to access.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eEaY	A former Londoner, I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space - so important to the local community and national heritage. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF). The required "Very Special Circumstances" (VSC) do not exist to justify overriding Green Belt protections. 2. Environmental and Ecological Destruction 50% of Whitewebbs Park's biodiverse grassland and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species. The replacement of natural grassland with heavily managed and synthetic football pitches would introduce microplastics, soil degradation, and long-term ecological harm. THFC has failed to conduct critical ecological surveys, meaning the full impact on protected species, including bats and invertebrates, remains unknown. Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation. Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met. 3. Loss of Public Access and Community Benefit The Park was purchased with public funds and intended for continued public use. The proposed development privatises 50% of the park, restricting public access to a site that has been freely available for decades. THFC's claims of community benefits are misleading - the facility will primarily serve an elite sports group with little public access. Harm and any benefit cannot be assessed without a Full Parkland Management Plan. 4. Procedural Failures and Mismanagement of SINC Review	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eEsB	I'm a former Londoner and I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space, which is completely unacceptable. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF). The required "Very Special Circumstances" (VSC) do not exist to justify overriding Green Belt protections. 2. Environmental and Ecological Destruction 50% of Whitewebbs Park's biodiverse grassland and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species. The replacement of natural grassland with heavily managed and synthetic football pitches would introduce microplastics, soil degradation, and long-term ecological harm. THFC has failed to conduct critical ecological surveys, meaning the full impact on protected species, including bats and invertebrates, remains unknown. Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation. Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met. 3. Loss of Public Access and Community Benefit The Park was purchased with public funds and intended for continued public use. The proposed development privatises 50% of the park, restricting public access to a site that has been freely available for decades. THFC's claims of community benefits are misleading - the facility will primarily serve an elite sports group with little public access. Harm and any benefit cannot be assessed without a Full Parkland Management Plan.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFBU	I do not agree with this whitewebbs is home to lots of lovely wildlife and has been a haven for many years to people who enjoy relaxing in its lovely gardens, as a local who has lived in Enfield for many years I am deeply concerned and object most strongly to these plans	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF5T	This development will do nothing for the local community, destroying a great recreational space and a great deal of natural environment. It is already evident that criminal damage has been done which is possibly connected to this application and no prosecution is imminent.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eI4K	The public golf course was a unique facility and cannot be replaced therefore its loss is irrevocable. Once given to Spurs it will never be publicly available again. Snatching it from public use is disgraceful and yet another facility lost to the residents of Enfield by this profligate and ill managed administration.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e506	Please do not allow this application which would destroy a public open space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCqv	Negative biodiversity impact. Loss of veteran and other trees. Loss of public open space. Please reject this irreversible land grab for nature and people.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFub	I grew up locally living in forty hill. I think this is a terrible idea and will impact negatively on the local environment and health of the local population for many years to come. The next move will be to say the plans fell through and build housing.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dwsM	THFC have slogans that they'll listen to the people. People have very clearly said NO! A rich club can regenerate a brownfield site but of course not at the very suspicious / incompetent rates the Labour Councillors have agreed to for this. A travesty for a PUBLIC park a vital green space so precious in London for nature and people's well being. This space could generate MORE revenue if the council let the properties on it properly at market rates let alone the discounted price here. A smoke screened application "for women" to progress in football. THFCs current training ground is never fully used quiet 90% of the time and last I looked women can play on the same pitch...so other than a potential pathway to development to profit Spurs further in the future there is no merit in their application or need. Disgusting. People of Enfield that keep voting in this awful, insincere Labour council for the past 20 years need to realise this is on them as much as Spurs. You'd think the "Green" Mayor flying across the Globe to sanctimoniously lecture everyone on global warming would step in - but it seems he's as fickle, devious, inane and fake as the rest of them...makes a mockery of everything they (Spurs, Enfield Council the Mayor) preach or claim to be concerned about - abject hypocrisy. However you view this it's just to benefit millionaire footballers and the profit sheet of a company. That kicking a football is more precious, valued, and important than our green spaces says a lot about society...Absolutely crazy when it's clear there are sound alternatives available and no need to lose this land - for good! Leave it alone THFC and Enfield Council.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEDr	I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF). The required "Very Special Circumstances" (VSC) do not exist to justify overriding Green Belt protections. 2. Environmental and Ecological Destruction 50% of Whitewebbs Park's biodiverse grassland and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species. The replacement of natural grassland with heavily managed and synthetic football pitches would introduce microplastics, soil degradation, and long-term ecological harm. THFC has failed to conduct critical ecological surveys, meaning the full impact on protected species, including bats and invertebrates, remains unknown. Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation. Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met. 3. Loss of Public Access and Community Benefit The Park was purchased with public funds and intended for continued public use. The proposed development privatises 50% of the park, restricting public access to a site that has been freely available for decades. THFC's claims of community benefits are misleading - the facility will primarily serve an elite sports group with little public access. Harm and any benefit cannot be assessed without a Full Parkland Management Plan.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dut1	Dear Mayor of London/GLA Planning Team, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development"; by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit for residents of the borough. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections ~~The Greater London Authority (GLA) has identified the proposed as inappropriate development in the Green Belt.~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eChl	To lose such a valuable asset to the community is a huge disappointment. It's our favourite place for dog walks and is one of our favourite places in the whole of London. A real shame to see it go.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEVe	Whitewebbs Park is a sensitive site for biodiversity many rare invertebrates and ancient trees. In this day and age we must conserve biodiverse sites such as this and not circum to the development at all cost mantra. Whitewebbs should be a jewel in nature's crown not another sports complex.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dk8q	Strongly oppose to the proposals. Please leave nature as it is intended to be. The animals and wildlife are unable to voice their objections to save their homes and habitats. We depend on these creatures for life cycle. Lets please not destroy them.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e20A	People need green spaces! And people know this is a huge loss for the natural living world. How can our natural species survive if their food sources and habitats continue to be destroyed? Where will they find food & shelter? We're getting to the point of self-destruction if entirely self-interested, short-sighted developers have their way on land set aside as a boundary to what is now negative growth. The Green Belt was the limit needed to protect ourselves from the harms of over-development yet this proposal dares trample over this common sense safety net. Those with legitimate rights and interests here have made their wishes clear: local residents, including the natural environmental ecosystems which took 100s years to establish. Does Hotspurs think they have a right to trample over our remaining sources of untouched natural land, destroying it for everyone with sanitised, unnatural football pitches? No: there are NO RIGHTS where harm is caused to others or their properties. It simply is not possible to replace the level of biodiversity which evolves perfectly over decades through the laws of Nature, with man-made tree planting initiatives - this can never be seen as a like-for-like substitution: they are incomparable. You reveal yourselves as tyrants if you choose to exert illegitimate authority over those you are both constitutionally and morally obliged to be in service to: this is clearly not in anyone's interests except for the large financial stakeholders. Let this be your legacy: it will be held on your conscience either way. We still await Justice for Whitewebbs Oak.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4K	Please don't let this happen. It is unacceptable to lose more parkland and trees to make way for football pitches. Spurs have enough football pitches. We can't lose more wildlife. We need green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAle	This area is huge for dog walking in the community as we are slowly losing green spaces.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eILy	I am appalled by Spurs! This must not go ahead! We have a significant lack of green space, let alone ancient trees for biodiversity. Please do the right thing! Refuse the money and allow nature to recuperate and provide beautiful green space to the locals.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e7d0	See attached Letter which contains my Strong Objections to this entirely inappropriate use of Designated Green Belt land	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIPB	We must preserve space like this for Londerers now and future generations.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHen	I object to loss of valuable green space containing iconic trees	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF05	Please stop developing over Green Land- This is too precious- Think of the mature trees the biodiversity and the devastating impact on the environment- STOP building on Green Spaces and parks	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3Qa	Dear Sadiq Khan, I live in Enfield. This is precious public land and should remain open and accessible to the public not to private entities. Thank you.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q50000aPQZt	This site is metropolitan open land and green belt and the planning application should have been rejected out of hand. Tottenham Hotspur is a very rich and powerful football club. Are their requirements for training facilities really going to be allowed to damage the ecology and biodiversity of this area of ancient woodland. I am appalled at the plan to install plastic grass, cut down trees and build on the open land of the park. Please reject this application in its entirety.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHZa	I am writing to ask the Mayor to reject this application. The land has long been designated for public use and enjoyment. It is used and valued by Londoners for healthy exercise and contact with nature. This plan removes a huge area from public access for the benefit of a single business. Large areas are planned to be covered in artificial surfaces, which is notoriously detrimental to wildlife and biodiversity. A concern for promoting nature-rich green spaces has been identified by the Mayor identified as a priority for London. This plan would be in conflict with the London Environment Strategy, p.18. My personal interest is in the destruction of safe riding paths that the plans entail. There are many horse riding establishments in the area whose activities will be endangered or curtailed by this development. In spite of numerous enquiries to the applicant there has been no clear information of how the safety of both horses and riders will be protected. In all the documentation I have seen no evidence that the applicant has sought advice from equestrian bodies to assess the impact of these plans on riding activities. I am truly worried that serious accidents could result. The Mayor is concerned to promote healthy outdoor exercise for Londoners of all ages. Horse riding is of enormous benefit for physical and mental health. The applicants claim that occasional access to their facilities by outside organisations in no way compensates for the permanent loss of open space for riding and walking. This is an environmentally destructive plan whose only beneficiary is an already wealthy international business that should not be allowed to expand its operation to the detriment of ordinary Londoners.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dy9Z	I ask you to refuse the planning application by Tottenham Hotspurs for Whitewebbs Park Enfield. This is a place, a space I visit often. This is a much used and loved green space it is vital to my health and well being and all of us. I enjoy the light through the many different trees, listening to the birdsong catching a glimpse of a woodpecker, bat, kingfisher or deer. It brings much joy to myself family and friends. Encounters with nature nurtures my imagination as an artist living and working in Enfield this is essential to my creative practise. When I am struggling to live life on life's terms this is where I visit to heal, repair to restore balance. In lockdown and beyond walking in this green open space became essential to the physical and mental well being of my family. This application will damage the beauty, the biodiversity of this much needed natural space. Whitewebbs Park is a vital asset to Enfield the lungs of Enfield of London. Please do not let Tottenham Hotspurs take our Park save Whitewebbs for everyone not for the few. We cannot not afford to lose Whitewebbs Park. I ask you to refuse this application by land grabbing Tottenham Hotspur Thank you	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEdj	I OBJECT	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEyf	Please dont let them build think of the wild life and and animals that live there and the community that love walks the heritage of Whitewell too	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHJE	This is my favourite place. I visit this area everyday with my dog and has supported my mental health for the last few years. There are not many places where we can go locally to get back to nature in such a beautiful and peaceful setting. The wildlife spotted at different t times of the day is something to behold. The community of walkers is a unique and friendly bunch and I have not met such a lovely group anywhere else. So many different people use this facility and it is awful that it is even being considered to turn into a training ground. The noise and traffic will destroy the tranquility of the place. While I am all for promoting women's football, there are plenty of brown field sights that should be considered- and why can they not share the me s facility which was built locally and every time I have walked past- it has been empty! Please don't take away our whitewebbs.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGVt	Public space, and wild space is absolutely critical for London. More pitches are not needed - what is needed is green space. The Victorians understood that and built parks and green spaces. Greed should not drive civic decisions, the public good should. Green space is in the public good. A few more football pitches for a club that already has enough, is not in the public good.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8fO	At a time when we should be preserving biodiversity it makes no sense to divide up beautiful land connecting 2 woods - contributing to an enormous loss of wildlife habitat. Please protect our land further future generations	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGVh	The only country I am not disappointed in is the countryside. It is crazy that we should have to defend a landscape. We want to assume that it is not alive that it doesn't feel, but it does. We tear each other to pieces, one side calling people terms like tree huggers or even nimbies the other side seen as cold blooded greedy people, sensitive to only their wants. Unfortunately, what would be destroyed is replaceable. It is a way of life which has taken centuries to create. A home for insects, birdlife and animals; we have our homes and now certain people want these. It is impossible to place like with like, to grow age and history again. Centuries old trees can never be replaced or the network they provide for each other underground. We are only just awakening to the fact there is other life - that trees can communicate, able to tell one insect from one another just through the insect's saliva and know whether they are good or bad for the tree's own being. When we walk through this great countryside, we are stepping into another Kingdom where hate and prejudice does not exist.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eDEd	I am writing to request that planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC) for a football training centre and ancillary buildings, be called in by both the Mayor of London (under article 7 of the Mayor of London Order 2008) and the Secretary of State (under s77(2)(b) of the Town and Country Planning Act 1990). This application should be refused for the reasons set out in my attached letter.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEq	Please reject this application. Whitewebbs Park is a beautiful place. As a public park it is well-used, and no part of it should become inaccessible to the general public. It would be wrong for it to become just for a privileged few. With its long views and open feel, one can see a long way and this makes it a preferred place for walking or exercising for many – particularly women – as it feels safe. For me, regular visits there play an important part in keeping my mental health in a positive place. To replace this naturally rewilded landscape – which is now so rich in biodiversity – with football pitches, ugly tall barriers, artificial lighting and noise would be devastating for the environment, and therefore for the generations that will come after us. There is no amount of money that would make this loss of green space to the general public a good deal for Enfield. Thank you	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8rb	The environmental impacts of this would be disgraceful, we need to protect our nature and biodiversity and the cost environmentally is incalculable.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBt0	This is public land and shouldn't be sold off by the council.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHJf	Enfield is losing more and more of its green space. Whitewebbs is a local beauty spot for the people of Enfield to enjoy daily. I regularly walk my dog from Forty Hall to Whitewebbs and back and seeing many people doing the same. The plans proposed by Tottenham will greatly reduce the amount of space we can access and harm the local wildlife. The fencing around the current training ground makes you feel as if you are walking past a fortress and feels imposing. To take the land from the public and give it to a football club is wrong. If Spurs need a bigger training ground they should have taken that into account before building there.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFHv	Please do not approve the Whitewebbs planning application. Once a green space and the wildlife within that space is disturbed it cannot be returned to its original state by 'enhancements' and 'restoration'. It is also an important space for the local residents who, whatever 'enhancements' are made, will not provide the same natural facility as previously as a football club will now be using a large proportion of that space.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAki	I am appalled that my local council (Enfield) has granted permission to Tottenham Hotspur's Football Club to build an elite football training facility on public access land (the former Whitewebbs Golf Course) on a 25 year lease. I believe this; • Violates green belt protection • Will have a massive negative impact on the environment and it's supported ecology • Block public access to 50% of public access land within the leased area • Control public access to the remaining 50% of public access land within the leased area (including Parking, which will be significantly reduced and potentially cause localised traffic congestion), and manage that parkland within no proven experience of mature parkland management • There is no benefit to the local community, nor the environment – this will be an elite, female only, training facility which will not be freely available to residents who currently enjoy this open space Given the lack of justification for Green Belt development, substantial environmental harm, and lack of public access or benefit, I believe this planning application should be called in and rejected in favour of preserving Whitewebbs Park and other important green spaces for future generations. 	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGto	I am concerned that Spurs will limit access to the public to Whitewebbs. I am also concerned about the environmental impact to the biodiversity in the local area.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEZK	Spurs already control a vast area of land in the northern area of Whitewebbs Park and clearly they intend to acquire use of the majority of it, it with promises of so called improvements which will not benefit the users of the space or the ordinary residents of Enfield at all and will merely serve to deny access to the majority for the ultimate benefit of Spurs and Spurs alone. This appalling land grab aided and abetted by a council which has little or no interest in the green spaces of Enfield should be rejected out of hand.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eICE	Having visited Whitewebbs many times and done some ecological tours of the park it seems criminal to me to mow it down and make it into football pitches. Its biodiversity and status as an established natural haven should be protected and treasured and not bulldozed for yet more football pitches caving into big money from Tottenham Hotspur. Please protect this special place - it is a treasure in our urban environment.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9SI	We, Enfield residents, do not need a separate women's football academy. The spurs site already have plenty of pitches which could be used for both sexes. The land Spurs intend to build on was bought for the residents of Enfield to enjoy and was not meant to be utilised by a private enterprise. This land should not have been leased so cheaply either to Spurs. We would like the land to remain for public use as it was intended, for future generations to enjoy. The natural habitat will be totally destroyed by building artificial pitches.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e4lI	With the recent felling of the 500 year old Whitewebbs oak tree, there has been increasing concern on the impact on the environment that this plan will have. It is concerning that land designated for public use is being earmarked for private gain at very little benefit for the community. As founder of the Enfield Community Action Group, I have also written an open letter to the Mayor (see file attached) which highlight the issues of this proposed development in relation to trying to increase more affordable housing across London. We urge you for all the reasons cited above to reject the application. ██████	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e0AM	Please refuse this planning application and do not ignore the heartfelt pleas from so many local people not to allow the destruction of this beautiful place!! The current established, thriving, ecosystem provides a stunning mosaic of grassland, scrub and woodland habitats and is home to an astonishing array of flora and fauna, which includes rare and protected species. The THFC proposal to build a new road through a portion of the ancient woodland near Whitewebbs Lake*, would irremediably destroy the historic character of the Park and the vital, present nature, and take away a long standing space dedicated to the public. And this all comes in a time where we are losing so much publicly accessible open space, with an ever growing population, and during the threatening loom of climate change and species decline. Please listen to your people!!!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010donS	Public open space is an amenity for all; football pitches are an amenity for a minority of the population. London is not exactly deprived of football pitches. The maintenance of the public open space is far more important.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAVm	I strongly object to the loss of this wonderful open green space and the associated negative effects on wildlife, its habitats and the quality of life and well being of local residents and visitors alike. The environmental impact of the building of the development is beyond horrific and on almost unimaginable levels. The scale and numbers of buildings planned is unacceptable and unnecessarily destructive. Too many huge developments are being imposed on communities and are destroying London's precious green spaces which are so vital to all aspects of our lives. I urge you to reconsider this plan and to call it in. Please help us Londoners save this amazing park.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4fR	I strongly object to the loss of this wonderful open green space and the associated negative effects on wildlife, its habitats and the quality of life and well being of local residents and visitors alike. The environmental impact of the building of the development is beyond horrific and on almost unimaginable levels. The scale and numbers of buildings planned is unacceptable and unnecessarily destructive. Too many huge developments are being imposed on communities and are destroying London's precious green spaces which are so vital to all aspects of our lives. I urge you to reconsider this plan and to call it in. Please help us Londoners save this amazing park.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e2dw	More people enjoy gardening and gardens than football, this application is just about more money!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dtjh	I was born near Whitewebbs Park and still visit family there frequently. It has been a public accessible area with considerable environmental value, with great importance to childrens' development for many decades. No part of it should be converted to the proposed new use.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dreo	I was born in North Enfield, and have lived all my life in the Borough of Enfield. I have used WhiteWebbs park as a garden, a play space, and a healthy piece of countryside to get away from the stresses of daily life. I know and love every corner of it. It is also one of Enfield's greatest assets, which makes it a very special place to live. Without it, Enfield will become just another suburb..	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e8wS	I am very concerned regarding the loss of whitewebbs park, I often walk in the area and it has meant a lot for my mental and physical health. Also we don't need these green spaces for us humans, it is also vitally important for Flora, fauna, insects and wildlife. I am also concerned with the rise of temperatures and the trees keeps us cooler, we can't afford to cut down any trees, a bird won't build a nest in a sapling. Please I plead to think of the residents of enfield to save Whitewebbs park for us to walk in and keep our sanity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCH8	I am concerned that whitewebbs park if taken over by Spurs, the residents of Enfield will lose a large area that is allocated to them to enjoy an open landscape, for walking and exercise. Green spaces aid humans both mentally and physically. There is also the impact it would have on Flora and fauna, birds, insects and wild life. Light pollution could have an impact on bats and moths. The trees gives us the clean air we need to breathe, and with climate change I thought it would be more important than ever to keep the trees we have to keep temperatures down. Therefore I plead, save Whitewebbs park for the people of Enfield.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eD8E	The ENIC/THFC bid of £2million over 25 years = £80,000 per year and is less than 25p a year for every resident of Enfield. For the loss of access to 150 acres of open park land this is an exceptionally poor deal for the residents and tax payers of Enfield by any commercial standard ENIC is an investment company registered in the Bahamas where it doesn't pay UK tax. It has part ownership of THFC/Spurs which has an Enterprise value of £1.9 Billion and has an estimated turnover in 2022 of £443 million. If they want to extend their training facilities then they can afford to access land at commercial value at another site	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF00	Object to Natural Beauty, being developed.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFRb	Whitewebbs has been a really meaningful space for me and my family since we moved to the areas 2 years ago. I have spent hours walking there with my toddler who loves spotting birds and other local wildlife. Everyone who visits the area is amazed by what a beautiful wild space we have on our doorstep. The Tottenham takeover of part of this area would be an enormous loss for the community and the impact on the environment would be heartbreaking.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCMP	Dear Sadiq and team, I realise that this type of planning application might not be something that you would usually interfere with but I am pleading with you. I live in a one bedroom, inner city flat and my four-year old son lives near Whitewebbs Park. Whitewebbs is our 'garden' and our favourite greenspace. It is essential to us. To think that a public park is being potentially given away to a huge business (which already has a vast amount of land) is insanity. There is zero benefit to local people and there will be a huge environmental and wildlife cost. Also, we know how much nature recovery means to you and your office so i can't understand how the Enfield beavers (the first London beavers, which you helped to facilitate their arrival) would be a few feet away from a colossal building site and consequently surrounded by Spurs fences and development on three out of four sides? With the proposed green belt developments over the coming years, we absolutely cannot afford to lose public greenspace, especially ones as full of wildlife as Whitewebbs Park. Please help us to stop this mad and unjust proposal. It would not be for the good of Londoners. Best wishes, [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eD3k	I oppose this planning application as it constitutes yet another bulldozing of vital nature and green space - even more valuable rewilded green space no less - in pursuit of financial excess. I sincerely hope that it does not go ahead.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHMT	I just want to ask that no trees are chopped down.	Not set	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCqt	It is vital we protect urban green spaces in this time of climate crisis.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eA2K	This is outrageous- this is green space / green belt. This should continue to be just that. Stop building on the green belt / countryside just for money. Please re think this as it's green countryside that should be accessibly to all. Did Covid not teach us how valuable Green countryside and open space is for peoples mental health and wellbeing?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIlf	Whitewebbs Park is an asset to local residents and others who use it for recreation and health. It contains an ancient woodland and other trees of significant heritage. Wildlife is abundant. It is a local green space for Enfield. All of this will be lost through the transfer to Tottenham Hotspur. It will be devastating to the local community, users of Whitewebbs and nature. It will be an irreversible loss. It is imperative that you reject this application.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAn9	This application must be rejected, it would destroy an invaluable area of greenwood's and wildlife that is crucial to the local area and to London. The impact would contradict the policies that London and the GLA stand for of health, well being and natural environs for people and wildlife. Please reject this application. Thank you.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dkYT	I am writing to formally object to the proposed sale of White Webb's land to Tottenham Hotspur. This land does not belong to the council to sell but rather belongs to the people of Enfield. The council, as custodians of the land, is duty-bound to protect the interests of the community and should not have the authority to dispose of public assets in this manner. The land in question is not private property, but public land. It has long been held in trust for the benefit of the people of Enfield, and it is morally and legally wrong for the council to sell it off to a private entity, especially without the informed consent of the local community. The people of Enfield have a right to this land, and its sale should not be decided by a few individuals behind closed doors but by the collective voice of the public. The council's role is not to treat public land as an asset to be sold for short-term gain, but as a trust to preserve and protect for future generations. This is a fundamental principle of local governance. By selling this land to a private corporation, the council is abdicating its responsibility to protect the long-term interests of Enfield residents. The land should remain in public hands, and any decision about its future should involve thorough consultation with the community, not just a handful of council members or corporate interests. The sale of public land to a private entity, especially one with commercial interests such as Tottenham Hotspur, raises serious concerns about transparency and accountability. The local residents of Enfield have not been given a fair opportunity to voice their opinions on this matter, and the council has not provided sufficient evidence that this sale is in the best interest of the community. The decision appears to have been made with little to no regard for the will of the people, and this is deeply concerning. There is also a strong legal argument that the council does not have the authority to sell land that belongs to the people of Enfield. The notion that public land can be sold off without the informed consent of the public or a proper democratic process is, at best, highly questionable. The council is not the owner of this land in any true sense — it is the custodian, entrusted to preserve and protect it for future generations. The people of Enfield should have the final say in the fate of this land, not an external corporate entity seeking to profit from it. In conclusion, I urge the council to reconsider this decision. The land at White Webb's belongs to the people of Enfield, and it is unacceptable for the council to sell it off without due process and without consulting the very people it is supposed to serve. The council should act as true custodians of public land, protecting it for the benefit of the community and future generations. Please do not sell White Webb's land to Tottenham Hotspur.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eCB0	I am writing to formally object to the proposed sale of White Webb's land to Tottenham Hotspur. This land does not belong to the council to sell but rather belongs to the people of Enfield. The council, as custodians of the land, is duty-bound to protect the interests of the community and should not have the authority to dispose of public assets in this manner. The land in question is not private property, but public land. It has long been held in trust for the benefit of the people of Enfield, and it is morally and legally wrong for the council to sell it off to a private entity, especially without the informed consent of the local community. The people of Enfield have a right to this land, and its sale should not be decided by a few individuals behind closed doors but by the collective voice of the public. The council's role is not to treat public land as an asset to be sold for short-term gain, but as a trust to preserve and protect for future generations. This is a fundamental principle of local governance. By selling this land to a private corporation, the council is abdicating its responsibility to protect the long-term interests of Enfield residents. The land should remain in public hands, and any decision about its future should involve thorough consultation with the community, not just a handful of council members or corporate interests. The sale of public land to a private entity, especially one with commercial interests such as Tottenham Hotspur, raises serious concerns about transparency and accountability. The local residents of Enfield have not been given a fair opportunity to voice their opinions on this matter, and the council has not provided sufficient evidence that this sale is in the best interest of the community. The decision appears to have been made with little to no regard for the will of the people, and this is deeply concerning. There is also a strong legal argument that the council does not have the authority to sell land that belongs to the people of Enfield. The notion that public land can be sold off without the informed consent of the public or a proper democratic process is, at best, highly questionable. The council is not the owner of this land in any true sense — it is the custodian, entrusted to preserve and protect it for future generations. The people of Enfield should have the final say in the fate of this land, not an external corporate entity seeking to profit from it. In conclusion, I urge the council to reconsider this decision. The land at White Webb's belongs to the people of Enfield, and it is unacceptable for the council to sell it off without due process and without consulting the very people it is supposed to serve. The council should act as true custodians of public land, protecting it for the benefit of the community and future generations. Please do not sell White Webb's land to Tottenham Hotspur.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e6q6	Absolutely shocking proposal for a much loved and highly used area with far greater potential. This place should be a symbol of how we can use green space in built up areas in and around London, accessible to everyone, not privatised and made a commodity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4Hp	Once this beautiful area has been bulldozed it can never return - the landscape, the trees all gone and for what??? Football pitches can be built in another space, some wasteland that no one cares about.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e46Y	This would impact on green space and natural habitat for animals.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHo4	I object, whitewebs is a much loved and well used green space. The proposed change with draticly reduce the public areas. The councils seems to being agreeing to it purely for fancist gain and I am sure Tottenham could develop other local brownfield or other sites.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dyZX	I strongly object to Enfield Council's proposal to lease part of Whitewebbs Park to Tottenham Football Club to increase the number of training pitches. This former golf course has rewilded and provides a biodiverse habitat for a multitude of species, some of which are on the red list for conservation and therefore merit protection. I have seen buzzards, kestrels, red kites, swifts and many other species of birds, as well as countless insects, such as butterflies and bees on my walks through the park. The project would necessitate the removal of vast amounts of soil to level the area and the removal of over 200 mature trees, some of which are considered veteran trees. Mature trees should not be being removed at a time of climate crisis and biodiversity loss. Equally shocking is the fact that such a rich habitat would be covered by plastic grass, which is sterile and which degrades to put micro plastics into the soil. This proposal is a totally inappropriate use of our open space, a space which is used by both locals and those from further afield as a wonderful place to walk, to relax and to enjoy nature. If Tottenham Hotspur genuinely need to increase their training areas (though they already have more pitches than any other London Club) and want somewhere close to their facilities, then the area earmarked for the Sunset Studios, which has already been levelled and cleared would be ideal. It is just a stone's throw away and would not cause any further environmental damage. Whitewebbs is too precious to be lost to this development. The people of Enfield, like me, want to keep it and want to have access to it for ourselves, our children and our grandchildren.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010el4J	This totally inappropriate use of Enfield's green open space must be refused. The Labour Government promised to be a party that would protect and enhance the environment and as such it got my vote. I have always believed Sadiq Khan to be a "green" Mayor and someone who cared, not only about air quality in London, but also London's green belt and Metropolitan Open Space. I am utterly disappointed and feel betrayed by the present government's change of heart, putting growth at the centre of everything, intending to weaken environmental protections at a time when biodiversity loss is rife and build on precious open spaces, eliminating hedgerows and veteran trees, which cannot be replaced. I hope my faith in Sadiq Khan will not be shattered and he will have the courage of his convictions to stand up and protect this rich, biodiverse habitat and refuse this application.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGtt	No green belt land should be allowed to be built on its absolutely disgraceful. Poor wildlife have nothing anymore	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyYB	I was born in Enfield and this park was always accessible to the public to enjoy!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGCI	The irreversible and destructive building over green spaces has to stop. The natural environment is essential to public health and more important than the interests of one wealthy organisation.	Support	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEZB	We regularly walk out dog at Whitewebbs and have been doing so since the pandemic. Since the area stopped being used as a golf course, I have seen the increase in the variety of wildlife from woodpeckers and sparrow hawks to owls and kites. The variety of fungi that grow there is great and the insects and creatures: dragonflies, butterflies, moths, bees, frogs, moles and rabbits, as well as deer is just too abundant to ignore. Turning this daily used land into a concrete jungle for sport is not helping benefit our world against climate change.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEZH	Removal of beautiful open space used daily by many locals and also myself for dog walking business.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eECO	Whitewebbs is an essential part of green belt land. Given to the people of Enfield for public use. NOT to be give to a private company	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e4zx	Re: 24/00987/FUL I'm writing to ask you to reject the planning request to convert Whitewebbs park into a training ground for Tottenham football club (London Borough of Enfield). The park is loved and very well used - all year round - by dog walkers, walkers, cyclists, horses, families, to say nothing of the abundance of wildlife that lives there from the tiny insects to red kites. It's a place where supportive communities are built. This application relies on a change to Enfield's local plan - which has not been approved. The application turns the park into a ground for professional sport. This would not be open out accessible to everyone, making it exclusive to a very few, rather than inclusive, which is against the approved use of the land. The application doesn't bring any benefit to the residents of Enfield. I have walked and still walk there with my husband, children (now adults) and with our dogs every week. The beautiful green belt parkland is blessed with open space, footpaths, woodland and a stream so that whatever the weather there is always a suitable route to take - for all its users - something that is not easy to come by. The ecological impact cannot be underestimated. In the current climate environment we need to do more to preserve the biodiversity and natural wildlife and pollinators and their habitat, not remove and replace it with astroturf and hard materials which are useless to them. Removal of mature trees will also cause a huge CO2 release as well as the loss of places for nesting birds and insects to hibernate. You cannot replace them and planting young trees is not an effective mitigation. Leaving them where they stand is the only sensible option. Already an ancient oak has been cut down 'in error'. The application talks of replacing planting and restoring the historic landscape. Any planting would by necessity have to be in the current open spaces, hardly restoring the original landscape then. There are so many objections to think about - Whitewebbs was bought with public financing for public use in 1931 and is Green Belt land. My understanding is that the Council run golf course (not run as a private club) which previously occupied some of the parkland was only a temporary measure to cover the council's costs. The golf course was sympathetic to the environs - evidenced by how it has rewilded itself and blended in. A private football ground is neither public, parkland, environmentally friendly, accessible or temporary. The proposed change to the character of the landscape, the biodiversity, our enjoyment of it would be impossible to reverse. 25 year lease or not. A hundred years of growth cut down is unimaginably damaging and cannot be understated. The application will result in a smaller car park than existing- already this is often full due to the high level of visitors to Whitewebbs - another loss for the local community. And many of the pathways we use will be gone. The club say they will build a cafe - but there is already an excellently run cafe that is very well used. The light pollution caused by the proposed floodlighting is also a serious consideration for nocturnal wildlife and the local area more broadly. ~~Furthermore the council does not have a drainage issue at the moment. It is ecologically balanced. The approval will require drainage needs to be~~	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eE92	Our NorthTottenham has lost the ability to have many more small businesses and homes due to Spurs buying up, and in that we've recieved a pompous FC seeking help from us locals in their projects, but giving us nothing in return except a consistent case of congestion, further gentrification, rubbish, police blockades and more. Worsening our quality of life. Now Spurs seeks to takeover our Enfield greenspace for themselves, all our problems here are now extending further into North London and this must be stopped.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eCAu	We don't need more privatised areas of our public owned parks sold off - we need more spaces for nature. This is a huge mistake when as a society we need to prioritise more accessible green spaces which are ecologically valuable. I object on the grounds of irreparable environmental impact, and additionally on moral grounds being that this won't benefit society as a whole more than leaving it as a space for nature thats able to be accessed by everybody would.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBZJ	The proposals breach many local and national planning regulations that are in place to support local communities and environment biodiversity and ensure a development does not only benefit the few. This has been formally confirmed by experts in the planning regulations. The return on the investment for the council is so poor that it beggars belief they would even consider the proposals. The track record of the applicant for a similar development next to the proposed site has been evidenced to be poor, only now that they need planning for the new site are they pursuing some of the conditions that they should have done as part of the agreement for the existing site. There is no evidence that the local community will be able to benefit from the development in any way. But there is plenty of evidence the local community and other users of the site will be negatively impacted by the development. On a personal level my family will loose important green space which is of such a rare size that you can see all forms of nature throughout the seasons and totally immerse yourself for hours so close to central London. It is a place where people from all walks of life cross paths and an important social space for many who are living alone or isolated.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFee	Application 24:00987:FUL currently threatens our local and beloved Whitewebb's Park in Enfield. Further, ommercial landgrab like this will create a dangerous precedent for more valuable greenspace. Whitewebbs Park is not only home to a remarkable and somewhat unique environment (old woods, grassland, and wildlife), but it is also crucial for the local population, which wishes to continue using the land without destroying its wildlife and flora. Everyone in the Edmonton Cycle Club, of which I am a member, is opposed to losing the space. The club frequently gathers for a drink at the café before heading out into the park. There, my husband and I enjoyed numerous walks, always learning something new and taking in the distinctive scenery. One thing is immediately apparent when coming to Whitewebb's Park: the local population, which includes families, senior citizens, and dog walkers, is strongly opposed to Spurs' ambitions to take this area away from the inhabitants for their own profit. Several hundred residents, including we, have previously voiced their detailed objections to this planning application, which is also the subject of a legal complaint because Enfield Council failed to properly follow SINC and nature recovery protocols. This is based on the following reasons: • Inappropriate Development: Because of the visual effects of the training ground boundaries, fencing, floodlights, buildings, and extensions, the Greater London Authority (GLA) determined in its Stage 1 Planning Report GLA/2024/0213/S1/01 (GLAS1R) that THFC's proposed development "would not preserve the openness of the Green Belt compared to what is existing" (para. 16). According to the GLA, this is "inappropriate development within the Green Belt," and in order for the plan to be approved, "very special circumstances" would need to exist (GLAS1R, paras. 13–17). • There are no very special circumstances: Any harm to the Green Belt should be given "substantial weight," according to the NPPF, and "very special circumstances" won't exist unless the proposal's potential harm to the Green Belt due to inappropriateness and any other harm is clearly outweighed by other considerations" (para. 153). • Wildlife and environment: (1) Landscape changes: In order to construct its training pitches, THFC would need to level the terrain. Massive earthmoving projects and permanent habitat destruction would be required for this. The outcome would be inconsistent with the natural landscape. There has never been much landscaping done on the area of the property that is supposed to house the training pitches. No further material has been deposited here, according to the British Geological Survey. It depicts a historic scene that was in perfect condition prior to the deforestation of Enfield Chase (forest) after 1777. Whitewebbs Park, an Area of Special Character, contains important landscape and soils that should be preserved (NPPF para. 180). (2) Increased flooding risk: The risk of flooding is increased when trees and grassland are lost. THFC would have to maintain these dry because hybrid pitches don't absorb a lot of moisture. Although THFC suggests building attenuation ponds, we don't think this is the solution. It damages the soil in addition to the natural landscape by necessitating the removal of substantial volumes of earth. Two sections of active meadowland that already drain well would be used for attenuation ponds. Since the nearby beaver flooding project and the existing wetland in the forested edges are naturally addressing floods, attenuation ponds offer minimal ecological benefits (3) Biodiversity Net Gain (BNG): THFC plans to plant about 2000 trees throughout the property in order to achieve BNG (PS para. 8.120). But in our opinion, THFC's DC offers no advantages for the public ecology sustainability requirement. As stated in para. 5.4.5 of Davis's 'Wildlife'.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAc2	I lived in Enfield and nearby for 55 years and only moved away last year. It has made me realise more than ever how unique Enfield is for their open, green spaces including Whitewebbs, Hilly Fields, Forty Hall all in the vicinity. Whitewebbs is a unique and irreplaceable heritage green space supporting a vast biodiversity of flora and fauna - a green lung in an urban spread. It should not have this unique biodiverse area bulldozed for what? Profit, greed and plastic pitches! No new planting can replace what will be lost forever. It is well known through scientific research that ancient and natural grown trees have a longer lifespan and stronger root systems than farmed and planted trees. Once gone trees that are decades, if not, hundreds of years old cannot be replaced by saplings, nor the biodiversity they supprand give home to. Spurs cannot be trusted to instigate any green proposed green plan having not carried out that which they said in their current site expansion. Moreover, knowing residents who live adjacent to Spurs training ground I have been told that they feel bullied and pressured by their aggressive tone and behaviour with any interaction as 'neighbours'. Spurs should not be allowed to devastate Whitewebbs as an essential green, recreational space enjoyed by the tax paying residents of Enfield and surrounds purely for Labours gain and profit. It's criminal to even propose losing this much loved habitat and recreational space that improves the wellbeing of all that use it for a privileged few. It demonstrates just how hypocritical Labour's manifestos are.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBHX	Please consider it will be taking away a local amenity and valuable green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eA0m	Although I do not live in the area I visit the lovely green Whitewebbs site regularly when visiting our son in Enfield. We take his dog for daily walks at Whitewebbs. I can see it's a really great green space for people to walk which is important for people's mental health. Talking to locals who frequent it on a daily basis it's obvious they strongly disagree with the proposed planning application and I totally agree with them. It would be a huge loss to people in the surrounding areas.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBT7	Totally object to this planning application. To lose this valuable green space where people walk for exercise would have a very negative effect on people's mental health. People meet for a coffee and chat after walking their dogs so it's a very sociable meeting place. It would also have a negative impact on the wildlife. It would be a huge loss to the local people.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFL7	To whom it may concern, It is completely ridiculous that this plan is even being considered. Tottenham have more training pitches than any other Premier League club - they do not need to take green space that is vital for the local community. Whitewebbs Park is vital for the mental health of those in the local area and those who use it, and vital for biodiversity. Stop private capital essentially stealing public space from local people. It is the Mayor of London's job to ensure the city is a liveable place for all and to stop organisations with enormous bank balances buying up all the land and reducing everyone's quality of life. I am so disappointed that this plan is even being considered. London is one of the best cities because of its green spaces. These spaces need to be protected, particularly given climate change. Green spaces stop cities becoming heat islands. We need trees. Take the mental and physical health of people seriously. These kinds of developments are backwards, corrupt and harmful. I oppose this plan and I hope the Mayor of London's office sees sense and does too. Yours sincerely, ██████	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDdR	This would be detrimental to the local area and would bring more traffic and pollution to the area as well as depriving local people the use of the public space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGH4	I've lived here for over 45 years and in Enfield borough for 55 years. This is a beautiful Green area sold off by the council to a large football club- it's not necessary and wanted by us locals. You are ruining our green spaces.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dhCb	This application must be refused as the proposal will destroy the vista and open space. This land was created in 1931 for the the people of Enfield and to have public access, not to be divided up and taken by a multi billion pound private enterprise for the benefit of a few people. The lease value is pathetic £2m for 25 years! How will this paltry amount benefit the borough in a meaningful way	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dhnl	I am objecting to this plan as it will destroy valuable habitat, loss of endangered and rare species, the felling of trees. The construction of new pitches will involve the laying of several thousand tons of steel and concrete and removal of several thousand tons of soil. It will be a massive construction site. At a time of climate crisis, it is increasingly important to preserve the green belt, not just for London but our country	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dwTO	I do not understand why Spurs needs more pitches. At 18 it already has more than all the major premier league clubs which accommodate men AND women training. I think there is an ulterior motive - us it for NFL or other development longer term?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e209	This application must be refused as the proposal will destroy the vista and open space. This land was created in 1931 for the the people of Enfield and to have public access, not to be divided up and taken by a multi billion pound private enterprise for the benefit of a few people. The lease value is pathetic £2m for 25 years! How will this paltry amount benefit the borough in a meaningful way	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e3ML	I am objecting to this plan as it will destroy valuable habitat, loss of endangered and rare species, the felling of trees. The construction of new pitches will involve the laying of several thousand tons of steel and concrete and removal of several thousand tons of soil. It will be a massive construction site. At a time of climate crisis, it is increasingly important to preserve the green belt, not just for London but our country	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e7Ui	At a time when there are many evidenced studies to show the benefits of open and publicly available green space, the proposal to take away 50 acres of land to concrete over is wholly contrary. This proposal must be rejected. This is valuable space for all wildlife, in the space of 4 years, it is plain to see the benefits of rewilding and to the enjoyment of park users.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEvY	This application must be refused as the proposal will destroy the vista and open space. This land was created in 1931 for the the people of Enfield and to have public access, not to be divided up and taken by a multi billion pound private enterprise for the benefit of a few people. The lease value is pathetic £2m for 25 years! How will this paltry amount benefit the borough in a meaningful way	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eFHT	Dear Mayor of London/GLA Planning Team, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF).	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGAc	This space is PRECIOUS. It is one of the most beautiful and biodiverse areas within easy reach for me and many others living in my local area to get to. Just the thought it will be covered in manmade materials makes me physically ill, and the idea that I will no longer have a place to escape to. As Clapham Common, while improved, is nowhere near as diverse in nature and habitat as Whitewebbs. It will surely be a criminal offence if this incredible wildlife haven is destroyed, in a country which is already the most nature depleted in the world.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFmi	The Spurs plans to cut down 150 mature trees and lay astroturf is absolutely shocking, and I don't understand how development would even be allowed on this land when there are protected animals living there. There are plenty of other places they can build their pitches, surely they can work on an alternative. Please put a stop to this, as once it's gone we can't get it back.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eG5l	Very concerned about the environment impact, both day and night (due to floodlights) that will happen if this development is approved.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e4Qj	Building football pitches in Whitewebbs will have a huge impact on the wildlife there. It's also the people's park and should remain as a green open space. It's widely used by locals and to concrete it would be a travesty. The is a Tottenham training centre up the road surely they can use these facilities as they are often unused. Please save Whitewebbs.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eClt	Dear Mayor of London, Sadiq Khan, I was heartened to see the launch of your Green Roots Fund, aiming to create greener, healthier, and more climate-resilient spaces across London. Your call for all community groups to participate in transforming neighbourhoods so that every Londoner can benefit from nature is both timely and inspiring. It is in that spirit that I write to you today with deep concern about the proposed handover of Whitewebbs Park by Enfield Council to Tottenham Hotspur Football Club, a private enterprise. This plan would lead to the destruction of 50% of the park's rewilded meadows and over 200 mature trees. The area is home to an abundance of wildlife, including bats, newts, deer, snakes, bees, and swifts – with the latter using the open meadows as a vital feeding ground. Whitewebbs Park is also bordered by ancient woodland, including a 500-year-old oak tree that was left unprotected due to the council's failure to recognise its value. The site is now home to beavers, whose habitat is under threat not only from development, but also from the potential contamination of their water due to weed killer use by the proposed new occupiers. Tottenham Hotspur have already demonstrated disregard for the local environment — raising floodlights well above the tree line adjacent to the beaver enclosure, in breach of previous commitments. Their continued presence and expansion pose a serious risk to the ecological balance and peace of the area. Furthermore, Whitewebbs Lane is a narrow, winding road that floods regularly and is unsuitable for heavy traffic or coach access. The environmental and infrastructural strain of this development is clear. There are viable alternatives. For example, the unused and already-cleared Sunset Studios site just a few miles away lies adjacent to the A10 and would provide ideal access for the proposed training centre without sacrificing greenbelt land. There are no special circumstances that justify this encroachment on our precious green space. I urge you to use your influence and leadership to prevent Enfield Council from handing Whitewebbs Park to a private developer. This park belongs to the whole community of Enfield – not a privileged few. Please help us protect it. ██████████	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDzO	██████████ feel like a justifiable loss of green space.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9eG	As someone who lives very close to THS training ground and has seen the way Tottenham Hotspur's have broken multiple promises to the community I dread to think how they will behave if allowed to lease whitewebs park. The park is a wonderful local resource full of nature. Its destruction would be detrimental to local residents the environment and long term health of our community. The councils handling of this issue has raised concerns over corruption and competency.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e8Wm	Dear Mayor of London/GLA Planning Team, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. there has been a lot of hard work protecting this space and defending the habitats of numerous insects, wildlife and diverse species. Please do the right thing and help continue to defend green spaces such as this - it makes such a difference. Warm wishes, [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIQj	The site contains established trees that are home to an abundance of wildlife. Not only does destroying green space remove habitats for the wide range of insects, birds and bats that rely on the area to survive, this will have a huge environmental impact, and destroys yet another established area that is enjoyed by so many.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e9JA	Dear Mayor of London/GLA Planning Team, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF).	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eA7T	Dear Mayor Khan, I am writing to you with great sadness and strong objection to the proposed development of Whitewebbs Park by Tottenham Hotspur Football Club. I have lived long enough to see many changes in London — some for better, some not. But what has remained constant is the importance of our green spaces. Whitewebbs is one of those rare places where nature is allowed to breathe, and where people, young and old, can walk, think, and feel part of something timeless. Since the golf course closed, the park has begun to heal and rewild itself. I've seen new life returning — deer, birds, and countless saplings, many of them young oaks. These trees will outlive us all, if only we let them. The idea that this peaceful, public space could be flattened, fenced off and turned into a private training ground is deeply upsetting. Spurs already have 17 training pitches. There is no public need for this development. It is not being done for the community, but for private gain. The land was bought for public benefit and should remain that way. The failed Sunset Studios site would be better suited and has already been flattened. To destroy over 200 mature trees, half the grassland, and block access to this cherished park is not progress — it is a loss that cannot be undone. I have watched generations of families walk these paths, play among the trees, and find comfort in this landscape. We must not allow this to be taken away. I have signed the petition. I have read the reports. Even the Greater London Authority has called this proposal “inappropriate” for Green Belt land. I ask you now, with the deepest respect, to listen to the thousands of voices — young and old — who are begging for Whitewebbs Park to be saved. Please do not let this be another story of nature lost for profit. Let it be a moment where London stands up for its green spaces and for the people who treasure them. Yours sincerely, 	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eHuc	This park was left in trust for the people of Enfield to enjoy. It has rewilded itself in the most magnificent way. Other parks that try to rewild have not achieved a tenth of the success of whitewebbs. The paths are so well trodden by so many people the council does not have to maintain it. There is nowhere else in Enfield quite like it. It is our lungs our refuge. To lease it, divide it up & destroy it is a travesty. The destruction would be a betrayal & a crime in this time of climate change. All of WhiteWebbs is for the people now & generations to come. Spurs can relocate in broxborne or purchase private land on the other side of whitewebbs. There is no need for a foreign private business to run whitewebbs. Mr Khan if you believe in your environmental program then save Whitewebbs for us.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dq0f	Beautiful area full of nature and wildlife we do not need more training pitches or buildings destroying this green belt open countryside	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dhCY	Dear Mayor of London/GLA Planning Team, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008). This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit. Please note: Guardians of Whitewebbs made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint. Summary of why I believe the application should be called in and refused: I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. 1. Violation of Green Belt Protections The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF).	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eBjT	This planning application is devastating for nature for the following reasons and I urge you to reject it: i.) the land has been rewilding since the golf course closed in 2021 and the grassland now supports a tremendous number of species, including those which are priorities for conservation such as the Small Heath butterfly, which is becoming very common. As insects have increased, birds such as Common Woodpeckers, House Martins and Swallows are now a wonderful and more common sight. The Park is a very precious space, important for the whole of London, not just Enfield. This habitat and the nature it supports will be lost. ii) The precious grassland, some of it relic acid grassland, will be concreted over and lost. iii) It is unclear from the planning application how the pitches will be constructed as the land is on a slope. The construction is likely to be much more imposing and significant than the plans indicate and to cause more destruction to the natural landscape and to nature. In the absence of clear plans and of an EIA, the level of damage is unknown. iv) The openness of the 19th century parkland design will be destroyed. Important local views will be lost as well as the open sweeping nature of the Park. Huge bunds and fences will be constructed and thousands of trees planted blocking the view, as well as covering over even more of the grassland. These are just a few of the reasons why this planning application must be rejected.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eBZI	Dear Mayor of London Please reject this planning application. Whitewebbs Park was bought for the people of Enfield for their recreation and is held in Public Trust. It is completely against Labour values to lease it to a multi billion pound company to build an elite training facility, shutting the people of Enfield out of much of their own Park. The Park is much loved by the local community and provides much needed open space. Since the golf course closed, it has become a wonderful rewilded space where people can go for long walks freely. It is very dear to the community. Tottenham Hotspur can build on available, more suitable sites very close by. There is no reason to build another training ground here, depriving the community of this very special place which links three Metropolitan SINC's. The planning application must be rejected. To grant it would be indefensible.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eEva	I am writing to object to planning application 24/00987/FUL for the following reasons: Public Trust Land Whitewebbs Park was purchased for the people of Enfield in 1931 for the benefit and recreational purposes of the local community. It is Public Trust land and Open Space. The public have a right to access all areas and are currently able to do so. Large areas of the Park should not be closed off for use by a private elite football club. Green Belt Not only is Whitewebbs Statutory Public Open Space, it is also Green Belt land. The proposed plan to lease the land in order for it to be closed off to the public is not only against its protected status as Public Trust land, it is against the fundamental tenet of Green Belt land outlined in the National Planning Policy Framework (NPPF, 2023) which is its "openness and permanence" (p. 42). It is contrary to paragraphs 142-143, the intention of which is to preserve Green Belt and prevent encroachment. The proposed development is contrary to The London Plan (2021), Policy G4, Open Space. This states that "development proposals should: 1) not result in the loss of protected open space and 2) where possible create areas of publicly accessible space.". This proposal is inconsistent with this as it would mean the removal of public access to around 50% of the open space at Whitewebbs. In addition, rather than creating publicly accessible open space, it would extinguish public rights to access to a large area of the Park. The proposal is also inconsistent with the London Plan (2021) Policy G2 which aims to protect the Green Belt from inappropriate development. This is clearly an inappropriate development for Public Trust, Green Belt, land as it reduces access and destroys the environment and the openness of the landscape. The development is also contrary to Enfield draft Local Plan (EDLP, 2024), BG6, which is intended to prevent inappropriate development in the Green Belt. Very Exceptional Circumstances (VSC) not met I do not believe VSC have been met for the dedesignation of Green Belt as the applicant states in their Planning Statement. The Park is fully accessible by the public, therefore it is incorrect to state that the proposal would deliver "a significant increase in the quality and quantity of publicly accessible land". It is disingenuous in para. 8.45 to state that the proposal merely "recycles" sports use. It changes the use from a golf course/rewilded Open Space accessible to all to an elite training facility which only a tiny minority of the population will be able to access. A very	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eCdI	I am a regular visitor to Whitewebbs Park and the adjacent Forty Hall and Myddleton House. I am very concerned that this proposed development will have a substantial adverse effect on both Whitewebbs Wood SINC and the adjacent Forty Hall Park and Estate SINC, both of Metropolitan Importance. There will be significant impacts from light pollution, noise and runoff. The light pollution is likely to particularly impact breeding birds, bats and nocturnal insects (moths are important and undervalued pollinators). The proposed mitigation for light pollution does not address the fundamental incompatibility of the development in this setting. The Local Plan Draft for Enfield (SA57 / RUR.07) explicitly allocates the 43 ha former golf course for "Local Nature Recovery"—prioritising rewilding, ecological enhancement, quiet public recreation, and connecting green corridors. However, the Spurs plan proposes fencing off 18 ha, erecting sports infrastructure (floodlit pitches, car parks, access roads), and removing 109–207 trees from this land. That intensification directly clashes with policy intent, replacing a nature-led allocation with commercially-driven built use. The value of Whitewebbs is enhanced by being part of a larger area of green space; a benefit for both people and wildlife. The draft plan for Enfield supports ecological connectivity between Whitewebbs Wood and surrounding SINC's, as part of borough-wide biodiversity ambitions. The Spurs proposal fragments this emerging nature corridor, through lighting, fencing, noise, and tree removal—undermining local nature recovery objectives.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010eA2N	I strongly object to this proposal. This is a public access green space and turning it into a private football training centre reduces community access to nature. It harms local wildlife and biodiversity. It increases traffic and noise. It is skewed towards privilege and money over nature and community. Whitewebbs is part of local heritage, and should not be decimated, with more beautiful trees felled to make way for a commercial facility.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eDdE	Whitewebbs is a precious green space in London, supporting the health and wellbeing of people and nature. It shouldn't be sold off.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIsA	Dear GLA, I am writing to formally object to the proposed development of a football training ground on the treasured wooded forest located at Whitewebbs Park, a rare and irreplaceable green space. This forest is not just a collection of trees. It is a living, breathing sanctuary — a place of calm, beauty, and connection. For generations, it has been a quiet refuge for walkers, families, dog-lovers, nature enthusiasts, and those seeking peace from the bustle of urban life. It is one of the last ancient, undeveloped woodland pockets in London, a precious remnant of the natural world in a city rapidly losing touch with it. Last year, without proper consultation or authority, developers controversially felled one of the forest's oldest trees — an enormous, centuries-old oak that had stood silently through wars, seasons, and time itself. That loss was felt deeply by the local community and nationwide. Children had climbed it, artists had sketched it, and countless people had rested beneath its branches. It was not just a tree; it was a symbol. And now it's gone — and it will never come back. If this development goes ahead, it will not just be another patch of green lost to concrete. It will mark the permanent destruction of a natural heritage we cannot recreate. Once bulldozers arrive and foundations are laid, no amount of landscaping or "green initiatives" can restore what was lost. Football pitches can be built anywhere. Ancient forests cannot. This woodland is widely used and deeply loved. On any given day you'll find joggers tracing its winding paths, grandparents teaching grandchildren about birdsong, and neighbours greeting one another beneath the shelter of the trees. It fosters mental wellbeing, encourages exercise, and nurtures a sense of community. It belongs to the people — not developers. We urge you to reconsider this proposal, not just as elected representatives but as fellow humans. Please protect what little unspoiled beauty we have left. Future generations deserve to know that we chose trees over tarmac, peace over profit, and legacy over short-term gain. Yours sincerely, [REDACTED]	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e39q	So disappointed that this could be taken away from the people of Enfield. What gets given seems to get taken away in the end (Trent Park) ! This could change the local environment and nature! To me that's more important than football or any other sport or building that would be there!	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGM6	Whitewebbs is a beautiful parkland. We already have so few green areas in London. Why should this portion of land be sequestered and reserved for about 50 footballers and taken away from every other visitor of Whitewebbs? I think for most of the public, this proposal bring no value, and the question is then, why should they be claiming land that is already frequently used and valuable to the public, rather than just claiming land further on the outskirts of London?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e7mr	This is area is a haven for nature at a time when we are severely nature depleted. It provides huge biodiversity and is vital not just for the survival of endangered species but for the mental health and well being of the local community and beyond .	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF5R	I object to this proposal as it will represent a loss of an important local amenity.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eI95	Whitewebbs must not be developed. The bio diversity of this site is immense and creating a lesuore sport facility will incredibly be detrimental to the environment.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010dyY9	In a time when green spaces , especially within cities are so valued and needed , it is outrageous that I Tottenham Hotspur's bid for the land is even being considered at all. No amount of "parkland development" they promise can replace what will be lost. The valuable habitat and ecosystems that exist within whitewebbs park take hundreds of years to develop and it amazes me there seems to be so little consideration of this from both the council and Tottenham Hotspur. The land should not be developed !	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010e9P2	Myself and my wife strongly object to leasing the entire Whitewebbs area to Tottenham for a mere pittance. This is such a valuable open space for the local community. It's been re-wilded since before Covid and provides a valuable habitat for many species of especially insects and birds. We don't need nature destroyed by football pitches and a large number of well established trees cut down to make room for football training facilities and we don't need another manicured park. We visit at least three times a week and this open space is used extensively by the local community. Please vote to save this open space for the residents of Enfield. If Spurs need more training facilities, please find a better position and let them pay properly for it. They are clearly not without funds.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eIP9	Loss of recreational area historically made available to all Enfield Residents. Currently undergoing natural rewilding. Huge Adverse effect on Whitewebbs park area used by residents as accessible area for walking and observing nature. Whitewebbs lane already a problem area for traffic. Destruction of trees . Negative impact on views in Whitewebbs park.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010e7Uf	My family and I greatly value Green Belt being conserved for us, future generations, and biodiversity. We need green space in order to enjoy life.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eF5Y	This would be a huge, avoidable loss to the area but also flies in the face of what is needed to avert what are now certain economic losses resulting from significant weather events driven by climate change. https://www.lloyds.com/about-lloyds/media-centre/press-releases/lloyds-new-data-tool-highlights-vulnerability-of-the-global-economy-to-extreme-weather	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAlc	I was brought-up in Enfield and live here. This proposal only benefits THFC - a multi-billion pound business controlled offshore. After years of highly questionable practices, outright untruth and lack of public transparency; what Enfield Council wish to allow would lead to the permanent loss of land - sixteen hectares - which was gifted for public enjoyment, for appallingly little return. Alternative sites exist but are not being considered. Enfield's councillors themselves will face no accountability; it is not theirs to give away. THFC's existing facility nearby has enough space for their plans; there is no morally defensible reason why this or any other business should be allowed to stage such an obscene 'land-grab' of public space. This application should be called-in and rejected.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eFpe	This area is used all the time. It is full of nature. The large area attracts numerous birds and other wildlife. It is an area where people walk their dogs, walk with family and friends and is enjoyed by everyone in the area and wider.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eAYT	Whitewebbs is a valuable piece of natural environment that will be severely damaged by this scheme. Once destroyed it can never be replaced. Scraping the land of its ancient trees and vegetation will be a severe loss to the native animal species that live there. Many diverse ecosystems have developed there and their disappearance will severely impact the area. As well as animals many humans use the space for exercise and improving their mental wellbeing and will suffer if Whitewebbs is harmed.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390	a07Q5000010dyWS	I am asking the Mayor to reject the planning application OR call it in. Whitewebbs is a public park of old woodland and grassy open space that I love and use every day. I attach a copy of my objection made to the London Borough Enfield local planning committee written in May 2024, with some additional reflective comment: The 'engagement' with THFC goes back some years before Covid; I believe it was unwise of Enfield Council to begin a process (with very limited exits, functional or political) that would lead to THFC taking control ('ownership') over 140 acres of Whitewebbs, Green Belt public parkland belonging to the people of Enfield, for very little in return. A global sporting business can call upon resources which far exceed those in any local council with which to pursue their own interests and get their own way. Much has changed in the years since then including Covid/Lockdown which altered people's perception of the value of green space and its importance for their health and well-being. Use of the park has visibly and significantly increased. The land itself has changed; the golf course which sat on part of the land, closed and it has reverted to high quality grassland landscape now rich in butterflies, insects and wildlife of all kinds, a testament to years of careful, respectful local management of the site. It does not require a manufactured 'restoration'. New café owners have created the conditions for a vibrant community focal point, with rent going back to the council and park visitors benefitting from social connection and feeling safe in open space, particularly by women, thus meeting some of LBE's wider policy objectives in health, leisure and outdoor activity. This is historic parkland landscape and public parkland; space, which is open and accessible, only a small percentage of Green Belt in Enfield and the wider London area is. It is likely that other Green Belt land in Enfield will be taken for housing development, increasing Whitewebbs value as public open space. THFC are quite capable of purchasing any land they require for their own business development plans, they do not need to take and despoil ours. Thank you	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eGNi	I use Whitewebbs park every day. Since the golf course was closed by Enfield council It has become the best dog walking park in the area. It would massively affect, in a negative way, so much wild life that I see everyday. The trees and grounds that would have to be removed if Tottenham football club get their way would never recover. I'm afraid I will only ever see Tottenham and Enfield council as eco terrorists if this is allowed to go ahead.	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2
2024/0390	a07Q5000010eE7J	YET ANOTHER GREEN AREA GOING TO REDEVELOPMENT WHY JUST FOR MONEY . IN THE UK GREEN LAND ISBEING ABOLISHED EVERYWHERE AND WHAT EXCUSE DO THEY GIVE THAY SAY IT'S OLD AND NEEDS TO BE DEVELOPED FOR THE GOOD OF PEOPLE IT IS NOT IT IS PURELY TO FILL POCKETS OF INVESTORS IN THEM IF THESE PEOPLE CONTINUE THERE WILL BE NO GREEN FIELD AREAS OR FORESTS AND WOODLAND FOR THE ORDINARY PEOPLE TO ENJOY VISITING TO BREATH REAL FRESH AIR THAT DOES NOT CONTAIN FOUL POLUTIONS IN IT	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

2024/0390		Dear Sadiq Khan, Congratulations on being re-elected for your 3rd term as Mayor of London. I am writing to you as Mayor today to bring to your attention about Tottenham Hotspur's new planning application "24/00987/FUL". I really appreciate your commitment to protecting London's greenbelt, and as you will know, Enfield Council announced in 2022 that it would be leasing well over a hundred acres of Whitewebbs Park to Spurs. This development is not in conformity with the London Plan 2021 - from my planning application objection: "Any Green Belt destruction is out of keeping with the Mayor of London's (Sadiq Khan) London Plan 2021 policy G2 para. 8.2.1. This planning application will harm and destroy the Green Belt as it was intended, and therefore does not ensure "continued protection for London's Green Belt" - note THFC acknowledges in para. 8.56.4 of their "Planning Statement" document that their proposed developments in regard to Green Belt will have "moderate harm in respect of Whitewebbs Park". Ever since this announcement, the residents of Enfield and beyond have been opposing the proposals, yet not once have we been listened to. This is especially evident if you take into account the 750 respondents to the survey conducted by Sean Wilkinson (Chair of Friends of Whitewebbs) in November 2023: https://whitewebbspark.org.uk/survey-of-park-users-by-friends-of-whitewebbs-park-november-2023/ - be sure to look at the additional comments made by residents on the survey: https://whitewebbspark.org.uk/wp-content/uploads/2023/12/Written-responses.pdf In addition to the survey, several protests have been held such as: outside the Enfield Civic Centre on 10th January 2023 (https://enfielddispatch.co.uk/whitewebbs-campaigners-protest-against-councils-terrible-tottenham-hotspur-deal/), again outside the Civic Centre on 28th July 2023 (https://enfielddispatch.co.uk/committee-reconfirms-whitewebbs-park-lease-to-spurs-despite-local-anger/), and most recently over a hundred residents lining the proposed southern perimeter of Spurs' lease on 5th May 2024 (https://enfielddispatch.co.uk/whitewebbs-park-users-stage-protest-as-judicial-review-verdict-still-awaited/). As the Labour Mayor of London, with amazing green promises, I would really hope you can represent us as the public by advocating to the (Labour) Enfield Council to back down from leasing this valuable greenbelt public trust land to Spurs?	Object	Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

Total

Applied filters:Name contains '2024/0390'Source is Public

WriteON (277 records)

11/7/25

Please could you provide all comments submitted regarding the planning application 24/00987/FUL (LBE) from the date the Stage 2 process finishes/the comments close. I wish to see all 700 or so comments sent both via email or submitted to the PlannApps/Commonplace site (I understand that they will not be published for Stage 2 applications, however they can be provided through FOI or EIR requests?). The link to the referenced planning application on PlannApps is: <https://glapanningapps.commonplace.is/planningapps/24-00987-FUL> I wish to be provided with either separate pdf files or a spreadsheet, whichever is most convenient.

#4768 [1-30]

I would like to register my strong objection to the above Planning Application.

Whitewebbs is a valuable area of green space which has had public access since 1931 when it was passed from landowner Sir Duncan Orr-Lewis to Enfield Council, for the benefit of the whole population of Enfield.

[Section 40 Personal information] . During lockdown my family and I used the woods, lake and golf course daily, and have visited at least weekly since, for exercise, relaxation and communing with the natural environment. It is one of very few truly wild places in the borough. Concerns for nature & habitats:

Since the golf course closed, the grassed area and sand bunkers have rapidly been recolonised by nature with many species of plants, insects, birds and animals. The value of this large area of habitat is obvious to anyone with even only a passing interest in nature.

The trees must also be noted – many of which are at risk under Spurs' plans. Some are interesting and unusual specimens, perhaps unique in the borough, thoughtfully planted over 90 years ago as part of the landscaping of what was a premium golf course designed by Hawtree & Taylor, two of the most illustrious golf course designers of the 1930s.

I am also concerned for the potential loss and deterioration of parts of the ancient woodland to be leased to Spurs. This is set to be carved in two by the new carvery access road, and this new roadway will also abut areas of wild and ancient woodland not included in the leased area.

The precious habitats of both the re-wilded golf course and the woodland should, without doubt, be protected with the most stringent possible standards. Instead Spurs propose to level a large portion north of the site, cut a road through the woods, replace native and self-sown wild grasses and plants with heavily maintained, mowed, weed-killed and fertilised (or worse, artificial) pitches, where flora and fauna is actively excluded and / or discouraged from doing its natural thing. There will be other impact on nature because of the fencing, the noise during construction, and light, in terms of floodlighting once the academy is completed.

The former golf course proposed by Spurs for development is adjacent to no less three Sites of Metropolitan Importance for Nature Conservation, at Hillyfields, Forty Hall and Whitewebbs' own woods). The 2020 SINC review writes of these woods: "The site forms part of a wider network of habitats, which offer important opportunities for a range of protected and notable flora and faunal species in the north of the borough.

Views and fencing:

The high fencing that will enclose the space will completely change the landscape and adversely affect views from both Whitewebbs Lane from the north and across the un-enclosed parkland from Beggars Hollow at the south end of the site. Walking the path adjacent to the existing Spurs ground is an unpleasant experience, with its tall wire fences, high earthworks and dense non-native planting creating an enclosure for both humans and animals (to be blunt not far off the impact of a built development and entirely inappropriate in the Green Belt). Spurs have said that they will mitigate the effect of fencing with planting, but non-native laurel is inappropriate in this environment and native trees take time to mature – the 25 year lease will be up by the time any trees and hedging are approaching maturity!

I have particular concern for the lake area which will effectively become a traffic island, sandwiched between the existing access route into the carvery and northern golf clubhouse,

and the proposed new route on the east side of the pond. Spurs have said that they are “reinstating the historic carriageway” at this location but the reality is that it has long been no more than a peaceful path, abutting the most ancient and wildest part of the woods, full of enormous veteran trees. I would be devastated to see this utterly devastating change to the landscape. A continuous stream of carvery customers will disturb the peaceful atmosphere of this part of the park and create a danger to wildlife.

Public access and green belt:

This application opposes London Plan policies G2 (on protecting the Green Belt) and also G4 (on Open Space) which states that Development Plans should “ensure that open space, particularly green space, included as part of development remains publicly accessible”. The application is also contrary to the draft Enfield Local Plan’s policy BG6 on protecting the Green Belt and historic landscape/features.

Unlike the proposed Spurs Women’s Academy, the golf course was open to anyone from the area to join for a small fee, and more recently free public access to the entire site has been maintained 24 hours a day.

Spurs’ proposals will remove public access from a major portion of the leased area. The Women’s Academy will be “invitation only” and public access to the rest of the leased area will be entirely at Spurs’ discretion, as they will control all entrances to the park, and the only car park (especially once the north car park is closed as proposed).

There is lack of clarity in the application on the future status of the widely used permissive paths and bridleways which currently cross the leased area.

To add:

My strong view is that Whitewebbs in its entirety should remain a public park with full public access. With Enfield’s population growing, and more and more green space in north and west Enfield now under threat, including nearby in Crews Hill, as per the new Local Plan, I feel that it’s incredibly short sighted of Enfield Council to lease such a significant proportion of the park away to a private company. If a 1000+ homes spring up in the vicinity, as Enfield Council are proposing, their occupants will need space to exercise, relax and enjoy contact with nature. The Council should have the foresight that their predecessors did in the 1930s to save and secure areas of open land for the free use of the local population.

If they do lease the land, as I fear they intend to, despite widespread opposition from residents in north Enfield, Enfield Council must include and enforce strict conditions (both through planning conditions in its role as planning authority, and through the terms of the lease in its role as landowner); there must be a mandated timetable of works to include those to the wider park, not just to the Academy area, and a clear undertaking that the part of the property to be enclosed for the Academy will be strictly as shown on Spurs’ proposal and not allowed to extend further for any reason.

#4954

Dear Enfield Council,

This is my objection to the planning application "24/00987/FUL".

There are many points stated in Tottenham Hotspur's (THFC) plan that I feel are unsound when referencing the National Planning Policy Framework, Sites of Importance for Nature Conservation (SINCs) and Metropolitan Green Belt laws.

1. Changes to the Landscape and Character of the Land

There will be a significant change in landscape to approximately 50% of the former golf course. THFC will build 2 metre high fences, which will impact on the openness and character of the park. Dense tree plantations and hedges both around these fences and across the park will further harm the feel and design of the park as it was intended.

These proposals will obscure panoramic views from Whitewebbs Lane looking south and south west; views from the current footpath through the centre of the former golf course looking north and north east; dense tree planting will obscure views from the south of the park, near the café, looking north west. The metal fences will not be in keeping with the natural character of the Green Belt land. Obscuring views and the impact this has had are also already evident in their current training grounds – THFC have blocked the view from Whitewebbs Lane with similar approximately 2 metre high fences and hedges. For these reasons, I believe the plan is unsound as THFC will

destroy view Important Local View "6. Whitewebbs Lane" which is protected in Policy DE5 of Enfield Council's Local Plan.

In addition to obscuring views, the 21 metre tall floodlights THFC propose will be out of keeping with the character of the land too.

THFC propose to level out the land, which changes the character and landscape of the Park. They will build attenuation ponds, which are also out of keeping with the natural landscape. In and around the lake and north eastern Whitewebbs Woods area will also be seriously reconstructed (see point 6).

2. Rescheduling of Land

The disposal plans for Whitewebbs are not consistent with the "statutory purpose" of the land, which is to be held as open space land on trust for the public (a purpose for which it was acquired using public funds when it was purchased in 1931 by Enfield Council using public money). The lease and plan will extinguish public rights to access these facilities, and therefore is unsound: see NPPF para. 154 (b).

This planning application is not in line with Enfield Council's current draft Local Plan (see NPPF para.: 006 Reference ID: 21b-006-20190315), as in this plan, Table C1.184 Design Principle A states that development on the site (i.e. Whitewebbs Former Golf Course) "must maximise publicly accessible space". Since there will be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park, THFC's planning application is unsound. THFC also fail to take into account NPPF para. 103 - neither section (a), (b) or (c) are met for this planning application.

3. Change of Use for Private Usage

Whitewebbs is intended for recreational and leisure use already and should not be rescheduled for private use by professional elite athletes. It should be kept open to the public it was intended for. The proposal also focuses solely for the commercial benefit of one corporation (i.e. THFC) - any community benefit promised in these proposals would be peripheral. For the same reasons as my second point, this planning application is unsound: see NPPF para. 154 (b). THFC also fail to take into account NPPF para. 102 - there is no need for extra private sporting facilities in the borough.

4. Physical and Public Accessibility

Even if the proposed training facility allowed public access, it would be inaccessible to most of the borough and people in Enfield to enjoy sport, because it is situated in the very north of the borough and has little to no transport infrastructure, therefore requiring a car to be able to visit.

The park is already being used for leisure and sporting activities (walking, running, cycling). For this reason, the planning application is unsound: see NPPF para 104 - THFC will in turn extinguish public rights to their lease area, not enhancing public access.

There is no provision for parking at the Northern end of the park. If the current car park near Whitewebbs Road were to be removed, this will diminish access to the park from the North. Attenuation ponds further reduce public access to the Park.

5. Health and Wellbeing

This planning application focuses solely on the health and wellbeing of a tiny proportion of the young female generation (since it will be a women's training centre), many of whom will not even be from Enfield. Most of the public will not be able to practice or engage in sport in this setting. This is an inappropriate strategy: the planning application is not in line with NPPF para. 96 (c).

6. Harm to Whitewebbs Lake and Consequent Traffic

In THFC's proposals, Whitewebbs Lake's character will be drastically altered, such as destruction to the surrounding woodland to create what THFC calls "restoring the historic carriageway" in order to reroute the access road to the Toby Carvery. The harm to wildlife both habitat and sound pollution wise will be devastating. By creating a new access road, there will be greatly inflated numbers of cars passing through the woodland. The noise and brightness (i.e. car headlights) of this traffic will disturb wildlife and will create pollution. Since there is little to no public transport infrastructure around the area of Whitewebbs, this will require athletes to use their car. This does not "Promote Sustainable Transport" between para(s). 108-117 in the NPPF.

7. Biodiversity, Wildlife and Habitat Loss, plus Historic Parkland Restoration Model

"Restored Historic Parkland": the proposals and photos on p. 77 in THFC's "SECTION EIGHT: DESIGN RESPONSE - LANDSCAPING" document suggests no benefit to the Park. Except for intense and unnecessary tree planting which will alter the character of the Park, they are stating what is already there. Despite THFC promising the creation of wildflower meadows, there will not be enough compensation at Whitewebbs for currently present open and diverse grassland. 50% of this grassland will be lost to monoculture football pitches and astroturf. Open grassland is vital for butterflies, spiders, bees, small mammals and an abundance of insects such as beetles, and with THFC's tree planting proposals, this is not recognised (NPPF para. 180 (b)).

The destruction of this grassland and trees also creates an added risk of flooding. While THFC propose to create attenuation ponds, I do not believe this to be the answer. Not only does it harm the natural landscape, it creates

the need for displacing large amounts of earth, in turn harming the soil. From RHS: "Digging damages soil structure by destroying natural drainage channels made by worms, disturbing fungal networks, and releasing carbon that's locked in the soil". Attenuation ponds will take up 2 areas of active meadowland, which is already draining well. There is little ecological benefit of these, since the adjacent beaver flooding project, promise of the Dickenson Meadow project, and the existing wetland in the wooded margins are solving flooding in a natural fashion.

Sand bunkers will also be destroyed, which are home to rare and unique examples of mining bee habitats. They also house ant colonies and other important insect life.

The issue of felling 137 trees is unsound under Green Belt character protection framework (see point 1 and NPPF para. 180 (b)). THFC will also fell an additional 70 "Category U" trees - the argument for felling these trees because of "good arboricultural management" is flawed, since dead and/or decaying trees are vital for the ecosystem, housing an abundance of insects, birds and wildlife.

Floodlights as part of THFC's proposals will not only have an impact on the character of the Park (see my first point); they will have a great impact on bats, owls, moths and other nocturnal wildlife, along with sleeping wildlife too.

While THFC might talk about "biodiversity net gain" in their proposals, "Biodiversity offsetting is wrong because it is based on an allegedly false ontological assumption that loss of natural value can be compensated for by creating at least equally valuable units of nature". - Karlsson M, Edvardsson Björnberg K. Ethics and biodiversity offsetting. *Conserv Biol.* 2021;35(2):578-586. doi:10.1111/cobi.13603.

Any Green Belt destruction is out of keeping with the Mayor of London's (Sadiq Khan) London Plan 2021 policy G2 para. 8.2.1. This planning application will harm and destroy the Green Belt as it was intended, and therefore does not ensure "continued protection for London's Green Belt" - note THFC acknowledge in para. 8.56.4 of their "Planning Statement" document that their proposed developments in regard to Green Belt will have "moderate harm in respect of Whitewebbs Park".

8. Alternative Sites not Exhausted

There are other sites that could be used for a professional women's football facility. An obvious example is using a couple of THFC's current 17 pitches. Not to use these pitches, or focus on non-Green Belt sites is unsound: see NPPF para. 186 (a).

9. Inappropriate Use of Green Belt

This is not an appropriate use of Green Belt Land when compared to other options - i.e. maintaining the full accessibility of this Green Belt land for public use. I do not agree with THFC's arguments around Green Belt exceptional circumstances. How is this an appropriate strategy/use when taking away a large area of land from the public, rescheduling the land as an elite professional training centre, spoiling the important view from Whitewebbs Lane, and importantly damaging wildlife and biodiversity?

10. Heritage

THFC must restore the Grade II listed North Lodge building on Whitewebbs Road.

THFC has neglected this building since purchasing it.

Thank you for reading my objection

#1940

We would like to draw this urgent issue to your attention:

We, the Guardians of Whitewebbs, are fighting to protect Whitewebbs Park, Enfield, North London, which is under threat from development by Tottenham Hotspur Football Club (THFC) for their new women's training ground.

Please watch our short, 5 minute video, that provides an overview and understanding of Spurs' plans, and shows the importance that Whitewebbs has for nature and wildlife: <https://youtu.be/OY3J56JpU98>

We are shocked that the Enfield Labour Council are going ahead with such a plan without proper, meaningful consultation with the public (thousands of us oppose the proposals). We have identified many points in Spurs' planning application that are not in line with the National Planning Policy Framework (NPPF), the London Plan 2021 and Enfield Council's own Regulation 19 Draft Local Plan.

There is strong evidence to suggest that the park ought to have been made into a Site of Importance for Nature Conservation (SINC), in accordance with the surrounding area. We believe it to be a serious oversight that it was

not considered for such protection in Enfield's latest SINC review (2020). If this had been the case, these plans would have come under greater scrutiny, and likely been rejected.

Plans are now being rushed through in advance of the roll-out of the Local Nature Recovery Strategy (LNRS) for London. With its high ecological sensitivity the site should also have been integrated into the borough's LNRS plan before this project was greenlighted.

We are asking you to step in to hold Enfield to an urgent appraisal of this site for SINC status, and also to ensure that DEFRA is made aware of the situation, and ask them to intervene directly. By allowing the destruction of a site of high ecological sensitivity, the minister and the Council may be failing in their duties under the Environmental Act 2021 to integrate nature protection into their decision-making.

The building of pitches could clearly take place elsewhere (please see the video above), and as such the National Planning Policy Framework mitigation hierarchy has not been observed (NPPF, 186a).

We believe it will be a failure of planning safeguards which ought to protect nature if our park is lost to an unnecessary and avoidable development.

We look forward to hearing from you

#1945

We hope to hear from you soon on this urgent matter?

In addition to my previous points, I have read the GLA Stage 1 response to THFC's planning application (dated 18th July 2024, see [here](#) under "related documents"). It details that increasing public benefit could outweigh harm and secure "Very Special Circumstances", meaning the planning application could be approved (as has recently been the case for the former Wimbledon Park Golf Course).

THFC have now revised their [planning application](#), adding a slight increase in public/community benefit for this purpose (e.g. "developing a package of community obligations to be delivered by the Club and its charitable Foundation". (Please note THFC has a poor record of delivering its Section 106 agreements for the men's training centre - they have still not built the education centre and nature reserve promised in 2008 and 2009, and are now developing plans for doing something similar further along the Green Belt.)

However, Whitewebbs is a much loved Park. People do not want community access to another elite training ground. People want continued access to their historic and beautiful park. THFC will be privatising approximately half of the open space, and it has always been for the public, so there is a **net loss of public and community access/benefit**. Alternative land exists. The planning application is classed as inappropriate development on the Green Belt. For these reasons, Very Special Circumstances should not be granted.

We look forward to hearing from you on the points I have raised,

#2362

I'm following up on my email dated 21st September, and would be grateful for your prompt response.

#2452

Thank you for your email and clarification on the Mayor's planning powers.

May I ask whether our request of holding Enfield Council to an urgent appraisal of Whitewebbs Park for SINC status will be included in these representations? We have written representations to the planning application.

#3075

We read your letter and planning report (REFS: 2024/0213/S1 and GLA/2024/0213/S1/01) regarding the planning application for Whitewebbs Park (REF: 24/00987/FUL). We would like to draw your attention to the issue of public benefit regarding Very Special Circumstances (VSC):

THFC have now revised their planning application, adding a slight increase in public/community benefit for this purpose (e.g. "developing a package of community obligations to be delivered by the Club and its charitable Foundation". Please note THFC has a poor record of delivering its Section 106 agreements for the men's training centre - they have still not built the education centre and nature reserve promised in 2008 and 2009, and are now developing plans for doing something similar further along the Green Belt.

However, Whitewebbs is a much loved Park. People do not want community access to another elite training ground. People want continued access to their historic and beautiful park.

THFC would be privatising approximately half of the open space, and it has always been for the public, so there is a net loss of public and community access/benefit. Alternative land exists. The planning application is classed as inappropriate development on the Green Belt.

For these reasons, Very Special Circumstances should not be granted.

We request that you raise this issue with Mayor Sadiq Khan and urge him to reject the planning application.

#4261 - See attached
#5075 - See attached
#5373 - See attached
#5705 - See attached
#6324 - See attached

#6468

I write to ask you to think hard about the suitability of this proposed development when it comes before you for approval. I understand that there have been questions about the inadequacy of its fire-safety standards. This, among many other shortcomings, is something which has been flagged up by our local community when it first came before us for discussion.

Penge is a vibrant, diverse patch of South London. It has its attributes and its eye-sores; no-one would describe it as completely photogenic - and building development of the right kind would go a long way to making the future of our High Street sustainable. Unfortunately, the 16-storey block which is being proposed is not it. The height and sheer ugliness of these buildings would completely dominate our low-rise shopping street which has been evolving since Victorian times.

We deserve better!

#6617

I am writing to request you reject or call in the above planning application, (to build a 16 storey multiple tower block housing development in Penge High Street) on the grounds that this breaches multiple fire safety regulations contained within London Plan 2021 Policies D12, D5, BS9991 regulations and more.

To be explicit, the London Fire Brigade has issued the most serious warnings about fire safety infringements concerning this plan, stating this is **"ethically unjustifiable" and "contrary to the spirit of the guidance"**.

I am horrified to see **NONE** of the multiple and fundamental breaches in fire safety protocols exposed by the London Fire Brigade have been corrected.

These include the absolutely fundamental failure in the application of fire safety regulations regarding the provision of a second evacuation stair in tall buildings of 18m (Block A).

This Block is in concrete terms 22.5m tall. By applying a notional formula of measuring the Block to the highest habitable level, the developer has re-calculated the height of the Block to 17.7m, **literally only a ruler's breadth below the 18m threshold**. The developer adds the qualification that this is only an APPROXIMATE estimate of height.

However, these facts seem not to have been shared with the LFB. Their report states their belief that the Block has been **physically reduced to 17.7m**, which is not the case and there is no mention that this re-imagined height is **approximate**. Since the LFB already declared the plan to be "unethical" without this further information, the LFB's red flags are considered strengthened.

We must hold developers and planners to the highest fire safety standards after the terrible Grenfell Tower tragedy. We are now 100 per cent relying on the GLA to stop this development before all the conditions are recreated to allow for another disaster. Let's stop and learn the lesson NOW, before more lives are lost or ruined.

#6780

However, [Section 40] told us yesterday that this plan had been approved by the GLA. I have studied the fire safety report for this plan at depth and it is chock full of fundamental, substantial and crucial failures to meet the highest standards of fire safety as required by the guidelines. The London Fire Brigade has issued 9 monumental red flags about this plan, calling it ethically unjustifiable and contrary to the spirit of the guidelines. Please can I speak to the mayor directly and apprise him of these red flags? More to the point, can I ask he talks to LFB directly? These include unanswered questions around the application of the BS9991 regulation that he introduced to protect people in the event of a fire, in the wake of the terrible Grenfell Tower tragedy. Thank you

#8755

Good Morning Mr Mayor Sadiq Khan ,

I am sure that you are aware of the plight of a much loved green space in Enfield that is at real threat of being taken over by Tottenham Hotspur to supposedly give space for women's and girls training despite the training grounds already having adequate pitches for this . Tottenham have already have a huge space for training and do not need to take what little green space we have on this side of Enfield away from its residents. The case is that Enfield council have acted unlawfully in its decision to lease half of this green space - Whitewebbs formally a golf course .

Mayor Khan we really need some support with this . Whitewebbs park formally the golf course is the most amazing place to walk with friends and family explore the small river going through and play with children and grandchildren , walk dogs and enjoy a coffee at the cafe. The residents of Enfield need this space we really do not have a lot of green space left . Tottenham can afford to build elsewhere and not do this to the residents of Enfield. The case was brought to court by the friends of Whitewebbs park [REDACTED] Mr Justice Mould heard three days of evidence in February after the case was brought by Friends of Whitewebbs Park.

Please see below the most recent information regarding the plight of Whitewebbs Park . Enfield Dispatch The Premier League club wants to build a women's and girls' football academy on the northern part of the former Whitewebbs Park Golf Course and is set to enter into a 25-year lease with the council, in which THFC also agrees to maintain the remaining area of the course as open parkland for the public.

The lease still remains contingent on the council granting planning permission to Spurs for its women's academy, with the plans submitted last month now being open to consultation. If the plans are rejected, the lease won't go ahead.

In reaction to the news that the judicial review case brought by [REDACTED] had been rejected on all four grounds of appeal, a council spokesperson said: "Enfield Council welcomes this judgment confirming that due process was followed at all times leading up to the decision to enter into the agreement for lease.

"The lease of part of Whitewebbs Park is set to bring significant benefits to the local community including the protection and enhancement of the park and woods, further investment in a new on-site café, toilets and other facilities as well as preserving open public access to over 80% of the park for all residents."

In his own statement reacting to the verdict, [REDACTED] said: "The judgement includes important decisions that

adversely affect public open spaces in Enfield and potentially in the whole of London and beyond.
"Although supporters will be disappointed with the Judge's decision this is far too important an issue for us to abandon the case. We will be asking for permission to appeal the judgement
"Do not think for one moment that we are giving up on this vitally important case."
<https://enfielddispatch.co.uk/council-lease-of-whitewebbs-park-to-tottenham-hotspur-deemed-lawful/>

#8756

PLEASE SUPPORT US AND LOOK INTO THIS FOR US

I am sure that you are aware of the plight of a much loved green space in Enfield that is at real threat of being taken over by Tottenham Hotspur to supposedly give space for womens and girls training despite the training grounds already having adequate pitches for this . Tottenham have already have a huge space for training and do not need to take what little green space we have on this side of Enfield away from its residents. The case is that Enfield council have acted unlawfully in its decision to lease half of this green space - Whitewebbs formally a golf course .

Mayor Khan we really need some support with this . Whitewebbs park formally the golf course is the most amazing place to walk with friends and family explore the small river going through and play with children and grandchildren , walk dogs and enjoy a coffee at the cafe. The residents of Enfield need this space we really do not have a lot of green space left . Tottenham can afford to build elsewhere and not do this to the residents of Enfield.

PLEASE SUPPORT US AND LOOK INTO THIS FOR US NOBODY IS HELPING US.

The case was brought to court by the friends of Whitewebbs park [REDACTED] [REDACTED] Mr Justice Mould heard three days of evidence [in February](#) after the case was brought by Friends of Whitewebbs Park.
Please see below the most recent information regarding the plight of Whitewebbs Park . Enfield Dispatch
The Premier League club wants to build a women's and girls' football academy on the northern part of the former Whitewebbs Park Golf Course and is set to enter into a 25-year lease with the council, in which THFC also agrees to maintain the remaining area of the course as open parkland for the public.
The lease still remains contingent on the council granting planning permission to Spurs for its women's academy, with the plans [submitted last month](#) now being open to consultation. If the plans are rejected, the lease won't go ahead.
In reaction to the news that the judicial review case brought by [REDACTED] had been rejected on all four grounds of appeal, a council spokesperson said: "Enfield Council welcomes this judgment confirming that due process was followed at all times leading up to the decision to enter into the agreement for lease.
"The lease of part of Whitewebbs Park is set to bring significant benefits to the local community including the protection and enhancement of the park and woods, further investment in a new on-site café, toilets and other facilities as well as preserving open public access to over 80% of the park for all residents."
In his own statement reacting to the verdict, [REDACTED] said: "The judgement includes important decisions that adversely affect public open spaces in Enfield and potentially in the whole of London and beyond.
"Although supporters will be disappointed with the Judge's decision this is far too important an issue for us to abandon the case. We will be asking for permission to appeal the judgement
"Do not think for one moment that we are giving up on this vitally important case."
The first ground of appeal claimed that the council had "no power to dispose of a lease" under the Local Government Act 1972 "in such a manner that members of the public are unable to obtain access to some part of the park".
However, on this ground the judge ruled: "The proposed training facility will have a social and educational element. It will foster a large element of community access and support women's and girls' football locally. It will consist of both indoor and open air facilities catering for the club's women's team, for academy teams and the wider community (including boys and mixed training). The proposals were not confined to commercial football training, as the claimant contends."
The second ground argued that, if it was ruled the council did have power to dispose of the park, "it may not do so without appropriation" of the land for its new intended purpose.

However, on this ground, the judge wrote that he could “find nothing upon which to infer” in the Local Government Act 1972 “the legislative intention that the decision to dispose must be founded upon a prior decision to appropriate”.

The third ground for appeal claimed that, in taking its decision to lease Whitewebbs Park to Spurs last July, the council “failed to understand, and failed to take account of, the obviously material fact that granting a lease for the use of the land as a private training academy [by THFC] would be inconsistent with its statutory purpose”. This ground saw the most passionate arguments made in court as it was claimed that councillors on the overview and scrutiny committee were essentially “misled” by not being explicitly told about the statutory purpose of the land – being held in public trust as open space for recreational use – before making the decision to confirm the lease.

However, Mr Justice Mould again rejected this argument and said: “In the light of the information and advice given by officers to the [council] leader in the June report, and subsequently in the further report to the overview scrutiny committee, I am satisfied that in taking the decisions under challenge on 7th July and 27th July 2023, the defendant did recognise and take proper account of the fact that granting the proposed lease would be inconsistent with the public’s beneficial interest in the enjoyment of the land under the statutory trusts.”

In the fourth and final ground, [REDACTED] and his legal team from the Public Interest Law Centre argued that the council, in taking its decision, “was influenced by the prospect of a capital receipt yet did not take account of (or failed to understand) the limitations in law on its ability to make use of that money”.

But the judge ruled: “The advice given in the June report that the premium and other monies payable to the defendant upon the grant of the proposed lease to THFC would be available for use as part of its general funds was not erroneous in law.”

The full 61-page written verdict is available to read [here](#).

https://enfielddispatch.co.uk/wp-content/uploads/2024/05/ewhc_admin_2024_1193.pdf

#9536 – See attached

#9620

Our email and written representation does not relate to the application you mentioned. It relates to planning application 24/00987/FUL (GLA ref: 2024/0213/S1/01)

- <https://glaplanningapps.commonplace.is/planningapps/24-00987-FUL>

Please can you add our final version of our written representation (re-attached) to the case file of the correct application and confirm once this has been done? Thank you.

#9906

This is an invitation to visit and see for yourself Enfield's oldest Public Park, Whitewebbs with its ancient woodland and newly established meadows in London.

24/00987/FUL

I recently emailed the Leader of Enfield Council about the Planning Application put in by Tottenham Hotspur for 11 more football pitches (making a total of 28) and top grade facilities on Whitewebbs Park, Metropolitan Open Space, green belt. I have forwarded it to you.

A complaint has been submitted to the council about incorrect procedures or omission to assess and designate this particular section of land as **a Site of Importance for Nature Conservation**. It is flanked on two sides by two SINCs. This is just one point of concern. There are many.

Whilst I understand the **need** for some Green Belt to be considered in Very Special Circumstances for development, perhaps for essential social housing for instance, is supporting the growth of a wealthy Football Club truly fulfilling a need for the people of Enfield?

I personally have serious concerns about how the planning process has been conducted. I personally was at first refused access to public documents and even after the Planning department agreed I should be able to access them and after two further requests, I was not allowed access to all those requested. In hindsight, I should have submitted a formal complaint.

Please see just a few of my concerns raised with the Leader of the Council. I have put in an official objection and emailed relevant councillors too. I am one of many who love this park and enjoy its benefits. Why don't you come and see for yourself?

Within Very Special Circumstances within the Officer's Report, I take issue with the weightings given to the so called need and against the harm.

The conservation of mature, veteran and ancient trees is attributed importance by Natural England and The Woodland Trust. This seems to have been minimised especially related to the 400-year old oaks and others which will border the new access road (entitled Re-Instatement of Historic Carriageway) which follows the route of a well used footpath, that Spurs propose. This proposed new road will be busy and seriously damage tree roots and mycelium and is totally unnecessary and as Spurs could easily improve the existing access road and have a security gate and entrance part way down. Some trees are due to be felled and damaged here too but at least it will not be in two separate locations.

This new access road is not fulfilling a need for the residents of Enfield, just a convenience for Spurs.

I do hope you will at the right time give this application your attention, with the long term protection of wildlife, biodiversity and Enfield Residents right to the quiet enjoyment of our natural world. Conservation begins at home.

See the letter below and also the attached objection by The Woodland Trust.

#0029

Dear Mayor of London and GLA Planning Team,

We, the Guardians of Whitewebbs, request that the planning application 24/00987/FUL (London Borough of Enfield) (GLA REF: GLA/2024/0213/S1/01) submitted by Tottenham Hotspur Football Club (THFC) for a football training centre and ancillary buildings is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and is refused for the reasons set out below and in the attached documents.

This proposed development is out of line with the London Plan, and is deemed "inappropriate development" by the GLA (see its Stage 1 response REF: GLA/2024/0213/S1/01). The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit (please see our written representation attached).

Please note that:

Our group has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, we believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address our initial complaint. We have just escalated our complaint to the internal review/Final Stage.

The attached documents are:

1. Written Representation Executive Summary
2. Written Representation
3. Our Initial Complaint
4. Enfield Council's First Stage Complaint Response
5. Our First Stage Complaint Escalation

Summary of why we believe the application should be called in and refused:

This planning application is strongly opposed by the [Guardians of Whitewebbs](#). The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC)** do not exist to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of our **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

Thank you for considering our request.

#0105

Dear Mayor of London and GLA Planning Team,

We just wanted to update you that the planning application has been approved by the planning committee, despite overwhelming public opposition. There was a 7:1 ratio of public objection to public support. The councillors vote was: 7 for; 4 against and 2 abstentions. The Labour planning committee members were heavily whipped and did not adequately address our legitimate concerns, in regard to conformity with national policy. The planning committee vote also shows how controversial this application is.

We very much hope you will refuse or call in this application for the reasons set out below and in the attached documents.

#0201

I hope this email finds you well.

Thank you for all the good work you do for London.

I am an Enfield resident and have lived in the borough for 13 years. One of the wonderful things about Enfield is the diversity (as you may know, it has some of the most built-up and poverty-stricken neighbourhoods in London). But it also has an array of amazing green spaces. Whitewebbs Park, currently owned by Enfield Council, being the jewel in the crown.

I'm devastated that the council have agreed to lease this wonderful, rich diverse landscape with ancient woodland and a plethora of wildlife including bats, newts, deer and many bird species, to Tottenham Football Club for the measly fee of £2million. Their proposals include 19 football pitches! Can they do that with public land?

Whitewebbs is the lungs of North London and somewhere for everyone, from all walks of life, to get fresh air and exercise. It's crucial that most of it should remain open to the public but the current plans, with a colossal 18 hectares handed over to Tottenham Football Club, doesn't look promising.

At a time when nature and its benefits are more important than ever, it feels like a shortsighted decision by Enfield Council.

I know you have supported protecting the Green Belt in the past so it would be great to know your views and whether you are able to engage with Enfield Council? Is there at least more compromise here where the public can be better served and where old trees won't be cut down or habitats ruined?

#0276

[REDACTED]. We explored all the gorgeous areas in and around Enfield where you can walk a dog, (he had a very tough beginning), he loves to run through the grass and trees and splash in the streams, all still within London. Our absolute favourite place to go as a family is Whitewebbs Park, that is a re wilding park, parts of which used to be a municipal golf course. The council, for rather obscure reasons, closed the club down. It has allowed an astonishing and unique revival of plants and wildlife for the past four years, surrounded by ancient woodland and a beaver project on one side. It is where some of London's drinking water springs from, The New River and the Lee and the canals are linked, straight down into Islington.

One of the nicest aspects of the park is the cafe where a great, very diverse, community has built up, older people, kids at the weekends, small children can play and dogs are welcome outside. It is genuinely a welcoming place where you can chat to all sorts of people and I know is valued as a lifeline by many, especially those with mental health issues.

The park has all sorts of interesting habitats, and community groups arrange walks and activities for locals. I have seen peregrines, buzzards and kites. There are moles and bees and finches, thrushes galore not to mention the water fowl in the lakes and ponds. There is a bridle way all around the edge of the park and fields nearby where the horses graze. This is all in a borough which has a huge need for access to open space and free activities for all those children and older people on very low incomes. It is a magical place. It is beautiful.

Enfield Council, instead of valuing this amazing land, given to the residents of Enfield in 1931 as an open space for them to enjoy, has decided to allow Tottenham Hotspurs to flatten, drain and enclose 15 hectares and develop and extend the lovely old golf club, once a stable block, (which could have been used as a brilliant wildlife education centre) as a facility for their women's football team. It is truly heartbreaking. The floodlights, the high fences and security will completely ruin the park's lovely undulating landscape and seriously upset the burgeoning wildlife. If you look at the men's nearby training ground, the massive laurel hedges and the private nature of top class football facilities are totally at odds with the open full access to the park. As are all the chemicals and pesticides used to maintain it. If there was a proposal to do this on Hampstead Heath or one of the Royal Parks, like Greenwich, Richmond, or Regents Park or even Hyde Park there would be uproar. Enfield Council are desperate for money and seem unable to properly value what they should be the fierce guardians of. They are selling this precious land for a couple of million and vague promises of outreach programmes by Spur's charitable foundation.

This is green belt and is vital in maintaining the fresh air benefits and exercise health of the residents who have the M25 and a huge industrial area running down the east side of the borough. I would really like you to come and visit, enjoy what so many people use and see what a disaster this is for our communities. Enfield have waved through the planning permission but there is still time to stop the whole process and think instead of a way of developing and nurturing this wild and wonderful place for the whole borough and indeed, Londoners, instead of a wealthy and entitled football club. Ironically I was a Tottenham Ladies fan and used to go to their matches at Leyton but sadly no longer. There are much better ways of developing a sport for girls and women that does not involve destructive and selfish ecological vandalism.

There are some great advocates for the park, Guardians of White Webbs and Friends of White Webbs, if you are interested have a look at their social media.

#0331

Please save Whitewebbs! How can London be a green city if you turn greenfield sites into development. My mental and physical health depends on these green spaces. Once it is gone, it's gone! Please save Whitewebbs! It is a beautiful space for all.

#0333

Dear Mayor of London and Secretary of State,

We are urging you to call in planning application 24:00987:FUL, which currently threatens our local and beloved Whitewebbs Park in Enfield, because you have the authority to do so and because of the national impact. Furthermore, opening Whitewebbs Park to commercial landgrab will create a dangerous precedent for more valuable greenspace. If we are not mistaken, Mr. Khan, you are protective and understand the value of the greenbelt.

Whitewebbs Park is not only home to a remarkable and somewhat unique environment (old woods, grassland, and wildlife), but it is also crucial for the local population, which wishes to continue using the land without destroying its wildlife and flora. Everyone in the Edmonton Cycle Club, of which I am a member, is opposed to losing the space. The club frequently gathers for a drink at the café before heading out into the park. There, my husband and I enjoyed numerous walks, always learning something new and taking in the distinctive scenery. One thing is immediately apparent when coming to Whitewebbs Park: the local population, which includes families, senior citizens, and dog walkers, is strongly opposed to Spur's ambitions to take this area away from the inhabitants for their own profit.

Several hundred residents, including we, have previously voiced their detailed objections to this planning application, which is also the subject of a legal complaint because Enfield Council failed to properly follow SINC and nature recovery protocols.

This is based on the following reasons:

- **Inappropriate Development:** Because of the visual effects of the training ground boundaries, fencing, floodlights, buildings, and extensions, the Greater London Authority (GLA) determined in its Stage 1 Planning Report GLA/2024/0213/S1/01 (GLAS1R) that THFC's proposed development "would not preserve the openness of the Green Belt compared to what is existing" (para. 16). According to the GLA, this is "inappropriate development within the Green Belt," and in order for the plan to be approved, "very special circumstances" would need to exist (GLAS1R, paras. 13–17).
- **There are no very special circumstances:** Any harm to the Green Belt should be given "substantial weight," according to the NPPF, and "very special circumstances" won't exist unless the proposal's potential harm to the Green Belt due to inappropriateness and any other harm is clearly outweighed by other considerations" (para. 153).
- **Wildlife and environment:**

(1) Landscape changes: In order to construct its training pitches, THFC would need to level the terrain. Massive earthmoving projects and permanent habitat destruction would be required for this. The outcome would be inconsistent with the natural landscape. There has never been much landscaping done on the area of the property that is supposed to house the training pitches. No further material has been deposited here, according to the British Geological Survey. It depicts a historic scene that was in perfect condition prior to the deforestation of Enfield Chase (forest) after 1777. Whitewebbs Park, an Area of Special Character, contains important landscape and soils that should be preserved (NPPF para. 180).

(2) Increased flooding risk: The risk of flooding is increased when trees and grassland are lost. THFC would have to maintain these dry because hybrid pitches don't absorb a lot of moisture. Although THFC suggests building attenuation ponds, we don't think this is the solution. It damages the soil in addition to the natural landscape by necessitating the removal of substantial volumes of earth.

Two sections of active meadowland that already drain well would be used for attenuation ponds. Since the nearby beaver flooding project and the existing wetland in the forested edges are naturally addressing floods, attenuation ponds offer minimal ecological benefits.

(3) Biodiversity Net Gain (BNG): THFC plans to plant about 2000 trees throughout the property in order to achieve BNG (PS para. 8.120). But in our opinion, THFC's PS offers no advantages for the site's ecology, sustainability, or environment. As stated in para. 5.1.5 of [REDACTED] BSc(Hons), FLS, CBiol, MRSB, MCIEEM (Consultant Ecologist) "Whitewebbs Park (Enfield): Ecological Appraisal and Priority/Protected Species Assessment" (November 2023):

"Biodiversity net gain (BNG) calculations are based principally on habitats and do not adequately take account of faunal species present even if of high conservation status. Therefore, with regards the potential development of Whitewebbs Park, woodland planting is not considered appropriate with regards off-setting the loss of grassland. This will not benefit bird species and invertebrate species associated with open grassland, the populations of which have suffered an unprecedented decline in recent years. Additionally, if woodland planting is chosen to off-set the

loss of grassland, the poor-quality secondary woodland which results may take more than 30 years to mature and possibly 100 years plus before it supports a relatively wide range of fungi, lichens, Bryophytes and fauna".

Monoculture football fields and artificial turf would replace half of the mosaic/neutral, and acid grassland. The production, shipping, installation, and non-recyclability of astroturf and artificial grass result in a significant carbon footprint. When in use, it destroys wildlife by discharging microplastics into rivers, seas, drainage systems, and soil. In addition to suffocating life underneath, the plastic grass membrane causes flooding during rainy seasons. For butterflies, spiders, bees, small mammals, and a variety of insects like beetles, the open grassland must be preserved. The proposed tree plantings by THFC significantly diminish this habitat. It would take a while for the habitats that THFC plans to establish as part of their BNG to mature and become useful to animals. According to THFC's ecologists, the grassland on the site is primarily g4 modified grassland.

But in our opinion, it would be better described as a vast area of grassland that is rich in invertebrates, including priority species, and includes mosaic, modified, neutral, and acid grasslands. The grassland's GIGL-reported acid neutrality and publicly available statistics have not been fully taken into consideration. When THFC first performed their poll, there was a drought. Numerous grass species are notoriously hard to recognize and differentiate. We also doubt the methodology used to estimate the species density per square meter. Furthermore, the faulty BNG measure never records nor mentions the substantial habitat value loss resulting from the projected tree cutting. The 27% BNG is probably exaggerated. It seems inconceivable that a significant portion of the website could be removed and yet yield a profit. Our overall impression is that THFC has unreasonable overestimated the BNG of its proposal

(4) Pollution and Disturbance: Wildlife would be negatively impacted by the development's noise and planned floodlights. For instance, bats would suffer from light spill from floodlighting even in the presence of curfews. In addition to perhaps preventing roosting in nearby trees and woodlands, this is probably going to deter foraging and commuting activities. Bat species are light-sensitive and feed on Whitewebbs Lake's surface. This is next to the new access road that is being proposed. Bats in the Whitewebbs Lake area would suffer from the construction of this road and the accompanying traffic. Additionally, it appears that no bat surveys have been conducted in the Whitewebbs Lake area (Figures 11-3 and 11-4), which is included in the Ancient Woodland and Metropolitan SIN, according to Logika's "Biodiversity Baseline Report."

If a new road is going to pass the Lake, we think bat surveys need to have been conducted here. Additionally, there is a good chance that many bird species—especially those found in open grasslands—will either disappear entirely or become significantly less common in the area. The park's attractiveness and the peace of the surrounding SINs would also be impacted by noise from the training ground, auxiliary facilities, and their development. For instance, it might have an impact on the nearby Enfield Beavers on Forty Hall Estate. All of these planned developments—Whitewebbs Park, Dickenson's Meadow nature reserve, and the upcoming teaching center renovation in the Western Field—would seriously disrupt wild animals, particularly those kept in enclosures

(5) Tree loss: According to NPPF para. 180(b), the plan to cut down 137 trees (PS para. 8.57.2) is not sound. Additionally, in an effort to practice "good arboricultural management," THFC intends to cut down an additional 70 "Category U" trees. This is incorrect, though, because rotting or dead trees are essential to the environment because they provide a home for a variety of mammals, birds, and insects. By focusing solely on saproxylic species in relation to the ancient woods, Logika overlooks this environment on site and makes the error of linking high-quality saproxylic fauna with ancient woodland rather than open-grown trees. This is demonstrated by the occurrence of *Pocota personata*, a rare hoverfly and bumblebee mimic, on an ash tree. In the past 50 years, Whitewebbs is the third location in London to record this species.

In contrast to closed canopy woods, saprophytic plants typically need rotting wood in open-grown trees where there is more light and heat. Additionally, they need flowering shrubs like hawthorn close by. The Environmental Impact Assessment (EIA) ignores the effects on saproxylic species of losing large amounts of valuable rotting wood due to the removal of so many trees. We feel that the Arboricultural Impact Assessment's (AIA) suggested tree removals are needless and stem from a change in use rather than intrinsic risk. They also represent a substantial loss of biodiversity, as mentioned above. The BNG metric does not take this into consideration because it treats them as generic trees rather than trees with decay and other habitat characteristics.

(6) Glyphosate: It would be extremely detrimental to use glyphosate to clear large grassland areas before replanting. This chemical is illegal in Europe; 50 UK local authorities have either outlawed or severely restricted its use, especially in parks; and the Greater London Authority passed a motion in 2019 to discourage its use. Glyphosate is poisonous to wildlife and destroys plants. The hydrology of the site and surrounding surroundings, including the beaver enclosure, may be impacted by the glyphosate seeping into the soil due to the site's moisture content. The chemical could also damage aquatic life and its habitats by getting into Turkey Brook and Cuffley Brook.

(7) Wildlife Corridor: The Park's ability to serve as a wildlife corridor would probably be diminished by the construction and conversion of the Green Belt. Habitat loss and disturbance would make it more difficult for small

animals, reptiles, amphibians, and other species to get to and from Whitewebbs Wood, Forty Hall Estate, and Hilly Fields Country Park SINC.

(8) Irreplaceable Habitat: According to NPPF para. 186(c), it is unacceptable to lose or degrade veteran tree habitat and irreplaceable ancient woodland, such as that which surrounds Whitewebbs Lake. The "wholly exceptional reasons" listed in NPPF chapter 15 footnote 67 are not met by THFC's plans, and there is no appropriate compensation plan in place. The important veteran trees that THFC wishes to keep cannot be protected since its tree protection plan does not adhere to the Natural England and Forestry Commission Standing Advice.

Fazit: More harm than good: All of THFC's recommendations would negatively impact the Green Belt, and there is absolutely no environmental or ecological benefit overall. These factors make this planning proposal in violation of NPPF paragraphs 180, 185, 186, and 191. Additionally, it is an unacceptable land use (NPPF para. 194).

Impact for local residents

(1) Inequality and exclusion: The health and welfare of a small percentage of the young female generation—many of whom would not even be from Enfield—is the only emphasis of this concept for an elite/private women's training centre. According to WR para. 5(B), there would be a net loss of community access and public benefit since the majority of the population would not be able to participate in sports in this environment. This approach is incorrect since the planning application does not comply with paragraph 96(c) of the NPPF. The advantages of this park is being available to people of all ages without charge.

(2) Mental health: Whitewebbs offers the community great physical and mental health benefits as it stands. People come here on a regular basis to walk, run, cycle, perform yoga, meditate, see animals, create art, paint, or draw, or even play football or other sports. In its open parkland state, the location promotes mental wellness and offers a serene and motivating environment.

Fazit: More harm than good: In general, we do not think that these plans will improve public health; on the contrary, they will primarily have a negative effect. As a result, the harm from the loss of Green Belt would not be greater than the benefits.

Need, other locations and other

(1) Need: Given that THFC already has 17 fields and a cutting-edge facility, we wonder why we need another training center. Why the women's teams are unable to use these has not been explained by THFC. We would still doubt the scale of a new training ground even if there were a case for it. THFC could easily acquire property elsewhere without seriously damaging a public park and the Green Belt if the proposed development was smaller. We don't think the borough needs any more private or elite sports facilities. With the extra pitches, Tottenham would have 28 total. When comparing the amount of men's and women's fields at other elite football teams, the average is about 11, with Manchester City having the most with 17. The fact that visiting teams may already use their facilities further indicates that they have enough space, and this is more of a case of corporations occupying public space.

(2) Other Locations: THFC has not used all of the available brownfield sites (NPPF 146 (a)).

(3) Size of leased area: We wonder why so much land is required, on top of the 37Ha additional land required for the training center. Although it is evident that this land is required to achieve BNG, we do not think this is a suitable use of the property or a way to accomplish so.

(4) Gender Equality: THFC asserts gender equality in a number of ways. While we agree that women's football is just as vital as men's, in order to achieve true equality, women should have access to the same facilities as men at THFC's current training facility.

Fazit – More harm than good: NPPF para. 104 has not been considered; the loss of the previous use would not be outweighed by this development.

Missing Information

THFC states in the OUTLINE PARK MANAGEMENT PLAN that *"The full Whitewebbs Parkland Management Plan will be prepared and agreed with Enfield Council post consent"* and also *"The OPMP does not provide information on the approach to construction or how construction effects (for example dust creation, noise and temporary drainage) will be managed. These elements will be covered within a Construction and Environmental Management Plan (CEMP) that will be provided and agreed with Enfield Council post-consent."*

We think that the application's supporting documentation ought to have contained the CONSTRUCTION AND ENVIRONMENTAL MANAGEMENT PLAN (CEMP) and the FULL WHITEWEBBS PARKLAND MANAGEMENT PLAN (FWPMP) for public consultation, given the importance of this information. In order for Enfield Council, the planning committee, and the Mayor of London/GLA to fully assess the planning application as part of the Stage 2 GLA planning process, certain documents are required. For instance:

We are confident that THFC's plans will have a significant negative influence on the Park's and the surrounding area's environment (just two examples include the massive earthworks/relandscaping and the use of glyphosate), hence it is imperative that the CEMP be supplied immediately. Once more, the application cannot be appropriately

weighed against the anticipated harm of the proposals by the LPA or GLA without the information that would be provided in the CEMP.

The FWPMP must be submitted immediately because the outline version omits important information, such as park upkeep. The vaguely stated "maintenance" of the Park is part of the VSC/public benefit of THFC's recommendations, but it is obviously impossible to accurately balance this maintenance against the anticipated harm of the suggestions by the LPA or GLA without knowing all the specifics.

There is no information about how walkers, bicycles, and horses will be allowed to use the bridleway and footpath in the park's north, which runs east to west. Given how tight the path is, this could present an extremely high safety risk. In order to obtain the plans as part of the planning process, it is imperative that these footpaths—which are crucial to park users and for any public benefit to be appropriately weighed against the harm of the proposals—be worked out in detail right away.

It is even more important that the FWPMP be produced immediately so that it is obvious how Enfield Council and THFC will share costs and obligations, especially in light of the management plans' lack of clarity and the ridiculous £2 million fund for the lease agreement. How will this money cover THFC's complex promises?

Because of THFC's startling disregard for S106 agreements from its current men's training centre and Enfield Council's inability to hold it accountable, it is especially crucial to review the comprehensive management measures.

#0334

Mayor Khan , I am huge supporter of your drive to reduce pollution in London but why are you standing by while London loses perhaps its most bio diverse open space to a land grab by a billionaire ?

Enfield council are receiving a paltry 2 million in total for a 25 year lease to Tottenham Hotspur football club who are going to destroy the beautiful habitat and lay 11 plastic football pitches which are known to leach poisonous chemicals into the local water course.

Please come and visit the beautiful site , providing lungs to north London adjacent to the busy M25. You can meet with ecologists who will tell you about the wealth of pollinators and campaigners who will tell you how Spurs have broken all previous promises about public access in the past.

We are disgusted this happened under a Labour council and Labour mayor and beseech you to step in to save our beloved

Whitewebbs.

I await your help in this matter

#0336

We need your help to save our much-loved park and ancient woodland from being sold off by Enfield Council.

This wild natural habitat is irreplaceable for wildlife as well as the many people who use it.

Tottenham Hotspur want our land to add to their already vast local presence.

Please think of the future of all London parks if this is allowed to go ahead.

#0337

I am a lifelong Labour supporter, member and voter. I live less than half a mile from Whitewebbs Park that I use regularly.

I am devastated by Enfield Council's proposed transfer of control of Whitewebbs Park to ENIC t/a Tottenham Hotspur.

Spurs proposals are to convert around 50% of the currently publicly accessible biodiverse eco wilderness into sterile plastic and grass football pitches. The public will be excluded from this and other areas which will be fenced off. The floodlighting will create light pollution over the entire area.

ENIC and Spurs are a billion pound operation, but are only being asked to pay £2 million for a 25 year lease (80k per year). For that they get to take away the public's access to half our park and build on Green Belt Land.

The Council have brought Labour into disrepute. In May 2018 I campaigned and leafleted for Labour in my ward, results as follows:

Chase Ward	Dino Lemonides	Labour Party	
Chase Ward	Vicki Pite	Labour Party	
Chase Ward	Hass Yusuf	Labour Party	

In 2022, the proposals had shocked the community. The renamed Whitewebbs ward saw 3 Conservatives returned. I could not bring myself to campaign or assist in re-electing the Labour Council.

It is a Council's job to manage and protect public spaces for the community. If they are not up to the task they should resign and let someone else do it, rather than flog them off for a pittance.

They have been clever in framing this as an opportunity to create a female football academy to try and justify it. However, how is it Spurs have not done this until now? Why have they been unable to buy other, private sites for this purpose? There is no guarantee once Spurs get hold of the lease they will do what is promised. They were previously given similar largesse to build and develop their current training ground have not kept many of their community engagement promises.

The reputational damage goes beyond the Labour Council. If this goes through our local Labour MP and you will find any attempts to present a Green agenda completely undermined. No one will believe in future that Labour are safe custodians of the environment or that they will protect public spaces.

Please do everything you can to stop this nonsense before it is too late.

#0412

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.

- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0554 [31-60]

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit, I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below. This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) – please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.

- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0557

I am a resident of the London Borough of Enfield and am protesting about the planning permission recently granted by my local authority to Tottenham Football Club. Despite very strong representation by the residents,

the council has continued to forge ahead with this project. The local protests are supported by countryside and ecological organisations.

The project is being driven forward under the smoke screen of supporting women's football and improving the amenities at Whitewebbs. There is other land for sale nearby which could have been bought by this rich club and there is no strong case for additional pitches on land previously left for the enjoyment and recreation of Enfield residents. The area is greatly used by local people and especially families.

Please call in the planning application and approval for scrutiny. It does not align with the London Plan and is just an opportunity for an already wealthy organisation to take green belt, community land for profit.

#0560

We write to urge you to call for an urgent scrutiny of the plan to allow Enfield Council to sell a huge part of Whitewebbs land here in Enfield.

Please can you ask for an exploration of the other land which we understand to be available to purchase nearby and seriously consider the implication of such a wealthy organisation taking land from the local community.

The London Plan does not approve of taking Green Belt land for commercial purposes. the loss of Whitewebbs would be a devastating blow to the people of Enfield.

Locally we are also under pressure to consider releasing green belt land for housing. There is a limit to the sacrifices the community should be asked to make.

We've always been loyal members of the Labour Party through difficult times but fail to understand how this Enfield Labour Council can countenance this deeply unpopular sale of Green Belt land.

#0564

Enfield council have plans to sell Whitewebbs Park to Tottenham Hotspur thus removing this popular park from public use and also eroding vital wildlife habitat.

I trust we can count on your support in opposing these disgraceful plans.

#0563

I strongly request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, **is called in by the Mayor of London.**

Whitewebbs is a uniquely beautiful area of parkland, regularly used loved by thousands of North London residents. I have lived near Whitewebbs for 12 years - if I had to name the most important place in the area for me as a resident, it would be Whitewebbs. Myself and my wife go there three or four times a week - more in the summer. We are two of a great many. The Tottenham Hotspur application is one that is not only poorly conceived and justified, it violates Whitewebbs's greenbelt status and its huge importance as a conservation area. I would urge any of you to go and visit it for yourselves - **for me it is the most beautiful British parkland I have experienced anywhere** - and it's in the Greater London area!

This is clearly an application that has been driven by greed. They already have a training ground up the road - how much more space do they need? **Moreover I am appalled at Enfield Council's attitude in supporting this application**

If we let this application proceed not only will it destroy **an area of huge importance**, it is also an open invitation to other super-rich organisations to think they can just take control of areas of natural beauty with no consideration other than increasing their already vast wealth. This type of behaviour is something we are seeing every day in the News. Are we just to shrug our shoulders and wave it though? Governments simply have to do more to control these acts of avarice.

I request that you do something immediately.

#0565

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

This planning application is strongly opposed by the [Guardians of Whitewebbs](#). The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
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3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** – the facility will primarily serve an elite sports group with little public access. THFC's own proposal highlights that profit is their primary concern.
- Allied to this is the continuing speculation about ENIC's role at THFC. What happens if there is a change of ownership?
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
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- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0567

Dear Sir , I and the community of Enfield, don't agree with the application , it's going to destroy the green belt , the wild life , the welfare of the community of Enfield .

So we ask to Save Whitewebbs, from a speculative deal with the Tottenham Club. We want to retain our green space which its including many very old trees and a wonderful wildlife.

#0569

request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

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Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

Furthermore, I believe that to give away public open space which, if we learned any lessons from the Covid pandemic, is vital for people's mental and physical wellbeing is criminally reckless and brings shame and disgrace on those so called public servants who are ignoring public good in favour of enhancing private coffers.

#0571

I am writing to voice my concern over Enfield Council's decision to allow Tottenham Football Club to lease part of Whitewebbs Park in Enfield for 25 years.

This area of green space is full of biodiversity which is under threat from the current proposal. It is home to many ancient trees which will be cut down and replaced by young trees which will take decades to mature.

This whole area is enjoyed by walkers, dog walkers, cyclists and people just enjoying what little open space still remains in the area. My interest is in walking in the woods and the open grassland much of which will not be open to the public.

This area of land is on Green Belt land purchased with public money in 1931 for the people of Enfield. A fact

appearing to be ignored by Enfield Council!!
Hoping you will have the same concerns as I and many local residents have.

#0574

Please save Whitewebbs! How can London be a green city if you turn greenfield sites into development. My mental and physical health depends on these green spaces. Once it is gone, it's gone! Please save Whitewebbs! It is a beautiful space for all.

#0438

Dear all,

As a follow on, please find some additional points to consider in 'calling in' the application:

- None of us are 'Not in my back yard/NIMBY' protesters.
- If this green belt ancient woodland was going to be destroyed for good social uses such as much needed social housing, schools or hospitals, then whilst sad, I think we could all understand the need.
- However, this application is purely for the gain of one, already very cash rich company, who is not giving anything back to the community. Quite the reverse.
- There are many other available sites that are currently lying as wasteland (directly opposite the Spurs Training ground) and less than 0.25m away from the site of this application. These sites have no historic, environmental or social value. Yet, Spurs and Enfield council seem focussed on decimating ancient woodlands.
- The wildlife in Whitewebbs now includes 80+ bird species (tawny owls, kestrels, woodpeckers), badgers, beavers, 9 bat species, deer and rare insects.
- The park is also very undulating, so the volume of machinery involved in destroying trees and flattening the land suitable for astro turf football pitches will be enormous (and yet flat wasteland lies but 0.25 m away).
- As the park is an area of outstanding beauty, if you haven't already visited, I would urge you to see for yourself what will be destroyed.

Many thanks for taking all of these points from both of my emails in to consideration.

#0476

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I am writing to you with a heartfelt plea and an urgent sense of responsibility, to request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, be called in by the Mayor of London under Article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. This application must be refused for the reasons set out below.

Whitewebbs Park is not merely a green space; it is a precious ecological sanctuary, a haven of biodiversity and unusual natural features that has flourished since the golf course closed in 2021. Over the past few years, this area has become a shining example of rewilding in Enfield, providing a refuge for countless species of flora and fauna, and serving as an invaluable green lung for the local community.

The proposed development stands in stark contrast to the London Plan and is deemed "inappropriate development" by the Greater London Authority (GLA). According to the GLA's Stage 1 response (REF: GLA/2024/0213/S1/01), "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We unequivocally believe that this application fails to meet the criteria for "very special circumstances", as it offers a net loss of any benefit.

Summary of why I believe the application should be called in and refused

I vehemently oppose this planning application. The proposed development is fundamentally incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the tragic loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt.
- Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF).
- The required “Very Special Circumstances” (VSC) do not exist to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- 50% of Whitewebbs Park’s biodiverse grassland and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and synthetic football pitches would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has failed to conduct critical ecological surveys, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. ‘Wholly exceptional circumstances’ (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- The Park was purchased with public funds and intended for continued public use. The proposed development privatises 50% of the park, restricting public access to a site that has been freely available for decades.
- THFC’s claims of community benefits are misleading—the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a Full Parkland Management Plan.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs’ formal complaint and the Local Plan Stage 2 Hearings.
- Whitewebbs Park meets the ecological criteria for a Metropolitan Importance SINC but was excluded from designation, reducing its legal protections.
- These failures raise serious legal and environmental concerns regarding Enfield Council’s handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would destroy key panoramic views protected under Enfield’s Local Plan.
- It contradicts the Forty Hill Conservation Area guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The proposed changes, including massive re-landscaping, would permanently alter the park’s historic character.

Conclusion and London-wide/National Impact

This planning application flagrantly violates both regional (i.e., the London Plan) and national policies related to Green Belt and public open space protections. It threatens biodiversity, restricts public access, and undermines vital conservation efforts.

The application could set a dangerous precedent for the privatisation of parkland and the consequent reduction of public access—please see Public Interest Law Centre's press statement "There is no real protection in law for public parks if this judgment stands" regarding the 2023 judicial review judgement: [Public Interest Law Centre Press Statement](<https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>).

This planning application has, and continues to, spark considerable national controversy and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the glaring lack of justification for Green Belt development, significant environmental harm, and procedural failures, this planning application should be called in and decisively rejected. We must preserve Whitewebbs Park and other irreplaceable green spaces for future generations. The protection of Whitewebbs Park is not merely a duty to our environment but a profound responsibility to our community and the generations to come.

Our vision

Our aim is for Whitewebbs Park to become a designated nature reserve. We would like to see the Park become a central hub for residents and visitors to enjoy the beauty of nature that this borough showcases and to be a beacon for biodiversity in London.

Our vision is to build an inclusive community focussed on rewilding; environmental and wildlife education; mindfulness and collaborative activities (outdoor crafts, gardening, nature walks, retreats, eco-therapy, sustainable sports).

Please, I implore you to step in and help save this precious natural haven. Your action can make a monumental difference in safeguarding our environmental legacy.

#0556

I am writing in the hope that you will see fit to put a stop to the planned atrocity that has been proposed by Enfield Council and Tottenham Hotspurs to destroy Whitewebbs Park by building a training ground for women's football.

The park has been held in trust by Enfield Council for the public and not for a corporation as large as THS to profit from, surely it is illegal for this to happen. There are many other options for THS besides taking over green belt land, of which there is precious little. In fact they already have SEVENTEEN training grounds for men.

This park and ancient woodland is home to many species of wildlife as well as a sanctuary for many communities, not only Enfield. People come from afar to enjoy this beautiful, natural, wide open space. If this is allowed to happen it will set a dangerous precedent for other multi billion pound corporations to follow suit.

We implore you to please take time from your busy schedule to help put a stop to this plan.

#0555

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit, MPs and Councillors,

I am writing to you with an extremely concerning issue regarding the proposed development of Whitewebbs by Tottenham Hotspurs Football Club and Enfield Council. I have been an Enfield resident my entire life, whom has enjoyed Whitewebbs park during that time and do not see the value in demolishing vital green space in favour of building a training ground for women. Of course I am in favour of supporting women in sport, however not at the detriment of this vital space for wildlife and the citizens of Enfield. I would also like to point out that London is meant to be a national park city whereby 49% of London is green and blue space, providing habitats for 15,000 species and 8.4 million trees. How are we fulfilling and supporting this if green and blue space at Whitewebbs is demolished and built upon? As a proud Londoner who loves, supports and shares my enthusiasm for nature and wildlife I cannot sit by and see this happen. As an Early Years Educator and Forest School Leader I believe it is

important we teach the next generation to care for our planet, wild spaces and nature, I urge you to refuse this planning application.

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** – the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0558 – see attached

#0559

Dear Mayor Khan,

I am writing to express my deep concern regarding the recent approval of Tottenham Hotspur's new training ground, which entails the development of a significant portion of our cherished Green Belt land. This decision poses a substantial threat to our local environment and community well-being.

The Green Belt serves as a vital ecological buffer, offering habitat for diverse wildlife and acting as a natural carbon sink. Its preservation is essential in our collective work against climate change. The proposed development would lead to the irreversible loss of these invaluable green spaces, undermining our environmental sustainability efforts. Moreover, the Green Belt provides recreational spaces that are integral to the physical and mental health of our community. Its destruction would deprive residents of essential areas for leisure and connection with nature, adversely affecting our quality of life.

I urge you to reconsider this planning application, taking into account the long-term environmental and social costs. Protecting our Green Belt is imperative for the health of our ecosystem and the well-being of current and future generations.

Thank you for your attention to this critical matter.

#0561

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

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1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
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- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.

- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

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- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

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- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
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- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
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- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0566

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

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4. Procedural Failures and Mismanagement of SINC Review

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Conclusion and London-wide/National Impact

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- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0568

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

This is the first time I have even felt strongly enough to write to anybody to complain about something. But such are my feelings that this is without any doubt, a huge mistake on the part of Enfield Council, that I am compelled to draw your attention to the proposed development of our incredible Whitewebbs Park.

Please see the details below for further information. It is not too late to refuse this application on environmental grounds, amongst plenty of other very sound reasons.

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

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- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
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- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations..

#0572

I'm writing to request that the planning application 24/00987/FUL (London Borough of Enfield) submitted by Tottenham Hotspur Football Club for a football training centre & ancillary buildings is called in by the Mayor of London & the Secretary of State.

My concerns lie with the inappropriate development of Green Belt land that doesn't conform with the London Plan.

I feel that the proposed development will cause irreversible ecological damage to the Whitewebbs Park area. Over 200 mature trees will be lost in the process & the construction of a road through ancient woodland will cause harm to the habitat within & around. The replacement of natural grassland with synthetic football pitches will produce microplastics creating long-term ecological damage.

Whitewebbs Park was originally purchased with public funds & intended for continued public use. The proposed development would privatise 50% of the park restricting access that has been available for decades. It would destroy its historic character; result in the destruction of panoramic views & prevent the public from enjoying all that the park currently offers - days out with children; dog walking; keeping Londoners fit and healthy & similar.

The development could lead to yet more considerable impacts & would set a precedent for the privatisation of other parklands in the future.

I feel strongly that the application should be rejected in favour of preserving Whitewebbs Park & other important open spaces for future generations.

Thank you for considering my request.

#0570

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

This planning application is strongly opposed by myself and the [Guardians of Whitewebbs](#). The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.

- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application **violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies**, threatens biodiversity, restricts public access, and undermines conservation efforts.
 - The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
 - The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
 - Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.
-

#0573

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **“Very Special Circumstances” (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park’s biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. ‘Wholly exceptional circumstances’ (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC’s claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs’ **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council’s handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield’s Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park’s historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
 - The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
 - The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
 - Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.
-

#0591

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I wanted to write to you in regard to the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club.

On a personal note, Whitewebbs Park has offered me wild nature, similar to what might be found in the Countryside, the spacious type to get lost in, comparable in character to Hampstead Heath or Richmond Park. Whitewebbs Park has been my sanctuary since moving back to my hometown of Enfield in 2021. Witnessing a green space naturally restoring and renewing itself has brought me respite and a glimmer of hope against the climate change anxiety that weighs so heavily and a welcome contrast to the treeless main road I live by. Enfield Council do not see the value of the incredibly rare and beautiful space that Whitewebbs Park is.

I have no future plans to leave London and am wholly committed to the thriving of my Town and Borough. The proposed privatisation of 50% of the open grassland of Whitewebbs Park casts a dark shadow over Enfield's future.

As local residents, we are meant to be represented by our Councillors, we have not felt heard. We need to know that we can live in London and easily and freely access and continue to roam in our existing, open public land which we have become intrinsically attached to and part of. The flattening of the land, building of football pitches and fence boundaries will drastically alter the open views and cause ecological damage to the rewilded grassland, this would be a major loss to all.

██████████ who represents the Guardians of Whitewebbs, has brought to your attention further aspects of the planning application which outline specific points for dispute. I want to say I agree with all that he has raised and echo his request that this planning application be called in and rejected for the benefit of all, not just the few.

#0593

Dear Mayor and GLA Planning Team,

I am writing to ask you to 'call in' the planning application regarding Enfield Council's agreement with Tottenham Hotspur give up public green space at Whitewebbs as part of a long term lease.

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of

London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

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- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
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- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
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- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
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5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
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- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

I live in Enfield (EN2) and visit Whitewebbs several times a week. It is a really special place like nowhere else in the area and it is unimaginable to think that it is lawful that Spurs proposal can be entertained. We have had a Labour council vote in favour for this and Labour speak on social media promoting the proposal - what is the purpose of the Labour party if they are representing a multi-billion pound private company above it's own constituents?

The fact Spurs are claiming that their proposal would see a 30% increase in biodiversity shows how clueless they are on ecological matters and unfit to take any responsibility for this green space.

This is being done under the pretence of women's football however benchmarking against other clubs in the country Spurs currently have 17 pitches, next in the list is Manchester City with 16 followed by Manchester United with 14. For Spurs to say they need another 11 to have 28 in total doesn't add up. I am all but certain from that the football club is run (i.e. profit over results) that this is an attempt to acquire some cheap land and do something more lucrative with their existing site at Hotspur Way and I urge you to be on the right side of history and prevent this from happening.

#0575

Please can you protect Whitewebbs park in Enfield from destruction. A vital community space will be lost for people, the natural habitat and the wildlife that lives there.

#0577

We need your help to save our much-loved park and ancient woodland from being sold off by Enfield Council.

This wild natural habitat is irreplaceable for wildlife as well as the many people who use it. Tottenham Hotspur want our land to add to their already vast local presence.

Please think of the future of all London parks if this is allowed to go ahead.

Hoping you care.

#0578

I wish to express my concern regarding the proposed development of a women's football academy in Whitewebbs Park, by Tottenham Hotspur Football Club (THFC).

As a lifelong resident, and frequent user of the park, I am troubled by the impact this development will have, particularly when balanced against the minimal benefits gained.

The park and its waterways are a significant environmental reservoir in Enfield, a rewilded sanctuary for birds, insects, mammals and amphibians. This has developed over many years and is irreplaceable. Many of the trees pre-date the inception of the park and are surely what we should be seeking to retain, not tear down?

The park also offers a free open space for the residents of Enfield and beyond. Walkers, runners, families, horse riders and friends all use the area for recreation, it is a valuable resource benefiting the health and wellness of the community.

The benefits suggested by Tottenham Hotspur Football Club are negligible - and, apart from a select chosen few, will give no advantages to the local population.

Mr Khan, I ask you to consider the facts, examine the credibility of the claims made by THFC, and add your support to the people of Enfield in seeking to halt this development.

#0576

We've been really shocked to see that Enfield Council has approved a plan to lease a large part of our beloved park, woodlands and grassland to Spurs. I'm an Enfield resident and come here with my husband every week; it is more than just a park in the traditional sense, but a haven for wild birds and plants and a fantastic place for walking. It's always full of families, joggers, dog walkers, Nordic walkers, community walking groups and walking groups of older people.

The agreed income to the council is negligible and I can't understand what the benefit could be for Enfield residents. I've also not personally seen any consultation on such a significant decision. I've seen a suggestion that Spurs will increase access, but I can't see how access can be greater than we have already when the whole space is currently available to the public. Instead of being a benefit to residents, the space will be fenced off and exploited for the benefit of private enterprise.

I understand that the only hope for saving Whitewebbs for the use of local residents is that you can review the decision, and so I write to request that you do so.

#0579

Please help us to save Whitewebbs! They will be tearing down trees and parts of nature that people benefit from using. Being able to get out and walk in nature or enjoy being outside amongst trees has scientifically been proven to have a huge amount of health benefits in terms of preventing ill-health and healing from ill-health. Tearing this space down is not a necessity but the space itself is a necessity to those who use it.

Also where do I see a copy of the insurance policy that will cover any harm that comes from microplastics released from astroturf and any further health information available to the public to protect them please?

#0580

You may not be aware but Tottenham Hotspurs have applied to build several football pitches and training facilities for Womens football on public land in Enfield. Whilst commendable, the fact is that Spurs already have a large number of football pitches adjacent to the area. It would seem superfluous to add more pitches as the current number are not all in use. A simple additional changing facility for women could suffice.

The issue is the devastating impact on the wildlife this development will cause. Spurs claim that they will create a private nature reserve. Why when all can freely see wildlife, which is surviving well currently.

Taking a large area of public land for use by all in order to create a sports arena for a relatively select number seems inappropriate. There are already facilities which can meet the footballers needs.

I would ask that you take back Enfield councils agreement to lend the land to Spurs and allow the residents of Enfield to continue to enjoy all that the entire Whitewebs public space had to offer.

#0582

We need your support to save our much loved park and ancient woodland from being sold off by Enfield Council. The wild natural habitat is irreplaceable for wildlife as well as the many people who like to walk there. Tottenham Hotspur want our land to add to their already vast local presence. Please think of the future of all London parks if this is allowed to go ahead. Hoping you will help

#0581 [61-90]

I wish to express my concern for the planned development on Whitewebbs Park in Enfield by Tottenham Hotspur Football Club and request your support in opposing it.

Tottenham Hotspur claim that the planned development will provide more recreation facilities and increased access to the Park but their plans are to cordon off about half of the current parkland for their private commercial use, severely restricting access by the local people of Enfield who currently use it for walking, Nordic walking, running and picnicking, and only allowing access to those who wish, and are able to pay to use Tottenham Hotspur's facilities. Furthermore, the development will require the cutting down of a large number of trees and shrubs, destroying natural habitat, formed over many decades, for birds, bats and other small mammals. The claim by Tottenham Hotspur that the development will bring employment and enhanced recreational opportunities to the area is vastly exaggerated as it will severely restrict access to the local people and only provide minimal employment opportunities. The development will increase profits for Tottenham Hotspur but at great cost to the London Borough of Enfield and the people who live there.

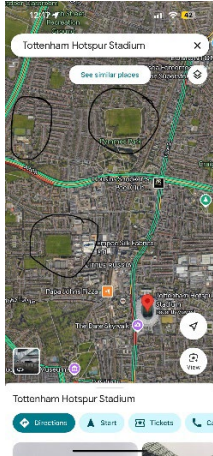
#0583

hello mayor

I just can't believe the constant lack of care or thought into anything that councils or governments do these days. I recently heard that Enfield council are selling off a huge amount of public park space in whitewebbs park to a football club! Please see the picture attached showing three areas very close by that would be much better used as football pitches for overpaid windbag kickers because guess what, they already are football pitches! Why has no one considered investing into these areas instead? Imagine if you set up a football arena in any of those areas where local teams could come and use decent looked after facilities with a cafe and so on.....the council could make some more money then hey? And more jobs could be created? Is there anyone employed by councils to

police common sense? Also you love talking about emissions and climate change so what's the benefit of destroying park land instead of tarding up an area already used as a football field?

I have no doubt you won't read this email and it will fall on deaf ears anyway, some of us are fully aware we are heading back to the dark ages so I'll let you get back to avoiding questions about the rise in knife crime and your lack of care for anyone other than yourself.



#0586



Whitewebbs' Enfield



[Redacted]

16:23

To mayor@london.gov.uk

Please Mr Khan,

We need your help to save our much-loved park and ancient woodland from being sold off by Enfield Council.

This wild natural habitat is irreplaceable for wildlife as well as the many people who use it.

Tottenham Hotspur want our land to add to their already vast local presence.

Please think of the future of all London parks if this is allowed to go ahead.

Hoping you care.

[Redacted]

Sent from [Outlook for Android](#)

#0585

Sadik Khan

I lead walks in the local parks in the borough of Enfield A lot of older people benefit Immensely as it's a way of getting out and meeting people

#0584

The people of Enfield North London need your help to save our much loved park and ancient woodland from being sold off by Enfield Council.

This wild natural habitat is irreplaceable for wildlife as well as the many people who use it. Tottenham Hotspurs football club want our land to add to their already vast local presence. There are trees here that have matured over decades or even centuries that will be destroyed with a power saw within minutes, and to the local people we feel this is unacceptable.

We hope you will consider the future of all London parks if this is allowed to go ahead.

#0588

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.

- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** – the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

Thank you for considering my request.

Yours sincerely,

[Regulation 13 personal information]

PS - Whitewebbs and Richmond Park are the lungs of London since the loss of other parks. Please don't let this valuable natural asset be destroyed through short sightedness, lost for the next generations, sold off to a billionaire with a total disregard for the people of Enfield. As a resident of the Whitewebbs ward I do not want a synthetic relandscaping of a natural treasure with fences stopping me from enjoying the natural world. The collateral damage to the surrounding area would be irreparable. It's public land and should remain so. I beg you to please do the right thing and stop

the sell off of Whitewebbs. My confidence in the council is not great, especially when I understand that there are many related members within it, something I thought was illegal.

I sincerely hope that you give this matter some serious thought and (now that we're in a new Trumpian world) do not allow THFC or the Enfield Council to feel emboldened to bulldoze their view literally onto the landscape! I hope you conclude that it should be stopped.

#0587

To The Lord Mayor

Please save our beautiful Whitewebbs park in Enfield. Stop Tottenham football club taking over the public's park. This park is for the people of Enfield and should not be for Tottenham football club

#0589

Dear Mayor and GLA Planning Team,

I am writing to ask you to 'call in' the planning application regarding Enfield Council's agreement with Tottenham Hotspur give up public green space at Whitewebbs as part of a long term lease.

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.

- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **“Very Special Circumstances” (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

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- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs’ **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council’s handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield’s Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park’s historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre’s press statement **“There is no real protection in law for public parks if this judgment stands”** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search “Whitewebbs Park”).
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

I live in Enfield (EN2) and visit Whitewebbs several times a week. It is a really special place like nowhere else in the area and it is unimaginable to think that it is lawful that Spurs proposal can be entertained. We have had a Labour council vote in favour for this and Labour speak on social media promoting the proposal - what is the purpose of the Labour party if they are representing a multi-billion pound private company above it's own constituents?

The fact Spurs are claiming that their proposal would see a 30% increase in biodiversity shows how clueless they are on ecological matters and unfit to take any responsibility for this green space.

This is being done under the pretence of women's football however benchmarking against other clubs in the country Spurs currently have 17 pitches, next in the list is Manchester City with 16 followed by Manchester United with 14. For Spurs to say they need another 11 to have 28 in total doesn't add up. I am all but certain from that the football club is run (i.e. profit over results) that this is an attempt to acquire some cheap land and do something more lucrative with their existing site at Hotspur Way and I urge you to be on the right side of history and prevent this from happening.

Thank you for considering my request,

#0590

Save Whitewebs, don't let Corporate greed spoil our environment.

#0592

Please can you step in and try to help save our lovely north London park? I'm a 76 year old Enfield resident and I go there three times a week for walking, it's a big part of my health regime and I don't understand how it can be of greater benefit to local people to give the land to Tottenham Hotspur than to keep it for us to use. It's always busy and well-used and the plan is to fence off a huge part of it and turn it into pitches which will destroy the grassland habitat entirely. Please try to come and see it for yourself.

Thank you for your time reading this

#0600

Mayor of London and Secretary of State,

I am a resident of the London Borough of Enfield and am writing to request that the planning application 24/00987/FUL (London Borough of Enfield) submitted by Tottenham Hotspur Football Club to build a football training centre and ancillary buildings at Whitewebbs Park is called-in for further review. Whitewebbs Park was originally bought by London Borough of Enfield in 1931 for the people of the borough and for public use. The proposed development would privatise 50% of the park, restricting access that has been available for decades to the public. It would destroy the park's historic character, result in the loss of panoramic views, and prevent people, local and from far and wide, enjoying recreational activities such as days out with the family, picnicking and insect hunting, and of course dog walking.

Another major concern lies with the inappropriate development of Green Belt land, which violates both regional policies i.e. the London Plan (as confirmed by Enfield Council) and national policies. The proposed development will cause irreversible ecological damage to the Whitewebbs Park area. Specifically, over two hundred mature trees will be lost in the process, and the construction of a road through ancient woodland will harm the habitat within and around the area. Additionally, the replacement of natural grassland with synthetic football pitches will produce microplastics, leading to long-term ecological damage. The massive amount of earth movement and landscape modification to create these pitches will also have a negative effect on the biodiversity of Enfield's Green Belt. My understanding is that Tottenham Hotspur FC have to date failed to conduct critical ecological surveys which means that the full impact on protected species currently thriving at Whitewebbs Park remains unknown.

The development could lead to further significant impacts and would set a precedent for the privatisation of other public parklands in the future. I feel very strongly that the application should be rejected in favour of preserving Whitewebbs Park and other important open spaces for future generations.

I urge you to call-in this planning application for further review to ensure that the ecological and public impacts are thoroughly examined and that the principles of the London Plan are upheld.

#0630

See attached

#0668

I am writing to implore you to consider rejecting the application for Spurs to build on Whitewebbs park.

It would be a devastating loss to the community and to nature. It is irreplicable habitat.

I also believe it is a huge failure to the people you represent selling off public land to private buyers, more lost to billionaires.

There are many of us who are intensely concerned and looking for your hel

#0671

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

Whitewebbs Park is one of the most wildlife-rich public greenspaces in London. Beavers, Kingfishers, Great Crested Newts, Kestrels, Moles, Mining bees, Grass snakes, 9 species of Bat, 80+ species of birds etc... The list is huge and atypical for London.

A **private business** (Tottenham Hotspurs FC), valued at £2.6billion should not be digging up, destroying and fencing off 50% of the open space of a **public park** - they should be buying **private land**.

The Enfield Council lease agreement with Tottenham FC is utterly appalling on every level - socially, economically and environmentally. The groundworks and construction would be colossal and catastrophic, on multiple levels.

The plans are ill-thought out and are dangerous to the local area and the wider environment.

Beaver welfare has not been fully considered; hydrological impacts of the beaver enclosure and waterways of the site have not been fully considered.

Some Enfield councillors, who were allowed to vote on the planning permission admitted being paid season-ticket members of Tottenham FC. They are elected to represent the general public; not a multi-billion pound business.

Many families in Enfield do not have a garden or access to greenspace; you CANNOT give permission for public greenspace to be given away to a hugely profitable, private business. It an utter disgrace.

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

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#0689

Dear GLA Planning Team and Secretary of State/Planning Casework Unit,

I am writing to implore you to consider rejecting the application for Spurs to build on Whitewebbs park.

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 - Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.
-

#0709

I am writing to express my deep concern regarding the recent approval of Tottenham Hotspur's new training ground, which includes the development of a significant portion of our cherished Green Belt land. This decision poses a substantial threat to our local environment and community well-being.

The Green Belt serves as a vital ecological buffer, offering habitat for diverse wildlife and acting as a natural carbon sink. Its preservation is essential in our collective work against climate change. The proposed development would lead to the irreversible loss of these invaluable green spaces, undermining our environmental sustainability efforts. Moreover, the Green Belt provides recreational spaces that are integral to the physical and mental health of our community. Its destruction would deprive residents of essential areas for leisure and connection with nature, adversely affecting our quality of life.

I urge you to reconsider this planning application, taking into account the long-term environmental and social costs. Protecting our Green Belt is imperative for the health of our ecosystem and the well-being of current and future generations.

Thank you for your attention to this critical matter.

#0699

RE: planning application 24/00987/FUL

I am pleading that you use your powers to block the development of the public nature reserve, Whitewebbs Park, to Tottenham Hotspurs FC to build astroturf pitches for an elite sports training facility.

I absolutely support the idea of a women's football academy but the 17 pitches Spurs already have next door isn't enough (really?!), if 11 more pitches is really what is required then a multi-billion business like Spurs can buy some private land to make it happen, rather than stealing a public nature reserve for a measly £200 per week (£2m over 25 years lease) gain to public funds. Scratch beneath the veneer and it's obvious that they actually don't want to invest in women's football at all, the whole thing is a gender-wash to try and make the land-grab optics more palatable.

Many, many people go nature bathing in the beautiful park, you should really come and see how stunning it is. It absolutely qualifies as an Area of Outstanding Natural Beauty. The panoramic views are beautiful. It's a haven for

families, dog walkers, and anyone who wants to have a moment to return to themselves in this busy, crazy modern world we live in. It a unique spot of beauty in North London. It would be a travesty, a tragedy, if these awful, devastating plans went ahead.

It is home to all manner of protected species; bats, great crested newts, grass snakes and at least 2 pairs of breeding kestrels, and Enfield council failed to properly assess this on the planning application. Ultimately, there is no net gain to the public, just to the greedy football bosses.

Please see below for more details:



We request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

-

The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.

- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.

- The required **“Very Special Circumstances” (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park’s biodiverse grassland**

and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.

-

The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.

-

THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.

-

Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.

- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. ‘Wholly exceptional circumstances’ (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds**

and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.

- THFC’s claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.

-

Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

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Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs’ **formal complaint** and the **Local Plan Stage 2 Hearings**.

-

Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.

- These failures **raise serious legal and environmental concerns** regarding Enfield Council’s handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield’s Local Plan.

-

It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.

- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character.**

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0710

Please call in Enfield Council's planning decision regarding Whitewebbs Park (Recognised at Stage 1 - Inappropriate development GLA/2024/0213/S1/01).

If allowed to proceed Tottenham Hotspur Football Club will bulldoze 17 hectares of biodiverse Green Belt adjacent to the Enfield Beaver Enclosure to level it for 11 plastic football pitches. These massive earthworks would bring to 28 the number of polluting elite sport pitches draining into Cuffley Brook, Turkey Brook and the New River. There has been no Environmental Impact Assessment. The GLA and UK government cannot meet their duty to enhance biodiversity, promote nature recovery in London and permit these massive excavations next to London's first beaver enclosure.

It is not just London's beavers that are threatened. The site contains numerous protected species including 11 species of bat, grass snakes, Great Crested Newts, orchids, waxcaps and 28 species of butterfly. Protected habitats include designated ancient woodland, veteran trees, acid grassland, wildlife ponds and two water courses (Turkey and Cuffley Brook). Despite the scale of the development and the ecological value of the site Enfield Council screened out an EIA consequently the scale of the adverse impact has not been properly quantified.

This is inappropriate development on Green Belt and ancient woodland. This remains true despite recent changes to NPPF in favour of housing. This is not housing; it is a gated elite sport leisure complex. There is no benefit for local people. Local people will lose half their park behind barbed wire. This is a politically toxic plan that will ruin Labour in Enfield. It serves only a super-rich company with whom even Spurs football fans are furious because the focus is on money, not football.

Tottenham HFC does not need of more training pitches. They already have far more than Chelsea, Arsenal and West Ham (all shared by their topflight women's teams), and even more than the England joint men and women's training facilities. There is absolutely no case to show need. In fact, Spurs may really intend to build an NFL training facility, only pretending this is to promote women's football. If they truly supported women's football the women would have equal status on the existing huge 17 pitch facility next door to Whitewebbs. No Premiership club has more than 17 training pitches.

Enfield planning department chose not to scrutinise THFC's plans. The officer's hopelessly flawed report failed to mention irreplaceable habitat or its full protection in NPPF (para 193c ancient woodland and veteran trees). This despite admitting "*the proposal includes limited measures that will impact upon Whitewebbs Wood SINCE*". The Woodland Trust made specific objections based on these issues and Butterfly Conservation made objections based on threats to species and habitats. The reassurances made by the applicant and Enfield are of no value because

they are not substantiated by an EIA, Tree Protection Plan or Arboricultural Method Statements. On a development of this scale impacting ancient woodland and veteran trees it is clearly negligent to consider granting permission before these basic industry standard documents have been submitted and agreed.

Enfield also failed to scrutinise the ludicrous claims of 30% Biodiversity Net Gain. It is obvious that you cannot achieve 30% BNG by digging up and astroturfing 17 ha of a species rich park that sits between 3 metropolitan SINC's and has two priority water courses running through it. The BNG claims are nonsense. They are largely based on a plan to plant 2000 trees on a site where there are literally 10s of thousands of young trees already naturally regenerating. Furthermore, aside from the ancient woodland and veteran trees threatened, the biggest loss will be to flower rich unimproved grassland (including some acid grassland). None of the BNG claimed even purports to compensate for the loss of 17 ha of species rich grassland.

Had Enfield conducted a proper SINC Review in 2020 they would have designated Whitewebbs. It is clearly qualifies for SINC status. The review upgraded the status of two existing Enfield golf course SINC's but Whitewebbs was not even looked at. They did not ask for records from GIGL or recognise the site as a wildlife corridor between multiple designated sites. Enfield had already earmarked the site for development and were in discussion with Spurs thereby compromising their duty to assess wildlife sites objectively. The flawed SINC Review was never submitted to the GLA and there was no external consultation.

Enfield's purported justification for their lax approach is that environmental and tree protection will be dealt with by conditions. This is bad practice and it removes those issues from the scrutiny of the proper planning process. Worse, Enfield know THFC ignore conditions. It is irrational to assume they will comply now when they did not in the past on a similar development.

This plan will fail. The question is whether the GLA and Secretary of State will stand up for people and nature in London, or be seen to side with an ugly public land grab by an exploitative billionaire's company. Every policy of the NPPF, London and Local Plan is against this type of enclosure of Green Belt for exclusive use of a private elite. It is harmful to Green Belt, harmful to people, harmful to wildlife and threatens London's first beaver reintroduction.

Please be on the right side of this debacle and SAVE WHITEWEBBS.

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#0713

I'm writing to ask you to do what you can to prevent the deal on the Whitewebbs acquisition from going ahead. I want to make three points:

Firstly: Changing green belt to brown does not align with the London plan:

Secondly, it would mean that a wealthy organisation was riding roughshod over the wishes and usage by the local community, who value it enormously, especially the heritage of the trees and woodland:

Thirdly: There is other land nearby available to purchase, and to remove the amenity of Whitewebbs in its present unspoiled state from the community is unfair and unnecessary.

#0715

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

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As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

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1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.

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- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
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- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0782

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation

change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0783

I am writing to request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club, for a football training centre and associated buildings in Whitewebbs Park, is called in by the Secretary of State and Mayor of London.

My main concerns over the proposed development are as follows:

1. It is green belt land
2. It will cause irreversible ecological damage, with trees lost and animal habitats destroyed
3. Whitewebbs Park was originally purchased for public use on an ongoing basis and the development would go counter to the original intended use of the park
4. The park is very popular with local residents for recreation and dog walking and the loss of a significant portion of the park will adversely impact the local community
5. The development, which allows for the erection of buildings, infrastructure and football pitches, will, as a necessity, alter the character of park, affecting its "natural" ambiance

Please could you reconsider the council's decision to allow the development to go ahead.

#0784

Dear Mayor of London, GLA Planning Team and Secretary of State, Planning Casework Unit

I am writing to you to request that the above planning application, submitted by Tottenham Hotspur Football Club (THFC), for a football training centre at Whitewebbs Park, is called in by the Mayor of London under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990.

Here are my reasons:

- The impacts of this proposal extend beyond just Enfield, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "There is no real protection in law for public parks if this judgment stands" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application violates both regional (the London Plan) and national policies related to Green Belt and public open space policies. The GLA has stated that the proposal is inappropriate development in the Green Belt, and Enfield Council acknowledges that it contradicts the National Planning Policy Framework. The required "very special circumstances" do not exist to justify discounting Green Belt protections.
- The proposed location, Whitewebbs Park, was bought with public funds in 1931 and intended for public use. Since then it has been available for the public to use with no restrictions. These proposals would result in the loss of this public access to 50% of the Park. It would be disastrous for this to go ahead, given that we know how important accessible green spaces are for people's physical and mental

health. The claims being made that this proposal will be a benefit to the community are false. The reality is that only a small elite group of girls and young women stand to benefit.

- Important panoramic views which are protected under Enfield's Local Plan would be destroyed, and the historic character of the Park would be permanently altered. The plan also contradicts the Forty Hill Conservation Area guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- Significant environmental harm would occur as a result of 50% of Whitewebbs Park's diverse grassland and trees (including veteran trees) being lost which would result in massive loss of habitat. It also undermines conservation efforts. The football pitches would result in poor quality soil, while the artificial pitches would introduce microplastics. There have been no critical ecological surveys, involving day and night-time surveys during different months of the year so the full impact on protected species remains unknown. Constructing a new road through the ancient woodland would damage habitat that cannot be replaced by planting young trees. "Wholly exceptional circumstances" are not met.
- A proper Sites of Importance for Nature Conservation (SINC) review was not conducted. This application should not be considered before the Local Plan Stage 2 Hearings, or before resolution of the formal complaint by the Guardians of Whitewebbs. The Park meets the criteria on ecological grounds for a Metropolitan Importance SINC. However, it was excluded from designation and therefore has reduced legal protections. This is a major procedural failure.

Given all of the above, this planning application should be called in and rejected in favour of preserving Whitewebbs Park and other important green spaces for future generations.

There has been extensive coverage in the national media. This can be found by just searching "Whitewebbs Park".

#0785

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

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Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

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- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.
-

#0807

Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.

- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** – the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0835

I would like to add my name to protest against the Enfield Council decision to sell a large part of this beautiful open countryside to Tottenham Football Club when it has been and is still used and enjoyed by so many people, myself included. One of my reasons for objecting is that there are other spaces available locally that could be used.

There are sites that could be purchased rather than encroaching on precious London Borough green belt which by law was preserved for the use of the public. Why should wealthy organisations have the right to purchase land and deny local people access to a space that had been given to everyone for pleasure, good physical and mental health. This is surely against London Plan.

I would also add the disturbance and detriment this would bring to local wildlife.

I hope you will take my objection into consideration.

#0862

I write to request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is "called in" by the Mayor of London.

As a local resident who uses and cherishes Whitewebbs Park every weekend, Spurs' proposals break my heart. I would urge you to visit the site to experience its special nature, see the incredible rewilding already taking place and to understand how much Enfield residents stand to lose to this wealthy private company (who already have 17 pitches on their 77 acre training ground on an adjacent site - why do they need to build more on publicly-owned parkland?). Trust in Enfield Council is so low, I feel that their decision must be re-examined if it's to have any legitimacy at all.

I do believe the application should be refused for the reasons set out below:

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.

- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
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4. Procedural Failures and Mismanagement of SINC Review

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- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
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Conclusion and London-wide/National Impact

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- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0876

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power

under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

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Thank you for considering my request, I write with respect for your work and your position.

#0903 [91 – 120]

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

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- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#0960

I am writing to strongly request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, **is called in by the Mayor of London.**

Whitewebbs is a uniquely beautiful area of parkland, regularly used and loved by thousands of North London residents. I have lived near Whitewebbs for twelve years and if I had to name the most important place in the area for me as an Enfield resident, it would be Whitewebbs. I go there with my husband three or four times a week - more in the summer. We are two of a great many residents who cherish this public land.

The Tottenham Hotspur application is not only poorly conceived and justified, it violates Whitewebbs's greenbelt status and its huge importance as a conservation area. I would urge any of you to go and visit it for yourselves - **for me, it is one the most beautiful British parklands**- and it's right here in the Greater London area.

This is an application that has been driven by greed. The football club already has a training ground up the road - how much more space do they need? **Moreover, as a longtime Enfield resident, I am appalled at Enfield Council's attitude in supporting this application.**

If we let this application proceed not only will it destroy **an area of huge ecological importance**, but it also serves as an open invitation to other wealthy organisations to think they can just take control of areas of natural beauty with no consideration other than increasing their coffers.

This type of behaviour is something we see every day in the News. Are we expected to just shrug our shoulders and wave it though? Governments simply have to do more to control these overt acts of avarice.

I request that you do something immediately.

#0988

I am writing to express my deep felt opposition to the recent approval of Tottenham Hotspur's proposal to develop a substantial portion of Whitewebbs Park. Its development will take away much needed green space from the community and also destroy a habitat for diverse wildlife.

I urge you to reconsider this planning application in light of the negative social and environmental effect it would have.

#0997

See attached

#1047

As Enfield residents, and also as people who care deeply about the survival of our planet. we were extremely distressed to read that Enfield Council has agreed to lease a large part of Whitewebbs Park to a football club.

The park, open to the public since 1931, is a valuable wildlife habitat, with several rare or endangered species, as well as being a vital green space for the local community. At a time when we are faced with a climate crisis, and threats to biodiversity, it is even more important that green spaces of this type are preserved. Green spaces in cities mitigate the effects of pollution and can combat urban heat. They are also essential for our mental health, providing a necessary safety valve, as was proven during the Covid pandemic.

Spurious arguments have been advanced for the improvement in the environment, which the football club would supposedly bring about. However, it seems that the opposite is true, with ancient woodland and wild grassland destroyed, new access roads bringing more traffic in, and increased noise and pollution. It's not even clear whether existing rights of way would be honoured.

We understand too that the football club is paying Enfield Council the paltry sum of £2m over a period of 25 years, for the lease of this land, which raises questions in itself. It seems an exceptionally small amount, bearing in mind the club is one of the richest in the world (in the top ten, we gather) and seems to earn more than double this amount from one match. It also apparently generated over half a billion in turnover last year. 80k a year will not fund much in the borough and is poor compensation for the irreparable damage to the environment.

With the emphasis now on building more housing, and using green belt land for this purpose, it seems criminal to destroy even more of our valuable countryside for a football club, which brings no benefit to the community. Surely, there are other sites that can be found to accommodate these extra training pitches, if indeed there is a need for them in the first place? Furthermore, by agreeing to these measures, it seems the Council is failing in its duty to conserve and enhance biodiversity under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006.

We urge you to look closely at this and hopefully agree that this decision should be reversed.

#1084

I am contacting you to request that you call in and refuse planning permission for football pitches to be built on Whitewebbs park by Tottenham Hotspur football club, agreed by Enfield Council.

I am sure this will be of great interest to you as you have done so much to improve the air quality in and around London.

Also, with your interest in protecting the green belt (the lungs of London) that is so vital to offset our huge carbon footprint.

Whitewebbs park in Enfield, North London, is a 240 acre site that includes ancient woodland, grass meadows, streams, ponds, ancient mature trees (135 of which will be felled by Tottenham Hotspur football club), rare butterflies, Bats (which are a protected species in law), Crested Newts (also a protected species), over 60 species of Birds including Barn Owls, Insects, Amphibians, Mammals and rare grasses. This site is of great importance to the whole of the Metropolitan area.

Whitewebbs park was sold to Enfield Council in 1931 to remain for the benefit of the people of Enfield, and was not to be enclosed.

Enfield Council have made this decision, without due consultation, against the wishes of the residents of Enfield, an experienced Ecologist, a Biologist, Arbourist and many that want this unique place to remain untouched.

Tottenham Hotspur football club have a 77 acre site adjacent to Whitewebbs. This includes 17 full size football pitches. Clearly, Spurs don't need Whitewebbs park.

You have the power to stop this abhorrent decision. Please call in and refuse planning permission.

#1172

I am writing to you regarding the planning application which proposes the development of a football training centre at Whitewebbs Park in Enfield.

One of the huge concerns is the exclusion of the public from the Park if the development goes ahead. Whitewebbs is a very special place for many people who live in Enfield and for many reasons. We are distressed beyond measure at the prospect of losing such a beautiful space, a space the like of which other London boroughs don't have. As you know, any public space, particularly ones as verdant and peaceful as this one, are crucial for our mental health and well being. They promote exercise, reduce stress and champion a sense of community. We meet so many people out with and without dogs (and occasionally with horses) who stop to chat, all of them, and especially the elderly, bereft at the thought of having to find other places much further afield. Plus, it is free exercise for all - that is a big consideration during this recession.

But the main concern really is that in today's world, we need to protect this ancient woodland and cultivate it as a lung for Enfield. Not destroy it.

Apparently, Glyphosate is to be used to clear grasslands as part of the development. This is a banned substance in many countries and the citizens of Enfield are now to be subjected to it running off into water courses, possibly affecting their pets and the beaver colony, and also themselves possibly. And all this for what? A ladies football academy which won't bring any benefit to the people of Enfield. It will be for a handful of elite athletes. Why cannot the academy be built on brownfield sites? There is ample space for them on the other side of Whitewebbs Road if they insist on staying in Enfield. With their vast wealth, they could make a very nice development there. There is much concern about Tottenham Hotspurs' previous disregard for S106 agreements at its current training centre in Enfield and the council's lack of enforcement. There are fears that TH will continue to disregard S106 agreements if this development is allowed to go ahead.

Please listen to the people of Enfield and consider calling this application in.

#1189

We are writing to ask if you would SERIOUSLY CONSIDER calling in the above planning approval for proper scrutiny for the following reasons:-

Tottenham Football Club is a wealthy organisation, they are able to purchase land if extra is wanted.

The argument about women's football is a smokescreen for a land grab from Enfield residents. Other clubs run men and women teams successfully from the same pitches.

The promise to plant more trees is a further ploy. There are plenty of trees in the wider Whitewebbs environment. The ancient seedbank and grasses need space to thrive.

The planning permission changes green belt to brown unnecessarily. It does not align with the London Plan.

Thank you in anticipation of your consideration.

#1272

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

The Greater London Authority (GLA) has identified the proposal as inappropriate development in the Green Belt. Enfield Council itself acknowledges that the plan departs from the Local Development Plan and contradicts the National Planning Policy Framework (NPPF).

The required "Very Special Circumstances" (VSC) do not exist to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

50% of Whitewebbs Park's biodiverse grassland and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.

The replacement of natural grassland with heavily managed and synthetic football pitches would introduce microplastics, soil degradation, and long-term ecological harm.

THFC has failed to conduct critical ecological surveys, meaning the full impact on protected species, including bats and invertebrates, remains unknown.

Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.

Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

The Park was purchased with public funds and intended for continued public use. The proposed development privatises 50% of the park, restricting public access to a site that has been freely available for decades.

THFC's claims of community benefits are misleading - the facility will primarily serve an elite sports group with little public access.

Harm and any benefit cannot be assessed without a Full Parkland Management Plan.

4. Procedural Failures and Mismanagement of SINC Review

Enfield Council failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' formal complaint and the Local Plan Stage 2 Hearings.

Whitewebbs Park meets the ecological criteria for a Metropolitan Importance SINC but was excluded from designation, reducing its legal protections.

These failures raise serious legal and environmental concerns regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

The proposal would destroy key panoramic views protected under Enfield's Local Plan.

It contradicts the Forty Hill Conservation Area guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.

The proposed changes, including massive re-landscaping, would permanently alter the park's historic character.

Conclusion and London-wide/National Impact

The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts. The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "There is no real protection in law for public parks if this judgment stands" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>

The planning application has, and continues to, spark considerable national controversy and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the lack of justification for Green Belt development, significant environmental harm, and procedural failures, this planning application should be called in and rejected in favour of preserving Whitewebbs Park and other important green spaces for future generations.

Thank you for considering my request.

#1356

See attached

#1406

I am writing to express my strong opposition to the proposed development of Whitewebbs Park by Tottenham Hotspur Football Club. I am a lifelong (62 years) supporter of the club and am appalled at the proposal to build on a public park that is enjoyed by local residents and is a refuge for a range of wildlife too. The so called proposed "mitigations" go nowhere near compensating for the potential loss of habitat and public space. In such a densely populated area it is more important than ever that we protect and enhance such "green spaces" that are vital for the wellbeing of people and a safe haven for wildlife. I urge you to reject this proposal.

#1619

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

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1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
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- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
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#1666

All our hope is with you all now to save and protect public parkland, ancient trees and precious wildlife for people now and generations to come. Please show the younger generation that our leaders can and will do brave things to protect the environment. In this current political climate, they need this more than ever. Londoners need every tree and bit of greenspace possible. We need to conserve what we have and create more green space. Trees are our lungs. ULEZ results are amazing. Let's keep going and not let the rich and powerful take from local communities and pollute nature.

This extraordinary decision by Enfield Council will be a disaster for nature for so many reasons but I beg you to think about the effect of astroturf on the natural environment and on public health. If you have ever visited an astroturf pitch you will see the thousands of little black balls of plastic/ recycled tyres that break away from the structure at every tread. The environment is littered with broken astroturf balls from pitches and private gardens and get into the water course and are eaten by wildlife. Once this land is developed it will never be returned to a natural state. A formal list of reasons for this land to be saved now follows but from the heart I pray that a good decision for people and nature will be made

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#1742

I am writing to ask how you can help with the disastrous decision made by Enfield council regarding Whitewebbs park .

Whitewebbs has been a public park for approximately 100 years but Enfield council appear to have given half of this public space to a private enterprise to develop primarily their own use and financial gain .

Tottenham football club is a multi billion pound business but has been virtually given the park land to build another football training ground which is totally unnecessary as they have a massive training facility a short distance away .Their proposal is not environmentally friendly in any form - moving thousands of tonnes of earth / cutting down established trees destroying the environment / then covering the area in synthetic football pitches - with no real proposal as to what happens at the end of their lease agreement and the restoration of the park . If the council had decided to build desperately needed housing on the park , it would be regrettable, but far more understandable than the current proposal .

There must be a way to stop this and to investigate how such a building proposal has been accepted by the council when it benefits such a small number of people . The persons who will use the new area will not be local and it will not benefit the vast majority of the local enfield population at all.

Please consider why the councils proposal is wrong on so many levels and needs to be seriously reconsidered as a priority now .

#1809

I am writing to express my deep concern regarding Tottenham Hotspur's proposed takeover of Whitewebbs Park, which appears driven by profit, not the needs of the local community. Rather than developing private land, Tottenham has opted to lease Whitewebbs Park because of its higher value, with little regard for the long-term damage it will cause.

The construction of football pitches across 40 acres will drastically alter the landscape: leveling the land, erecting fences, and blocking critical views, especially from Whitewebbs Lane. These irreversible changes will harm the park's open, scenic character. Tree planting might temporarily obscure the impact, but it will take years to be effective and cannot undo the harm caused by the Spurs lease, which lasts 25 years.

Moreover, the construction of an access road for the Carvery will disrupt the peace of the area, disturbing wildlife, nesting birds, and residents, while also posing a safety risk to pedestrians. This industrialized development is a significant shift from the park's current tranquil, natural environment, and it will negatively impact public access.

Despite claims of public access to the training facility, as noted by Judge Mould, this will be minimal. The facility will serve only the elite development of professional footballers, not the community. Additionally, there are no plans to improve access or enhance bridleways or footpaths. Spurs' plans will reduce the park's accessibility and harm its open space.

This development contradicts local and London-wide planning policies, including those protecting Green Belt land and biodiversity. The replacement of diverse grasslands with artificial pitches and the destruction of habitats in Whitewebbs Wood will threaten the area's rich ecological value, including ancient woodlands and protected species.

I urge you to consider the irreversible damage this development will cause to Whitewebbs Park and the local environment, and to take action to prevent this exploitative project from going ahead.

#1816

I'm writing to you because I don't want Tottenham Hotspur taking over Whitewebbs Park. I don't think it's fair because it is not helping the people who live around here. They could build their pitches somewhere else, but they chose Whitewebbs Park because it's already nice and green.

This will hurt the environment, and it goes against the rules to protect parks and wildlife. The park is home to rare plants, animals, and old trees that need protecting. If Tottenham builds their pitches here, they will destroy that special place. The land will be flattened, fences will go up, and the beautiful views will be blocked. They say they will plant trees to hide the changes, but trees take a long time to grow, and the damage will last for 25 years. Whitewebbs is, and should remain, a public park with full public access. It is a space for everyone to enjoy, helping people's mental and physical health. It should stay as a place for exercise, relaxation, and contact with nature.

At a time when both Enfield and the London Mayor have adopted targets to improve and increase wild spaces, this proposal will destroy vital natural space and replace it with artificial surfaces. The loss of veteran trees and ancient woodlands, which are irreplaceable habitats, is especially concerning.

Please don't let this happen. It's unfair to the park, the people who live here, and the animals who call it home.

#1869

I am no planning expert so please bear with me as I try to explain my serious concerns.

I am contacting you to urgently request the above planning application to call in for you reconsider the decision made on 11th February at the Planning Committee of Enfield Council to grant this application. Please refuse it as it is not in line with the London Plan especially regarding Green Belt Protections. There are so many reasons why this is wrong in my view of Planning Terms regarding our vital Green Belt but also on moral grounds. The application is being made on behalf of Tottenham Hotspur Football Club (Spurs) to provide them with 11 more football pitches (in total 28 with their existing Training Facility, more than any other major football club in the UK) with amenity buildings, to provide a Women's Football Training facility on green belt land next door to two areas identified as SINC.

There is a live complaint against the council for excluding this particular area of council owned land from recent review as a Site of Importance for Nature Conservation, as it had already been identified as land of interest to be leased from Enfield Council by Tottenham Hotspur.

I believe that as the London Borough of Enfield are both landowner and planner that their planners' recommendation is biased. They have been in discussion with Spurs and their agents for several years, including during the leasing process some years ago. The lease has been on hold pending the planning permission.

Many residents have also registered objections to the leasing of Public Park Land to Spurs to benefit the Football Club and its associated businesses, seriously reducing public access for recreation. This also applies to the planning application.

Contra to The London Plan because

"Policy G2 – A

1. ..proposals that would harm the Green Belt should be refused except where very special circumstances exist.
2. .. to provide multi-functional beneficial uses for Londoners should be supported.

I] I object to their Arboricultural Impact Assessment as do the Woodland Trust in their objection letter. See further Attachment for your convenience. There may have been an additional letter too.

I do not believe that Spurs have demonstrated Very Special Circumstances even though the council have accepted they have. The council have noted " low level of harm" throughout, I dispute this.

Especially where damage to ancient and veteran trees in the ancient woodland will be harmful in connection with the so-called re-instatement of the Ancienr Carriageway. This carriageway was originally used by horses and carriages. Although an amendment was added at the committee meeting, to restrict it to pedestrian access only, there has been no change to the construction of this carriageway, even though it is no longer necessary. So the root systems of veteran trees, which lie adjacent to it, will be compromised, potentially leading to the demise of the trees. How is this protecting ancient woodland? Spurs could at a later date request that it revert to use by vehicles. Enfield would give it.

Enfield council state "the operational infrastructure associated with the sports use (boundary treatment; floodlighting; 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. Very Special Circumstances (VSC) are provided to outweigh this harm as set out in full in the Green Belt assessment in section 8 of the report."

I object to the council's assessment of "low level of harm" in any way. For example as there is no engineer's report with visuals that show how much the levels of earth will change and therefore, as I understand it, the actual impact the height of buildings and structures in relation to the views from Beggars Hollow and all around. The Planning committee was not adequately appraised of this situation. No special circumstances will outweigh this level of harm.

II]The London Plan states in 8.2.1 that the Mayor strongly supports the continued protection of London's Green belt. The protection of the Green Belt is more necessary now than when it began; for the protection of air quality and free beneficial enjoyment of our natural world of all Londoners as well as protecting biodiversity and wildlife corridors.

This development will shut off wildlife corridors completely and the limited benefit of access for the few, to the proposed new facility for football will be no way compensate for permanent loss of free recreational space to an area ideal for the protection and in places re-generation of natural habitats.

If this goes ahead with permission by the London Mayor, will you be fulfilling your commitment under 8.2.2 i.e to improve the quality of areas that are appropriate within the Green Belt?

I believe that this Public Park Land, which some say has already been developed as a golf course but in truth has always been open to the public (perhaps unusually) is now a meadow. Britain has lost around 95% of its meadows. For this reason alone we should keep it as such. (I am 73 years old and have walked in Whitewebbs most of my life including walking right down the golf course regularly. Just listening out for the golfers call of 'Four'!)

Policy G3 Metropolitan Open Land

.. *protects and enhances the open environment and improves Londoners quality of life.* Should this become a private training ground for Spurs it will be solely to enhance the corporate world of Football and facilitate wealth creation for them, with a few token benefits thrown in for local football lovers, this will not be the case!

Policy G4 Open Space

- A. 4) ensure that open space particularly green space, include as part of the development remains publicly accessible." This will be severely limited, . It will no longer be a free accessible space. The offers from Spurs also expire in 10 years.
- B. 1) Development proposals should not result in the loss of protected space.

I would also like to point out that myself and many in the local community do not trust the partnership that seems to exist between the London Borough of Enfield with Spurs. As just one example of many, in 2012 many conditions for the protection of the natural environment including rare bats, in and around the Original Training Ground were hard fought for. The height and schedules of floodlights was one. Some years later new floodlights were installed, much higher and schedules were ignored. Residents informed the council and the council eventually gave permission for these changes retrospectively.

You may also be aware of disclosures which have hit the news lately about the Chair of Planning and other councillors receiving recent benefits from Spurs . Opposition councillors have complained.

I believe that this application is not in the interest of Enfield Residents or Londoners but supports the big business of football only, at the same time as destroying a precious part of our vitally important Green Belt. I am relying on you Mr Mayor to please consider this application carefully, call it in and refuse it and help restore my faith in democracy.

#1948

Re my earlier email of 12th March at 14.16.

I omitted a couple of important points which I would like you to add to my request for a Call in re London Borough of Enfield Planning Application 24/00987/FUL etc .

1. On occasion with the planning officer's report they mention **'need' as a contribution to Very Special Circumstances** . This facility is not providing unmet housing needs, local infrastructure or s specific community **need**. To offset the harm to our Greenbelt which at present Whitewebbs Meadows fulfils, in free access to nature and recreation together as a community Spurs are offering limited access to their elite training centre which they offered previously at their Original Ground. I beleieve there will be a selection process.

Spurs already have larger facilities and more football traning pitches than most other similar football clubs and if this new facility goes ahead it will have more than any other club. Most other club facilties are shared by men and women, still meeting the FA regulations.

In fact because they have so many training pitches and a hotel/lodge they rent out to visiting clubs . This helps increase their wealth.

So I believe that the only need this new Women's Training Facility will meet is Spurs not Enfield residents.

I beleive that the limited benefits do not outweigh the harm.

2. To offset damaging ancient woodland and felling approx 130-150 mature trees Spurs intend to plant 1000 new trees. But this will be at the loss **of a valuable meadow habitat. Omitted from recent evaluation of SINC.**

3. Although Sprs have said they will not se **glyohosate** within their new facility they do intend to use it during the re-purposing of the land. This will be seriously deleterious to plant life, young trees, amphibians insects, and small mammals including bats. **Once again seriously harming London's Green Belt.**

Spurs haven't always committed fully to the conditions applied to previous planning applications as I mentioned in my earlier email but have received no penalties.

#1962

I am writing to request that **planning application 24/00987/FUL**, submitted by Tottenham Hotspur Football Club (THFC) for a football training centre in Whitewebbs Park, be **called in and refused** under **Article 7 of the Mayor of London Order (2008)** and **Section 77(2)(b) of the Town and Country Planning Act 1990**. This proposal **contradicts Green Belt protections** and has been deemed "inappropriate development" by the **Greater London Authority (GLA)** in its Stage 1 response (**GLA/2024/0213/S1/01**). The necessary **"Very Special Circumstances" (VSC) to justify Green Belt harm do not exist**—instead, this plan results in a **net loss of public and environmental benefit**.

Key Concerns

1. Green Belt & Environmental Harm

- The proposal **violates Green Belt protections** in the **London Plan** and **National Planning Policy Framework (NPPF)**.
- The development would **replace biodiverse grassland** with artificial pitches, introducing **microplastics, soil degradation, and habitat destruction**.
- **207 trees**, including veteran trees, would be lost, impacting protected species and priority habitats.
- A proposed **road through ancient woodland** would cause **irreversible damage** to irreplaceable habitat.

2. Loss of Public Access & Community Space

- **50% of Whitewebbs Park would be privatised**, restricting public access to a beloved community space that was originally purchased with public funds for public use.
- The **claimed community benefits are misleading**—the facility would primarily serve an elite sports group, not local residents.
- A **Full Parkland Management Plan** is necessary to assess the true impact of this development.

3. Procedural Failures & Conservation Concerns

- **Enfield Council failed to properly conduct a Sites of Importance for Nature Conservation (SINC) review in 2020**, impacting the legal protections of Whitewebbs Park.
- The **Guardians of Whitewebbs have filed a formal complaint (COM 101001267200)** against Enfield Council's handling of land designations and biodiversity obligations, which remains unresolved.
- Approving this application now would **prejudice the Local Plan Stage 2 Hearings** and ignore outstanding legal and ecological concerns.

Why This Matters Beyond Enfield

This application sets a **dangerous precedent for the privatisation of public parkland** and the erosion of Green Belt protections. The Public Interest Law Centre has already warned of the **wider legal consequences** of this type of development (<https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>). The national media has covered this extensively—just search "Whitewebbs Park" to see the widespread concern.

Call to Action

Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, I urge you to **call in and reject this application** in the interest of preserving Whitewebbs Park for future generations.

#2007

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes.

We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.

- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the **lack of justification for Green Belt development, significant environmental harm,** and **procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#2026

I am writing to you to ask that you call in this application.

I believe the council of Enfield are violating their responsibility (in trust) to ensure that the park remains open for all residents. I myself, my children and my grandchildren have all benefitted from access to this wonderful outdoor space, which we believe belongs to US the residents of Enfield.

This land was purchased for the people of Enfield to provide space for healthy outdoor exercise for generations to come. We have previous experience of the eventual outcome when OUR assets are "leased" to business enterprises in the sad history of Trent Park House and the immediate surroundings. Which is now a very upmarket housing development, and as such not contributing to the perceived local housing "need".

I believe the application approved goes against the London Plan in both letter and spirit. Local opposition to this plan has been very strong on every occasion we have been allowed to express our views. Our council said/says it is essential to find "guardian" to look after Whitewebbs as it is too expensive for them to continue doing so. Since the golf course was closed because it was a "loss maker" (this is not substantiated by accounts since seen) it has been largely ignored and enjoyed very little "maintenance". The outcome of this is that the space has "re wilded" without any outside help. Like the story of "sleeping beauty" it could be allowed to "sleep for 25 years" and it would awaken in a far better, more natural state than it will under the "careful management and use" of a football club.

It is not a problem that needs solving. We do not need THCs help!

Tottenham Hotspur is a wealthy corporation. They state that they "need" this land to further promote and enable womens football opportunities to expand. They do not "need" THIS land! There is land available close to their existing facility that they could purchase to pursue these objectives. The difference for them would be the COST! Not normally an issue when they are "buying" the human beings they employ to play football. Millions of pounds are available to secure the best players in the world, but they want to deprive Enfield residents of our assets, for

less money than they would probably spend on footballs over the same period.

Enfield council is practically "gifting" this land to them compared to purchasing at "market" prices. Tottenham Hotspur intend to hugely transform the land to fit their purposes. It is highly unlikely that the land will be returned to the residents at the expiry of the 25 year lease, but if it was, it would certainly not be "as it was handed to them".

They are a multi million pound business. When they were granted permission to start development of their training ground in Enfield there were a number of "conditions" attached to prevent future "overdevelopment" on the site. One by one these have been removed/over-ridden. There are many buildings and facilities there now that were specifically "banned" in the original permission granted.

TFC have the money and the expertise to ride roughshod over any clause in the lease that might "appear" to protect Enfield from future development within the Whitewebbs park. They have already proved this at their existing training facility.

My personal belief is that we are dealing with TFCs desire to have a private "country estate" as their north London HQ? There are a number of beautiful "country houses" on the perimeters of their currently occupied space within our communities, and they have a track record of both the money and power to "acquire what they desire".

If the protection of being part of the green belt cannot protect our park, how would Capel Manor House, Forty Hall, Middleton House or indeed the beautiful Whitewebbs House evade their attentions?

If the powers that are charged with protecting OUR assets, (our council) and those like yourself that also have the authority to stop unauthorised "disposals" of this kind, do not step up and do "the right thing" no park or open green space in the country will be safe from the self interest and deep pockets of greedy individuals/corporations with no forward thinking.

This beautiful park was purchased FOR Enfield Residents. For US to enjoy for generations to come. Please, please, please, save it for us and our children.

It is GREEN BELT, it is a PARK. It this cannot afford it protection, what can?

Do our laws need to be changed to ensure enduring, unassailable protection from the constant "hunting" that currently occurs.

Your inbox will have shown you the level and quality of support that Saving Whitewebbs has within the community. The many active volunteers within these groups could possibly be offered greater involvement in it's day to day running, thus reducing the need for council involvement and costs. The desires and priorities of our current council are obviously focussed elsewhere!

I hope this decision can be called in and a solution which benefits the rightful owners, the residents of Enfield, today and to come, can be found. Even purposeful neglect would bring better results on this occasion.

#2082

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures

in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character.**

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the **lack of justification for Green Belt development, significant environmental harm,** and **procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#2105

I am writing to urge you to reject the above planning application and call it in.

These are my reasons:-

1) I am a lifelong resident of Enfield [REDACTED] Whitewebbs has always been a huge part of my life as I spent many days playing there with friends and walking the path through the golf course with my grandad as a child. We often got chased by the parkie for picking up lost golf balls to sell to the golfers. We made camps in the woods and fed the ducks (and the swan in those days) . I still walk there most weeks and feed the ducks on the lake with my brother. The former golf course and woods are a haven for wildlife including owls, muntjac, birds and insects.

2) I have no faith that THFC will do anything that will directly benefit many members of the the local community. In fact the opposite will occur when they fence off, level and clear the areas they want to use. There are very many dog walkers and walkers who are really enjoying this land that was left to the council for the enjoyment of all of the citizens of Enfield. Since the golf course closed it has become a widely used open space by people and creatures alike.

3) THFC have a very large training facility just up the road from the proposed site. I often pass it and get the impression there is ample space to include a women's facility there.

4) Once this land has been built on it will be lost to future generations in Enfield for ever.

Thank you for considering my request, please don't allow this application through.

#2166

I am writing to you in the strongest possible terms to express my deep anger and frustration over the deal concerning Whitewebbs Park, a vital green space in Enfield. This land is not only an irreplaceable natural sanctuary but also a crucial public resource that must be protected. Enfield Council and Tottenham Hotspur's plan to bulldoze 18 acres of this precious land for an artificial, corporate-controlled training ground is nothing short of environmental vandalism and corporate greed in action. '

Whitewebbs is a living, breathing ecosystem that has thrived for centuries, home to ancient trees, diverse plant species, and an extraordinary range of wildlife. As someone who runs local community projects and manages a community orchard, I understand the immense value of green spaces in fostering well-being, biodiversity, and community engagement. The value of this land cannot be overstated: it is a haven for wildlife and a refuge for people seeking connection with nature. With the NHS under strain and climate change making access to nature and wellbeing increasingly difficult, the destruction of spaces like Whitewebbs is an attack on our collective future health.

Only 8% of England's land is accessible to the public, compared to 97% in Scotland. Whitewebbs represents a rare and cherished part of that tiny fraction where people can freely walk, breathe clean air, and experience nature firsthand. The proposed development would rob residents of this right, replacing it with 'No Entry' signs, plastic pitches, and floodlit enclosures. Instead of birdsong, we will hear the hum of artificial lighting. This is an unacceptable and devastating loss.

The environmental consequences of this decision are catastrophic. Whitewebbs is home to over 80 species of birds, 9 species of bats, an array of rare insects vital to our ecosystem. Badgers, deer, foxes, and other wildlife call this place home. Their habitats will be destroyed, their ecosystems shattered, all for the sake of corporate profits. Tottenham Hotspur may argue they will 'mitigate' the damage, but we know that no amount of PR-friendly gestures can replace what will be lost.

I implore you, as Mayor of London, to take a stand against this reckless destruction. You have previously spoken about the importance of protecting London's green spaces—now is the time to act. Listen to the voices of residents, environment scientists, and grassroots campaigners who are fighting to save Whitewebbs. Do not allow Enfield Council and Tottenham Hotspur to set a dangerous precedent where corporate interests outweigh public and environmental wellbeing.

I urge you to intervene and put an immediate stop to this disgraceful development. London's green belt is already under constant threat, and Whitewebbs must not become another casualty of greed. We demand transparency, accountability, and, most of all, action to preserve this invaluable space for generations to come.

#2429

Dear Rewilding Europe, Rewilding Britain, London Wildlife Trust and the Mayor of London,

We wish you a very happy World Rewilding Day 2025 from Whitewebbs Park. As you will likely be aware, Whitewebbs is sadly [under threat](#) from development by Tottenham Hotspur Football Club.

I am forwarding our recent newsletter in case it is of interest to you, with our #RewildTogether poster attached.

Would you be able to help our campaign?

#2654

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

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- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the **lack of justification for Green Belt development, significant environmental harm,** and **procedural failures,** this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#3413

I am writing as a local resident of whitewebbs park(former golf course) . I live in [REDACTED] and have been using whitewebbs for recreation ever since I moved here in 2004. This park is very special to this area providing much needed escape from the pressures of work and concrete walls. We are all very aware of the health benefits of being in nature and Whitewebbs park with its abundance of wildlife has improved mine and my families health exponentially. Please do not away this park.

#3522

Although I live in Crouch End and [REDACTED] regularly walk my dog in Whitewebbs Park as it is the next best thing in London to the countryside, which I love. Therefore I am horrified at the thought of Tottenham Hotspur taking a 25 year lease from Enfield Council to develop a women's and girls' football academy there.

It is the most beautiful and relaxing place to enjoy nature, in my opinion better than Hampstead Heath, which has become over-popularised and over- run with professional dog walkers. The Heath was saved from development by a similar campaign involving Octavia Hill and Sir Robert Hunter who went on to found the National Trust. It was at the heart of what became the new conservation movement, and the campaigners set up the Commons Preservation Society in 1865, now the Open Spaces Society, Britain's oldest national conservation body. Surely Whitewebbs deserves to be saved in the same way? It is also a great conservation battle and must be won.

As our world becomes increasingly more stressful, we all need these open spaces to relax and unwind from city life. The high level of support for the campaign and increased use of the park since Covid show that it is needed. If Tottenham takes it over, the landscape will be changed for ever, views lost and biodiversity destroyed – all for the sake of kicking a ball. And making a lot of money of course – for someone.

Whitewebbs Park is Green Belt land and Metropolitan Open Space and was bought with public money in 1931 for

the people of Enfield for recreation, not golf. The golf course was apparently a temporary measure to cover the costs of running the park, but obviously didn't achieve this and so was closed down in 2021. I am amazed at the way nature has taken over, and number of trees, plants and birds that have appeared since man stopped interfering. If Tottenham takes it over, the open space will be affected by its development plans in far worse ways than the golf course did, which after all, was for public use. The public will not be able to use the open parkland that Tottenham leases and will be left with just the ancient woodland and a reduced open area that will be planted with yet more trees to block the view of the pitches.

Apparently there is another suitable location for the Academy nearby, but it would be more expensive than the deal with Enfield. Surely Tottenham Hotspur is sufficiently wealthy to bear this extra cost if it means that valuable public open space is preserved?

I beg you to refuse their planning application and side with the people of Enfield, the birds and the bees versus big bucks. Thank you.

#3571

I am extremely distressed about the possible loss of the beautiful area of Whitewebbs in Enfield.

As you'll know, this wonderful open space was purchased in 1931 with public money for the people of Enfield and is now threatened by a proposed development by Tottenham Hotspur for a Women's Football Academy.

I have absolutely no objection to this laudable purpose: women's football should be encouraged and celebrated. But not at the expense of Whitewebbs park. Whitewebbs, especially since covid, attracts over 1,000 visitors a week in winter. It's hugely needed on the edge of London. The planning proposals, as you'll see, would fence off 15 hectares of land, would block extensive interior and exterior views and block off public access to half the open space, large artificial lakes will replace meadowland and the destruction to biodiversity here will be immense and irreplaceable. This proposal will permanently damage the landscape and is inappropriate for a 25 year lease!

The proposed benefits are minimal and will not replace or promote the health and well-being of the large population of the north London area who so love the place. There will be no sports facilities for the general public, a net loss of 3 km pathways, loss of Green Belt and Metropolitan Open Land – and there is another alternative nearby, but the THFC need to spend more money to use it. They have the money and needn't destroy the quality of life around Whitewebbs.

I and my husband live outside Enfield in N.8. but with local friends from here we've come to love and value this special space. If this decision is not challenged there will be huge irreversible loss. I do hope you will intervene to stop this rash, misplaced development.

#3643 [121-150]

See attached

#3815

Please use your powers to stop the illegal sale and private enclosure of green belt public land
Of Whitewebbs Park forest and Old golf club land

No resident wants this to happen

The labour council should
Be ashamed of this betrayal
Of the local residents



No one ever replied to me
In writing just bully boy tactics

#3820

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Whitewebbs has been an incredibly special place for me over the last year since I've moved to Enfield. I walk there most days with my dog and it has helped me find peace and comfort in an increasingly troubling world. By striking a deal with Spurs, I feel completely unrepresented by the council. I've been a lifelong supporter of the Labour Party but this decision to destroy Whitewebbs means I can no longer support the party.

#3872

See attached

#3945

I am disgusted by Enfield council's lack of regard for our precious green spaces and the important role of nature in providing a more sustainable environment for Londoners. Granting Tottenham Hotspur a 25 year lease to develop a women's and girls' football academy on Whitewebbs Park is scandalous.

Whitewebbs Park is the most beautiful and relaxing place to enjoy nature, in many ways better than Hampstead Heath, which has become over-popularised and over-run with professional dog walkers. The Heath was saved from development by a similar campaign involving Octavia Hill and Sir Robert Hunter who went on to found the National Trust. It was at the heart of what became the new conservation movement, and the campaigners set up the Commons Preservation Society in 1865, now the Open Spaces Society, Britain's oldest national conservation body. Surely Whitewebbs deserves to be saved in the same way? It is also a great conservation battle and must be won as an example to others..

As our world becomes increasingly stressful, we all need these open spaces to relax and unwind from city life. The high level of support for the campaign and increased use of the park since Covid show how much it is needed. If Tottenham takes it over, the landscape will be changed for ever, views lost and biodiversity destroyed - and all because women's football is the latest fad. Why can't women share the same grounds as the men ?

Whitewebbs Park is Green Belt land and Metropolitan Open Space and was bought with public money in 1931 for the people of Enfield for recreation, not golf. The golf course was apparently a temporary measure to cover the costs of running the park, but obviously didn't achieve this and so was closed down in 2021. I am amazed at the way nature has taken over, and the number of trees, plants and birds that have appeared since people stopped interfering. If Tottenham takes it over, the open space will be affected by its development plans in far worse ways than the golf course did, which after all, was for public use. The public will not be able to use the open parkland that Tottenham leases and will be left with just the ancient woodland and a reduced open area that will be planted with yet more trees to block the view of the pitches.

Apparently there is another suitable location for the Academy nearby, but it would be more expensive than the

deal with Enfield. Surely Tottenham Hotspur is sufficiently wealthy to bear this extra cost if it means that valuable public open space is preserved?

I beg you to refuse their planning application and side with the people of Enfield, the birds and the bees versus big bucks. Thank you.

#4005

I'm writing to request a 'Call In' regarding Spurs taking over part of Whitewebbs Park which is a beautiful unspoilt area intended for 'the people'.
Please help.

#4266

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#4348

You will have seen the recent national coverage of the devastating loss of the Whitewebbs Oak. You may know that Tottenham Hotspur has strong links to Mitchells and Butlers/Toby Carvery, and has an option to lease Whitewebbs House, which the tree is adjacent to (see [Guardian article](#)). Whitewebbs House is also adjacent to Spurs' proposed women's training centre. The [Guardians of Whitewebbs](#) has been central to fighting to protect Whitewebbs from Spurs' proposed development for a long time, and we are very shocked by this act of vandalism against nature.

We wanted to invite you to our upcoming protest and nature walk (<https://www.avidbeats.com/guardians-of-whitewebbs>) this Sunday, 20th April 2025 at 11am. We will now be protesting against the felling of this beautiful nationally significant ancient oak tree. We are protesting to put pressure on the Council/police to investigate; to put pressure on the Council to put TPOs on all trees in the Park; while also bringing attention to the wider development of the Park by Spurs. It is a large gathering to bring everybody together in support of Whitewebbs Park! We will start at the Southern café, and walk through the Park to the tree, where there will be expert talks from Benny Hawksbee and Russell Miller, and a moment of silence, mourning the loss of the tree. It would be amazing if you could make a speech if you are able to come along. BBC London will also be reporting it! Also, if of interest, I've attached our latest newsletter.

We very much hope you can join us. Many thanks again for your support. Have a lovely Easter.

Additionally, we request that you refuse or call in the planning application for Whitewebbs Park 24/00987/FUL, for the many reasons set out by our group and the large number of campaigners who have been emailing you about it.

#4376

Subject WHITEWEBBS PARK

I enclose a letter about the above emergency. [\[NB Unsupported file type\]](#)

#4406

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

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Please note:

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- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the **lack of justification for Green Belt development, significant environmental harm,** and **procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#4414

I would like to express my continuing anger over the felled ancient oak tree on the Southwestern edge of the Toby Carvery car park in Whitewebbs, which has caused nationwide outrage, and request that this incident be subject to a criminal investigation with the culprits pursued appropriately.

The tree has now been confirmed to be nearly 500 years old and is verified as ancient on the Woodland Trust and was recorded on its Ancient Tree Inventory by Mark Saunders: <https://ati.woodlandtrust.org.uk/tree-search/tree?treeid=200625&from=3523&v=2744161&ml=map&z=16&nwLat=51.68135814600065&nwLng=-0.0827347958839364&seLat=51.67438605472152&seLng=-0.0744950497901864#/>

As the oak tree was located on Council parkland, the private contractors would have needed to secure permission for the work from the Council officer.

My understanding is that, while the Council decided to refer this matter to the Metropolitan Police, the Metropolitan Police decided not to investigate it as a civil matter. I would really like to understand the reasoning behind this, please enlighten me @Metropolitan Police.

The tree's worth might exceed £620,000. This illegal felling resulted in criminal damage valued at over £5,000, a serious offence that carries a maximum penalty of 10 years in prison.

I urge the Metropolitan Police to initiate an independent investigation into the circumstances surrounding this incident. This would be an appropriate response to the loss of a tree of national importance. **An investigation should look into the broader context of the park's development too!** The Whitewebbs Oak stands on land leased to the Toby Carvery. This pub chain has ownership connections with Tottenham Hotspur. The football club is currently advocating for controversial development plans for the park, which include access roads near the vicinity of the tree.

Whitewebbs is increasingly becoming a symbol of power and wealth abuse. As a country, we frequently discuss the ever-growing divide and inequality between the rich and the poor, as well as the importance of preserving nature and addressing climate change urgently. I understand, especially you, Sadiq Khan are an advocate for nature preservation.

But what is Enfield Council doing, by granting 24:00987:FUL, they enabled a wealthy corporation to take land that has been gifted to the people of Enfield, for a ridiculously low price, to have the locals locked out of their park, have it flattened, poison biodiversity with glyphosate, 207 more trees of different kinds, ages, some of them fellow veteran trees, felled, so that a few billionaires and privileged people have even more football pitches they don't need as they already have more than any other premier football club and it makes them play no better.

How can it be that a steady, strong number of residents is fighting planning application 24:00987:FUL, for a wealth of reasons that I raised in previous correspondence in detail, but including the failure to follow due procedures and ridiculous claims on biodiversity gains etc.. Now the extremely suspicious circumstances of the

felling of the Whitewebbs oak, by a party, clearly tied to Tottenham Hotspur, the oak being in the way of their planned development, which I believe is at least part of the reason the press has gotten very interested in the ongoing at Whitewebbs, which dominated the news all week.

Considering all this, how can you now not call in planning application 24:00987:FUL and, at last, start to represent the interests of the people who have elected you and pay your wages with their tax contributions?

#4415

I write to implore you NOT TO SUPPORT the current planning application submitted by Tottenham Hotspur football club to create new training grounds for the club on what is currently a beautiful parkland open to ALL members of the public.

Why should the rich be able to destroy a huge part of Whitewebbs Park simply to provide yet more training facilities for just an extremely small number of elite football players?

The section of beautiful, natural parklands that the club proposes to DESTROY contains hundreds, if not thousands, of wonderful mature trees – home to a hugely diverse population of wildlife – thousands of birds would be affected by the loss! Together with squirrels, deer, foxes etc etc. These animals are vital to the environment and are enjoyed by the vast numbers of visitors to the park.

What benefit does an elite Premiership's football ground bring to the area? It will be appreciated by such a microscopically tiny number of Spurs football players.

I beg you Mr Khan, DO NOT SUPPORT this proposal. If you do, then you will only be confirming that money talks. The multi millionaires will win again, and the rest of us (99%) will be left, once again, to rue the fact that, in this current world, money talks – and common sense is ignored.

It will be a hugely sad day for London if you approve the application.

#4416

I am writing regarding the recent unlawful felling of the Whitewebbs Park Ancient Oak near the Toby Carvery. I was moved to visit this site on Easter Sunday following the story breaking in the news.

Why was this 500 year old ancient tree felled and what is my connection?

[REDACTED]

Wellingborough is experiencing massive development, 10,000 homes to be built, a 25% increase, and we are losing trees and green areas ourselves. This is to help ensure that London's greenbelt is not developed. Many people live here and commute to London.

Why should my town suffer expansion and development when London has a huge population of millions that require homes and places to work? I was thinking that perhaps the greenbelt should be developed instead of my local area.

However, having visited the local area and seen Whitewebbs Park, the trees and re-wilded grasslands, I feel that the greenbelt land should not be developed. London absolutely must balance its huge population with a green and natural surrounding. This part of the remaining former Royal Park of Enfield Chase must be retained and the trees protected.

Whitewebbs Park is being partially leased to Tottenham Hotspurs for a women's training ground, which means destroying over half of this public space. I believe this is an incredibly bad decision and request your intervention.

Once this park is developed, so much will be lost for good. The planting of new saplings as a mitigation will never replace the loss of the biodiversity currently under threat.

I urge you on behalf of the north London population to overturn the planning application and keep this amazing park for the future young generations and the benefit of London as a whole.

Furthermore, investigations should take place into the unlawful felling, and the persons responsible for felling this nationally important ancient oak should be held accountable.

#4424

I am writing to you to ask you NOT to support Tottenham Hotspur's current planning application to seize a large section of the beautiful Whitewebbs PUBLIC parklands, and allow its conversion into, yet more, training facilities for Tottenham's footballers. If approved, then such a decision will sadly confirm that when 'money' is pitted against 'common sense', there is only one winner. And very sadly, it's NOT common sense!!

How can Enfield Planning Department even begin to consider handing over a very large section of the beautiful and environmentally very important, PUBLIC ACCESSIBLE, Whitewebbs Parkland to a private business consortium? The whole idea is bizarre.

If approved, thousands of members of the public will be denied access to the huge benefits, both physical and psychological, that are gained by walking in open parkland. Wildlife would also suffer hugely, due to loss of habitat and safe locations to rear their young.

And all for what??

So the tiny elite minority of professional footballers have somewhere to train.

And the vast majority of us, the blood, sweat and tears of the community? – We're simply told, "Go and find somewhere else to walk".

I'm sorry, but it's criminal – it smells of corruption.

#4428

I am writing as I attended the protest about the 500-year-old oak which has been felled (I understand illegally) by the Toby Carvery - which I have now learned is held by Tottenham Hotspurs.

I was upset about the Oak, but learned that the issue of Whitewebbs Park is of equally, if not greater, serious concern, and that you as Mayor of London have the power to veto Tottenham Hotspur's intrusive development.

I first discovered Whitewebbs 6 years ago as my partner lives in Enfield and I saw my first ever Kingfisher there - it was magical. On the nature walk I observed a self-seeding, dynamic natural environment with ancient and new trees, snakes, badgers, bunnies, bees and a vibrant community using the park (as my partner and his children and I do regularly). It is painful to imagine that space being mowed down, flattened, and replaced with artificial pitches - and a pathetic 'plantation' of 2000 uniform trees that didn't self-select to grow and support each other naturally. And what will happen to the wildlife? Our green spaces protect the air we breathe and mitigate the pollution that you are fighting so hard to reduce in this amazing city. I learned yesterday that there are mature root systems under our feet that are complex and take decades to establish; not something that can be removed and replaced with a few new plantings. This is a Greenfield site, and developments like the one proposed for Tottenham Hotspurs should take place on a Brownfield site, where much less damage to the environment can be done.

Mr Khan - you need to act on this. I am not an activist by nature but I feel sick to death that Enfield Council have taken the liberty to sell land for profit that was given to the people of Enfield. At the very least the people of Enfield should have a vote to decide this - it's their land and their green space - but there is so much more at risk here.

What would you like us to do?

Veto the sale of Whitewebbs Park to Tottenham Hotspurs and protect it from development. It is public land given to the people of Enfield - and should not be mowed down and destroyed for corporate profit and land-grabbing. You have the power to do this, Mr Khan. Please act before it's too late. Tottenham Hotspurs should be developing their astroturf pitches on a Brownfield site, not a Greenfield site. It makes me feel physically ill to imagine the beautiful green space destroyed and the nature in it displaced and killed. I have so many happy memories there and am determined to make more in the future. I hope that this plea and the pleas of many of the people who love Whitewebbs will move you to action.

#4430

Whitewebbs Park is a critical part of Enfield life and community. Please do not allow it to be taken over for development by Tottenham Hotspur Football Club. So many of our public spaces have been denuded by years of funding cuts. This is not the time to sell off another one at the expense of the many citizens who do not have a wide variety of accessible public space. I have been walking with my family in Whitewebbs for twenty years now, and it will be a much poorer experience should the development plans come to fruition - and perhaps it won't be possible to enjoy the natural space at all. It makes me very angry and upset to think of the hundreds of people for whom this is a hugely important community space- daily or weekly- which is functioning perfectly well as it is. The idea that Enfield Council is seriously considering this proposed development is about as wrong-headed and thoughtless as it is possible to be. Please re-consider!

#4432

I'm writing about Whitewebbs park in Enfield.

It is not just a park, it's a beautiful and precious natural resource, for people and for nature - trees, animals, insects, plants. It must be kept fully open to the public - it is vital to the mental and physical health of local people, local wildlife, and those who travel from further afield to enjoy the incredible benefits of walking and existing in nature - especially the many people who aren't lucky enough to have a garden.

The biodiversity and habitat that's at risk is myriad - it is heartbreaking and frightening to consider its loss, especially bearing in mind the current state of the climate, and the rate of loss of species.

Not only that, but the land belongs to the people of Enfield - it is not the council's to dispose of in order to make money. There is more than enough provision for football in this country, and precious little natural / wild landscape.

Please, please, don't let the sale of this land go through - once it is gone it will never be recovered, and it is so very precious. Please don't take it away. Not everything has to turn a profit, in order to be of value.

#4434

We are writing as we attended the protest about the 500-year-old oak which has been felled (we understand illegally) by the Toby Carvery - which is a business we have now learned is held by Tottenham Hotspurs. We were upset about the Oak, but learned that the issue of Whitewebbs Park is of equally, if not greater, serious concern, and that **you both have the power to call in and refuse the application of Tottenham Hotspur's intrusive development.**

We first discovered Whitewebbs 6 years ago and on one of our first dates saw our first ever Kingfisher there - it was magical. On the nature walk we observed a self-seeding, dynamic natural environment with ancient and new trees, snakes, badgers, bunnies, bees and a vibrant community using the park (as we, including our children, do regularly). It is painful to imagine that space being mowed down, flattened, and replaced with artificial pitches - and a pathetic 'plantation' of 2000 uniform trees that didn't self-select to grow and support each other naturally.

And what will happen to the wildlife? Our green spaces protect the air we breathe and mitigate the pollution that the government is fighting so hard to reduce in this amazing city. We learned yesterday that there are mature root systems under our feet that are complex and take decades to establish; not something that can be removed and replaced with a few new plantings. This is a Greenfield site, and developments like the one proposed for Tottenham Hotspurs should take place on a Brownfield site, where much less damage to the environment can be done.

Ms Clark - you need to act on this. We feel sick to death that Enfield Council have taken the liberty to sell land for profit that was given to the people of Enfield. At the very least the people of Enfield should have a vote to decide this - it's their land and their green space - but there is so much more at risk here.

What can you do?

Call in and refuse the application to sell Whitewebbs Park to Tottenham Hotspurs and protect it from development. It is public land given to the people of Enfield - and should not be mowed down and destroyed for corporate profit and land-grabbing. You have the power to do this along with the Secretary of State and Mayor of London. Please act before it's too late. **Tottenham Hotspurs should be developing their astroturf pitches on a Brownfield site, not a Greenfield site.** It makes us feel physically ill to imagine the beautiful green space destroyed and the nature in it displaced and killed. We have so many happy memories there and are determined to make more in the future. I hope that this plea and the pleas of many of the people who love Whitewebbs will move you to action.

#4445

Yesterday I went on the demonstration at Whitewebbs park and we walked to the Whitewebbs oak. Although I had already been very upset at the news that an ancient oak had been felled I wasn't prepared for the shock of actually seeing its huge trunk. It is an immense tree. This tree was healthy and thriving and an important part of biodiversity and should have had absolute protection.

I want to know that someone will be prosecuted for this, as there are about to be prosecutions for the Sycamore Gap felling, a less important tree. We know the Whitewebbs oak was cut down by Toby Carvery. And Toby Carvery is part-owned by a subsidiary company of Spurs, Ozydean. Spurs had had their access road through ancient woodland denied by Enfield, alongside this oak tree. All this needs to be investigated.

I campaigned against the leasing of over half of Whitewebbs Park to Spurs. It is the most beautiful park, which has rewilded itself since it was a golf course. It is a habitat for an amazing number of creatures. I love coming here with my dog. I think of it as Hampstead Heath without the people.

Since the Whitewebbs oak was felled, I think it's even more important to stop the leasing of the park to Spurs. Their plans will involve the removal of 207 trees, some of them veterans and all of them thriving, as was the Whitewebbs oak. They intend to level rewilded grassland for eleven football pitches, including astroturf, partly for their women's academy. A women's academy is a great idea, but Whitewebbs Park is remote. It's two bus rides and a long walk from the tube, down narrow country lanes, not great for long winter evenings.

Whitewebbs park was given to the people in the 1930s and along with parks around the country has always been a part of our heritage, fresh air and nature so important for the public's health and well-being. And as we all know now, so important for biodiversity. The recent High Court ruling two months ago, allowing Enfield council to lease the park to Spurs, means that no public space in the UK is safe. In the light of the cutting down of the Whitewebbs oak, this decision has to be reversed.

All veteran trees should have protection orders so nothing like this can happen again. Please halt the leasing of Whitewebbs park to Spurs and ensure there is a full investigation and prosecution of those responsible for cutting down the Whitewebbs oak.

#4446

RE: Planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings

Whitewebbs Park is a much loved part of the community for me and my family. Connecting with Whitewebbs Park during lockdown was a spiritual, mental and physical tonic for myself, my partner and my 2 children aged 16 and 17 at the time. Walking through the park inspired and helped my family recover from various personal mental health struggles as it helped develop a deep connection with nature and with the wider Community. This connection continues to support our wellbeing today.

[REDACTED]

I believe that Whitewebbs Park is a local and national treasure and should be conserved and protected for the local and wider community and future generations.

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#4453

I'm writing again to urge you to investigate the circumstances surrounding the recent felling of the 500-year-old oak tree at the Toby Carvery car park in Whitewebbs Park. As I said previously, this was an irreplaceable tree of immense ecological, historical, and emotional value. Its removal is nothing short of a tragedy, and many local people are rightly upset.

In addition to my previous concerns, I want to acknowledge something important: I have great respect for your efforts to reduce air pollution in the City of London. I know you've taken considerable flack—often personal and unfair—for standing by those policies. That takes courage, and I commend you.

But I also hope you recognise that tree protection and air quality are not separate issues. They are deeply connected. I won't insult your intelligence by spelling out what you already know—trees are essential for purifying air, supporting biodiversity, and contributing to public health.

Which brings me back to Whitewebbs.

This isn't just about one tree. It's about what it represents: our shared right to public open space, to walk freely with our families, to reconnect with nature, to safeguard our mental and physical health. These spaces—and the trees within them—belong to everyone. Their protection is not a luxury, it's a necessity.

I know you're navigating complex political landscapes. But I believe that beyond the rhetoric, beyond the press statements, you genuinely care about Londoners. I believe you want what's best for this city. And I believe that this issue—at its heart—is exactly what public service is meant to stand for.

Please investigate what happened at Whitewebbs. Look carefully at the application. Ask the difficult questions. And if something isn't right, have the courage to speak out—just as you have on other vital issues.

#4533

I am writing this email, in protest of the leasing of our park, which was given to the people of Enfield in 1931, Enfield council have no right to lease our park, it is historical and has lots of ancient trees, this provides habitat for numerous wildlife species. This park provides the people of Enfield with the green space, that is slowly being destroyed, I urge you to stop this council from taking this precious park, that provides us with nature and which is so important for mental health and wellbeing.

#4535

I'm writing in protest of the decision by Enfield council to lease Whitewebbs park to Tottenham Hotspur.

Whitewebbs is a treasured public park that was gifted to the people of Enfield in 1931. It holds historical value to the community and is home to wildlife and woodland. Greenspace is declining and is important to the community for both physical and mental health. I urge the council to reconsider their decision to lease our park and consider their community first.

#4599

We are urgently writing to you regarding the decision by Enfield Council to grant planning permission to Tottenham Hotspur Football Club for the construction of commercial facilities on Whitewebbs Park in the Metropolitan Green Belt. This decision is deeply concerning for all Londoners who enjoy their local green spaces, including those with Metropolitan Open Land and Green Belt designations that should be protected by law for the benefit of the public. Green public spaces enhance the health and well-being of us all. Vast swathes of public land should not be reallocated for exclusive use by elite professional clubs or players.

Tottenham Hotspur Football Club already owns seventeen private pitches at its existing football academy in Enfield which could easily be shared with its women's team. These facilities were constructed on Green Belt land north of Myddelton House in the Lee Valley Park.

The Very Special Circumstances case that Enfield Council's Planning Officer presented recommending the granting of planning permission to Enfield Council's planning committee was misleading, inadequate and unsound. It failed to assess the impact of the development upon the ancient woodland of Whitewebbs Park. Wholly exceptional reasons are required in such cases (NPPF 193c). The Greater London Authority agrees that Very Special Circumstances are also necessary to outweigh the harm to the Green Belt and its purposes from developments otherwise considered inappropriate. Whilst the benefits of the application were exaggerated, there was a complete failure to assess the significant adverse and permanent impact upon the openness of this cherished Green Belt site. The massive re-landscaping required by the applicants would permanently and adversely alter the park's historic character. As well as omitting key visual and landscape impacts, there were also very significant omissions in the planning application relating to ecological impacts, including on protected species.

If it is accepted that such a flawed justification can be used to enable private development of such a large area of currently publicly accessible open space, then it appears that no green and open space in London is safe from privatisation, inappropriate development and irreversible loss. The land in question was purchased by Enfield Council in 1931 for the benefit of the people of Enfield. A 999 lease was taken out, which was supposed to ensure the accessible golf course area would revert to full public use in the event of closure.

Half of Whitewebbs Park's naturally rewilded biodiverse grassland and over two hundred trees, including veteran trees (as verified by The Woodland Trust ATI), stand to be lost, eliminating habitats for priority species. As you will be aware, the most ecologically valuable tree in Whitewebbs Park was recently chopped down without authorisation. No further losses should be tolerated.

London's Green Belt Review has been 'accelerated' in Enfield, risking a rushed process that fails to adequately assess the value of the Green Belt, not just to the borough, but as a vital green lung for London during a climate and ecological emergency. Piecemeal, partial and rushed assessments are inadequate in such circumstances; risking the loss of some of the capital's most nature-rich sites, contrary to your stated objectives in the London Plan.

The Planning Inspector has expressed doubt that Enfield Council have effectively assessed the site allocations in its Local Plan, including Whitewebbs. In its supporting documentation, criterion 2 of Policy CL4 supports 'development for sport and recreation' without mentioning the need to preserve openness or the purposes of the Green Belt. It is premature to grant planning approval to applications within the Green Belt prior to the Inspector examining whether the site allocations are sound and should be located within the Green Belt at all.

In your prior election manifestos, you promised that London's Metropolitan Open Land and Green Belt were safe, and would only be developed in genuinely 'exceptional circumstances'. Before his election as environment secretary Steve Reed stated, "Nature is under threat. Our children and grandchildren deserve to be astounded by the magnificence of our landscapes [...] and enjoy our iconic wildlife, just as we can."

As Londoners based across the city, coming from all walks of life, who value our local green spaces, not just for recreation but for their vital contribution to nature recovery, we agree. There are serious legal and environmental shortcomings in Enfield Council's handling of this application and associated conservation policies. Should the planning permission for Whitewebbs Park be upheld by the Greater London Authority, a completely detrimental precedent will be set for all parks and green spaces across the capital. The Public Interest Law Centre has even concluded that there will be 'no real protection in law for public parks'.

Therefore we request that this application should be refused under article 7 of the Mayor of London Order (2008).

#4614

I am sending this email to express my disgust that Whitewebbs Park in Enfield is to be leased to Tottenham Hotspur FC for them to develop into a training ground. As far as I understand Whitewebbs Park was given to the people of Enfield and therefore the council have no right to lease it to anyone. The park holds special memories for me having spent many happy hours there whilst growing up and was what sparked my love and appreciation for

nature and the natural environment. To hear that it is being sold off to a football club just so they can build some more plastic training pitches fills me with despair. It is well known and documented that we are in the middle of a climate and nature emergency so it is frankly immoral to destroy acres of fields and forest just to satisfy the demands of a greedy premier league football club. The impact on local wildlife including rare birds, mammals and insects will be enormous, we should be doing more to help them survive not destroy even more of their natural habitat. It is also now becoming more accepted that people can also benefit from being connected to nature to help with physical and mental health so destroying this area will also no doubt harm the local population. It is time we started putting nature and the environment before money and greed. I urge you to step in and do all you can to get this decision reversed before we lose a piece of beautiful local nature forever.

#4655

I understand that you have the power to overturn local council decisions.

I would like to ask you to consider intervening on two decisions taken by Enfield council, which seem to me to be in contradiction with the ethos and aims of the Labour party.

1) Enfield Council has voted to close 6 of our local libraries. This is a crime against education, culture and community. Once closed they will never be reopened. Libraries are safe spaces, places of learning and community. They give much needed quiet homework space to young people who don't have that at home, and provide online facilities for those who can't afford them. Closure targets the least well-off in our society.

2) Enfield Council has agreed to lease 140 acres of Whitewebbs park to Spurs football ground. This is a well used public space, and rich in biodiversity. Mature trees would be felled, in return for a monoculture of football pitches, and it would no longer be accessible to the public. Spurs is a commercial company which could well afford to lease from a private landlord.

#4670

I am writing to you regarding the referral of application **24/00987/FUL (LBE)**

Enfield Council has informed us that the application was officially referred on 14/04/25. However, on the Greater London Authority web portal, it appears as 'Stage 2 TBC'. Has the referral been validated? If not, please could you let us know as soon as possible when this happens?

It would also be useful if you could clarify the referral and validation process, for example whether there are sometimes delays in referred applications appearing on the portal.

Thank you so much.

#4684

I hope that you are well. I am writing to ask for your support in objecting to the proposed planning application for Whitewebbs in Enfield, with the planning reference 24-00987-FUL. This land is set to become a football training centre, and although this plan allegedly includes areas for community use, these are minimal compared to current access. The economic benefits for both London and Enfield are also minimal, as stated in Spur's own environmental impact statement.

After being opened to the public in 2021, the space has become a pillar of the community but is now under threat. It is my understanding that you have the power to directly refuse an application or to become the local planning authority for the application. There are a number of issues with the proposed changes, for example, developers claim that historic restoration will take place on the parkland, but maps and aerial images show that these plans do not match the original 19th century lay out. Recently on the news there was uproar against the removal of a 500-year-old tree from the Whitewebbs area, yet these development plans would see the removal of many trees just like this one.

As a young person who has lived in Enfield for my entire life, I know that the loss of this space will be significantly detrimental to the community. Since it has opened up to the public, it has become one of the few positive spaces for people my age to visit and experience nature. The loss of areas like Whitewebbs are having a great impact on our youth and wider community and must be preserved for public use for years to come. The land is also essential for the environment and character of Enfield; it is not only a beautiful historic landscape but has a range of ecology and wildlife. These sorts of areas cannot be brought back or developed once they are gone, and the proposed plans will have permanent changes.

Overall, the area has become an essential space for the community, and the proposed development holds no benefits. Changes to Enfield should occur for the benefit of the people and objections to current development plans clearly show that the community wishes to maintain the land as it is. I believe that the development of this land would only prove to be negative and is not in our interest at all.

I hope that you will consider this message and thank you for your time.

#4703

Regarding the above reference I would like to express my deep concerns with the recent application that Tottenham Hotspur has made to the London Borough of Enfield for 11 pitches to be built on Whitewebbs Park in Enfield, North London.

Whitewebbs Park is a precious part of Enfield; Green Belt historic land held in trust for the people of Enfield. It is an open space for us to enjoy the wonderful landscape, ancient and veteran trees, abundance of thriving wildlife enjoyed by all.

The proposal of Tottenham Hotspur building 11 pitches on this land will flatten part of this historic landscape. This massive reconstruction of 16 hectares is permanent and irreversible which I feel will desecrate the wildlife within this area and the ancient trees which are vital to our environment.

The "Special Circumstances" relate to only 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. According to Spurs' own Environmental Statement the economic benefits are minimal for Enfield and London's economy. According to Enfield Council's own Local Plan landscape views will be lost.

I urge you to reject this application because of the damage this will do to our Green Belt and parkland.

#4761

I would respectfully ask you to reject the planning application OR call it in.

I have lived in the London Borough of Enfield for over 70 years, and I visit and enjoy Whitewebbs Park six or seven days per week, simply enjoy it even though these days I have no dog.

I am particularly concerned how the plans will impact upon the historic parkland that, after all, was held in trust for the people of Enfield. The proposals and plans will destroy the park; will flatten the landscape; will irreversibly reconstruct a huge area of the parkland; will destroy important trees and habitat; will severely reduce the area of the park available to the people whose park it actually is. It has been seen, since the golf course was closed by LBE, increased usage by the people, mental health and wellbeing is of such importance these days, the community spirit and camaraderie increasingly important as can be seen on any day, and is "available" and welcome to all borough-wide. Whitewebbs Park is a place of beauty, of natural beauty, not in a manicured way but in a natural way, with re-wilding taking place mostly by nature itself.

I see no actual benefits to the community, only benefits to a select, and relatively few, chosen sportspersons whom I know will not necessarily be local as I know and have experience of how football academies' function.

Barriers, bunds, flattened landscape, floodlighting, fences, security measures are not what I believe Whitewebbs Park should be subjected to. That a proposed increase of some 10 additional football pitches plus building and associated structures to be added to some 17 existing football pitches is somehow wrong, this veritable fortress will enable huge profits to be made at no benefit to the borough. Local roads and infrastructure are hardly adequate to support increased usage. That it will see what will probably be the best and most wonderful training facility in the country, likely attracting interest and "huge" rental fees for visiting teams and associations, is not a feather in the cap for Enfield, and it will not benefit from its existence.

I see few, if any, economic benefits to the community; to LBE at the stated financial rates over the 25 year period. I do see favourable economic benefits to the corporate behemoth, who will be making enormous financial profits.

Other proposed benefits do not stand scrutiny. Nicer but smaller car parks and, I assume (maybe wrongly?) at a cost to park is not of benefit. A better cafe, albeit the current cafe owners would surely be happy to invest in themselves if given a decent length lease, and that would include toilet facilities up to an appropriate standard. There will be no benefit to the community with less space; no accessible sports facilities for the community, only for the elite and chosen; There will be less pathways, and it cannot be overlooked that much of the land that will NOT be taken away does naturally flood due to the presence of underground water and a high water table in the area, of benefit to seagulls only during these times.

What do I see? I do see that there is an alternative adjacent site that could house the THFC plans, albeit that it is not classed as green-belt and would of course be at greater cost, but green-belt is the issue surely, why destroy green-belt land where there is an alternative?

In precis, please reject the planning application OR call it in.

#4788 [151 – 180]

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. Writing as a Londoner, I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement **"There is no real protection in**

law for public parks if this judgment stands" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>

- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").

Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#4812 I am writing to formally request that planning application **24/00987/FUL**, submitted by Tottenham Hotspur Football Club (THFC) to the **London Borough of Enfield**, be called in for review under **Article 7 of the Mayor of London Order (2008)** and **Section 77(2)(b) of the Town and Country Planning Act 1990**. I urge that this application be **refused** for the reasons set out below.

1. Non-Conformity with Planning Policy and Green Belt Protections

The proposed development, a football training centre and associated infrastructure at Whitewebbs Park, has been deemed **"inappropriate development"** within the Green Belt by the **Greater London Authority (GLA)** (Stage 1 response REF: GLA/2024/0213/S1/01). The GLA clearly states that **"very special circumstances"** are required to justify such harm to Green Belt land. In this case, no such circumstances exist. The application fails to deliver sufficient public benefit to outweigh the permanent damage to the Green Belt, as required by national and regional planning frameworks.

Furthermore, **Enfield Council acknowledges** that the proposal represents a departure from the Local Development Plan and conflicts with the **National Planning Policy Framework (NPPF)**.

2. Environmental and Ecological Harm

This application threatens irreversible ecological damage:

- The development would destroy **50% of Whitewebbs Park's biodiverse grassland**, as well as **207 trees**, including veteran specimens, thereby eliminating critical habitats for priority species.
- The introduction of synthetic pitches would increase **soil degradation**, introduce **microplastics**, and compromise long-term biodiversity.
- Crucially, **essential ecological surveys remain incomplete**, and the full impact on protected species (such as bats and key invertebrates) has not been properly assessed.
- The application's **Biodiversity Net Gain (BNG)** calculations are flawed. They undervalue unimproved grassland and fail to consider the area's ongoing **natural rewilding**.
- A proposed access road would run through **ancient woodland**, in direct conflict with paragraph 193c of the NPPF. The criteria for 'wholly exceptional circumstances' to permit such destruction are not met.

3. Loss of Public Access and Public Benefit

Whitewebbs Park was purchased with public funds for community use. If approved, this application would result in the **privatisation of 50% of the park**, stripping away public access to open space that has been freely used for generations.

While THFC asserts that community benefits will arise, these claims are overstated. The facility is primarily intended for **elite sports use**, with negligible access or benefit for the wider public. No **comprehensive Parkland Management Plan** has been submitted to properly assess these supposed benefits or their feasibility.

4. Procedural Irregularities and SINC Review Failures

The **Guardians of Whitewebbs** have lodged a formal complaint (Ref: COM 101001267200) against **Enfield Council** regarding the improper handling of its 2020 **Sites of Importance for Nature Conservation (SINC)** review. This includes:

- Failing to designate Whitewebbs Park as a site of Metropolitan Importance, despite meeting ecological criteria.
- A conflict of interest involving the proposed re-designation of land in the draft **New Enfield Local Plan**.
- Rushing application 24/00987/FUL through planning processes **prior to the Stage 2 Local Plan Hearings**, potentially prejudicing outcomes.

These concerns raise serious questions about whether **Enfield Council has fulfilled its statutory duty** to conserve and enhance biodiversity, as required by **Section 102 of the Environment Act 2021** and **Section 40 of the Natural Environment and Rural Communities Act 2006**.

The **related application 24/01012/NMA** would also be prejudiced by the unresolved SINC designation and ongoing complaint, which is now in the final stage of internal review.

5. Impact on Heritage and Conservation Areas

The development would irreversibly alter the park's historic landscape and destroy key **panoramic views** protected under Enfield's Local Plan.

It contradicts the aims of the **Forty Hill Conservation Area** guidelines, which have previously criticised similar developments by THFC for contributing to urban sprawl and undermining the area's rural character.

The proposed earthworks, infrastructure, and landscaping would fundamentally damage the park's historic and visual integrity.

6. London-wide and National Implications

This planning application has implications beyond the borough of Enfield. If approved, it would set a **dangerous precedent** for the privatisation of publicly owned parks, potentially weakening protections for open spaces across the capital and beyond.

As highlighted by the **Public Interest Law Centre** in its statement following the 2023 judicial review judgment (*"There is no real protection in law for public parks if this judgment stands"*), this case is of significant public concern.

It has attracted **widespread media coverage**, reflecting the scale of local and national opposition. A simple search for "Whitewebbs Park" reveals the volume of interest and discontent.

#4834

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.

#4835

I am emailing you as a resident of Enfield to ask that the application from Tottenham Hotspur asking to take over Whitewebbs for their ladies football academy be stopped please. Thousands of residents have signed a petition asking for this to be stopped as after the felling of an ancient 500 year old tree which was a healthy tree I believe Tottenham may have been behind this??? Not only that but I believe Enfield Council dumped thousands of signatures to disregard the application months ago from residents opposing the planning application from Tottenham Hotspur. Whitewebbs was left to residents of Enfield and as such Enfield Council are guardians of whitewebbs they do not have the right to lease it out Please bring this up as a matter of urgency and do the right thing in telling Enfield Council they cannot allow this application to go through Tottenham Hotspur can apply to the borough I.e Harringay as it is closer to their ground

#4933

Please refuse Tottenham's application to build a football academy on part of Whitewebs Park.

Surely Tottenham should be developing a Ladies Academy within the urban area it claims to serve, so enabling local women and girls easy access via public transport and adding a useful resource to support those in the community who do not have access to sport and leisure facilities.

In many people's minds the fact that it is a development linked to football will confuse the fact that it is an assault backed (by mega bucks mostly interested in the commercial gains to be made in sport) on a lovely green space that currently provides recreation and solace to many people.

#4972

Having been to Whitewebbs Park over the Easter weekend and having seen the butchered stump of the ancient Whitewebbs oak, I was shocked, angry and extremely upset that such a needless and illegal thing could have happened. The Whitewebbs oak was ecologically much more important though less well known, than the iconic Sycamore Gap tree, which was also illegally felled and which has been investigated as a criminal act. This should be the same for the Whitewebbs oak, yet the Metropolitan Police are not pursuing this course. I urge you to do all in your power to put pressure on them to investigate this crime and to find out the identity of the "tree expert" who said the tree was dead, who the company were that cut it down and who the person was who gave permission for the felling. These people need to be held to account for their actions.

The future of this beautiful biodiverse park with its many veteran trees hangs in the balance as a result of Enfield Council's decision to lease part of the park to Tottenham Hotspurs Football Club. A further 207 trees will be felled and a rich varied habitat will be replaced by plastic grass.

As I walked through the park, a blackcap was singing in a nearby tree and there were butterflies and bees in abundance. There was also a red kite soaring overhead and, in the past, I have also seen kestrels hovering over the rewilded golf course. There are many new sapling oak trees springing up randomly in the long grass as a result of natural regeneration, which may, in 300 years' time, be as majestic as the Whitewebbs oak. They are signs of hope for the future if Enfield Council's proposals are overturned.

I am not against women's football, on the contrary, but I cannot help but feel that there must be more appropriate sites, which will not require the removal of thousands of tons of earth to level the area and not require extensive tree removal, the loss of important habitats and the loss of a public open space, given to the council for the benefit of the people of Enfield for the foreseeable future. This park is loved by the people of Enfield and is very important for both physical and mental well-being. Tottenham football club should not be taking over a public park, and their gesture of planting many sapling trees to satisfy ticking the box of biodiversity net gain, is a nonsense. This plan flies in the face of one of the Government's supposedly important aims, that of increasing biodiversity at a time when virtually all species - animals, birds and insects are declining at a worrying rate, making our country one of the most nature depleted. This plan must be called in as a matter of urgency.

I also request that you refuse Enfield Council's planning application to begin building on green belt land. The area of Vicarage farm/Enfield Chase is an area of stunning countryside with corridors of ancient oak trees separating the fields. Many of these are significant trees with several veterans approaching the size of the Whitewebbs oak. These cannot and must not be lost. They are irreplaceable. It is essential that Enfield Council is made to follow the London and National Plan, which clearly states that brownfield sites, of which there are many in the Borough, are used first. We all know that demographics can change. Many parts of London are closing Primary Schools at the moment, due to a population fall. Our green belt land, with its many old trees and hedgerows is too precious to lose, when alternatives are available.

I hope I can count on you to do the right thing and that you will refuse these applications. I write from the heart and I thank you for reading my letter.

#5000

I am writing to express my concern at the above mentioned planning proposal submitted by Tottenham Hotspur Football Club.

The proposal will remove part of an important historic land from public access and together with the Enfield Plan (yet to be approved) would represent a substantial loss of the precious Green Belt for the residents of Enfield and also the nearby residents of Barnet. Since COVID this area has become even more popular for a wider area with its ancient woodland, lake and open views across a gently undulating historic landscape with established trees and grassland.

Whitewebbs Park was bought by Middlesex County Council to be held in trust for the people of Enfield as an open space for their recreation and it has been a great benefit to us. I have enjoyed this beautiful place for over sixty years and I believe that it has a positive effect on our mental health and well being.

A great part of its appeal is the openness of the landscape with wide views stretching into the distance which give you a feeling of freedom. This will be ruined by the proposed fences & high hedges planned to screen the football pitches. The creation of the pitches will flatten sixteen hectares of the natural landscape and the planned AstroTurf pitch will add to the detrimental effect to the wonderful biodiversity of this place. Floodlighting will also have a negative effect to the natural life in this area. Existing trees will be lost and new planting cannot compensate for the loss of and damage to the flora and fauna of this established habitat.

The proposal is for a twenty-five year lease but all these changes plus extra large buildings will change the park irreversibly. The benefits will be for a large corporation and a relatively small group of people who will be driven in, the residents of Enfield will have very little community benefit, it will be mostly inaccessible to the majority and will limit and spoil what is left for us. Three kilometres of pathways will be lost so reducing access, views and variation for walkers. The economic benefit to the borough would be a minimal one off payment compared to what we will lose forever.

An alternative Grey Belt site is very nearby and would provide a better option for the extension of the Tottenham Hotspur grounds without ruining this historic parkland for future generations of Enfield and the surrounding areas.

Please can you consider looking at this proposal with a view to supporting the people of Enfield who value this unique local Heritage site and would like to continue to hold it in trust in its entirety.

#5001

I am writing to express my concerns regarding the plans by Tottenham Hotspur Football Club to build training ground facilities on the Green Belt in Whitewebbs Park, Enfield.

The land is part of the Green Belt. Whitewebbs park is held in trust by the London Borough of Enfield as an open space accessible for all for leisure and recreation. If the plans go ahead some 16 hectares of this open natural landscape will be flattened and developed causing permanent loss of amenity to the general public.

Significant views across the landscape will be lost. Three kilometers of established paths that criss-cross the area will be lost. Natural habitats and biodiversity will be permanently damaged. The detrimental effects of this development will affect not only local residents, but visitors from outside Enfield.

The siting of the development will have a detrimental effect on local traffic - all users of the new facility will have to come to the site by car or coaches - and will adversely affect local air and noise pollution.

The development includes the erection of some large buildings, entirely inappropriate for the Green Belt. Floodlighting will affect wildlife. Whilst the plan includes planting new trees these cannot adequately replace the removal of large established trees and the well developed understorey. Locally scarce acid grasslands will also be destroyed, replaced with barren turf, and even plastic playing surfaces.

Grey belt land nearby would be a better option for this development, leaving the unique historical site of Whitewebbs Park intact for all Londoners to enjoy.

I urge you to intervene in this planning issue.

#5003

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.

- The required **“Very Special Circumstances” (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park’s biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. ‘Wholly exceptional circumstances’ (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC’s claims of **community benefits are misleading** – the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs’ **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council’s handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield’s Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park’s historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
 - The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre’s press statement **“There is no real protection in law for public parks if this judgment stands”** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
 - The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search “Whitewebbs Park”).
 - Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.
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#5069

I am writing to add my voice to those of many others to ask you to call in and reject the proposed development, by Tottenham Football Club, of a Football Academy for Women on 50% of the grassland of Whitewebbs Park in Enfield, London.

Additional attention has been drawn to this matter by the illegal felling of a 500 year old veteran oak tree, a local landmark much loved by local people and of significant environmental importance, by the management of the neighbouring Toby Carvery, - this franchise seeming to have, it has been discovered, business links with the above mentioned Football club.

Whitewebbs Park is a green area within London's urban sprawl, vital to the life and wellbeing of its local community. Such places are also vitally important in supporting and improving the environment of the Metropolis as well as being a haven for wildlife, several species of which are endangered. How can it be right that such a precious green oasis of beauty and calm that brings such wide ranging benefits to our capital city and its residents should be desecrated and despoiled in order to serve the interests of a minority, especially as it appears that very little information gathering around the availability of alternate sites, including brown field ones, has been done.

As well as yourself, many of us will also appeal to the Secretary of State on this matter.

We ask you both to please support the residents of this area and those who have a care for the greater good of our urban communities and refuse permission for this ill thought out and badly advised vanity project to go ahead.

Throughout the country our green spaces are under threat and it is incumbent on us all, from a Government who declares itself as having green credentials down to we ordinary folk in the street to do our best to protect them.

Once they're gone, they're gone.

#5091

I wish to register my opposition to the proposed development of Whitewebbs Park by Tottenham Hotspur Football Club. A development of this sort would ruin a valuable open space, much loved by the people of north London as a site for informal recreation. It would also cause great damage to an historic landscape and significant wildlife area. I think that the proposal is wholly inappropriate and against the public interest, and that an alternative site should be found.

#5106

It would be hard to imagine a premier league club levelling and building a semi-industrial complex with 11 (plastic reinforced and astroturf) football pitches in either Richmond Park, Epping Forest or any other park in London. Like Whitewebbs these parks have expanses of biodiverse grassland and scrub surrounded by ancient woodland, which would be ruined by such a scheme.

Richmond Park and Epping Forest are obviously larger and well known but like Whitewebbs they were originally historic Royal hunting grounds which have been protected from enclosure and development for many generations.

I find it hard to understand why Enfield council has supported Tottenham Hotspur's plans as they aren't in the interest of current residents or future generations.

The £75,000 per year lease (to be paid by Tottenham Hotspur) seems derisory when you consider that just the proposed clubhouse / accommodation block could command this sort of rent on its own. Given the amount of hard landscaping I think a rent in the £1 million / year range would be closer to the mark.

It's impossible for a council in an area with a high proportion of Tottenham Hotspur fans to make an unbiased decision about this kind of proposal. The newspaper articles below highlight that council staff have accepted free tickets and entertainment from Tottenham Hotspur which will have undoubtedly made them feel indebted / obliged to go along with the plans:

[Conservatives lodge complaint over planning chair's Spurs tickets admission - Enfield Dispatch](#)

[Council leader denies 'bias' claim over Whitewebbs - Enfield Dispatch](#)

My impression is that residents (and probably council staff) have also been misled by the slick marketing materials that imply the project will bring benefits for the environment and nature. It's clear that Tottenham Hotspur and their multi billion dollar owners have all the skills, know-how and resources to get what they want.

Considering Enfield council's consistent support and promotion of the plans I think it's hard to imagine that it's planning department will raise any significant objections.

For this reason and given the scale, visual impact and nature loss associated with this project I request that you 'call in' this planning application to allow an unbiased examination.

#5184

I'm writing as part of a body of people (Guardians of Whitewebbs) that are against the enclosure of public space by a private company that is being proposed by Enfield Council's leasing of Whitewebbs Park to Tottenham Hotspur Football Club (THFC). I'm requesting that the planning application 24/00987/FUL (London Borough of Enfield), submitted by THFC for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990.

The consideration of this proposal by Enfield Council shows a lack of care for public rights, considering that the park has been public space for almost a century now. Despite the area in question having been a golf course in the past, this was not a private space. It constituted a public area that could be used freely by the public when there was no golf being played. In addition, the exposed area still acted as a corridor to support wildlife moving between Whitewebbs' ancient woodland and Archer's Wood.

Since then, the rewilding of space at Whitewebbs has been a unique and greatly attractive feature for the Enfield community and the green space here in North London. I can see Red Kites circling from my house thanks to the unique hunting grounds that this rewilded space has to offer.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

And the ecological benefit to leaving this space as a public park is inextricably linked to the rights and benefits of the public to having readily accessible green space. I know of many, myself included, that have used the unique openness of the space in the past to help with mental health difficulties, for example. The vastness that covers North Enfield's green space facilitates a liberated sensation, which would be greatly affected by the positioning of THFC's encroachment into Whitewebbs park.

Obviously THFC are a business; the move to acquire a greater space is in the interests of this business model. It is Enfield Council that are grossly betraying the public, alongside the lack of transparency by THFC, by allowing for the lease to be negotiated in this way and for the potential for it to go through.

It makes much greater sense for a private company, such as THFC, to acquire private space that lies local to the area. Also, the bid has been proposed to make space for more pitches, when THFC currently have the most pitches of any Premier League club – 17.

So why affect the public so greatly when there is an evident solution to both of these issues?

I am urging you to recognise how much difficulty this will cause the local community here in Enfield. With this, I plead you, given your influence, to voice the growing concern that the local people are having about this proposal and to "call in" Enfield Council's approval of THFC's bid.

Many thanks for your time.

#5190

I am writing to ask that the Mayor intervene in the planning application relating to Whitewebbs Park, Enfield. Tottenham Hotspur are proposing to construct a Football Training Ground in Whitewebbs Park, which is in the Green Belt. Enfield Council would lease land to this football club for 25 years. This application has significant impact on the implementation of the London Plan, and affects more than one London Borough. I believe there are sound planning reasons for intervention.

The issues are as follows:

- Whitewebbs Park is a historic landscape, held in trust for the people of Enfield for recreation and open space since 1931. It is in the Green Belt.
 - These plans include the loss of over a hundred trees, and significant habitat loss. New planting cannot replace loss and damage to flora and fauna. The open views across the park will be blocked by 1.8m fencing and laurel hedges. Proposals will involve levelling and reconstructing 40 acres of the park to create football pitches. These changes will affect half the open area of the park. Heritage views will be lost.
 - 3km of pathways will be lost
 - Floodlighting will affect creatures living in the park
 - This proposal will have a detrimental effect on a historic park enjoyed by local people. The minimal economic benefits don't offset the loss to Enfield residents and biodiversity. The area would no longer be accessible to the vast majority of Enfield residents. Participants would be bused or driven in from outside the borough.
 - Together with the other proposals in the Enfield Plan, it will be further loss of Green Belt.
 - Grey belt land nearby, would provide a suitable alternative site, without ruining this unique heritage site.
-

#5247

I am writing to ask that you exercise your right and please call in this application by Enfield Council to lease Whitewebbs golf course to Spurs for training football pitches for women.

This lovely park was gifted to the people of Enfield and should not be leased to a private company.

Beautiful views along with habitat for nature will be lost when trees are felled and ground levelled to make way for the pitches.

You may be aware that a 400 year old tree was recently felled by lessees on land at the end of this park and one wonders what other devastation will happen if Spurs take over the lease. Such actions cannot be reversed.

We would like future generations to enjoy this park as much as we have.

Please consider these objections.

#5276

I would like to add my voice to the numerous correspondence you must all be getting in relation to the above.

Thankfully this time, the media have played a good part in alerting more people about the illegal felling of our prize specimen tree. The tree even has a name, "The Guy Fawkes Oak" which alone, one would have thought, might have kept it safe.

Please would you make it an urgent task now to let us have the answers as to why this was ever allowed to happen.

We need:

1. A full investigation into this act by the Metropolitan Police;
2. Who was the tree expert who said it was dangerous? This person must have submitted a report. We need to see it;
3. Who authorised the felling?
4. Who did the deed? There are photographs with the registration numbers of the vehicles involved so they can't be too difficult to find;
5. We also need to know why there wasn't a TPO on this important specimen? And indeed, I believe that most of Whitewebbs' trees haven't been afforded a TPO? Why is this when it is classed as ancient woodland? Clearly, the Council have been negligent in this regard. Mitchells & Butlers claim to have "taken the necessary measures to ensure any legal requirements were met" as regards the felling. However, the Leader of Enfield Council claims to be outraged that the leaseholder has "cut down this beautiful ancient oak tree without seeking any permissions or advice from Enfield Council". Who is telling the truth?

I am told that the Metropolitan police have already closed the case. If true, this is shocking in itself. This is clearly criminal damage and no different to the Sycamore Gap case. I call on you to reopen the Guy Fawkes Oak case and take action.

I also call for the stop of the lease of any part of Whitewebbs Park to THFC. I am afraid the links that MBR have with Spurs also tarnish Spurs in this unfortunate violent act. If Enfield Council insist on leasing to anyone, then it should be to someone who will nurture Whitewebbs for future generations. We desperately need to protect it from future assaults. At the very least, stronger enforcement of tree protection policies and more TPOs on all Enfield's ancient and veteran trees should be a start.

#5302

I am writing to bring to your attention that there is no CEMP for the planning application 24/00987/FUL (London Borough of Enfield), and therefore the Stage 2 referral of this application should not be validated until this information is provided by Enfield Council. There is only a Site Construction Management Plan, which states "*a Construction Environmental Management Plan (CEMP) will be developed prior to the commencement of the main construction works.*" Therefore there is no information regarding how impacts to the Whitewebbs Wood Metropolitan SINC will be avoided and mitigated in line with the sequential approach set out at London Plan Policy G6.

Additionally, we believe that the Full Whitewebbs Parkland Management Plan (FWPMP) should also be provided as critical details including the maintenance of the park are not discussed in the outline version. The nebulously defined 'maintenance' of the Park is included as part of the VSC/public benefit of THFC's proposals, yet without the full details of this maintenance, it clearly cannot be properly weighed against the expected harm of the proposals by the GLA.

I trust that you will not validate the application till this information has been provided by the applicant/Enfield Council.

#5314

I am writing again as a deeply concerned London resident about the possible fate of Whitewebbs Park in Enfield. Enfield Council have agreed a lease agreement with Tottenham Hotspur football club to take over 50% of the open space of Whitewebbs Park for a sum of roughly £80k/annum, on a 25 year lease agreement.

I've been taking my son who is now four years old to the park every week since his birth and it is a vital greenspace for us, given that I personally do not have a garden.

I am a trained biologist and I have not seen many parks in my life as rich in wildlife as Whitewebbs; from the first time arriving at the park and seeing the (now-felled) Whitewebbs Oak from the back of a car park, I knew this place to be special.

Over the last four or five years, since the council ceased managing the park (save for bin changing), it has become a site where rare species of bee, butterfly, bird, reptile, amphibian have actually *increased* in abundance. How many places in the world can say that, at present?

Whitewebbs Park is one of the most wildlife-rich public greenspaces in London, without doubt. Beavers, Kingfishers, Great Crested Newts, Kestrels, Moles, scarce mining bees, Grass snakes, 9 species of Bat, 80+ species of birds etc... The list is huge and atypical for London.

In short, the Tottenham proposals involve digging up colossal amounts of earth in the park, building concrete support structures, levelling ground and fencing off the public for the pitches.

From the council planning documents, we have found out that in at least some of the work, there will be 7000 tonnes of excavation, thousands of tonnes of concrete (including substructure), with a total material quantity of over 11,000 tonnes. It says that there will be a total emissions of over 6000 tonnes of carbon.

Or we could just leave a thriving public park remain as a thriving public park?

A private business (Tottenham Hotspurs FC), valued at £2.6billion should not be digging up, destroying and fencing off 50% of the open space of a public park - they should be buying private land.

■■■■ a Whitewebbs local, made this video which helps to give an overview of the situation of the park, from a resident-perspective. <https://www.youtube.com/watch?v=0Y3J56JpU98>

I also would like to leave you with this study from King's College London who have scientifically concluded a positive correlation between our mental health and biodiversity: <https://tinyurl.com/b96js5ar>

I implore you - at this time where an unprecedented amount of British greenspace is under threat - to save our park from private business. It should remain, in full, completely open to the general public.

You simply must intervene and halt this proposal. Destroying a public park like this is not a legacy anyone should want.

Please reject the Tottenham Hotspur proposal.

#5318

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102

of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
 - The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
 - The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
 - Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.
-

#5325

Hi Mayor and GLA Planning Team,

Since my e-mail in February, there has obviously been the issue regarding the destruction of the ~400 year old oak tree at Whitewebbs by Mitchells & Butlers. I'm sure you are aware that there are family connections between both businesses (Daniel Levy at Spurs, Josh Levy at Mitchells & Butlers) and both businesses effectively have the same owner in Joe Lewis (70% ownership of ENIC who own 86.6% of Spurs, Lewis is majority shareholder of Mitchells & Butlers). It looks incredibly suspicious that the destruction of the tree is connected to Spurs plans to develop on this land and further underlines our view as residents that we do not think they are not a fit or trustworthy business to take responsibility for this land. The fact that Mitchells and Butlers are saying it was for 'health and safety' looks pretty clearly like a cover up to me, as a business they wouldn't want to spend money to get rid of a healthy tree (as Spurs survey (inconveniently for them) found only around 6 months ago).

I urge you once more to call in the planning application.

Separately I have contacted Feryal Clark as my MP to ask the police to fully investigate this matter to get answers to the following questions:

1. Have the police established the identity of the individual who claims the tree was dangerous?
2. Are the police investigating why Mitchells & Butlers falsely claimed the tree was dead?
3. When did the contractor claim the tree was dangerous?
4. What period elapsed between that assessment and the tree being felled?
5. How much did Mitchells & Butler pay the contractor?
6. Who at Mitchells & Butlers authorised the destruction of a tree they did not own?
7. What is the police's precise reason for saying that no crime has been committed when a priceless public asset was destroyed without permission?

Another recent development since I originally e-mailed is that I understand from Private Eye that the Enfield councillors have also been given free lunches and tickets from Spurs. As a local resident this makes me further angry and disgusted since this deal with Spurs is about profit and selfishness achieved through bribery and corruption rather than for the good of the community and nature.

#5329

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power

under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

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Please note:

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Summary of why I believe the application should be called in and refused:

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- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
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#5334

Further to my previous email I would once again request that this planning application is called in for further review. Myself and many, many other local people have been totally disheartened by the way our wishes have been disregarded. It was almost symbolic when our beautiful 500 year old tree was cut down in early April, showing how both Tottenham Hotspur FC and Toby Carvery, having the same parent companies, have absolutely no problem destroying our heritage for the sake of their profit.

Please do consider this request on behalf of my grandchildren and their children's children.

#5341

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

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Conclusion and London-wide/National Impact

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- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#5364

The shocking destruction of a 500 year old oak tree has highlighted just what is going on in Whitewebbs Park. An irreplaceable ancient oak has been felled - illegally, yet Enfield Council are actually sanctioning the destruction of a further 207 trees if the planning application by Spurs FC goes ahead. The loss of these trees alone is a reason to reject this application outright.

Nature is in crisis and Whitewebbs - which by all accounts, should have been designated a SINC by Enfield Council will be sequestered, covered in plastic grass which we now know leaches into the environment and this precious rewilded habitat will be denuded and destroyed. This would be a travesty for nature.

Whitewebbs falls within the Green Belt and is currently enjoyed not only local people but by all Londoners, it is an open green space where people can breathe and immerse themselves in nature, so crucial to health and mental well being. Please do not allow this to be taken away.

Labour promised us a greener future; please uphold this promise by rejecting this application.

One might see this land grab by Tottenham Hotspur as a vanity project - they already have 17 pitches (no club in the premier league has more than this); we are not talking about a sacrifice for affordable housing or a project to support the homeless. This is an extremely rich, private enterprise taking land from 'the People' that will be lost in perpetuity, land that is held in trust for everyone to enjoy being given to a private organisation for profit.

For these reasons alone and there are many legal, technical, planning infringements to support what is ultimately also a moral decision. I implore you on behalf of all Londoners to please draw a line under this threat to our heritage by rejecting this application.

#5373

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For these reasons alone and there are many legal, technical, planning infringements to support what is ultimately also a moral decision. I implore you on behalf of all Londoners to please draw a line under this threat to our heritage by rejecting this application.

#5390

I find myself lost for words adequate enough to describe how disillusioned I've become by the decisions made by politicians in favour of those with money and power - not the people they were voted in to protect and support.

Whilst marketing, media and education tells me that we are in a climate crisis, there is a mental health crisis raging and alternative ways of living are vital for the survival of planet and people, the decisions I see made by my government tell me they don't really care or hope to make a difference. In fact, they are willing to exacerbate the problems for their short term benefit.

The onus is put on the people to use metal straws and cycle to work, whilst you continue to lie in bed with corporations that cause more harm in a day than a million straws, cycle rides and recycled bottles could ever solve.

Whitewebbs is a space for the people and for the ecology. It was given to the council to steward on behalf of the people.

I don't need to tell you about who owns what and what significance that has on this case. You already know it all.

Acre by acre, ancient tree by ancient tree, lease by lease, you are deeply letting us down and leaving us furious, disillusioned and unable to take anymore.

I beg of you all to do what's right and let this land be.

#5510

Whitewebbs is a hub for the community and a site of many ancient trees and protected animal species. The destruction of which would be morally, socially and legally bankrupt. Yet that is exactly what is proposed with the current building plans.

The only excuse for this is corporate greed.

#5512

Whitewebbs is a vital local space and the site of many vulnerable species, and veteran forest habitat. Yet 50 percent of this will be destroyed.

Veteran forest is valuable because it is ancient. Planting young trees is not an acceptable offset for this loss.

Additionally the greater London authority has deemed that the proposals currently listed do not meet planning policies for the appropriate use of green belt land.

Public Access will be restricted by half.

That is not the councils space to take.

Spurs can live without another ten pitches.

We cannot live without nature.

Yet more and more is taken everyday for corporate greed.

But we, down here have little power to change this, save the writing of sad letters to the ones like you who hold the power.

So I must humbly ask you to reject this plan.

#5526

I am writing to request that planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC) for a football training centre and ancillary buildings, be called in by both the Mayor of London (under article 7 of the Mayor of London Order 2008) and the Secretary of State (under s77(2)(b) of the Town and Country Planning Act 1990). This application should be refused for the reasons set out below.

Conflict with Policy and Loss of Green Belt Land

I strongly oppose this planning application. The proposed development is incompatible with the London Plan and the National Planning Policy Framework (NPPF), and has been identified by the Greater London Authority (GLA) as “inappropriate development” within the Green Belt (Stage 1 response: REF GLA/2024/0213/S1/01). As such, it requires “very special circumstances” to justify overriding long-standing protections. The application does not meet these criteria. The proposed benefits are negligible and do not outweigh the harm caused by permanent loss of Green Belt land.

Public Access and Community Value

Whitewebbs Park, purchased in 1931 with public money, was placed in trust for the people of Enfield. The land was intended for open public use, and golf was only ever a temporary, revenue-generating use. Since the closure of the golf course in 2021, the park has flourished as an accessible green space, now seeing over 1,000 visits per week even in winter. The proposed development would result in the loss of public access to half of the open space — a level of exclusion never seen before, even when the golf course was operational.

The promised community benefits are limited, sporadic, and accessible to only a small proportion of Enfield residents. As Justice Mould noted, “the football academy... is not a facility that will be meaningfully accessible to the general public.” There are no sports facilities proposed for general use.

It is clear from the applicant’s Environmental Impact Statement that the economic benefits for Enfield and London’s economy are minimal. The benefit is overwhelmingly in favour of a very wealthy applicant to further their commercial enterprise. The use of part of Whitewebbs Park for a football training facility is a matter of convenience for the applicant since it is directly adjacent to their current facility.

Environmental and Ecological Harm

The proposed development would require extensive re-landscaping and levelling, destroying 16 hectares of biodiverse grassland and resulting in the loss of 207 trees, including veteran specimens. The introduction of synthetic pitches poses additional long-term risks, including soil degradation and microplastic contamination. In effect it ‘sterilises’ the park of a significant amount of ecology and biodiversity that it currently has.

Construction plans also include building a road through ancient woodland — an irreplaceable habitat. This would cause irrevocable damage, and the necessary ‘wholly exceptional circumstances’ under NPPF paragraph 193c are not met. The application lacks adequate ecological surveys, leaving the full impact on protected species, including bats and invertebrates, unknown.

Heritage and Landscape Integrity

Whitewebbs Park is locally listed for its historical, archaeological, and landscape significance. The development would compromise its character, obstruct scenic views, and disrupt the course of the historic New River. Although the applicant claims to be restoring 19th-century parkland, their plans are at odds with historic maps and visual records. Replanting to meet biodiversity net gain (BNG) targets would alter the park’s open and historic landscape, with fencing, bunds, and dense vegetation further restricting access and changing its appearance.

Conclusion

This application violates national and regional planning policies, undermines the integrity of protected Green Belt and heritage land, and fails to deliver meaningful public or environmental benefits. The likely environmental degradation, loss of biodiversity, and reduction in community access represent significant and irreversible harm.

This case also has broader implications. As highlighted by the Public Interest Law Centre, “There is no real protection in law for public parks if this judgment stands.” Allowing this development risks setting a dangerous precedent for the privatisation of public land.

I therefore urge the Mayor of London and the Secretary of State to call in and reject this application in order to preserve Whitewebbs Park and ensure continued protection of vital green spaces for the public and for future generations.

#5603

What is your message about?

Spurs FC plan to enclose Whitewebbs- a public park. Enfield Council are enabling this

Message details

The GLA has already stated that the Tottenham Hotspur’s plans for a training facility are inappropriate within the green belt. This area of grassland is in public trust; I have walked in Whitewebbs and been introduced to the dazzling array of species living there. I saw children get excited over burrowing bees. I felt as if I were in the countryside. This space is rightly loved by the locals who have formed a group – Guardians of Whitewebbs. Why should local people – and visitors like myself be deprived of something that was given in trust to the public? This is ancient land and we are losing so much of our wildlife already (75% down on insects as you must know) – football is a big wealthy industry BUT although sport is healthy, so is walking in a park that is beautiful. So is breathing in oxygen-rich air. Artificial grass pitches are plastic. They pollute at every stage of their short lives – from the petrochemical plants where they’re born through to eventual incineration (or dumping in huge piles) at end of life. During use they heat up and add to the urban heat island effect. They shed microplastics from their infill. They are full of PFAS.

What would you like us to do?

Help to protect this space. Support the public who are fighting the best they can to prevent further harm to this park from corporate interests (the Enfield Oak has already been ruthlessly destroyed by the same holding company that owns Spurs)

#5687 [181-210]

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power

under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

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Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
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3. Loss of Public Access and Community Benefit

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Conclusion and London-wide/National Impact

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#5749

I am writing to you because I feel very strongly that Green Belt land should NOT be built on when so many other grey sites could be used. As a frequent visitor to Whitewebbs Park I am VERY concerned about the fate of the Park and feel it should most definitely NOT be leased to Tottenham Hotspur Football Club for the following reasons.

As the instigator of London traffic free zones and apparently in favour of clean air 'projects' eg the LOWER EMISSION ZONE (implemented by yourself) I am very surprised that Enfield Council has seen fit to lease valuable Heritage land to Spurs for 25 years as it is crucial people continue to benefit from the fresh air of the park.

In actual fact it is NOT Enfield Councils land to lease because it was bought by Middlesex County Council in 1931 with public money to be held in trust for the people of Enfield. It should be retained as Green Belt for the use of future generations and not leased to an affluent Football Team which is only beneficial to that company making even more money.

Enfield Council are not averse to building on Green Belt land and seem to have no respect in regard to protecting/retaining Green Belt Land for residents of Enfield (as can be seen in their Local Plan ie a proposal to build on another Historic area appreciated by local people....Crews Hill Nurseries)

The landscape of beautiful Whitewebbs Park will be altered forever after the proposed work is completed as the current open and historic views and vitally important GREEN BELT land will be lost!

It is not in the least a beneficial monetary asset for Enfield residents as the facilities built will be for the benefit of an elite few and not for the many children/teenagers seriously in need of outdoor exercise.

There is no plan for sports facilities for the general public. There is no plan to provide sports facilities for less fortunate children/young people to let off steam in the safety of parkland with their parents, siblings, and friends. Local sports/tennis clubs are notoriously expensive and many parents cannot afford the membership or find themselves able to send their children to classes etc.....whereas during weekends or school holidays Whitewebbs Park is a good place for them to let off steam

The THFLs plan for LARGE buildings are totally inappropriate for Green Belt land.

Public access to open space would be lost. The park is visited by myself (aged 82 years old) as well as very many others both young and old as a safe place to walk, run and play.

It begs the question of whether this will set a precedent for Enfield and other Councils to do likewise with other parks thereby reducing more recreation and breathing space for residents?

To tackle OBESITY children need to be able to take more exercise, not less, and as Labour has recently given permission for school playing fields to be sold off these children, in particular, need a place to exercise.

MENTAL HEALTH in these days when there seems to be huge issues with Mental Health then surely it makes no sense to reduce areas where people of all ages can go to escape the pressures of life in this day and age.

Whitewebbs Park is an extremely valued area for use by young and old residents. It enables people of all ages to be able to walk, run and play in a safe environment away from TRAFFIC FUMES etc etc.

Last but not least is the affect this plan would have on the ancient woodland, ancient trees, etc. Presumably you will have seen the devastating news about the felling of the Ancient Oak at the southern end of the Carvery car park. Apparently there are about 80 bird species that inhabit Whitewebbs. In addition there are at least many other species of bees, butterflies etc.

Under the circumstances I am writing to ask you to exercise the power that you have to call in the Whitewebbs Planning application and hopefully decide that this space should be retained and maintained as an area of natural beauty.

#5780

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#6075

I am writing to you on behalf of Guardians of Whitewebbs regarding the planning application 24/00987/FUL (London Borough of Enfield).

We refer to the letter submitted by Public Interest Law Centre on behalf of Guardians of Whitewebbs, Friends of Whitewebbs Park, CPRE London and London Parks & Gardens dated 3rd April 2025. This letter regards excavation work, construction and engineering, and separately includes a professional opinion from Philip Ridley, MSc (Town Planning), PGDip (Heritage).

We made an EIR Request to Enfield Council on 25 April 2025, asking for "Enfield Council's correspondence with the Greater London Authority (GLA) after the Council formally referred the planning application 24/00987/FUL for the Mayor of London's Stage 2 process". As you will be aware, a member of the GLA Planning Team was concerned that information requested in para. 77 of the GLA's Stage 1 Report for this application was not included in the Council's Stage 2 Referral. We have now been provided with multiple documents, and notably the Whole Life Cycle Assessment Spreadsheet. We consider this document contains data which adds significant weight to the points made in the letter above. Particularly, the development will result in a:

- Net total of 9,119,283 kg of carbon emissions (Modules A-D incl. B6-B7);
- 7,040,000 kg of excavation works;
- 2,838,194 kg of concrete and rebar substructure (i.e. we believe this must include underneath the proposed football pitches);
- A total of 11,659,149 kg in material quantity.

In deciding this application, we request this information be considered by the GLA alongside the points made in our above letter.

And given this, plus the points made in [REDACTED] and the Guardians of Whitewebbs' numerous other objections (see our written representation re-attached), we believe this application must be refused.

Please see the following documents attached:

- WLC GLA Spreadsheet-TH WTC
- Letter to Enfield Planning Service 03.04.25 - Earthworks and EIA.pdf
- Opinion of Philip Ridley 02.04.25 - Earthworks and EIA.pdf
- 24/00987/FUL Written Representation for Tottenham Hotspur's Planning Application for Whitewebbs Former Golf Course - Guardians of Whitewebbs

#6215

See attached

#6179

I am writing to request you call in the planning application by Tottenham Hotspur football club to lease Whitewebbs Park in Enfield.

This is a public park which greatly benefits the physical and mental health of many local residents. It must not be used for private gains!

Please help in any way possible.

#6200

am writing to you on behalf of Guardians of Whitewebbs concerning the planning application 24/00987/FUL (London Borough of Enfield).

From an Environmental Information Regulations (EIR) request that we made on 3rd April 2025 (Enfield Council reference 101001439049), it has come to our attention that the ecologist (██████████) contracted by Enfield Council to provide *"advice and ecological support throughout [the application], including advice on EIA screening, pre-application advice and advice on the full application (including a review of any Biodiversity Net Gain calculations)."*

██████████ was commissioned to undertake an independent review (document titled "ECO2332") of Tottenham Hotspur Football Club's Biodiversity Net Gain (BNG) figures. He expressed serious doubts concerning the applicant's figures, and in particular the baseline. We consider ██████████ Sutton's consultation response and associated advice should have been included both in the Council's Planning Officer's Report and background material presented to the planning committee (we have had confirmation that the only papers made available to the committee are "the committee reports and application documents on the Council's website and planning register and the attached brochure provided by the applicant"). In this independent review, ██████████ compares THFC's BNG report conducted by Logika with ██████████ ecology report of Whitewebbs Park. Enfield Council then contracted another ecology company (PlumbAssociates) to do an "independent audit" (also attached) of this independent review.

It is evident that in the document titled "ECO2332", ██████████ appeared to agree with ██████████ assessment of the ecological value on multiple occasions, e.g.: "It would be counterintuitive to conclude that the development would result in the significant (33% above the baseline) BNG that the applicant claims given that a large proportion of the park (around 40%) would be lost to the new development. We do not have an agreed baseline for the site as there are inadequacies in the applicant's BNG report and differences in the classifications between the two ecologists who have both surveyed the site (in my opinion Mr ██████████ better reflects the habitats on the site, particularly for the woodland)."

It is also notable that Enfield Council appeared to persuade ██████████ Sutton's advice/views, when ██████████ wrote: "I am not sure if or how to respond to this, I disagree with the bullet point statements below, and many of the points made in the memo and it doesn't change my previous advice."

██████████ also raised concerns over the Council's conduct in relation to this matter: "I must say that I was concerned by your conduct at our meeting last Friday with the applicant and their ecologist. You contradicted me in front of the applicant and publicly disregarded my advice...". and goes on to explain.

Additionally, ██████████ raises concerns about specific surveys, including reptile surveys.

We then submitted a further EIR to try to obtain the voice memos referenced in this correspondence. However, the response to this EIR neither addresses this request, nor provides the memo. This raises concerns about the content of the memos (and also about Enfield Council's response to EIRs). As you know, the Council has a duty to provide all recorded forms of information, including voice messages. We see no reason why these memos would be

withheld, and clearly, if there was a reason to withhold information, this must be explained in the Council's response.

We request that this information is factored into your decision making. And for the reasons set out by [REDACTED] plus the points made in my/our previous objections, this application must be refused.

Please see the attached documents:

- Enfield Council's response to my EIR request 3rd April.
- Enfield Council's response to my EIR request 23rd April.
- [REDACTED] Ecology Report (November 2023).
- Various correspondence between [REDACTED] and Enfield Council.
- Logika's technical note regarding BNG (14 August 2024)
- [REDACTED] Sutton's Independent Review (19 November 2024)
- PlumbAssociates Independent Audit (December 2024)

#6488

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

I am writing to object to planning application 24/00987/FUL (London Borough of Enfield). I am extremely disappointed that this proposal would be allowed to get this far. This publicly open land is home to a huge biodiversity of animals and plants, and not to mention irreplaceable ancient trees.

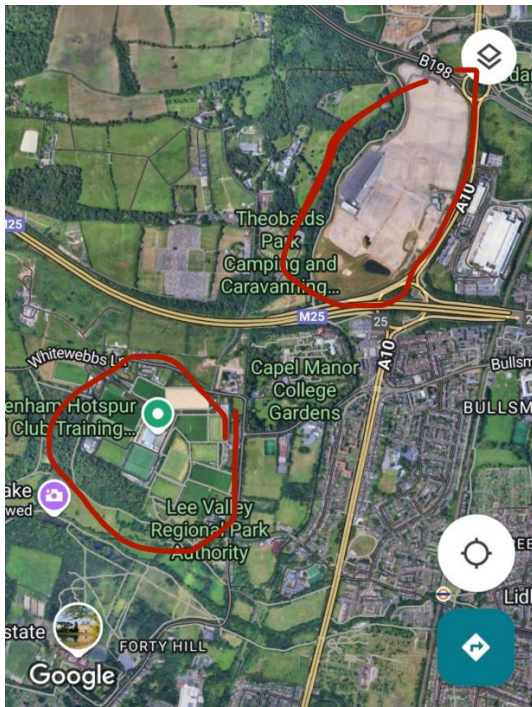
There is no reason to allow this unique land to be ruined when suitable sites nearby would create much less destruction.

To allow it to proceed would show a complete disregard for preserving this for future generations.

Spurs already have an elite training ground, larger and more modern than every other UK club.

Did you know that Spurs could use a much larger, abandoned, site just north of its existing training centre, which was intended for Sunset Studios? Please see attached image.

I am also sending you a short number crunching video that shockingly outlines the damage this development will do (<https://youtu.be/KOBSLCiwTDA>) and a 5 minute video which briefs the key issues I have with these proposals (<https://youtu.be/OY3J56JpU98>). I request that this planning application is called in and/or refused for the reasons stated above. Thank you.



#6635

I'm writing to object to planning application 24/00987/FUL (London Borough of Enfield). I'm genuinely heartbroken by what's being proposed — it feels like everything that makes this area so special is being pushed aside.

The plan to expand Spurs' training ground with yet more football pitches will destroy a vital stretch of green belt. It may not be concrete, but the result is the same — open countryside being flattened and fenced off for elite use. It strips the land of its natural character and takes away space that the community actually uses.

This area is used every day — by dog walkers, families, and especially by elderly walking groups who depend on it for safe, gentle outdoor exercise. It's not just open land, it's a lifeline for so many people. The social and mental health benefits can't be overstated. It's a proper community hub — and we'll lose that completely.

The wildlife here is just as important. Deer, rabbits, foxes, badgers, crested newts, frogs, bats, owls, hedgehogs — they all live here. So do countless birds and insects. You won't get that back once it's replaced with perfectly mown pitches and fences. The biodiversity loss will be permanent.

There's already been a lot of anger locally about a tree that was destroyed in the adjoining space, not just any old tree, but one believed to be around **500 years old!!** No warning, no explanation, no accountability. It's hard not to feel like nature is being chipped away bit by bit, with no respect for what we're losing. People are rightly angry — and this latest proposal is a step too far.

What makes this even harder to swallow is that there's a bigger, empty site just north of the current Spurs ground — the one previously earmarked for Sunset Studios. Why isn't that being used instead?

I've attached an image for reference.

Here are two short videos that highlight the real impact this will have:

- [Data breakdown of the impact](#)
- [Key objections and overview](#)

Please — call in this application or refuse it outright. Once this space is gone, it's gone. And we lose something truly irreplaceable.

#6654

With reference to Enfield Planning Application **Ref. No. 24/00987/FUL - Whitewebbs Park, Ancient Woodland and meadows**

[REDACTED] We have a special love for Enfield and its heritage which may be protected under UNESCO's World Heritage Convention. I am distressed about losing our special public places as a result of irreparable decisions being made by this Labour run council. I am so sad that this beautiful natural place where I have spent so many peaceful hours over the past 65 years in the woodland and walking the golf course and meadows. This park will be changed beyond recognition for all of us. I am shocked by Enfield Council's decision, regardless of public opinion to lease and now grant planning permission in favour of this multi million pound Corporation for just 2 million pounds over and above their residents wishes.

I am concerned..

- that the council has been in discussion with Spurs and their agents for many years. The lease process was flawed and competitors applications were not made public as promised. I know this is not a planning point but I believe that it is illustrative of the Council's relationship with Spurs.

- Councillors and officers have accepted free match tickets, meals etc. These have been documented publicly and only just this week Cllr Ergin Erbil, Leader of the Council was photographed alongside Daniel Levy, Chairman of Tottenham Hotspur. 4 experienced members of the Planning Committee were replaced by new councillors who only just completed their training before the application was heard

- information to the public has been restricted. For example, I was first refused access to the Comments which should have been filed on line. Still not able to view them online, neither internal (LBE) and external consultees which are essential and public documents. I eventually was emailed a select few only.

- I am still awaiting responses from the council old and new enquiries regarding this application. The most recent was emailed 28th April about details appertaining to which areas of the park will be managed by Spurs. Whether this is included within the planning document or the lease.

- Councillors on the day of the Planning decision asked for the new (ancient carriageway) to be restricted to pedestrian use because of damage to the ancient woodland, including several veteran (400-500 yrs oaks). An amendment was passed and yet the construction of the road is still permitted under the planning application. So the tree root systems will still be damaged I have had this confirmed by the planning department. No further protections have been put in place. This means that Spurs could request vehicle access in the future. In my experience with their original training ground they have made changes to conditions detrimental to biodiversity and have gained planning permissions easily without the public knowing until afterwards.

- There has been no consultation with local Groups or Specialist consultees e.g. The Woodland and Wildlife Trusts as to section 106s or conditions.

- The Planning Inspector has recently criticised Enfield Council on their poor communication. He is due to return to Enfield in June

Please reject or call in this application.

Decisions have been made by LBE that are in contravention of the protections on Green Belt both in the London Plan and our government's National Planning Policy Framework and apparently in support of big business over and above their residents quality of life related to public access of one of the greenest and oldest parks, teeming with biodiversity, in Enfield. [London Plan Policy: 7.16, NPPF:7.55,79-92]

Ecological studies incomplete

Does not comply with Enfield's Local Plan regarding protection of Heritage

Mayoral statement 9th May 2025

I, like many Londoners are really concerned about lack of social and affordable housing in the capital and support much of what you say in your statement of 9th May this year which appears to change your stance on the current London Plan in relation to essential housing. However you do say..

"..I remain proud to be the greenest Mayor London has ever had.." and ".. we'll attach the right conditions to any release of the Greenbelt etc ... but **we'll ensure we increase biodiversity and public access to good quality green spaces.**"

Does your recent statement alone not support the protection of Whitewebbs Public Park within the greenbelt, against development?

The Park has been an part of Enfield's Heritage and all of it with public access including the golf course with its integral public footpaths for almost 100 years and part The Metropolitan Green Belt around London proposed by the Greater London Regional Planning Committee in 1935. So if this goes ahead public access will be reduced and biodiversity more or less destroyed with the new Training Ground.

There are many aspects of the application that are in contravention of existing Greenbelt Protections. I feel sure that others have listed them comprehensively. Those I feel are particularly important..

Special Circumstances..

".. development can only be permitted on the Greenbelt if it can be demonstrated that the development would be essential for the public interest and there are very specific reasons why the development is necessary." I feel that this development has been granted by LBE's Planning Committee supporting the growth and wealth of Tottenham Hotspur FC and to the detriment of public access to Londoners, health and wellbeing and biodiversity.

- there are a number of sites locally that could be used instead, some of which are in Whitewebbs Lane and are owned already by Spurs' companies as well as now disused farmland owned by Enfield Council, which has cost Enfield Council almost 1 million pounds in security.

- Hertfordshire Council's Sunset Studios site immediately north of the M25 has been cleared and now the project abandoned - is available (see aerial photograph)

Special Circumstances..

.. development can only be permitted on the Greenbelt if it can be demonstrated that the development would be essential for the public interest and there are very specific reasons why the development is necessary.

Positive Management..

NPPF = importance of positive management of the Green Belt to improve quality and accessibility, leading to improved benefits for Londoners.

This site will be secured with high fences, bunds restricting access and views, and wildlife corridors will no longer exist. Another 10 or 11 football pitches and buildings will require the levelling of a huge amount of land also destroying biodiversity of the soil. These extra facilities are unnecessary as Spurs already have 17 pitches, a hotel, a stand for viewing, a full size indoor pitch and state of the art facilities on their existing training ground. Some of which they regularly rent out to visiting clubs. No other premier league club has more. Negative impact.

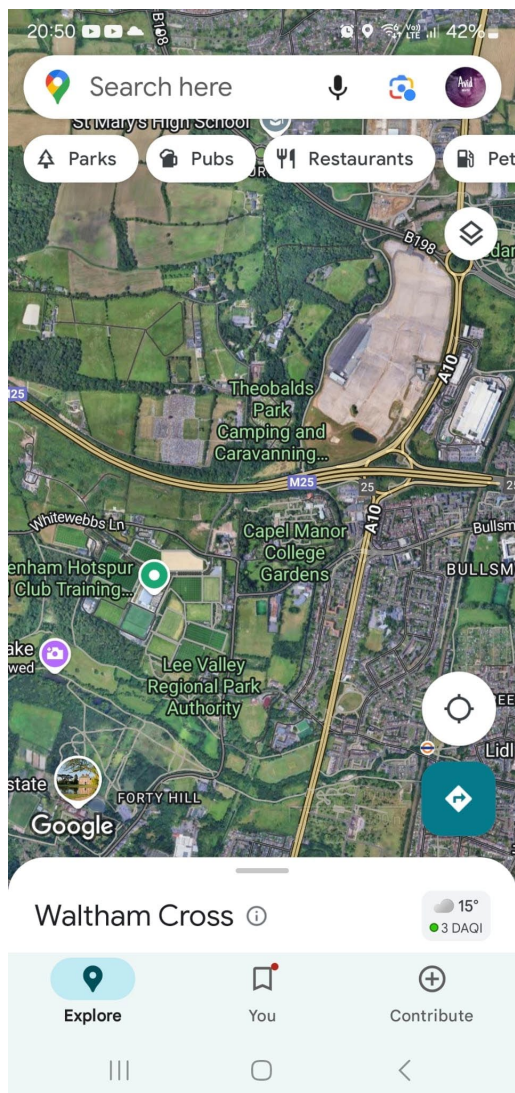
Exceptions..

This proposal will not be improving the quality of life of Londoners, just the opposite, and not providing essential services for Enfield residents or Londoners or sports for all, just a select few. Some benefits have been offered but these will end after 10 years.

Can the London Borough of Enfield truly be impartial? They are both land owner and planning authority as well as being proven to be poor communicators with residents.

Please do not add your voice to supporting the growth of a large sporting corporation like Spurs. But please do restore my faith in democracy, protect our Greenbelt as it was intended to be. Please support us and all Londoners and reject this application for the common good.

Attached: See Aeria Photo of Location of Sunset Studios and Spurs sites x 2 two example documents, site of which, were first refused **/Ecology & Heritage**



#6669

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power

under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

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Please note:

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#6670

Please help

I am trying to enter my comment on the <https://planapps.london.gov.uk/planningapps/24-00987-FUL> .

The site will not recognise my address [Section 40 Personal data]

There must be an error on your data base. Please check the Royal Mail database.

How can I lodge my comments on the portal?

(GLA response If you email mayor@london.gov.uk with your comment including the planning reference in the subject your comments will be sent to the planning officer and included in the report.)

#6674

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- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character.**

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#6678

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) – please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
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Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement **"There is no real protection in**

law for public parks if this judgment stands" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>

- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
 - Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.
-

#6757

With the appalling destruction of the Whitewebbs Oak at the Toby Carvery I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.

- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#6759

I am writing to express my concern about the proposed loss of 50% of grassland and 207 Trees, including mature and notable specimens and general disruption of this precious Public Open Parkland Site, in order to build 10 monoculture football pitches, large buildings and roads and access for the private and elite use of Tottenham Hotspurs football club.

We are one of the most, if not the actual most, depleted nation in Europe for Nature and Biodiversity and yet here we are again, on the precipice of sacrificing precious, rewilded grassland, scrub and established woodland, with all

its diverse flora and fauna to a large powerful private company for private and elite usage. This is Public land enjoyed by many for their mental and physical health and to reconnect with Nature. The proposed planning permission is surely inappropriate for Green belt land.

I myself enjoy visiting the adjacent Myddleton House and Gardens which help to form a wildlife corridor with the Park and surrounding countryside; Mr Edward Augustus Bowles would surely turn in his grave if he knew how the Parkland was being steadily eroded and neglected by Enfield council, eg the appalling loss of the 500 year old oak recently cut down by Toby Carvery contractors clearly lacking adequate protection from Enfield council. Unfortunately planting young vulnerable saplings doesn't in any way compensate for the benefits of mature and ancient trees or the carbon capture of established grasslands.

I would ask you to make a stand against the proposed shrinkage of this Green Belt site and advise Spurs to use less valuable sites for their expansion and I understand there are some in the vicinity that Spurs might now be able to afford rather than using precious public land on the cheap

#6773

I am writing to you to express my concern over the application by Tottenham Hotspurs Football Club to take and develop land in the public area of Whitewebbs Park. I believe that planning permission 24/00987/FUL (London Borough of Enfield should be refused for the reasons set out below.

There are pressing and important reasons for doing so, which I set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I believe that this application falls far far short of the criteria that fit "very special circumstances", as it provides a net loss of benefit to the general public.

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan.

Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space. I set out how below:

1. Violation of Green Belt Protections

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- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
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2. Environmental and Ecological Destruction

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3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
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Conclusion and London-wide/National Impact

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- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#6846

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of

London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

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5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
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- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#6857

Please don't steal a public park full of grass snakes, Great Crested newts, 10 species of bats and orchids.

Nature is not an added extra. It is essential.

Please do everything in your power to halt this destruction.

#6871

I am writing to formally request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons identified below.

A report already commissioned by the Greater London Authority (GLA), concludes that the proposed development constitutes "inappropriate development" within the Green Belt. I would like to draw your attention to the Stage 1 response (REF: GLA/2024/0213/S1/01). It then goes on to state that "very special circumstances" must be demonstrated to justify the development and it is my firm belief that that the application fails to do so and will result in a net loss rather than any perceived gains.

I strongly oppose this planning application. The proposed development contradicts the purpose of Green Belt protections. A consequence of this would be irreversible ecological damage and imposed restrictions on public

rights of access in a much more intrusive way than was ever the case even when operated as a golf course. As it stands currently Whitewebbs Park is fully accessible.

I have been walking in Whitewebbs Park for as long as I can remember from a very young age. It is my view, and I don't doubt that of many others, a gem at the edge of Enfield. I find it a place of tranquillity where I can unwind and clearly my thoughts while being surrounded in nature. It is one of a few places I truly enjoy visiting. The Covid-19 pandemic reinforced how important spaces like these are for mental health and social wellbeing, yet the social value of the park has been widely ignored in this proposal. It's worth remembering that when Whitewebbs Park was originally purchased under the then Middlesex County Council in 1931, being acquired for the benefit of the public and not the interest of private entities at the expense of public access.

Ever since Enfield Council first announced its intention to lease out the site, I have been deeply concerned about the future of Whitewebbs Park, then after it was publicly announced, that it would be leased to THFC further fuel my anxiety. From looking to their existing football academy, imposing steel fences with privacy screens provide a clear insight into how Whitewebbs Park may look. An enclosed space that erodes the open characteristics of scenic views, an element that should be preserved in line with the Enfield Local Plan. A counterargument is that the operational boundary only covers around 20% of the leased area however this overlooks a critical point, the precedent it sets for enabling future expansion thus further loss of public space.

Not forgetting the intensive groundworks required on the naturally sloping site to accommodate 11 football pitches. The area is a common site for rabbits and red kites flying overhead. Last but by no means least is the 207 trees that will be felled under these proposals, several of which are classified as veteran. The long-term implications will be both visual and physical, exceeding far beyond the 25-year agreed lease.

The Forty Hall Beaver enclosure sits no more than 10 meters away from the proposal site and will experience increased noise levels during and after the landscaping works have been completed. In the long term it increases the risk of the beavers becoming distressed, which could have knock-on consequences for their overall health.

I acknowledge that for years the area served as a public golf course since its formal closure in 2021, but most indicators of this prior use case have now vanished. Since then, the land has been given the rare opportunity to naturally re-wild itself. Fortunately, I have had the pleasure of witnessing this gradual transformation firsthand, seeing the fairways give way to a mixture of grasslands. The only major remnant is the sand bunkers which have become a habitat for a number of insects. Should this proposal be allowed to continue then years of progress will be undone.

The verdict of the judicial review has shockingly highlighted that no real protection exists for public parks. This basically gives local authorities the right to effectively hand a public park to a corporate entity when it should be preserving it for the benefit of the people it is supposed to serve. I am deeply concerned about the wider implications this will have for the other appreciated green space across that provide a natural escape.

#6872

I am writing to object strongly to the Planning Application: 24/00987/FU, London Borough of Enfield.

I understand that there is a great need for Housing in London and support Labours endeavours to achieve their objectives. However, this application made by Spurs to expand its training facilities even further is in my opinion not justifiable.

Private companies should not be allowed to take over public land. The park was bought in 1931 by Enfield Council with public money for public benefit in perpetuity.

The plans will cause an inordinate amount of damage to a very important stretch of green belt which is used daily by families, dog walkers and the elderly.

This area, an ancient Woodland, is home to deer; rabbits, foxes, badgers, bats, and many other species of wild animals, birds, and insects. This complex biodiversity will be lost for good for the poultry sum offered to Enfield Council.

The damage will be irreversible and far more widespread than documented as we have already seen with the illegal felling of a circa grand old 500-year-old plus "mother" Oak tree by the Toby Carvery.

There is apparently an alternative site nearby, which could be used instead.

The public's wishes and concerns have been totally ignored by Enfield Council. Local user groups and many people in the borough are furious about the loss of their park. There have been several well attended protests. The Ward has voted out all its labour councillors as a result.

#6873

I am writing to object strongly to the Planning Application: 24/00987/FU, London Borough of Enfield. I understand that there is a great need for Housing in London and support Labours endeavours to achieve their objectives. However, this application made by Spurs to expand its training facilities even further is in my opinion not justifiable.

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The public's wishes and concerns have been totally ignored by Enfield Council. Local user groups and many people in the borough are furious about the loss of their park. There have been several well attended protests. The Ward has voted out all its labour councillors as a result.

#6875

I am writing to you regarding my concern on the news of a potential development at Whitewebbs. As an ecologist with over ten years of experience working in nature, working nationally and internationally, I see Whitewebbs Park as something magical, an area that has quietly rewilded itself, becoming a haven for both wildlife and people. I have attended Whitewebbs monthly nature walks, where I have enjoyed not just seeing the vast expansive of nature it has to offer, but it has helped me mentally, being outside in nature within an urban area and as well on a social aspect. Whitewebbs is more than just a green space; it's a living system, full of birdsong, insects, herpetofauna, mammals, and wildflowers that have found their way back over time. I was surprised to see how the habitats were being scored within the BNG metric, with focus on some of the habitat classifications of the grassland, these do not seem to match the habitat classification present onsite. I am also concerned about the reptile survey methodology and how the surveys were undertaken, below temperature guidelines, undertaking with a large amount of human disturbance present. As such it may have missed important remnant reptiles populations within fragmented habitats. As well is there any light mitigation in place for light sensitive bat species recorded on site? It's important to remember that ecology is not just about ticking boxes, it's about understanding how everything interacts within a living system. When we consider whether development on this site would be beneficial, the simple answer is no. Once this kind of space is built on, it's gone forever. No amount of landscaping or 'offsetting' can bring back the richness and quiet balance that's grown here naturally, it cannot be recreated. We need to keep places like Whitewebbs wild, not just for biodiversity, but for people too. It offers a chance to slow down, to reconnect, and to remember our place in the natural world.

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

#6890

For once just review a request on its face value with the best interests of residents and the environment. Some more formalities below.

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is CALLED IN by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power

under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be REFUSED for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#6908

I strongly object to the Spurs/Whitewebbs planning application.

I have been a resident of Enfield all of my life and am a frequent visitor to Whitewebbs. It is an extremely valuable area of green and beautiful space which is enjoyed by so many for recreational and health purposes.

It isn't acceptable that a business is allowed to enclose public space.

Building on the land for the use that has been proposed will reduce public access and with the proposed structure radically change the landscape of this land forever.

Green space is important for so many in the area and this proposal will destroy so much natural space having a huge impact on flora and fauna and all at a time when the London Mayor has set targets to increase the amount of wild space. So many trees will be destroyed and wildlife affected.

50% of grassland and 207 trees would be lost. This would be devastating.

Whitewebbs should remain a public park with full public access.

It is a travesty if this planning application is approved. It will be devastating for so many and the reality is that a relatively few 'elite' footballers will benefit from the new facility.

I cannot express strongly enough my objection but I hope and pray that justice will prevail.

#7034

As I had trouble with your Planning Portal please can you acknowledge receipt of my request for refusal or call in of the above application emailed to you at 15.08 today. I may have not entered the planning reference correctly in the heading. I misspelt Enfield. So sorry. Technology does sometimes confound me.
I appreciate your help

#7036

With reference to Enfield Planning Application **Ref. No. 24/00987/FUL - Whitewebbs Park , Ancient Woodland and meadows**

Please see attachments.

[REDACTED]. We have a special love for Enfield and its heritage which I feel is protected under UNESCO's World Heritage Convention for generations to come. .

I am distressed about losing our special public places as a result of irreparable decisions being made by this Labour run council. I am so sad that this beautiful natural place where I have spent so many peaceful hours over the past 65 years in the woodland and walking the golf course and meadows. This park will be changed beyond recognition for all of us. I am shocked by Enfield Council's decision, regardless of public opinion to lease and now grant planning permission in favour of this multi million pound Corporation for just 2 million pounds over and above their residents wishes.

I am concerned..

- ancient woodland is to be seriously harmed by construction of a new road that is said to be no longer needed (amendment at planning meeting for no vehicles) Planning department say that permission still stands for bollards for parking spaces and lighting and road construction . Should be refused. **See photo below**

I attach a picture of a potentially 400-500 year old oak that is less than one metre away from the route. There are others.

- that the council has been in discussion with Spurs and their agents for many years. The lease process was flawed and competitors applications were not made public as promised. I know this is not a planning point but I believe that it is illustrative of the Council's relationship with Spurs.

- Councillors and officers have accepted free match tickets, meals etc . These have been documented publicly and only just this week Cllr Ergin Erbil, Leader of the Council was photographed alongside Daniel Levy, Chairman of Tottenham Hotspur. 4 experienced members of the Planning Committee were replaced by new councillors who only just completed their training before the application was heard

- information to the public has been restricted. For example, I was first refused access to the Comments which should have been filed on line. Still not able to view them online, neither internal (LBE) and external consultees which are essential and public documents. I eventually was emailed a select few only.

- I am still awaiting responses from the council old and new enquiries regarding this application. The most recent was emailed 28th April about details appertaining to which areas of the park will be managed by Spurs . Whether this is included within the planning document or the lease.

- Councillors on the day of the Planning decision asked for the new (ancient carriageway) to be restricted to pedestrian use because of damage to the ancient woodland, including several veteran (400-500 yrs oaks). An amendment was passed and yet the construction of the road is still permitted under the planning application. So the tree root systems will still be damaged I have had this confirmed by the planning department. No further protections have been put in place. This means that Spurs could request vehicle access in the future. In my experience with their original training ground they have made changes to conditions detrimental to biodiversity and have gained planning permissions easily without the public knowing until afterwards.

- There has been no consultation with local Groups or Specialist consultees e.g. The Woodland and Wildlife Trusts as to section 106s or conditions.

- The Planning Inspector has recently criticised Enfield Council on their poor communication. He is due to return to Enfield in June

Please reject or call in this application.

Decisions have been made by LBE that are in contravention of the protections on Green Belt both in the London Plan and our government's National Planning Policy Framework and apparently in support of big business over and above their residents quality of life related to public access of one of the greenest and oldest parks, teeming with biodiversity, in Enfield. [London Plan Policy: 7.16, NPPF:7.55,79-92]

Ecological studies incomplete

Does not comply with Enfield's Local Plan regarding protection of Heritage

Mayoral statement 9th May 2025

I, like many Londoners are really concerned about lack of social and affordable housing in the capital and support much of what you say in your statement of 9th May this year which appears to change your stance on the current London Plan in relation to essential housing. However you do say..

"..I remain proud to be the greenest Mayor London has ever had.." and ".. we'll attach the right conditions to any release of the Greenbelt etc ... but **we'll ensure we increase biodiversity and public access to good quality green spaces.**"

Does your recent statement alone not support the protection of Whitewebbs Public Park within the greenbelt, against development?

The Park has been an part of Enfield's Heritage and all of it with public access including the golf course with its integral public footpaths for almost 100years and part The Metropolitan Green Belt around London proposed by the Greater London Regional Planning Committee in 1935. So if this goes ahead public access will be reduced and biodiversity more or less destroyed with the new Training Ground.

There are many aspects of the application that are in contravention of existing Greenbelt Protections. I feel sure that others have listed them comprehensively. Those I feel are particularly important..

Special Circumstances..

".. development can only be permitted on the Greenbelt if it can be demonstrated that the development would be essential for the public interest and there are very specific reasons why the development is necessary." I feel that this development has been granted by LBE's Planning Committee supporting the growth and wealth of Tottenham Hotspur FC and to the detriment of public access to Londoners, health and wellbeing and biodiversity.

- there are a number of sites locally that could be used instead, some of which are in Whitewebbs Lane and are owned already by Spurs' companies as well as now disused farmland owned by Enfield Council, which has cost Enfield Council almost 1 million pounds in security.

- Hertfordshire Council's Sunset Studios site immediately north of the M25 has been cleared and now the project abandoned - is available (see aerial photograph)

Special Circumstances..

.. development can only be permitted on the Greenbelt if it can be demonstrated that the development would be essential for the public interest and there are very specific reasons why the development is necessary.

Positive Management..

NPPF = importance of positive management of the Green Belt to improve quality and accessibility, leading to improved benefits for Londoners.

This site will be secured with high fences, bunds restricting access and views, and wildlife corridors will no longer exist. Another 10 or 11 football pitches and buildings will require the levelling of a huge amount of land also destroying biodiversity of the soil. These extra facilities are unnecessary as Spurs already have 17 pitches, a hotel, a stand for viewing, a full size indoor pitch and state of the art facilities on their existing training ground. Some of which they regularly rent out to visiting clubs. No other premier league club has more. Negative impact.

Exceptions..

This proposal will not be improving the quality of life of Londoners, just the opposite, and not providing essential services for Enfield residents or Londoners or sports for all, just a select few. Some benefits have been offered but these will end after 10 years.

Can the London Borough of Enfield truly be impartial? They are both land owner and planning authority as well as being proven to be poor communicators with residents.

Please do not add your voice to supporting the growth of a large sporting corporation like Spurs. But please do restore my faith in democracy, protect our Greenbelt as it was intended to be. Please support us and all Londoners and reject this application for the common good.

#7102

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, be called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008).

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

[Guardians of Whitewebbs made a formal complaint](#) (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings.

Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced.

In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **REJECTED** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

I am writing to you as a concerned London resident, asking to you refuse the proposals to redevelop Whitewebbs Park. Nature in the uk is under threat, and this park presents an opportunity to really nurture biodiversity and connect a number of green spaces to create a rich and thriving nature sanctuary in north London.

#7191

Here is my appeal from the heart for you to assess this application fairly and holistically on our behalf. Please step in for us and refuse this application or, at the very least, review aspects of it which are suspect.

It seems that Spurs together with Enfield Council want to change this treasured Park and the surrounding area of wonderful Greenbelt beyond recognition. I feel this deeply, as do many who have lived here for generations or chosen to live here because it is so green. Please see the attachment for the full letter.

Subjects included

HERITAGE

LOCAL PLAN

NATURE & the Natural World

SINC

TREES

TREES & Construction damage - Access road/path

COMMUNICATION

PUBLIC TRUST

Construction:- Views - Traffic

i forgot to mention, that having read more information concerning the actual construction of the site. That it seems that a humungous amount of earthmoving will need to take place. This will change the views across this land from the south dramatically and even from Whitewebbs Lane itself with the size and location of the buildings. The construction process and particularly the earthmoving will effect the local communities and roads which are small and not equipped for such heavy traffic. Driving past Myddleston house along Bulls Cross will definitely damage their listed 12 foot walls and the cottages where I live. The cottages do shake when heavier vehicles pass even now. Whitewebbs lane has straight sections which encourage drivers to go at speed. It is often used as a cut through, particularly heavy use when there are issues on the M25. This results in major holdups at both ends of Whitewebbs Lane, Crews Hill and Bulls Cross/ Forty Hill.

It is my view that we, the people of Enfield do not need this elitest sports facility. The original training ground is bigger than any other Premier League Football club and could encompass the women's teams as other clubs do. This new Training Ground is to increase the wealth of the corporation of Tottenham Hotspur only. The financial benefit to the council of the lease is miniscule. The local community does not benefit from the Original Training Ground. So why should this new Training Ground prove to be any different? A great loss to biodiversity and wildlife corridors, loss of public access and loss of public enjoyment of our natural world is indefensible.

In my view no special circumstance or local need has been identified.

Why don't Enfield Council let us take over the park!

#7199

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008).

I have no doubt you have read the evidence, submitted by almost 50,000 people, to date, which details, thoroughly and accurately, the numerous reasons why this application should be refused.

I trust you and your team will meet our request.

#7292

Thank you for the reply..

Stage 2: Have Enfield submitted the application to your office yet?

#7298

My personal comment:

I'm disappointed that a very large part of Whitewebbs, which is an absolute haven for wildlife and people alike, is to be long term leased to an elite football team who wish to develop it. I have enjoyed this open and woodland space for many years. A large part of this precious and beautiful and necessary habitat will be destroyed and wildlife impacted and displaced. I believe we have a responsibility to look after our wildlife and its habitat for our future generations. Nature conservation is vital for the well being of humans, wildlife and the environment. We are being encouraged to increase the number of trees and spaces to assist Biodiversity. This area plays a vital part of the "lungs" that London needs to offset all the pollution that is generated. I also believe there may be a more suitable location very near by close to their current training ground which would not have the same negative impact as already flattened, and better transport links could be made available.

Please protect our historic and beautiful parkland before it is lost forever. Can this planning be called in please?

Now a formal part

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- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.
-

#7444

Whitewebbs is one of the most biodiverse rich green spaces in London.

Thousands of people have created deep and meaningful relationships with this space. It has become an important example of nature connectivity and immersion offering a true slice of wildness as opposed to “green” spaces of cut grass and amenity.

This area must not be turned into astro turfs. It must not be privatised. In a time of such ecological crisis standing by the wildlife and ecology of this precious space is of utmost importance and stands as a symbol of our protection and respect for the natural world.

#7765

I am writing to formally object to planning application 24/00987/FUL (submitted by Tottenham Hotspur Football Club to the London Borough of Enfield) and to request that the application be called in — and ultimately refused — under Article 7 of the Mayor of London Order (2008).

As someone who has visited Whitewebbs Park regularly for many years, I can attest to its exceptional value — ecologically, historically, and as public open space. It is not only one of my favourite places in London, but a rare and increasingly endangered example of biodiverse, accessible green space. In a city saturated with development, places like Whitewebbs are the exception, not the rule. This makes them all the more vital to protect — and all the more galling when they are treated as expendable.

The application, in my view, fails at every level — policy, principle, and process.

The GLA has already identified the development as “inappropriate” for Green Belt land in its Stage 1 response (REF: GLA/2024/0213/S1/01), correctly noting that such development must meet a threshold of “very special circumstances.” Yet no such circumstances exist here. A private football training complex that will serve an elite group while removing half of a cherished public space from community access hardly qualifies as a compelling public benefit.

It would seem we are now meant to believe that synthetic pitches, car parks, and corporate PR disguised as “community outreach” can outweigh the destruction of ancient woodland, biodiverse grassland, and over 200 trees — including veterans. We’re told this is progress. I see it as a cynical land grab dressed up in the language of regeneration.

What’s more, the application is built on a series of procedural failures and questionable decisions. Enfield Council has failed to conduct a lawful and transparent Sites of Importance for Nature Conservation (SINC) review — omitting Whitewebbs despite it meeting the ecological criteria for Metropolitan Importance. This omission, alongside a rushed planning process that dodged scrutiny prior to Stage 2 Hearings of the New Enfield Local Plan, casts serious doubt on the integrity of the application process.

The Guardians of Whitewebbs have submitted a formal complaint (COM 101001267200) detailing these issues, including potential conflicts of interest around land designation changes. Until this complaint is properly addressed, any consideration of application 24/00987/FUL — and its related amendments — is premature at best, and legally dubious at worst.

To summarise my concerns:

1. **Violation of Green Belt Protections**

The proposal is inconsistent with the London Plan, the National Planning Policy Framework, and even Enfield’s own Local Development Plan. There is no justification that meets the bar for “very special circumstances.”

2. **Ecological Harm and Loss of Biodiversity**

The proposed development would lead to irreversible destruction of habitat, introduce synthetic surfaces with long-term environmental consequences, and has failed to assess the impact on protected species. This is not merely oversight — it is neglect.

3. **Privatisation of Public Land**

The park was acquired for public use, and yet 50% of it is now slated to be handed over for private use

under the guise of community benefit. The reality is a loss of access for the many, for the benefit of the few.

4. **Procedural Irregularities and Planning Mismanagement**

The omission of Whitewebbs from the SINC review, the unresolved complaint, and the timing of this application all point to a planning process more concerned with expedience than accountability.

5. **Heritage and Landscape Damage**

The park's historic character, including protected views and the setting of the Forty Hill Conservation Area, would be permanently compromised. Prior developments have already been criticised for their sprawl — this continues the pattern.

Conclusion:

This application represents a perfect storm of weak justification, ecological harm, and procedural failure. It risks setting a damaging precedent — that Green Belt and public land can be carved up by well-resourced private interests, provided they frame their plans with enough vague promises of "community benefit."

Whitewebbs Park is not surplus land, nor a blank slate awaiting redevelopment. It is a living, breathing place — one of London's rare remaining wild spaces — and it deserves better than to be sacrificed for a training facility that will serve neither the public interest nor the environment.

I urge the Mayor to call in and refuse this application, and to make clear that London's parks are not for sale.

#7779

I'm writing to you not just as a concerned Londoner, but as someone who holds Whitewebbs Park incredibly close to my heart. I've visited Whitewebbs many times over the years — it's one of my absolute favourite places in London. It's peaceful, rich in biodiversity, and feels like one of the few remaining places where nature is allowed to thrive freely. In a city that is constantly changing and growing, Whitewebbs offers something increasingly rare and essential: a genuine connection to wild, unmanicured nature.

That's why I'm urging you to call in — and ultimately refuse — the planning application 24/00987/FUL (submitted by Tottenham Hotspur Football Club) under Article 7 of the Mayor of London Order (2008). This proposal to develop a football training centre on Whitewebbs would cause irreversible harm, and I believe it fails to meet the criteria for "very special circumstances" as required for development on Green Belt land.

The Greater London Authority's own Stage 1 response (GLA/2024/0213/S1/01) identifies the proposal as "inappropriate development" — a serious designation that should not be overlooked. The plan offers little in the way of genuine public benefit and instead proposes to take away something deeply valuable: wild, biodiverse open space that belongs to all of us.

Whitewebbs isn't just a patch of grass — it's a living ecosystem supporting ancient woodland, priority species, and over 200 trees, including veterans. The idea that half of this space could be handed over to a private sports facility is devastating. Biodiversity is not a luxury — it's something London desperately needs more of, not less. If we lose Whitewebbs, we lose something we can never fully replace.

Beyond the environmental impact, the way this application has been handled raises serious concerns. Enfield Council has rushed the planning process, failed to properly review Whitewebbs' status as a Site of Importance for Nature Conservation (SINC), and moved ahead before key issues — such as the Guardians of Whitewebbs' formal complaint and the Local Plan Stage 2 Hearings — have been resolved. This, to me, is a failure of due diligence and a breach of the legal duty to conserve biodiversity under Section 102 of the Environment Act 2021 and Section 40 of the NERC Act 2006.

To summarise why I believe this application should be called in and refused:

1. **It undermines Green Belt protections.**

The proposal has been officially recognised as "inappropriate" for Green Belt land and lacks the required justification. Enfield Council's own planning documents acknowledge the deviation from local and national policy.

2. **It causes irreversible ecological harm.**

The destruction of biodiverse grassland, ancient woodland, and essential habitats cannot be justified by artificial pitches and landscaping. Critical surveys on protected species have not even been completed. This is negligent at best, and ecologically disastrous at worst.

3. **It takes public land away from the people.**

Half of Whitewebbs would become inaccessible — transformed into a private facility for elite use. This goes against the very principle of public parks, which should be protected and accessible to all, not commodified for private gain.

4. **It has been poorly managed and rushed through.**

The SINC review was flawed. Formal complaints have gone unresolved. The public has been sidelined. We deserve better stewardship of our green spaces.

5. **It harms heritage and historic landscape.**

The proposal would permanently alter a site with deep historical and cultural value, including key views protected under Enfield's Local Plan and the Forty Hill Conservation Area.

Conclusion:

Whitewebbs is more than just a park — it's a living symbol of what urban nature in London can and should be. Its unique combination of ancient woodland, open space, and ecological richness makes it truly irreplaceable. If we allow this development to go ahead, we are sending a message that public green spaces are up for grabs — and that biodiversity, public access, and community heritage are negotiable.

Please don't let that be the precedent we set.

Thank you for your time and for considering my deep concern.

#7817

The technical element to this email is a template, but please understand this email is sincere and comes from a place of concern for our local and national environment and passion for the benefits to our communities in having access to nature.

Whitewebbs Park is a vital community asset, and a much-needed natural space for people, wildlife and flora.

I live in Hackney, not far away, and I go there regularly with my family.

Please please preserve this natural space for generations to come!

#7943

I am writing to urge you to **call in and reject planning application 24/00987/FUL**, submitted by Tottenham Hotspur Football Club for a football training centre and ancillary buildings on protected Green Belt land in Enfield. This proposal has already been deemed **inappropriate development** by the GLA (Stage 1 Report, REF: GLA/2024/0213/S1/01) and conflicts with both the **London Plan** and the **National Planning Policy Framework**. No credible "very special circumstances" have been demonstrated to justify such a departure from policy.

Beyond planning violations, this application poses **serious and irreversible harm**:

- **Ecological destruction** of over 50% of Whitewebbs Park's biodiverse grassland and over 200 trees.
- **Loss of public access** to a publicly purchased park, effectively privatising half the site.
- **Procedural failures**, including an incomplete and contested SINC review, unresolved formal complaints (COM 101001267200), and disregard for due process in Enfield's planning timeline.
- **Violation of heritage protections**, including those covering panoramic views and the Forty Hill Conservation Area.

The wider implications are also deeply troubling. Approving this development would set a **damaging precedent** for the loss of public green spaces across London and beyond. As the Public Interest Law Centre noted: *"There is no real protection in law for public parks if this judgment stands."*

I respectfully urge the Mayor to call in and refuse this application under Article 7 of the Mayor of London Order (2008), in defence of London's Green Belt, biodiversity, public spaces, and planning integrity.

Thank you for your time and attention.

#7950

Dear Mayor and Planning Team,

I write to urge you in the strongest possible terms to call in and reject planning application [24/00987/FUL](#), submitted by Tottenham Hotspur Football Club (THFC), for the proposed development of a football training centre and associated facilities on Green Belt land in the London Borough of Enfield.

This application fundamentally conflicts with both the London Plan and national planning policy, and has already been recognised by the Greater London Authority (GLA) in its Stage 1 response (REF: GLA/[2024/0213/S1/01](#)) as “inappropriate development” in the Green Belt. The GLA rightly concluded that “very special circumstances” would be required to override this designation—circumstances that simply do not exist in this case.

Why This Application Must Be Called In

The proposed development would deliver no net public benefit, but instead result in irreversible harm—to the environment, the local community, and London’s Green Belt as a whole. This application must not be allowed to proceed.

1. Green Belt Protections Undermined

The site is protected Green Belt land, and both the GLA and Enfield Council acknowledge the development as inappropriate and inconsistent with the National Planning Policy Framework (NPPF).

The applicant has failed to demonstrate the required “very special circumstances” to justify such a violation of long-standing protections.

Allowing this development would set a dangerous precedent, inviting further encroachment on protected land across Greater London.

2. Ecological and Environmental Devastation

The proposal would destroy over 50% of Whitewebbs Park’s biodiverse grassland and more than 200 trees, including veteran and irreplaceable specimens.

Natural habitats for bats, birds, and other protected species would be lost—yet THFC has not conducted essential ecological surveys to assess this fully.

Replacing natural habitat with synthetic football pitches introduces microplastics and long-term soil degradation, undermining biodiversity and ecosystem health.

The Biodiversity Net Gain assessment is flawed and misleading, undervaluing the existing ecology and ignoring natural regeneration already underway.

3. Public Land Taken for Private Use

Whitewebbs Park was purchased with public funds for public use. THFC’s plan would effectively privatise half the park, stripping away public access to land enjoyed freely for generations.

Claims of community benefit are superficial—the facility is designed for an elite audience with minimal public engagement or accessibility.

No Full Parkland Management Plan has been submitted, making it impossible to assess the true impacts of this land grab.

4. Procedural Failures and Conflict of Interest

Enfield Council has failed in its legal duty under the Environment Act [2021](#) and Natural Environment and Rural Communities Act [2006](#) to protect biodiversity.

A formal complaint (COM 101001267200) was lodged by Guardians of Whitewebbs regarding the flawed Sites of Importance for Nature Conservation (SINC) review and the suspicious exclusion of Whitewebbs Park from that process.

The application has been rushed through without proper scrutiny or resolution of outstanding complaints, and ahead of the New Enfield Local Plan Stage 2 Hearings—raising serious concerns about transparency and due process.

5. Harm to Heritage and Landscape Character

The proposal violates the Forty Hill Conservation Area guidelines and would destroy key panoramic views protected under Enfield’s own Local Plan.

This is not merely a sporting facility—it is a large-scale commercial redevelopment that will permanently alter the landscape, eroding the park’s unique historic character and tranquillity.

The Broader Implications: A London-Wide and National Threat

The consequences of approving this application extend far beyond Enfield:

It would signal that no public parkland is safe from private appropriation.

It directly contradicts regional and national planning priorities on green space, biodiversity, and public health. It has already sparked widespread public and media outrage, with growing national attention and legal scrutiny, as highlighted by the Public Interest Law Centre's statement: "There is no real protection in law for public parks if this judgment stands."

In Conclusion

This proposal offers no compelling justification for the destruction it would bring. It would sacrifice precious public land and ecological value for private gain—against policy, public interest, and legal precedent.

I respectfully but firmly urge the Mayor of London to exercise his powers under Article 7 of the Mayor of London Order (2008) to call in and refuse this deeply flawed application. Our green spaces are not commodities—they are legacies, and they must be protected.

#8276

I write reference the proposed plan to lease 150 acres of Whitewebbs Park to ENIC as I am concerned that this deal offers poor value to the residents of Enfield.

The ENIC/THFC bid of £2million over 25 years = £80,000 per year and is less than 25p a year for every resident of Enfield.

For the loss of access to 150 acres of open park land **this is an exceptionally poor deal for the residents and tax payers of Enfield by any commercial standard**

ENIC is an investment company registered in the Bahamas where it doesn't pay UK tax. It has part ownership of THFC/Spurs which has an Enterprise value of £1.9 Billion and has an estimated turnover in 2022 of £443 million. If they want to extend their training facilities then they can afford to access land at commercial value at another site. At the moment the park is full of beautiful butterflies. **Why don't you or one of your team come over to Whitewebbs for a visit** see the value this Park has for local residents?

I'd be happy to show you round as would any number of the local residents who are part of groups supporting the park.

On a brighter note the 500 year old oak tree that was recently cut down in Whitewebbs Park has started to re-grow [see attached picture] which shows it wasn't dead as claimed by Toby Carvery/M&B and is a great example that if left alone a natural habitat will repair itself and continue to provide value to our communities as long as we don't cover it with plastic pitches and concrete!

#8369

You will have heard from many other residents of Enfield who regularly use Whitewebbs Park which was once a part of Henry 8th's hunting ground. This Park is full of ancient trees and woods, having provided a wonderful asset for the people of Enfield for many years. Its unique nature is something to treasure for years to come, providing a permanent green lung which should be preserved in the face of increasing numbers of dwellings encroaching on green belt land surrounding the Borough of Enfield.

With this in mind, it would be the utmost folly to allow Tottenham Hotspur to desecrate this unique piece of both historical interest and superb outdoor facility for the Borough's residents.

Tottenham Hotspur is very wealthy and can afford to buy land elsewhere. Their ruthlessness in cahoots with the Toby carvery in both chopping down our ancient oak, and their proposed plans which will mar the entire Park are both unnecessary and unwanted by the people.

I hope you will see fit NOT to grant their destructive plans to go ahead.

#8486

See attached

#8538

I ask that the planning application 24/00987/FUL (LB Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is refused.

I'm not going to repeat a lot of what you've read already, but Mr Khan, you need to know that the land is being used as a public park for the enjoyment of all, and the football club is trying to Enclose it, so that only they can use it.

I've heard that the Football club say the land is of poor quality and that they would only take half of it and improve the rest.

I was there on Sunday 22nd June and saw a whole lot of plants and animals. My records are available on iNaturalist, where my name is [REDACTED] should you wish to see them. It's a fine park and lots of people were enjoying it. I can't think of what the football club could do to improve the rest of the park.

Were THFC to go ahead with enclosing the land they would need to provide access to the complex which I'm sure would involve heavy plant traffic, congestion, new roads being built, noise & dirt to annoy residents, sewers built, trees chopped down; all those so-unpopular happenings.

Dear Mr Khan, I implore you! Refuse THFC the right to steal Whitewebbs park away from Londoners. Thank you for considering my request.

#8665

[Section 40 personal information] many in the borough have become increasingly concerned at the plan to lease a large part of Whitewebbs Park to THFC for the development of a training ground.

You are probably aware that Whitewebbs is a valuable amenity for people across the borough and beyond. Sitting alongside Forty Hall, Capel Manor and Theobalds Park, Whitewebbs is one of the increasingly rare areas of public land in the green belt.

A large part of the park once served as a council owned golf course. After lockdown the council decided that the golf course was no longer viable and the park has now become a green space increasingly popular with walkers, cyclists, joggers, dog walkers and families. This change of use has been generally welcomed as the area is well served by other golf course and, since the change, the park has effectively been rewilded. It would seem that converting the area into a training ground for a professional sports club, including adding a substantial number of artificial pitches, would be in conflict with the ethos of the Rewild London and Green Roots projects which I know you support.

I use the park very regularly and I know, from talking to people who are visiting, that they come from all parts of the borough, notably less affluent parts to the east which have few such amenities, and areas of London beyond the borough too. Visitors have actually mentioned to me that being able to access the park has been of great benefit to their mental health since lockdown.

For the Council to be offering public land in the green belt to a commercial organisation for this kind of development, which would mean it being closed to the public, seems at the least very curious. Even more so as the cost to THFC is a mere £2m over a twenty five year period. It is difficult to understand how this very small annual return can be seen as good value for money for the people of Enfield when weighed against the social and environmental cost to the community.

I think it should be taken into account that THFC is valued at £3.3bn and is therefore well able to go into the commercial market and procure a grey field site which would avoid the damaging consequences of the current plan.

You may be aware that there are two council owned built structures in the park which are current disused and falling into disrepair. I see no reason why these could not be the subject of sympathetic development which could yield a financial return to the borough without the environmental impact of the current plan.

It would also seem appropriate that a thorough review of the terms of the agreement should be undertaken as there is little information in the public domain and many people fear that further changes of use might follow of which we are not aware. This is clearly a matter of public interest and should not be considered as commercially confidential as is currently claimed by the council and THFC.

It seems to many of us that this scheme is a quick fix decided on by the council without due consideration of the negative impact on the people of London. In addition the council's approach seems to indicate that there is no more appropriate alternative, which is clearly not the case. As Mayor we would urge you to take a more measured and strategic view of this matter, as defined in your planning powers, before serious damage is done that would have a massive social and environmental impact for decades to come.

#8811

[Section 40] I believe passionately in the importance of public green spaces for the mental and physical benefits they provide to people, and the crucial roles they play in providing resources and habitat for biodiversity, particularly in urban areas. These things are essential for a thriving metropolis that strives to protect the crucial links between people and the environments they inhabit.

In an age of climate change and increasing biodiversity loss, the creation of more green spaces in urban areas is essential in order to face the challenges of the future. The many ways they do this includes, reducing the urban heat island effect through shading by trees, mitigating water runoff through the soil, reducing pollution and increasing clean air by plants. The documented health effects of parks and gardens to citizens has become well known, particularly since the pandemic. Conversely the loss and destruction of green spaces is extremely detrimental to a healthy city.

It is with this latter point in mind that I wish request your intervention in the current planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, to the effect that it is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008).

Further to the general importance of green spaces cited above, I believe that there are procedural issues that mitigate against the granting of this application.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

The co-opting of public space by Tottenham Hotspur Football Club (Spurs) through a leasehold agreement with Enfield Council, which is far from reflective of market prices, in order to fence off and flatten 40 acres of public parkland to build 10 football pitches (including two floodlit and one astro-turf pitch), large buildings, and new roads, for private/elite use, is contrary to the values of civic, social and environmental best practices.

The proposal constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Enfield Council failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' formal complaint and the Local Plan Stage 2 Hearings. Whitewebbs Park meets the ecological criteria for a Metropolitan Importance SINC but was excluded from designation, reducing its legal protections. These failures raise serious legal and environmental concerns regarding Enfield Council's handling of conservation policies.

The park is of great importance to the local community and a heritage asset, yet the voices of dissent against this proposal continue to be neglected.

The mosaic of trees and biodiverse grassland provides many important ecological niches that cannot be replicated elsewhere. The effects of excavation and construction on the site would not only be extremely ecologically damaging but would also contribute to global warming from the large carbon footprint involved. As this project is in no way essential to the welfare and thriving of Londoners, but is primarily a business venture that benefits Spurs and their stakeholders, it would be counter intuitive to the aims of the GLA if this were to go ahead.

I urge you to use your invested powers to call-in and/or refuse this application. Thank you for considering my request.

#8904

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and additional buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008).

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Whitewebbs Park is currently a beautiful mixture of open meadowland and woodland. It is a wonderful resource and unique green space for people who live in the area. Spurs are trying to enclose large parts of a public park that benefits large numbers of the local community. Enfield Council has failed to listen to the concerns of local people worried about the potential loss of this natural and richly biodiverse space should this development proceed on this site.

Tottenham Hotspur's planned training area would dramatically change both the landscape of the park and the public's access to the current green space. The surfacing over of meadowland with astro turf and monoculture pitch grass would profoundly impact the park's biodiversity, which currently is very rich and unique for a natural space within the city.

The new landscaping proposed by Tottenham will dramatically reduce the views which are currently open and expansive. Areas that are currently available for all the public to use will be fenced off and inaccessible for those not able to pay for access. Tottenham plans to balance the negative impact of their pitches through landscaping and tree planting. However their planting design will dramatically reduce the current open views.

Nature is currently thriving within Whitewebbs, which is a vital biodiversity corridor and a sanctuary for the rich collection of plants, birds, trees and insects that currently inhabit it. We are living in a time of dramatic climactic change and massive ecological losses where natural ecosystems are collapsing because of our incessant impacts upon them. These are systems that we depend on; without pollinators, we have no food. Already farming in the UK is being profoundly impacted by the changing climate that we have caused. We now need to do everything that we can to protect biodiversity and the natural world we depend on.

This is an industrial scale development on a site which is currently a thriving natural asset to the local community. Whitewebbs Park is a vital resource and sanctuary where nature can thrive and a loss on this scale would be immeasurable. Tottenham Hotspurs is a private business and it should not be allowed to exploit the natural resources that are owned and paid for by the people of Enfield through their Council taxes.

Football can bring immense benefits to our community and Tottenham Hotspurs is one of the richest football teams in the world. They already have extensive training football pitches, but if they feel they really do need to develop more, they should pay for a site that is not a prime natural resource.

Every planning decision that is made by councils on our behalf must now take the ecological emergency we are in into consideration. Whitewebbs is a unique sanctuary and should be protected for all of our benefit.

#8923

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

This planning application is strongly opposed by the [Guardians of Whitewebbs](#). The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** – the facility will primarily serve an elite sports group with little public access. THFC's own proposal highlights that profit is their primary concern.
- Allied to this is the continuing speculation about ENIC's role at THFC. What happens if there is a change of ownership?
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#9346

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in by the Mayor of London, Under article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990. I believe it should be refused for the reasons set out below.

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) – please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. We do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

As you will be aware, the Guardians of Whitewebbs has recently made a formal complaint (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020, a conflict of interest regarding the change of land designations in the New Enfield Local Plan, and the fact that Enfield Council is rushing the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings. Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. Therefore, the assessment of any planning application would certainly be prejudiced. In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. The Guardians of Whitewebbs have recently escalated their complaint to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

This planning application is strongly opposed by the [Guardians of Whitewebbs](#). The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access. THFC's own proposal highlights that profit is their primary concern.
- Allied to this is the continuing speculation about ENIC's role at THFC. What happens if there is a change of ownership?
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.

- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character.**

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#9427

COMMENT/OBJECTION GLA030625-7191 Enfield Planning reference No. 24/00987/FUL

As local resident particularly focussed on Enfield maintaining and protecting biodiversity in our special North London green spaces and also protecting free public access to these, in line with **Natural England guidelines and NHS is active integration of nature into healthcare**, promoting both environmental sustainability and public health by Green Social Prescribing and the NHS Forest initiative I am concerned that Enfield Council has not taken these into account within the Planning Process. Surely this should be the case?

I have been in touch with The Planning department at Enfield Council to try and gain information about planning conditions and Section 106 particularly related to the protection of trees and protecting free public access, but this appears not to be possible. No public request can be taken into account with these. **I feel that communication with their residents and the concerned public is still at fault, as criticised by their recent local Planning Inspection.**

PUBLIC ACCESS - Protection - Changes - Conditions Section 106?

Within the planning application are mentions of Spurs taking over managing the entrances with opening times and footpaths and car park of public areas not included their lease which obviously affect public access. The public have no access to other details which were published for the planning committee members as these were included within The Estate Management Plan (not available to the public) although in the Planning Meeting's agenda, it was not available for us the residents.

I have asked the the [section 40] about adding conditions to the Planning Application that will protect free public access to Whitewebbs Park (excluding the proposed new Spurs Training Facility) in its entirety particularly to condition the application so that Spurs cannot charge visitors/residents in the future and therefore gain financially out of an area that is NOT within their lease. She has replied as follows..

Quote from email dated 4th JULY 2025..

"Due to being proposed development in the Green Belt, it was necessary for the LPA to refer the Whitewebbs application to the Mayor of London who will make the final decision on whether it should be approved or refused. Their response is due imminently and would not be reasonable at this late to stage to open up elements of the application for re-negotiation unless there are new and sound planning grounds to do so.

There are tight legislative tests for applying planning conditions and legal obligations to planning permissions and it's also questionable whether legally we could use these to control parking charges."

Should this application be granted and supported by you, will you please help protect our FREE ACCESS to one of Enfield's oldest public parks, sold to Middlesex and passed to the London Borough of Enfield for the people of Enfield.?

#9440

addition paragraph added

Dear Mayor

I am recapping this problem just because it worries me that my comments will not be noted as I have no access to the planning portal, please acknowledge receipt and acceptance of this comment listed below this paragraph.

Just as a reminder.. please can you forward this issue to the relevant department .

[REDACTED]

COMMENT/OBJECTION GLA030625-7191 Enfield Planning reference No. 24/00987/FUL

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Spurs Training Facility) in its entirety particularly to condition the application so that Spurs cannot charge visitors/residents in the future and therefore gain financially out of an area that is NOT within their lease. She has replied as follows.

Added: As part of their financial lease arrangements with Enfield Council 500K has been put aside for improvements to public amenities and car park which is not within the leased area. They will be managing the public clubhouse once it is refurbished and the cafe. I believe they could be gaining financially from hire charges and rents from these too. This does not seem right and only the initial works have been mentioned , no accessibility protected.

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Should this application be granted and supported by you, will you please help protect our FREE ACCESS to one of Enfield's oldest public parks, sold to Middlesex and passed to the London Borough of Enfield for the people of Enfield.?

#9540

I'm writing to raise my strong objection to the proposed development on Green Belt land in Enfield. As a local resident who values both our natural environment and the unique character of this borough, I feel deeply concerned by what's being planned.

The Green Belt isn't just a bit of spare land, it's a beautiful, historic landscape that's meant to be protected for the benefit of all Londoners. The particular area in question holds real value: it's open, peaceful, and steeped in history. The idea of flattening a section of this parkland for large-scale development feels completely wrong. Once this land is gone, it's gone for good, there's no going back.

What's especially frustrating is that the supposed "special circumstances" used to justify this project don't seem to be in the public interest at all. From what I understand, the main driving force here is the commercial interest of an offshore company, not the needs of Enfield residents. That's not a good enough reason to permanently alter a landscape so many of us love and rely on.

We're being told there are community benefits, but let's be honest: they're minimal, and only available to a tiny fraction of Enfield's population, and even then, only for a few hours a year. That hardly justifies the irreversible loss of 16 hectares of Green Belt land. And even the economic gains appear limited, based on Spurs' own Environmental Impact Statement. So who is this really for?

I'm also really concerned about the loss of important views across the landscape, views that are actually recognised as significant in Enfield's own Local Plan. These vistas contribute to the borough's identity and sense of place, and once they're obstructed, a key part of Enfield's heritage will be lost.

I truly hope you will consider the long-term damage this project could do, not just to the land, but to trust in the planning system itself. This is about more than football or profit.... it's about protecting our shared environment and valuing the spaces that make London livable.

Please stand up for Enfield's Green Belt and reject this proposal.

#9552

This park was given , in trust, and trustingly, to the people of Enfield , and to one and all , for perpetuity.. to walk , refresh , and enjoy the beautiful and historic area. During Lockdown it became a vital space for people from miles around .. mental health is strengthened by enjoying the peace and ancient beauty of woodland and meadow. It is a site of special scientific interest .. habitat that supports literally thousands of flora & fauna .

It is NOT the property of Enfield Council to lease to Spurs ,& thus deprive the people of Enfield of their gift and heritage.

Please support our cause.

#9546

I am writing to formally object to the proposed takeover of Whitewebbs Country Park by Tottenham Hotspur Football Club for the expansion of their training facilities.

This plan, while cloaked in vague promises of community benefit, fails to meet the standards of fairness, transparency, and public interest. The “special circumstances” used to justify this appropriation of public land are plainly aligned with the commercial interests of a private offshore corporation, rather than with the needs or wishes of the wider Enfield or London population.

The so-called community benefits are negligible — targeting a tiny fraction of the borough’s residents and offering little more than a few hours of access per year. This cannot credibly be used to justify the alienation of valued public green space.

Tottenham’s own Environmental Impact Statement acknowledges that the economic benefits to Enfield and London are minimal. It is therefore misleading to portray this development as a driver of significant local growth or regeneration.

Equally troubling is the financial arrangement behind the lease. The council is offering this land for a peppercorn rent — far below market value — at a time when Enfield Council is facing severe budgetary pressures. This represents a gross undervaluing of public assets and a missed opportunity to generate meaningful revenue for essential services.

Whitewebbs Country Park is a cherished space, offering vital environmental and social benefits to the entire borough. Once lost, it will not be recovered. I urge you, as Mayor of London, to intervene and halt this proposal in the interest of democratic accountability, environmental preservation, and the equitable use of public land.

Finally, I must add this: if you choose not to stand up for the public interest in this matter, then you will lose my vote in any future mayoral election. I hope your actions will reflect the values of fairness, transparency, and genuine community representation.

#9548

The Planning Application must be called in for a proper review and scrutiny by the Mayor of London.

The people of Enfield wish to retain this park land for their use; this land was left in perpetuity for the people of Enfield, which fact is being ignored by the Council.

I and many of our friends have walked through and around the old municipal golf course land for decades and in my case over 50 years.

The manor in which this Application has been pursued by the Applicant and their many advisers with the Council has also been called into much question, not least the cutting down of the 500-year-old oak tree.

Those involved in this dreadful event claim to have a supposed plausible deniability, but it is so obvious what the full extent of this Application is all about and that this does not mean the land will be available for the quiet enjoyment of the people of Enfield; something that was the original intent for this land by the original benefactor.

The people of Enfield are simply being steamrollered by the Applicants aided by many and varied interested parties including dare we say, Enfield Council.

The arguments made by The Friends of Whitewebbs Park are well known and which I fully support, and so ask that these are given full and proper consideration by the Mayor.

If a change of status is to be considered, it should be for social rented housing that is much needed within the Borough, not a further private extension to the Tottenham Hotspur training ground, much of which will be modified and amended should planning permission be granted.

#9563

Congratulations on your well-deserved knighthood for helping Londoners breathe clean air.

For the same reason I am sure you will stop Spurs proposals for building on a public park with the destruction of grass land and the felling of over 200 oxygen-producing trees.

As a Socialist, it would be very wrong of you to give-away a public park to a private billionaire sports club.

Destroying public green belt in favour of a capitalist venture looks very bad.

Please reject Spurs plans for Whitewebbs in Enfield.

#9571

Mayor Khan, I am a labour voter and a huge supporter of your drive to reduce pollution in London but why are you standing by while London loses perhaps its most biodiverse open space to a land grab by a billionaire to create a facility that can only be accessed by a small elite group with no access for local sports people?

Enfield Council are receiving a paltry 2 million in total for a 25 year lease to Tottenham Hotspur football club who are going to destroy the beautiful habitat and lay 11 plastic football pitches which are known to leach poisonous chemicals into the local water course. I walk here nearly every day and have watched the wildlife bloom in this unique landscape since the old golf course closed, and it was left to rewild. It is loved by lots of people in the local community (most houses have a Save Whitewebbs poster in their windows) and many people travel from all over London to enjoy the beautiful site.

Please come and visit the beautiful site, providing lungs to north London adjacent to the busy M25. You can meet with ecologists who will tell you about the wealth of pollinators and campaigners who will tell you how Spurs have broken all previous promises about public access in the past.

We are disgusted this happened under a Labour council and Labour mayor and beseech you to step in to save our beloved Whitewebbs.

I await your help in this matter

Harm to Green Belt Land in Whitewebbs Park

- Only a small part of the Green Belt is public open space – around 20%. Any loss of public open space is a serious matter. A professional sports ground is a loss of public open space.
 - The landscape changes would be **irreversible**. The character of the park would be **permanently altered**.
 - A semi industrial facility for professional football will be created on this epitome of Green Belt open space
 - Barriers and tree planting would **block internal and external views**.
 - Public access to half the open space would be lost.
 - 15 hectares of land would be fenced off with high hedges, metal barriers, bunds and dense vegetation.
 - Floodlighting is visible 2Kms away in a 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 for a 25 year lease..
 - The openness of this open Greenbelt space will be lost forever
-

#9578

would like to register my objection to Whitewebbs development reference 24-00987.

How Spurs football club were able to gain planning for such a development on green land held in trust for the people of Enfield for the very purpose of recreation and a forest is a total mystery.

Spurs are going to dig up land and replace it with artificial pitches, remove facilities, chop down trees all these are not reversible and exactly what is the benefit for local people, none whatsoever.

We are not Spurs players or even Spurs fans why an offshore company gets to dig up 15 hectares of green belt land and then erect fences around it all where we can now walk and observe the wildlife is simply obscene.

This is all about Enfield Council getting money at the cost of residents. It's that simple there are no benefits to residents at all, none.

Please do not allow a very old woodland and land to be destroyed for the benefit of a private company we are supposed to be protecting wildlife and the environment not trashing it so a rich football club can have more facilities that will be private.

#9580

I strongly object to Tottenham taking a large section of Whitewebbs. This green space was given to the people of Enfield many years ago by a benefactor who wanted his legacy to give open space for people to enjoy all the year round.

Tottenham will use it for just a few people playing football and many will not be Enfield residents. It is unfair to deprive the many people of Enfield this wonderful space for a few.

Please do not allow this to happen. We rely on you to keep our green open spaces available to all.

#9588

I'm writing to ask you to intercede and reject the planning request to convert Whitewebbs park into a training ground for Tottenham football club (London Borough of Enfield).

The park is loved and very well used - all year round - by dog walkers, walkers, cyclists, horses, families, to say nothing of the abundance of wildlife that lives there from the tiny insects to red kites. It's a place where supportive communities are built.

This application relies on a change to Enfield's local plan - which has not been approved. The application turns the park into a ground for professional sport. This would not be open out accessible to everyone, making it exclusive to a very few, rather than inclusive, which is against the approved use of the land. The application doesn't bring any benefit to the residents of Enfield.

I have walked and still walk there with my husband, children (now adults) and with our dogs every week. The beautiful green belt parkland is blessed with open space, footpaths, woodland and a stream so that whatever the weather there is always a suitable route to take - for all its users - something that is not easy to come by.

The ecological impact cannot be underestimated. In the current climate environment we need to do more to preserve the biodiversity and natural wildlife and pollinators and their habitat, not remove and replace it with astroturf and hard materials which are useless to them. Removal of mature trees will also cause a huge CO2 release as well as the loss of places for nesting birds and insects to hibernate. You cannot replace them and planting young trees is not an effective mitigation. Leaving them where they stand is the only sensible option. Already an ancient oak has been cut down 'in error'. The application talks of replacing planting and restoring the historic landscape. Any planting would by necessity have to be in the current open spaces, hardly restoring the original landscape then.

There are so many objections to think about -

Whitewebbs was bought with public financing for public use in 1931 and is Green Belt land. My understanding is that the Council run golf course (not run as a private club) which previously occupied some of the parkland was only a temporary measure to cover the council's costs. The golf course was sympathetic to the environs - evidenced by how it has rewilded itself and blended in. A private football ground is neither public, parkland,

environmentally friendly, accessible or temporary. The proposed change to the character of the landscape, the biodiversity, our enjoyment of it would be impossible to reverse. 25 year lease or not. A hundred years of growth cut down is unimaginably damaging and cannot be understated.

The application will result in a smaller car park than existing- already this is often full due to the high level of visitors to Whitewebbs - another loss for the local community.

And many of the pathways we use will be gone. The club say they will build a cafe - but there is already an excellently run cafe that is very well used.

The light pollution caused by the proposed floodlighting is also a serious consideration for nocturnal wildlife and the local area more broadly.

Furthermore the parkland does not have a drainage issue at the moment. It is ecologically balanced. The proposal will require drainage ponds to be created to deal with the artificial materials.

Has the club undertaken a study to ensure their current facilities are used most effectively?

The football club's own consultants have admitted that the proposed buildings are inappropriate for the green belt site.

They could make better use of alternative nearby sites, this might carry a higher financial cost to them however it cannot compare to the significant overall impact and cost to Whitewebbs if this awful plan were to proceed.

Please take the appropriate action and reject this application

#9607

I am writing to you to ask for your intervention in the above matter taking place in the London Borough of Enfield.

Whitewebbs park is a much loved open space (one where I have regularly run for 35 years) and where I started my love of golf. I am still able to run there but the golf club was closed by LBE in a controversial move just after the pandemic. It is used by many local people but it is also much used by those throughout the borough. Usage has significantly grown since the pandemic.

It is a beautiful open space which has much bio-diversity present. Bees, bats, newts amongst others. The space is also important in terms of the borough's lungs and as space for improving mental health.

Unfortunately, LBE's plans will rob London's public of part of this asset to be replaced with unnecessary plastic pitches - Spurs already have space which is not always fully utilised and could be shared with the women (for whom the new facilities are intended). The contribution that the off shore company that run Spurs will make to LBE is £2M over 25 years - a mere £80,000 pa. A derisory sum.

Previously, Spurs have failed to adhere to their contract in restoring footpaths (as part of the existing development) and LBE's mismanagement of that contract has seen the council foot the bill for works required to be undertaken.

All in all this development provides no genuine asset for the borough and its people. There are many alternatives around the proposed site that would not impose this burden on land that belongs to the people of Enfield.

I ask you to stop this planning proposal from going ahead or at the very least call it in.

#9614

Dear sir/ madam As strong supporter of white Webb's [REDACTED] please intervene into the leasing of one of jewels of Enfield,I walk like hundreds of Enfield people ever week and take are dogs around this beautiful woodland my memories are of myself and my [REDACTED] walking and admiring nature at white Webb's I ask for your support sir/ madam thank you

#9621

This is a heartfelt plea to your better human judgement and nature regarding the proposed plans by Enfield council to redevelop Whitewebbs Park in Enfield. It is a place I and many of my friends and family have grown up with as a resident of Enfield, whether it was playing golf in the 1980s and 1890s or even now as someone lucky enough to walk my dog through the beautiful ancient woodland every day and the, now, flourishing natural beauty left behind by the old golf course. The park has a community of local residents who have enjoyed its beauty for years, which would be decimated if the proposed plans went ahead.

It is one of the few remaining green areas of London that is not being flattened for short term profit for a badly run local government and the long term gain of a huge faceless offshore company. Enfield council seem to want that to change which is a disgrace and a huge insult to its taxpayers and residents.

This land is green belt land purchased with PUBLIC money in the early 1930s and was FOR the people of Enfield. The current running costs of the land are only £40,000 per year which is extremely low considering how incredibly well visited it is even in winter months. It is estimated that over 1000 visits a week are made by the public to Whitewebbs Park in the winter currently. Proving that it is in NO WAY surplus to requirements. It has a thriving new cafe run by a local business whose family attended schools in Enfield town. They take great pride in providing an excellent food and drink service for all visitors passing through.

I walk my dog [REDACTED] over Whitewebbs for miles every day of the year and the vast array of trees and wildlife there is something you find in maybe only a couple of other areas in what is a HUGE sprawling metropolis of roads, traffic and noise. The reason I mention my football team is because I am a season ticket holder at Tottenham Hotspur and am very well versed in the promises made by ENIC and Tavistock (the proposed buyers of the land) There are not many things that can tear a true football fan apart from their lifelong club but these owners of Tottenham Hotspur have pushed me and many fellow fans to their breaking point over the years with their MANY broken promises of investment and two faced public image. ENIC is someone that Enfield should not be getting into business with. Their owner Joe Lewis is a tax exile found guilty in the US courts of insider trading, surely these are people to steer clear of. There is a very strong chance that their reneging upon investment promises at their football club over the last 25 years will be mirrored if they complete the transaction for this PUBLIC land.

But staying on matters concerning the actual park, it remains unclear whether the correct procedures for protecting the park's biodiversity SINCE have been followed either. Once the proposed plans are in place Tottenham Hotspur be able to exclude visitors with tree lined hedges and do whatever the hell they want with the beautiful ancient woodland that Enfield council seem to think is up for grabs to the highest bidder. It is a truly sad state of human affairs that this has been allowed to happen.

The entire park is locally listed for its historical, archaeological and landscape value. It still has most of its original character. The old route or course of the New River, now also a local heritage site, runs through it. There would also be the LOSS of historic land as the plans in place would make over 16 hectares of 19th century parklands and beautiful open space inaccessible. all for what? a few extra football pitches. Please do the right thing by the people of Enfield and by the all the wildlife and animals that thrive there and call the matter in.

Your legacy as mayor of London seems to be one of environmental change and improvement. Don't let this be a blight upon that as the people of Enfield will never forget it.

PLEASE.

#9623

I cannot access and register my objection on the planning portal please accept this email instead as my objection.

Enfield Planning Ref: 24/00987/FUL

Does it seem right that Enfield Council are choosing to support this new development to further the wealth of a Premier Football Club over and above the health and wellbeing of the people of Enfield and visitors from across London, who will no longer have free access to enjoy the benefits of the natural world that this meadowland and woodland offer?

Should financial benefits of the refurbished ex golf club house, cafe and car park go to Spurs or Enfield Council for the benefits of its residents? Why are Enfield Council allowing this?

This area of the Park is not even within the area to be leased to Spurs and yet Spurs will actually control all entrances so free access even to the meadows and woodland will be restricted. Does this seem right?

Natural England are actively encouraging and supporting free access to nature and NHS are actively integrating nature into healthcare. This development is not in keeping with these.

London's Greenbelt still serves the purpose it was designed for and more and especially in these challenging times, with stresses on nature, and I believe that these important protections on biodiversity and human health should not be relinquished to support the big business of football, do you?

Enfield Council for some strange reason are not helping protect Whitewebbs Ancient Woodland and meadows, why not?

Please help maintain protections.

Spurs are going to destroy soil quality which supports our planet in so many ways by moving tons and tons of it to flatten the land for 10 more football pitches, they are going to fell over 200 mature and veteran trees and the thousands of species and sub cultures they support, using obscure calculations which they say offset these losses. Do they really? A thousand or so young saplings which may or may not survive, will take decades to help air quality and add to biodiversity that the mature trees did.

Spurs already have over and above enough football pitches (17), state of the art training facilities, offices a hotel, all of which are regularly rented out to visiting clubs for financial gain. There is no longer any access for the people/children of Enfield that expired a while ago. Thus new application with 10 more pitches, provides for some access to the youth of Enfield, particularly girls but only for 10 years and the lease is for 25 years. Will this be for all or only those who appear to show the potential for entering into the Elitist Sport of professional football?

Please stop this development in its tracks and you will be protecting nature here in Enfield now but for many years to come.

Protecting our planet begins at home and here in Enfield, in London not by supporting the excessive wealth of Premier Football clubs.

I am at least third generation Enfieldian, and have been lucky enough to benefit from Whitewebbs Park for more than 60 years, Watching and learning and playing. This comes from my heart as well as from a deep respect of our home planet.

[I know it is not a planning point but Tottenham Hotspur's parent companies appear to be registered in the Bahamas and are set to make yet more money out of their new training ground by renting out the facilities to visiting football clubs? Will they pay tax on the benefits locally or in the UK?]

#9636

I am writing as a resident of Enfield to urgently ask that you reject or call in planning application 24-00987-FUL for the development of a private professional football facility at Whitewebbs Park, a protected Green Belt site.

Although Enfield's Planning Committee voted to grant permission, the application is still subject to referral to your office and to the Secretary of State. This is not a done deal, and I urge you to use your powers to stop this damaging and unnecessary development.

Whitewebbs Park is a lifeline for thousands of us. I walk there regularly with my dog, and it's clear how many others do the same — families, couples, elderly residents, dog walkers, friends. It's a quiet, safe, natural refuge. Within our community, it's well known that Whitewebbs is essential to people's mental well-being and is often the

reason they choose to live in Enfield. This development would destroy what makes the park so important and irreplaceable.

My Objections:

- The plan would irreversibly flatten and enclose 16 hectares of historic Green Belt land.
- The “very special circumstances” cited by Tottenham Hotspur FC are based purely on commercial convenience, not public need.
- Public access would be lost — unlike the former golf course, which remained open and modestly priced.
- The park is heavily used and not surplus — over 1,000 visits per week in winter alone, equating to more than 150,000 person-hours a year.
- The project would harm a locally listed heritage site and destroy biodiversity and scenic views.
- The claimed community benefits are minimal and tokenistic (a few benches, signs, a dog tap, and a café), while the loss is massive.
- Better, more appropriate sites exist for THFC’s needs that don’t involve damaging Green Belt.

The plan would transform a treasured public park into a private, semi-industrial facility, fenced off from the very community that depends on it. This is contrary to your environmental and planning principles and should not be allowed to go ahead.

Please, for the sake of Whitewebbs’ history, beauty, and the people who rely on it every day — call in this decision and reject the application.

Thank you for your time and leadership.

#9638

I am horrified that this club is preparing to build on Whitewebbs park. This is green belt and belongs to the people. We don’t need another case of green belt being used for this absurd purpose. I like watching football but cannot understand why Tottenham needs to build wherever they like.

#9639

I am opposed to any building of houses in Whitewebbs Park. I live in Enfield and enjoy the park daily;

#9641

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008).

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

[Guardians of Whitewebbs made a formal complaint](#) (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield

Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings.

Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced.

In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character.**

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#9643

I write to you in regard of the above proposed acquisition of green belt land by Tottenham Hotspur football club.

Whitewebbs park is unique in its bio-diversity and open aspect. This park was bought for the people of Enfield by the then council in 1931 for the recreation of the people of Enfield. It is used by families inside and outside the Borough. My family have enjoyed the park for many years and have often celebrated birthdays and family occasions in the park.

The thought that it is to be torn up to provide football pitches is abhorrent. The fact that this is by a premier league football club who have a reputation locally of buying up land for training grounds and then selling them off for factories and housing.

The green belt, as you know, is to act as the lungs of London. Once it is gone, it is gone and the air will be poorer for it.

I ask you as Mayor of London to look at this proposal with an open mind. Any facilities provided by the football club will be for their use and interest only and by nature inclusive for them.

#9682

I wish to put in a strong objection to this application for change of use of Whitewebbs Oak Park. In our overcrowded and choking metropolis, we can ill afford to lose our green public spaces.

#9686

Please stop the destruction of the Green Belt and Whitewebbs Park in the London Borough of Enfield.

The Green Belt was created to stop urban sprawl. It was not created to be eaten into, now and again. There are alternatives.

The Borough of Enfield and Enfield Chase have a lot of history behind them and they should not be destroyed. I have lived in the borough for over 50 years, it is my home and I like it to remain a suburb rather than another urban development.

Please reject the plans and ask Enfield to look at alternatives.

#9692

Please refuse the Whitewebbs applications to turn acres of Countryside into training ground for Spurs football pitches. The Countryside cannot access human voices which is why, as its servant, I am appealing to you on its behalf.

The only country I am not disappointed in is the countryside. It is crazy that we should have to defend a landscape. We want to assume that it is not alive that it doesn't feel, but it does. We tear each other to pieces, one side calling people terms like tree huggers or even nimbies while the other side is seen as cold blooded greedy, people, sensitive to only their wants. Unfortunately, what would be destroyed is irreplaceable. A way of life which has taken centuries to create. A home for insects, birdlife and animals; we have our homes and now certain people want the countryside. It is impossible to place like with like, to grow age and history again. Centuries old trees can never be replaced or the network they provide for each other underground. We are only just awakening to the fact there is other life - that trees can communicate, able to tell one insect from one another just through the insect's saliva and know whether they are good or bad for the tree's own being. When we walk through this great countryside, we are stepping into another Kingdom where hate and prejudice does not exist.

What are we doing to this world? Can we not be grand and allow this noble ancient civilisation to live. Just because some people choose not to recognise it, it doesn't mean that it doesn't exist.

What we would lose is far greater than what we gain.

#9704

I sent my objection to this application to commonplace before midday today, but no confirmation came through to me. I therefore sent it to their email. However, their automated response says that it may take them 2 days to get to the email. This is inadequate, as the comments may have closed by then.

Please therefore receive this objection, and please confirm receipt as soon as possible. Many thanks,

OBJECTION re Whitewebbs 24/00987/FUL

This is the loss of a public park in London which has been held in trust for the benefit of Londoners for more than a century.

There is no doubt that the 16 hectares will never be returned to us for our amenity, or that, in the unlikely case they are, they will be in anything but an altered and unrecognisable state.

The proposal must be refused.

It must certainly not be granted until there is clarity about the circumstances in which the Whitewebbs Oak was felled.

It could be refused on any one of a number of grounds: the destruction of habitat which has not even been properly assessed; deficient detail in the material consideration of the works; a failure to meet VSC; and the entire loss of amenity of 16 hectares of beloved parkland.

Our group, the Guardians of Whitewebbs*, has only begun to document the extraordinary biodiversity on the site. We have objected that the grassland has been undervalued; that reptile surveys were inadequate; that there were no bat surveys of key areas; that the applicant has never, in spite of representations made at the Planning Subcommittee, recognised NPPF 186c, which prohibits "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees)" except where "there are wholly exceptional reasons" - and since that representation an ancient oak has been felled in suspicious and as-yet murky circumstances-; we have appealed to commonsense about the destruction and alteration of vital open grassland in a mosaic habitat of ancient woodland, which the applicant is constrained by BNG requirements to alter permanently with forestation, hence destroying existing habitat. I would add that invertebrate surveys ought also to have been made in the name of thoroughness in an area of some acid-characteristic grassland with large amounts of deadwood, where we have already made numerous records. In all, how can it possibly be said that the Council's decision has been made with the best possible cognizance of the space's ecological value (NPPF 192, 195)? There have been documented failures of the Council to designate the site as a SINC, which are the subject of a formal complaint from our group.

The plans, such as they are, fail to represent the level of engineering works that will be required to bring about the development, such as the 1000s of tonnes of material that will need to be removed or moved, and the retention features needed to flatten a hillside. There are no specifications or cross sections that enable the applicant to say that there will be "a limited effect on the openness of the Green Belt but that will be of a very low impact" (Planning Statement 16). They fail to give full material considerations for several reasons:

- retention features, which are external, visible features, are simply unspecified - these are a vital material consideration
- materials for such features are unspecified - another material consideration
- there is no tree retention plan for the scraping and building of these features - but the plans clearly show that trees must be dug around for this work, affecting root protection zones and the conservation of nature. This affects both nature conservation and NPPF policy, possibly including 186c, since there are ancient trees next to the site.

Philip Ridley has written about this comprehensively in a separate objection.

The claim the developer has made, by necessity, since this is metropolitan open land, is that the development proposal meets Very Special Circumstance (VSC) conditions. VSC are "significant and demonstrable benefits". These are avowedly only just met by the application when balanced against the loss to nature and neighbourhood amenity. But they are not demonstrated. For one thing, a large part of VSC depends on improvements to the park which are not actually feasible. For example, the planting of huge numbers of trees in the parkland will require a clear management plan to ensure irrigation. This and other vital details of park management are lacking. It is, anyway, absurd to say that the public's amenity could possibly be "improved" (Planning Statement, pp. 2, 3, etc.) by having 16 hectares of it fenced off and built on.

So VSC cannot, do not come from amenity improvements. They must therefore arise from benefit to the community and to football. Yet at the planning subcommittee it was confirmed that the community offering of the football club is only contracted for the first ten years of the twenty five year lease. Then, the applicant refused to confirm that the site would be ringfenced for football, leaving legitimate fears that it may be for future use for American Football. But even if the community "offering" (offering of a formerly public space back to the same public) was significant, the provision of some football training can hardly be said to be a very special circumstance.

Finally, and not without relevance, the Council has not yet disclosed whether it views the Whitewebbs Oak, an ancient tree felled illegally in April this year, as belonging to the development site in question. This decision must await that disclosure. The oak is present in the developer surveys. It was felled by a company under the same ownership as the developer on a site next to theirs. The police have so far decided not to investigate, but are now under increased pressure, including from MP Feryal Clark, to do so.

Each of these arguments ought to suffice to prevent a preventable idiocy. That it is such is quite obvious to anyone given the facts: a course that is both preventable and the shockingly near-sighted sale of a public asset to a crony of the Council. For we know from records that councillors have received benefits from the club, including the chair of the planning committee; and these did not prevent these officers from voting. It is scandalous and is already generating scandal in the press. The lease to be granted upon approval of these plans would be for 25 years, which is long enough to constitute a certain permanency - but the changes to the landscape and destruction of sensitive habitat must be thought of as final. Final, too, is the enclosure of a space that the public has been

free, in fact, more than free, legally entitled, to roam and enjoy since before any Enfield resident was born. I therefore urge you to refuse this application.

*This representation is my own personal objection and not my group's.

#9720

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Please note:

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- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
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- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

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- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.

- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
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- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
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Conclusion and London-wide/National Impact

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- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

Thank you for considering my request.

#9736

Having lived in the borough of Enfield all of 67 years, the proposed loss of open green space is distressing. The borough population is growing, and it must be a priority to preserve green spaces in Enfield.

Whitwebs is a beautiful and historic landscape with open views and ancient woodlands. It was purchased and held in trust for people living in Enfield, how can it be possible to develop this green belt space - it makes no sense.

The proposed plans will destroy vast areas of the parkland, have a devastating impact on nature and biodiversity and, if built, would be irreversible. The proposal only benefits Tottenham Hotspur Ltd and those allowed to use their facilities, there are no benefits of any significance for Enfield residents.

Please reject the proposal.

#9745

As an Enfield resident, living very close to Whitewebbs, I would like to ask you to reject the planning application from Tottenham Hotspur Football Club to replace our green space with football pitches and buildings. I have already sent my objections to Enfield Council planning committee along with many other residents - but our objections have so far fallen on deaf ears.

Now in my seventies, having taught in Enfield schools for much of my life, I walk there regularly, enjoying the diverse wildlife - birds, flowers and ancient trees and taking my grandchildren to one of the most beautiful and peaceful spots in Enfield, Whitewebbs Pond, where we can listen to birdsong and admire the ducks. I understand that a new path, track or road is planned to run very close to the pond which is of great concern to many of us.

I believe that the proposal to lease the land to Tottenham Hotspur Football Club violates the council's responsibility to ensure that the park remains open for all residents. Middlesex County Council bought this land for the people of Enfield; it is an important part of London's Green Belt—a beautiful historic landscape held in trust for the people of Enfield.

Professional sport, however, is not inclusive – it excludes the vast majority of people. A professional sports ground is a loss of public green space - which is recognised as necessary for our well-being in this city. And particularly with climate change and the increasing heat, such green, wooded spaces are becoming even more important.

Many walking groups as well as individuals- children, wheelchair users - walk, cycle, run, play and picnic in Whitewebbs. The proposal means the loss of around 2 miles of pathways - a significant reduction in public access. Parts of the area have already been ruined by the tall hedges and fences which do not hide the large structures on the current Spurs site - and more of these ugly constructions are planned. Spurs already own a considerable area with a large stand and many pitches - which currently seem to be under-used.

The proposal will destroy part of a historic parkland landscape - the massive reconstruction of 16 hectares is irreversible. Artificial pitches will severely damage the current ecosystem. It means huge lorries and earth movers travelling in and out of the site, on to extremely narrow country lanes, which already get congested by local traffic as there is a nursery and schools close by.

And what is very hard to understand is that Enfield Council are to receive only a tiny amount of money from one of the richest football clubs in the country - so that the people of Enfield lose a beautiful green space and do not benefit from a fair market price for the lease.

I hope you will give the objections of Enfield residents fair consideration and either reject the planning application or call it in.

Thank you for your attention.

#9754

As an Enfield resident, living very close to Whitewebbs, I would like to ask you to reject the planning application from Tottenham Hotspur Football Club to replace our green space with football pitches and buildings. I have already sent my objections to Enfield Council planning committee along with many other residents - but our objections have so far fallen on deaf ears.

I walk in this Park regularly, enjoying the diverse wildlife - birds, flowers and ancient trees and taking my grandchildren to one of the most beautiful and peaceful spots in Enfield, Whitewebbs Pond, where we can listen to birdsong and admire the ducks. I understand that a new path, track or road is planned to run very close to the pond which is of great concern to many of us.

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A professional sports ground is a loss of public green space - which is recognised as necessary for our well-being in this city. And particularly with climate change and the increasing heat, such green, wooded spaces are becoming even more important.

Many walking groups as well as individuals- children, wheelchair users - walk, cycle, run, play and picnic in Whitewebbs. The proposal means the loss of around 2 miles of pathways - a significant reduction in public access. Parts of the area have already been ruined by the tall hedges and fences which do not hide the huge structures on the current Spurs site - and more of these constructions are planned. Spurs already has a large sports area with many pitches - which currently seem to be highly under-used.

The proposal will destroy part of a historic parkland landscape - the massive reconstruction of 16 hectares is irreversible. Artificial pitches will severely damage the current ecosystem. It means huge lorries and earth movers travelling in and out of the site, on to extremely narrow country lanes, which already get congested by local traffic - there is a nursery and schools close by.

And what is very hard to understand is that Enfield Council are to receive a tiny amount of money from one of the richest football clubs in the country (and one of the wealthiest investment companies) - so that the people of Enfield lose a beautiful green space and do not benefit from a fair market price for the lease.

I hope you will give the objections of Enfield residents fair consideration and either reject the planning application or call it in.

Thank you for listening.

#9755

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008).

Whitewebbs Park is to local residents and visitors, including myself, an landscape of historic importance and incalculable wealth. To its more-than-human inhabitants it is invaluable as a habitat. It is a fragment of the UK's 2.5% remaining ancient woodland. A woodland that has, by definition, been persistently wooded since 1600. I can't help but be amazed and inspired by that.

Whitewebbs Park may not be vast, but size is not indicative of the precious ecosystem it contains and the wider ecosystem its supports through its interconnected corridors of flora and fauna. As such, I feel obliged to object to the planning application.

Below, I lay out my objections in detail:

This application proposal is for a private, commercial training ground on what is currently Public Trust and London Green Belt Land (bought for the public by Enfield Council in 1931). When the golf course associated with the park closed in 2021, as per the lease, the land reverted to public use. A private entity such as THFC should not profit from the privatisation and likely destruction of public land that has invaluable and nationally important biodiversity. Indeed, public land should never be considered for the use of private entities, and especially private commercial entities, on a matter of principle.

If THFC's proposal is supported and development goes ahead at Whitewebbs Park, its naturally rewilded area of land - a vibrant mosaic of swards grassland, shrubs and ancient woodland and particular associated fauna - will be irrecoverably depleted and its historic character destroyed (including its unique panorama) through heavy construction work and altered use. The development would undermine conservation efforts and likely constitute a violation of regional and national policies related to Green Belt and public open space policies.

The proposed private training grounds and associated development would make a large proportion of public use land inaccessible to the public. Indeed, 50% of the current accessible area - grassland with rich biodiversity - will be built on. This is the equivalent of losing a local public amenity almost twice the size of Enfield Town Park, a travesty in a time of continued negative climate change and species demise, precipitated by anthropogenic activity.

The associated THFC lease would mean there is a high possibility that access to the publicly accessible area of the development area could be revoked or never approved by Tottenham Hotspur. Football Club The outcome would be a further depletion of public access to already diminished greenbelt land as well as erosion of public trust and respect for entities such as THFC, Enfield Council and the Greater London Authority.

The argument for building on Green Belt Land constitutes a lack of imagination and foresight to protect the health of people and planet. In legal terms, there is a possible dereliction of responsibility by Enfield Council in relation to the failure to carry out correct Site of Importance for Nature Conservation procedures during its recent SINC review (2020).

The push to landscape and build through Whitewebbs' grassland and areas of ancient woodland will increase carbon levels through the destruction of carbon sinks such as soil and ancient woodland trees (which can sequester many tonnes of carbon per hectare), and by way of hydrocarbon pollutants created whilst levelling the land and constructing pitches and ancillary buildings.

The proposed use of glyphosates by THFC to "maintain" the proposed developed area will be catastrophic across the board. This herbicide's broad-spectrum ability to block the enzyme necessary for plant growth will not only disrupt vigorous plants, it will have the exact same effect on the scarce and precious grasslands and ancient woodland, impacting additionally on species that rely on said flora for food and habitat. Concerningly, scientific studies show glyphosate's detrimental effect on human nervous systems too. Thus over time, individuals training or working nearby would likely be prone to negative impacts of this chemical.

When London's air quality continues to create a high burden on its population's health and is known as a cause of mortality, conserving green spaces, maintaining green corridors and working to restrict urban sprawl is a vital mitigation strategy against negative anthropogenic actions. THFC should also understand that their athletes would benefit from clean air as much as anyone else. (Contributing to the destruction of a green space that sequesters carbon and can act as bioremediation for other pollutants associated with comorbidities in humans could well be argued as self-harm.)

The claim that nature and wildlife will be restored to an equivalent or "enhanced" level as part of the development process does not stand up to argument and would be a wholly inefficient, ineffective and unnecessary endeavour when Whitewebbs Park already contains a unique ecosystem that would be impossible to replicate due to the interconnectedness of its ancient woodlands, grassland and shrubland with succession habitats of flora and fauna that provide important green corridors extending across London. The introduction of new saplings ignores the fact that native plants self-seed and without years of mitigating study, it is likely that the introduction of new species would negatively impact native flora and fauna populations.

Instead of building on precious public parkland, that benefit the health and wellbeing of humans as well as myriad flora and fauna species, THFC should first consider any wasted potential of its current, extensive training grounds and make use of those, and only then consider alternative and additional sites, beginning with brownfield sites, which do not have over 400 years of continued old woodland growth nor the same level of conservation concerns. Utilising underused facilities would set a positive and more sustainable example to other similar entities.

It is important to note that other decision-making entities should consider the wider implications of leasing public land for commercial enterprise. Any detriment caused to local community's wellbeing, as well as negative impacts on biodiversity/exacerbation of pollution (chemical, sound and light) in the area would likely outweigh any short-term financial gain or saving related to devolved responsibility around parkland upkeep. It may also leave decision-makers liable to litigation, and in this instance Enfield Council's acts through the application process may constitute a failure in their duties in relation to section 102 of the Environmental Act 2021, and Section 40 of the Natural Environment and Rural Communities Act 2006.

Please consider my objection and its reasoning with the seriousness in which it is written. We all deserve more for ourselves and our planet.

#9766

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings, is called in and/or refused by the Mayor of London, Under article 7 of the Mayor of London Order (2008).

This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

[Guardians of Whitewebbs made a formal complaint](#) (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings.

Taken together, I believe that this constitutes a failure in Enfield Council's "duty to conserve and enhance biodiversity" under Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006, and a failure to follow London Plan policy G6 "Biodiversity and access to nature". Any assessment of any planning application could therefore be prejudiced.

In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' complaint.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage, and would result in the loss of public access to 50% of the open space.

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **"Very Special Circumstances" (VSC) do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. 'Wholly exceptional circumstances' (NPPF 193c) are not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development **privatises 50% of the park**, restricting public access to a site that has been freely available for decades.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group with little public access.
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was **excluded from designation**, reducing its legal protections.

- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines, which have already criticised previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character.**

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access – please see Public Interest Law Centre's press statement **"There is no real protection in law for public parks if this judgment stands"** regarding the 2023 judicial review judgement: <https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm, and procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

#9776

Tottenham Hotspur football club already have adequate facilities in Bulls Cross, Enfield they do not need to ruin a public park with a plastic pitch etc. and pay a peppercorn rent to Enfield Council for doing so. Please intervene in this ridiculous situation and save this green space which was so crucial during the pandemic. Thanking you in advance of a favourable outcome.

#9804

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This proposed development does not conform with the London Plan, and is deemed "inappropriate development" by the Greater London Authority (GLA) in its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides a net loss of any benefit.

Please note:

[Guardians of Whitewebbs made a formal complaint](#) (COM 101001267200) against Enfield Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020; a conflict of interest regarding the change of land designations in the New Enfield Local Plan; and the fact Enfield Council rushed the application 24/00987/FUL through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings.

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Communities Act 2006, and a failure to follow London Plan policy G6 “Biodiversity and access to nature”. Any assessment of any planning application could therefore be prejudiced.

In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park’s omission from the SINC review, its land designation change, and Enfield Council’s failure to properly address Guardians of Whitewebbs’ complaint.

Summary of why I believe the application should be called in and refused:

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1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
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Conclusion and London-wide/National Impact

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-

#9851

I have submitted my comments to the website.

On accessibility and inclusion grounds, may I request a review of how others are able to make their voices heard through different routes such as via email, letter or telephone call, public meetings. There should not be any impediment for Londoners to make their points on serious matters that affect their lives and livelihoods and a single website for comments does not seem adequate for those who may have (this is by no means an exhaustive list) disabilities including mobility impairments, or reduced/no access to the internet.

I welcome a response concerning this matter.

#9854

Dear Prime Minister,

I am writing to express my strong opposition to the proposed redevelopment of Whitewebbs Park in Enfield (ref 24/00987/FUL) and to respectfully urge your office to call in the planning application for national review.

Whitewebbs Park is a vital green space that plays an essential role in the local ecosystem and community wellbeing. The current development plans threaten:

- Significant damage to the landscape and loss of ancient woodland;
- Removal of mature trees and destruction of natural habitats;
- Displacement of wildlife, including owls, hedgehogs, badgers, foxes, muntjac deer, and several bat species;
- Loss of bird nesting sites and biodiversity;
- Increased restrictions on public access to green, open space—vital for mental and physical health.

In light of national priorities on environmental protection, biodiversity, and access to nature, I believe this development warrants urgent national oversight.

I respectfully ask that you call in this application for further scrutiny to ensure a transparent and environmentally responsible decision-making process.

Thank you for your attention to this matter.

**City Hall
Kamal Chunchie Way
London
E16 1ZE**

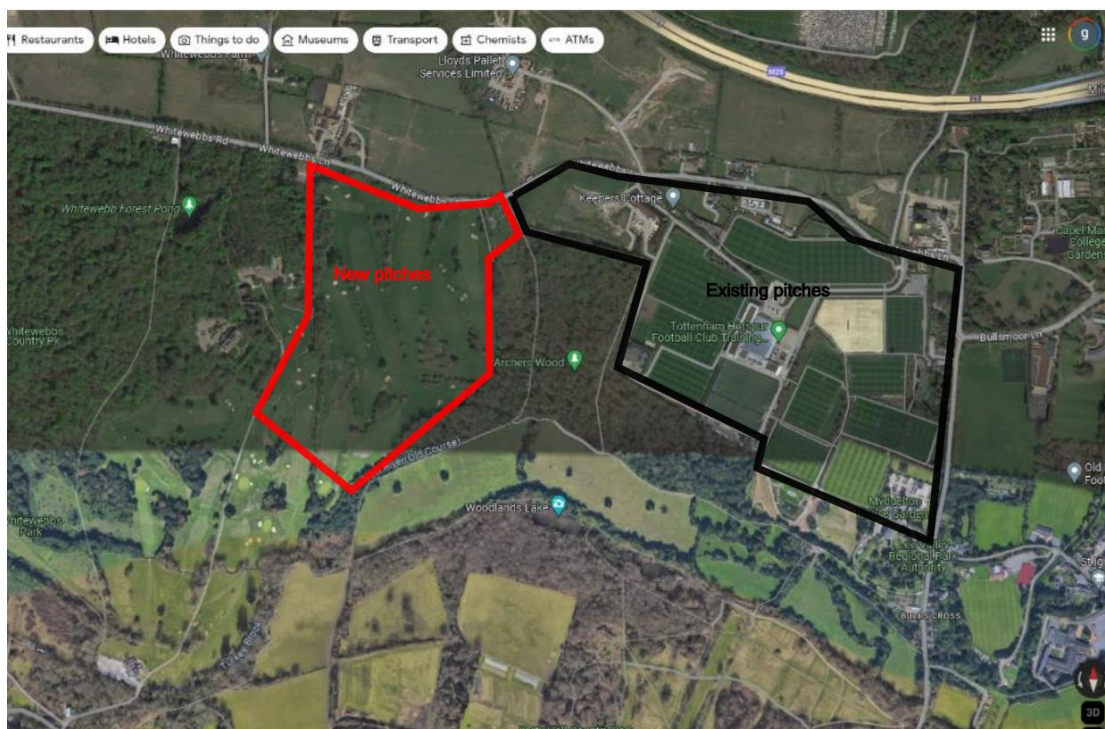
To The Mayor of London (GLA)

Tottenham Hotspurs Training Facility at Whitewebbs Park Enfield

I am writing to ask that you intervene to block this outrageous planning application, that is totally unnecessary and will create significant harm.

THFC are a business, I note their grandiose statements about community and using the additional land to provide a Womens academy but this is about taking land for commercial benefit, for a commercial organisation dominated by profits. Do THFC really care about the environment or is their main focus running a football club for profit?

See attached plan showing indicatively the size of their existing facility. There are at least 17 existing pitches covering approx. 200,000m2 (50 acres) and they plan an additional approx. 10 pitches, 150,000m2 (37 acres) .



Plan of existing training facility and additional land required

How many pitches do you need to run a Mens and Womens training facility?

I would argue this is about domination of a particular area and that it is not essential to almost double the area and number of pitches by taking nearly 40 additional acres of pristine open space and historic woodland to create a separate Womens academy.

There is sufficient existing space to easily accommodate both a Mens and Womens football training academy.

This new purpose does not qualify as an exceptional circumstance or one that can be easily justified when green belt land and historic public space and parkland is being used.

Public access to the new facility will not be granted, as we know that THFC require tight security for their training facility. The high fencing and earth bunds will adversely affect the natural landscape and character well beyond the proposes enclosed area. Protected and much-loved views will be adversely impacted. The plans propose taking over half of the usable freely available open space in Whitewebbs creating significant harm to existing users by significant reduction in freely accessible areas.

The application is contrary to the draft Enfield Local Plan's policy BG6 on protecting the Green Belt and historic landscape/features. The application is also opposed to the London Plan policies G2 on protecting the Green Belt and G4 on Open Space which states that Development Plans should "ensure that open space, particularly green space, included as part of development remains publicly accessible".

The whole development is totally inappropriate in the Green Belt. There are no exceptional circumstances or reasons why this should be agreed THFC have plenty of space in their existing training facility to accommodate a womens academy and don't need to take additional land to achieve this.

The historic parkland does not need restoration, as suggested by THFC, Historic parkland restores itself and is called historic because it has survived on its own for a large number of years. The proposals actually destroy historic parkland and landscape, and its attractiveness, and this proposal by THFC cannot be described in any way as *restoration* or *regeneration*.

I am also concerned by the loss of trees comprising the ancient woodland. These are irreplaceable habitats and should clearly be protected from harm. Mature trees provide significant benefits which cannot be replicated by planting new young trees as a replacement. Young replacement trees take up to 50 years to achieve sufficient stature to provide meaningful benefits and replace removed mature trees.

At time when both Enfield and the London Mayor have adopted targets to improve and increase the amount of wild space, habitat and for producing clean air, and to improve outdoor activities including walking, this proposed development will be wholly and significantly detrimental to such aims and should be declined.

There will be other major adverse impacts on surrounding nature because of light and noise. The whole of Whitewebbs should remain a public park with full public access to be retained for the mental and physical health of everyone, not just locals, the effect of the space covers more than the local population.

These detrimental landscape changes will be irreversible and will likely become permanent and remain after the 25 years of the Spurs lease.

Yours Sincerely

[REDACTED]

[REDACTED]

18th February 2025



KATE OSAMOR MP

HOUSE OF COMMONS

LONDON SW1A 0AA

Mr Sadiq Khan
The Mayor of London
City Hall
The Queen's Walk
LONDON SE1 2AA

20 February 2025
MP Case Ref: CD/KO63298

Dear Sadiq

Whitewebbs Park

I am writing to you regarding planning application 24:00987:FUL, which proposes the development of a football training centre at Whitewebbs Park in Enfield.

Many of my constituents have requested that I write to you in your role as the Mayor of London to ask that this application is called in. While Whitewebbs Park is not within my constituency, many residents in Edmonton and Winchmore Hill do make use of this green space.

A central concern for my constituents is the exclusion of the public from Whitewebbs Park if the development proceeds. This space holds a special place for many, and they are distressed at the prospect of losing such a large and open parkland, which is seldom available in London. Public parks are crucial for community health and well-being, providing spaces for exercise, reducing stress, and fostering community connections.

Public parks also contribute to social equity by offering free recreational spaces for all community members, regardless of income, which is especially important in a city like London. Removing access to Whitewebbs Park could disproportionately affect lower-income families who rely on public spaces for recreation.

My constituents tell me that Whitewebbs Park is home to ancient woodland, grassland, and diverse wildlife and my constituents believe that allowing this development would cause irreversible damage to this unique environment.

Concerningly, I understand there are plans to use the chemical Glyphosate to clear large grasslands as part of the development. This substance has been banned or restricted in many countries and by local authorities across the UK due to its environmental impact. Concerns have been raised about the potential for Glyphosate to seep into the soil and run off into surrounding water systems, further impacting wildlife outside the immediate development area, such as the beaver colony at nearby Forty Hall.

Furthermore, Tottenham Hotspur already possesses a vast and high-tech facility in Crew Hill, near the proposed development site at Whitewebbs Park. This raises the question of why they need more land when they already have a such a large facility at their disposal.

Additionally, I understand Tottenham Hotspur and Enfield Council have failed to explore development on alternative brownfield sites. Given the football club's immense wealth, my constituents feel there is nothing preventing them from purchasing alternative land elsewhere and stopping plans to develop Whitewebbs Park.

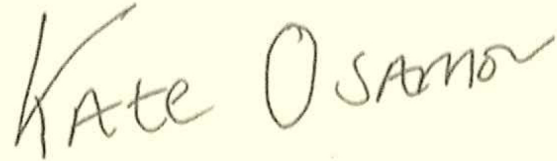
Constituents have also raised concerns about Tottenham Hotspur's previous disregard for

S106 agreements at its current men's training centre and Enfield Council's lack of enforcement. There are fears that Tottenham Hotspur will continue to disregard S106 agreements if this development is allowed to progress.

These are just a few of the concerns that have been raised with me regarding the proposed development and therefore I would urge you to consider calling this application in.

I would be grateful if you could provide a response that addresses these concerns, which I can then pass on to my constituents.

Yours sincerely

A handwritten signature in dark ink, reading "Kate Osamor". The signature is written in a cursive, flowing style. The first name "Kate" is written in a larger, more prominent script, and the surname "Osamor" follows in a similar but slightly smaller script. The ink appears to be a dark blue or black.

Kate Osamor MP
Member of Parliament for Edmonton and Winchmore Hill

FERYAL CLARK MP
Member of Parliament for Enfield North



HOUSE OF COMMONS
LONDON SW1A 0AA

Sadiq Khan
Mayor of London
City Hall
Kamal Chumchie Way
London
E16 1ZE

Our Ref: FC33904

26 February 2025

Dear Mayor of London,

Re: Tottenham Hotspur Football Club's planning application for Whitewebbs

I am writing to you concerning the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club which has been raised with me by several concerned constituents.

I am aware that the Mayor is consulted on all planning applications which are of potential strategic importance to London.

I would be grateful if you could confirm whether this application is considered a referred application, as per the Mayor of London Order 2008, in the first instance.

If this application is deemed to meet the criteria for referral, I would appreciate it if you could provide more information on the specific criteria your Office will use in assessing its merits. It would be helpful to understand how the environmental, social and infrastructural impact of the development will be weighed, and what measures are being considered to mitigate any consequences.

In addition, if you could set out the next steps following your assessment of the application. Would there be any further opportunity for my constituents to participate in this process to ensure that their voices are heard?

I look forward to hearing from you.

Yours sincerely,

Feryal Clark MP

Brimsdown • Bullsmoor • Carterhatch • Enfield Lock • Ponders End • Ridgeway • Southbury • Town • Whitewebbs

Telephone - Westminster: 0207 219 6607

Telephone - Enfield: 0208 804 4543

Email: feryal.clark.mp@parliament.uk

Twitter: [@FeryalClark](https://twitter.com/FeryalClark)

Website: www.feryalclark.org.uk

Facebook: www.facebook.com/FeryalClarkEnfieldNorth

Dear Mr Mayor,

We are writing to you regarding the planning application 24/00987/FUL that proposes the development of a football training centre at Whitewebbs Park in the London Borough of Enfield.

We would like to request that this application formally called in.

We believe that the proposal violates the Council's responsibility (in trust) to ensure that the park remains open for all residents, goes against the London Plan in both spirit and letter, and presupposes both the Planning Inspector's deliberations about the Enfield Local Plan, as well as the London wide review of the green belt by the Mayor.

Since these proposals were formally announced in 2021, local residents in Enfield have been fighting to stop Enfield Council from selling over half of Whitewebbs Park to Tottenham Hotspur Football Club. On every occasion that they have been given an opportunity to voice their opinion, residents have made clear their strong opposition to the development.

You have the power to protect this park and indeed have the power to announce clear protections for public parks. This is an opportunity to state that parks must remain preserved for public use. If this can happen to Whitewebbs Park, it can happen anywhere.

This is inappropriate development, which would be built both on Green Belt and on parkland. It is likely to cause irreparable damage to the precious biodiversity of the park; damage greenbelt views in an inappropriate way and considerably restrict public access.

Since the golf course closed in 2021, the area has become open public space. The high level of public use and support shows that the park and its facilities are not surplus to requirements. 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. Middlesex County Council bought this land for the people of Enfield, recognising it as one of the most beautiful areas in the county. Thousands of people still enjoy it today.

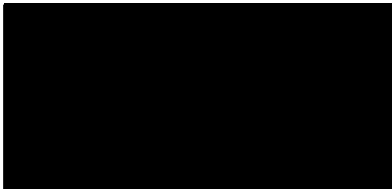
Whitewebbs Park provides real value to people across the borough and the whole city. The proposals represent permanent loss of public access and open space.

We hope that the decision can be called-in and a practical solution, which would benefit the whole of the whole Borough can be found.

With best wishes,

Cllr Reece Fox Cllr Dave Skelton Cllr Hannah Dyson

Councillors for Whitewebbs Ward in the London Borough of Enfield



7th April 2025

Sadiq Khan
Mayor of London
City Hall
Kamal Chunchie Way
London
E16 1ZE

Dear Mayor,

Re: 24/00987/FUL - Former Whitewebbs Park Golf Course Whitewebbs Road Enfield EN2

I wish to object to the planning application by Tottenham Hotspur Football Club (THFC) for the public land at Whitewebbs, which was purchased in 1931 by Middlesex County Council for the residents of North London to have access to an open space.

I would ask you, as Mayor, to call this application in and for it be refused for the following reasons:-

The space is currently protected greenbelt, recently fully rewilded following the closure of the Golf Course by the Council, and home to over 1,000 visits each week in winter (more in summer) and countless species of wildlife.

The proposal is for 50% of it is to be repurposed as fenced off astroturf pitches, with high intensity lighting visible from over 2km, and used solely to train elite football players, both male and female. This will deny the public the access, amenity and views that the land was purchased for.

The remainder is to be left unkept, with reduced access and parking and no café or water station facilities (which exist at the moment), effectively removing one of the few significant areas of accessible parkland in the North London area for an annual rental agreement (once you average the frontloaded fee) in the region of £100k each year. It should be noted the Council records show the cost of running the park to be approximately £40k each year.

Given there are nearby alternative brownfield sites available to THFC, it would seem they have simply chosen the cheapest option. This seems to have been aided by an exceptionally compliant Enfield Council which awarded THFC the lease ahead of the bidding process formally concluding, making it difficult to see this as a transparent and fair process which represents the best interests of the local residents.

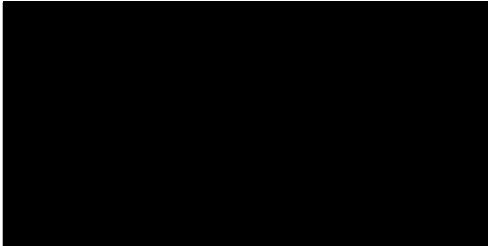
This application delivers no new housing or sports facilities to the community, only value to a wealthy football club. In doing so it would forever destroy a Local heritage site with the entire

park currently listed for its historical, archaeological and landscape value, at a time when the number of outdoor spaces is shrinking and mental health issues grow among the population.

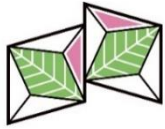
There is no justification for this proposal and it should be refused and THFC requested to use an the alternative brownfield site which is nearby.

 and have taken my children and my grandchildren to Whitewebbs most weekends. It is a beautiful space which I still wish to enjoy today and share with my great grandchildren. These open green spaces should be preserved for them and for future generations to enjoy.

Yours sincerely



Copies
Feryal Clark MP
Angela Rayner MP



City Hall Green

**Zoë Garbett
City Hall
Kamal Chunchie Way
London E16 1ZE**



Sir Sadiq Khan, Mayor of London
(Sent via email)

10 April 2025

Dear Sadiq,

Re: Whitewebbs, Planning Ref. 24/00987/FUL – Request to call in

A number of constituents have contacted me and my fellow Assembly Members, Caroline Russell and Zack Polanski, with a range of concerns about an application put forward by Tottenham Hotspur Football Club to redevelop Whitewebbs Park into a new sports facility (ref: 24/00987/FUL).

Given the significance of this proposal on the Green Belt, and residents' concerns that the potential harm of the scheme has not been adequately considered, I am writing to ask you to call-in this application.

I have touched on some key concerns below, but I urge you to ensure you fully consider the extensive range of concerns made by local residents, in particular the Guardians of Whitewebbs.

1. Harm to Green Belt

The NPPF states that “openness” is one of the two essential characteristics of the Green Belt (para. 142) and should be protected from development in all but exceptional cases.

Your officers' Stage 1 report outlined why the proposed development would contravene the openness of the Green Belt, stating:

“...it is considered that the proposed development would not preserve the openness of the Green Belt compared to what is existing, by way of:

- *Enclosure of the training grounds with a new permanent boundary treatment; ball-stop fencing around the pitches and use of floodlighting to two of the pitches;*
- *Significant new extensions to the northern clubhouse;*

- *Erection of other new ancillary buildings on greenfield land;*
- *Increased traffic movements; and*
- *Consequential visual impacts on openness (impacts on long views, visual links intervisibility etc)."*

As a result of deeming the proposal inappropriate development on the Green Belt, your Stage 1 report concluded that *"very special circumstances"* are required for the application to proceed.

It is the contention of residents I have spoken to that the very special circumstances that could permit such a scheme has not been sufficiently demonstrated or evidenced. Given the delicacy of weighing substantial considerations against one another, and the significant harm this development would cause to the Green Belt, I request you call-in this application to make a proper determination on the balance of evidence.

2. Damage to landscape and biodiversity

Residents have also raised considerable concerns about the risk this development poses to local wildlife, habitats and overall biodiversity. Residents do not consider your officers' Stage 1 report to have adequately acknowledged the risk to biodiversity due to the loss of and disruption to existing habitats – and the applicant's claim of a 30% biodiversity net gain unsubstantiated and divorced from the reality of the proposals.

The proposed development is expected to dig-up and re-landscape 50% of Whitewebbs Park's grassland and remove 207 trees. The grassland, much of which has undergone considerable rewilding since the closure of the golf club in 2021, is vitally important in sustaining biodiversity and this loss will have an untold impact on local wildlife, like birds, badgers and hedgehogs, as well as butterflies, fungi and invertebrates. They have also raised concerns that mitigations for intrusions into tree root protection areas are unlikely to be effective, and floodlighting of the pitches could have a huge bearing on winged wildlife, like the nine species of bat and 80 species of bird that are reported to have been spotted locally.

The applicant's commitment to replace and supplant the existing stock of trees does not adequately account for the unique value of the existing trees, especially older and partially rotting trees, in supporting rare insects and other wildlife. Residents fear that any positive impact of this tree planting plan would take decades to materialise, if at all, and skews the biodiversity net gain (BNG) metric away from the reality for the natural environment.

Residents are concerned the complex impacts of this proposal have not been adequately captured by the applicant or your officers' Stage 1 report, and fuller scrutiny of the applicant's BNG metric, the Environmental Impact Assessment and Arboricultural Impact Assessment is required.

3. Restrictions on public access

I share residents' concerns that the proposal represents the privatisation of a huge swathe of publicly owned land. Over a third of the site will stop being publicly accessible with permission to use and access the land becoming strictly controlled by a private company. The applicant justifies this change of use given much of the land was previously used as a golf course. This claim was echoed in the GLA's Stage 1 report. But even when the site was primarily used as a golf course, over four years ago now, it was never fenced-off and always remained publicly

accessible. In the proposed development, the applicant would limit and control access to swathes of land and new facilities on what is currently a public park.

4. Dispute over SINC designation process

It is also important to note that the Guardians of Whitewebbs have made a formal complaint to Enfield Council (Enfield Council complaint ref. 101001267200) over its Site of Importance for Nature Conservation (SINC) designation process from 2021, which decided that the bulk of the site affected by this scheme would not be awarded SINC status. The complaint makes the case that Enfield did not follow the guidance set out in the London Plan or the NPPF. This complaint has been escalated and yet to be settled.

This is incredibly significant for the planning application, given the London Plan Policy G6 states unequivocally: “Sites of Importance for Nature Conservation (SINC)s should be protected,” and goes on to describe the hierarchy of mitigations that applicants should adhere to where a SINC designation is in place. This complaint is therefore incredibly salient, and should be taken into account at Stage 2.

I urge you to call-in this application and to give due consideration to the issues both local residents have raised and the points I have made here.

Kind regards,

A handwritten signature in black ink that reads "Zoë Garbett". The signature is written in a cursive, flowing style.

Zoë Garbett AM

Green Party Member of the London Assembly

Written Representation for Planning Application 24/00987/FUL

STANCE: OBJECT

Commenter Type: Campaign Group

I am writing on behalf of the Guardians of Whitewebbs. This is our written representation (WR) for the planning application 24/00987/FUL, concerning Whitewebbs Park.

Whitewebbs Park Definition

When referring to Whitewebbs Park, we mean THFC's lease area, including the open space/grassland, of which circa. 50% would be lost to the proposed training centre, and the portion of the ancient woodland around Whitewebbs Lake, which would be seriously reconstructed. ([Site Wide Coloured Landscape Masterplan](#).)

1. Overview

- **(A) Inappropriate Development:** The Greater London Authority (GLA) concluded in their Stage 1 Planning report GLA/2024/0213/S1/01 (GLAS1R) that Tottenham Hotspur Football Club's (THFC) proposed development "would not preserve the openness of the Green Belt compared to what is existing" due to the visual impacts of the training ground boundaries, fencing, floodlights, buildings and extensions (para. 16). The GLA states, therefore, it is "inappropriate development within the Green Belt" and "very special circumstances" would have to exist for the scheme to be approved (GLAS1R, paras. 13-17). Although the GLA didn't mention the 5 purposes of the Green Belt, we also believe that THFC's proposed development is out of line with NPPF para. 143 (d) and (e).
- **(B) Very Special Circumstances (VSC):** The NPPF states that "substantial weight" should be given to any harm to the Green Belt and that '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" (para. 153). In its Planning Statement (PS) paras. 8.59-8.129, THFC set out the factors which they consider constitute the VSC of its proposed development. We consider each of these below, why each is misleading, and why the factors fail to meet the standards in NPPF para. 153.

2. Environmental, Sustainability and Ecological Benefits

- **(A) Biodiversity Net Gain (BNG):** For BNG purposes, THFC proposes to plant c. 2000 trees across the site (PS para. 8.120). However, in our view, there are no benefits in THFC's PS to the environment, sustainability or ecology of the site. As stated in para. 5.1.5 in Denis J Vickers', BSc(Hons), FLS, CBiol, MRSB, MCIEEM (Consultant Ecologist) "Whitewebbs Park (Enfield): Ecological Appraisal and Priority/Protected Species Assessment": "*Biodiversity net gain (BNG) calculations*

are based principally on habitats and do not adequately take account of faunal species present even if of high conservation status. Therefore, with regards the potential development of Whitewebbs Park, woodland planting is not considered appropriate with regards off-setting the loss of grassland. This will not benefit bird species and invertebrate species associated with open grassland, the populations of which have suffered an unprecedented decline in recent years. Additionally, if woodland planting is chosen to off-set the loss of grassland, the poor-quality secondary woodland which results may take more than 30 years to mature and possibly 100 years plus before it supports a relatively wide range of fungi, lichens, Bryophytes and fauna". 50% of the mosaic/neutral/acid grassland would be lost to monoculture football pitches and astroturf. Astroturf/plastic-grass has a large carbon footprint from manufacturing, transport, installation, and non-recyclability. It devastates wildlife during use, shedding microplastics into soil, drainage systems, rivers, and seas. The plastic-grass membrane suffocates life below and contributes to flooding in wet weather. Preserving the open grassland is vital for butterflies, spiders, bees, small mammals and an abundance of insects such as beetles, and with THFC's tree planting proposals, this is not recognised. THFC's ecologists have stated that the site's grassland is chiefly g4 - modified grassland. The survey was initially conducted in a time of drought and many grass species are notoriously difficult to distinguish and identify. We also question how the density of species/m2 was estimated. Additionally, the loss of significant habitat value from the proposed tree felling is not recorded, nor mentioned, in the flawed BNG metric calculation or the ecological impact assessments. Overall, THFC has considerably overestimated the BNG of its proposals.

- **(B) Re-landscaping:** THFC, as part of building their training pitches, would have to flatten the landscape for pitches. This would involve colossal earth moving works and irrevocable habitat disruption. It would also be out of character with the natural landscape (see WR para. 4 (A)). The part of the site proposed for training pitches has never been significantly landscaped. The British Geological Survey does not show any additional material deposited here. It represents a historic landscape pristine from when Enfield Chase (forest) was deforested post 1777. Important landscape and soils, such as what is present in Whitewebbs Park (an Area of Special Character) should be protected (NPPF para. 180).
- **(C) Attenuation Ponds:** The loss of grassland and some of the site's trees also creates an added risk of flooding. Since hybrid pitches do not absorb much water, THFC would need to keep these dry. While THFC proposes to create attenuation ponds, we do not believe this to be the answer. Not only does it harm the natural landscape, it creates the need for displacing large amounts of earth, in turn harming the soil. From Royal Horticultural Society (RHS): *"Digging damages soil structure by destroying natural drainage channels made by worms, disturbing fungal networks, and releasing carbon that's locked in the soil"*. Attenuation ponds would take up 2 areas of active meadowland, which is already draining well. There is little ecological benefit of these, since the adjacent beaver flooding project and the existing wetland in the wooded margins are solving flooding in a natural fashion.
- **(D) Tree Felling:** The issue of felling 137 trees (PS para. 8.57.2) is unsound (NPPF para. 180 (b)). THFC would also fell an additional 70 "Category U" trees -

the argument for felling these trees because of “*good arboricultural management*” is flawed, since dead and/or decaying trees are vital for the ecosystem, housing an abundance of insects, birds and wildlife. Logika fails to acknowledge the habitat on site, focusing on saproxylic species only in relation to the ancient woodland. This exposes an inexcusable mistake in equating ancient woodland rather than open grown trees with high quality saproxylic fauna. The presence of a rare hoverfly and bumblebee mimic, *Pocota personata*, on an ash tree highlights this. Whitewebbs is the third site in London to record this species in the last 50 years. Saproxylic species generally require decaying wood in open grown trees where there is more light and heat as compared to closed canopy woodland. They also require flowering shrubs like hawthorn nearby. The impacts on saproxylic species of losing significant volumes of high value decaying wood by removing so many trees is not mentioned in the EIA. Proposed tree removals in the Arboricultural Impact Assessment (AIA) are unnecessary and result from the change of use, not inherent risk. As noted above, they also represent significant biodiversity loss. This is not accounted for in the BNG metric because in this calculation, they are just treated as generic trees, not trees with decay and other habitat features.

- **(E) Pollution and Disturbance:** The proposed floodlights and noise from the development would seriously impact wildlife. For example, despite curfews, light spill from floodlighting would have a detrimental effect on bats. This is highly likely to discourage foraging/commuting activities and possibly prevent roosting in adjacent trees and woodlands. Bat specie “Daubenton’s *Myotis*” feed on the surface of Whitewebbs Lake and are light sensitive. This is adjacent to the proposed new access road (WR para. 2 (G)). The building of this, and the traffic that comes with it would be detrimental to bats present in the Whitewebbs Lake area. Furthermore, in Logika’s “Biodiversity Baseline Report”, there seems to be no bat surveys around the Whitewebbs Lake area (Figure 11-3 and 11-4), which is classified at part of the Ancient Woodland and Metropolitan SINCC. We question why this area was overlooked and believe bat surveys should have taken place here if a new road is planned to run past the Lake? There is also a high likelihood that many bird species (particularly those associated with open grassland) would become much rarer in the locality or no longer occur. Noise from the training ground, auxiliary facilities, and the development of both, may also be a concern with regards site aesthetics and perceived tranquillity of nearby SINCCs. For example, the adjacent Enfield Beavers located in Forty Hall Estate could potentially be affected. All these proposed developments (Whitewebbs Park, the nature reserve development at Dickenson’s Meadow, and the future education centre redevelopment in the Western Field) would constitute major disturbance for wild animals, especially for wildlife in an enclosure, that spends time under water.
- **(F) Glyphosate:** The use of glyphosate for the eradication of extensive grassland areas prior to replanting would be immensely harmful. This chemical is prohibited in Europe; in 2019, the Greater London Authority adopted a motion to discourage its usage; and 50 local authorities have either banned or significantly limited its application, particularly in parks. Glyphosate kills plant-life and is toxic to wildlife. As the site is wet, the glyphosate could seep into the soil, potentially affecting the hydrology of the site. The chemical may also find its way into Turkey Brook and Cuffley Brook, and harm aquatic wildlife and their habitats.

- **(G) Whitewebbs Lake:** In THFC's proposals, Whitewebbs Lake's character would be drastically altered, such as destruction to the surrounding ancient woodland to create what THFC calls "*restoring the historic carriageway*" (see WR para. 4) in order to reroute the access road to the Toby Carvery and make the existing road private. The harm this would cause to wildlife and their habitats (including the irreplaceable ancient woodland) would be devastating. It would create air, noise and light pollution. Since there is little to no public transport infrastructure around the Northern area of Whitewebbs where the training ground would be situated, this would require athletes to use their car. This does not "Promote Sustainable Transport" between paras. 108-117 in the NPPF.
- **(H) Wildlife Corridor:** The development and repurposing of the Green Belt would likely reduce the Park's functionality as a wildlife corridor. The passage of small mammals, reptiles, amphibians etc to and from Whitewebbs Wood, Forty Hall Estate and Hilly Fields Country Park SINC's would be impeded via habitat loss and disturbance. The development is also likely to have an adverse impact on flora and fauna e.g. people entering woodlands, grasslands and other habitats and affecting populations of small birds and mammals.
- **(I) Irreplaceable Habitat:** The loss or deterioration of irreplaceable ancient woodland and veteran tree habitat (i.e. around Whitewebbs Lake - see WR para. 2 (G)) should be refused (NPPF para. 186 (c)). THFC's proposals do not meet the "wholly exceptional reasons" set out in NPPF chapter 15 footnote 67, nor does a suitable compensation strategy exist. THFC's tree protection plan does not follow the Natural England and Forestry Commission Standing Advice and therefore cannot protect irreplaceable veteran trees they claim they will retain.
- **(J) Tree Root Protection Areas:** Russel Miller MSc (Arboricultural and Ecology Consultant) states "*The proposed mitigation for intrusions into tree Root Protection Areas (RPAs) are extremely unlikely to work in such a large-scale landscape alteration scheme. The development proposes huge dislocation and movement of soil. The proximity of proposed retained veteran and Grade A trees to these major earthworks means the proposed RPA protection measures will not work. The scale of protection and supervision required to protect tree roots of multiple trees in close proximity to major earth works rarely results in successful tree retention. Furthermore, veteran trees should have extra-large RPAs (minimum 15 x diameter), a metric not recognised or applied in the AIA mitigation proposals. Instead of following this Natural England guidance on 15 x dia for RPAs the AIA adopts BS5837 12 x and a cap of 707m2. The failure to note and acknowledge this special requirement for veteran trees is particularly concerning given the purported mitigation plans for protection of these trees' root areas and their irreplaceability*".
- **(K) Harm Not Outweighed:** Overall, there is no benefit whatsoever regarding the environment, and all of THFC's proposals would involve harm to the Green Belt. For these reasons, this planning application is not in line with NPPF paras. 180, 185, 186 and 191. It is also not an acceptable use of land (NPPF para. 194).

3. Health Benefits

- **(A) Training Centre Focus:** This proposal for an elite/private women's training centre focuses solely on the health and wellbeing of a tiny proportion of the young female generation, many of whom would not even be from Enfield. Most of the public would not be able to engage in sport in this setting, and as stated in WR para. 5 (B), there would be a net loss of community access/public benefit. This is an inappropriate strategy: the planning application doesn't align with NPPF para. 96 (c).
- **(B) The Current Site:** Whitewebbs, as it is, provides excellent health benefits to the community, both physically and mentally. Large numbers of people visit the site regularly to walk, run, cycle, do yoga, meditate, and even play ball games/football. The site in its open parkland state provides an inspiring and calming atmosphere and contributes to good mental health. People of all ages are free to experience the benefits of this site. Exclusion of people to the training ground area would increase public pressure elsewhere. This could lead to more habitat deterioration e.g. disturbance of nesting birds, trampling of sensitive habitats and potential misuse.
- **(C) Lease Area "Improvements":** THFC's claims around "community access" are flawed for the reasons set out in WR para. 5. There is no need for additional walking or cycle routes, as many people are seen using the current paths which have been created from regular use by the public. Creation of these routes would further harm the environment and nature.
- **(D) Harm Not Outweighed:** Overall, there is negligible benefit (and mainly a negative impact), to the health of the public through these proposals.

4. Heritage Benefits/Restoration

- **(A) Character:** Enfield Local Heritage List, May 2018, entry 259 states *"[Whitewebbs still] retains much of the parkland character"*. NPPF para. 205 states *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation"*. THFC's proposals would not conserve the Whitewebbs Park and its assets, and would obscure panoramic views from Whitewebbs Lane looking south and south west; the main driveway (footpath through the Park) would be cut by the training ground fencing, and subsequently the panoramic views looking north and north east would be lost; and dense tree planting would obscure views from the south of the park, near the café, looking north west. The plan is unsound as THFC would destroy Important Local View "6. Whitewebbs Lane" which is protected in Policy DE5 of Enfield Council's Local Plan. In addition to obscuring views, the 21 metre tall floodlights would be out of keeping with the character of the land. THFC proposes to level out the land, which changes the character and landscape of the Park. It would build attenuation ponds, which are also out of keeping with the natural landscape. In and around the lake and north eastern Whitewebbs Woods area would also be seriously reconstructed. THFC claims (PS para. 8.118) that

there would be “*reinstatement of the historic carriageway route to Whitewebbs House*”. However, there is no historic significance of this “carriageway”, and building a new road to the Toby Carvery would consequently cause great disruption and harm to wildlife, the ancient woodland and the character of the Whitewebbs Lake area (WR para. 2 (G)). Whitewebbs Park is also an Area of Special Character (ASC), along with adjacent Forty Hall and Myddleton House, as set out in Enfield Council’s 2013 Boundary Review (pp. 18-19). Not to preserve this ASC is out of line with NPPF para. 143 (d).

- **(B) Northern Clubhouse:** There would be significant harm to the historic character of the Northern Clubhouse/Stable Block. It is listed as entry 257 in Enfield Local Heritage List, May 2018. THFC would approximately double it in size, and would build extra car parking. The justification for this is not convincing, and therefore this proposed extension is not in line with NPPF para. 206.
- **(C) Harm Not Outweighed:** While some heritage assets may be preserved, these are highly minimal and the harm of the development is not outweighed by the historic preservation in this VSC claim. There is overall a negative impact to the Park and its historic assets.

5. Community Access/Public Benefit, Training and Club-led Programmes

- **(A) Statutory Purpose:** While not fully related to planning, it is still important to know when making judgements around VSC that the disposal plans for Whitewebbs are not consistent with the “statutory purpose” of the land, which is to be held as open space land on trust for the public (a purpose for which it was acquired using public funds when it was purchased in 1931 by Enfield Council using public money). The lease and plan would extinguish public rights to access these facilities, and therefore is unsound: see NPPF para. 154 (b).
- **(B) Net Loss of Community Access/Public Benefit:** THFC say (PS para. 7.14) it is “*developing a package of community obligations to be delivered by the Club and its charitable Foundation*”. Please note THFC has a poor record of delivering its Section 106 agreements for their existing training centre. It has still not built the education centre and nature reserve promised in 2008 and 2009 and is now developing plans for doing something similar further along the Green Belt at Dickenson’s Meadow. Do we really need community access to another elite training ground in place of our historic and beautiful public park? THFC would be privatising approximately half of the open space, and it has always been for the public, so there is a net loss of public and community access/benefit. THFC misleadingly indicate in point “4.4 MASTERPLAN - LAND USE/PUBLIC ACCESS” of their “DESIGN AND ACCESS STATEMENT: REVISION 1” that when the site was used as a golf course, there was “*Restricted Access*” to 77% of the open space. This is flawed, since as set out in WR para. 5 (A), the statutory purpose of the land has always been held for the public, whereas in THFC’s proposed development, it would be restricting access to approximately half of the open space.

- **(C) Local Plan:** This planning application is not in line with Enfield Council's current draft Local Plan, as in this plan, Table C1.184 Design Principle A states that development on the site (i.e. Whitewebbs Former Golf Course) "*must maximise publicly accessible space*". Since there would be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park, THFC's planning application is unsound.
- **(D) Programmes/Training Centre Focus:** The points regarding the training centre's primary focus that are set out in WR para. 3 (A) fully apply to this point as well. THFC says it would offer coaching programmes, yet these would still be private and inaccessible to the vast majority of the community. These proposals do not include the older generations at all.
- **(E) Harm Not Outweighed:** There is an overall negative impact on the public/community through these proposals.

6. Socio-economic Benefits

All socio-economic benefits listed between pages 64-65 of THFC's PS are either solely focused on commercial, private and elite benefit, or are flawed. Both grassroots and professional sports offerings would be private and only benefit the select few, and would feed into THFC's own interests and growth as a commercial company. PS para. 8.98.2 is flawed for the reasons set out in WR paras. 3 and 5 (B). PS para. 8.98.3 is flawed for the reasons set out in WR para 2. Evidently, these points have a negative impact on the current use of the Park.

7. Need and Alternative Sites

- **(A) Need:** We question the need for another training centre, when THFC already has 17 pitches and a state-of-the-art facility. THFC has not clearly demonstrated why the women cannot just use these. Even if THFC were not to use their current one, we still question the size of the development, and if it was smaller, THFC could easily find land elsewhere that could take a development without causing so much harm to the Green Belt. In our view, there is no need for private/elite sporting facilities in the borough (refer back to WR paras. 5 and 6).
- **(B) Gender Equality:** THFC makes numerous claims around gender equality. We do not disagree that women's football is as important as men's football, but for true equality, the women should use the same facilities as the men in THFC's existing training centre.
- **(C) Alternative Sites:** THFC has failed to exhaust options of existing brownfield sites (NPPF 146 (a)).
- **(D) Lease Area:** We question the need for so much land in addition to the land needed for the training centre (37Ha extra). We understand that this is needed for

BNG purposes, but if the woodland planting set out in THFC's BNG proposals is unsustainable (as set out in WR para. 2 (A)), we do not believe this is an acceptable use of land.

- **(E) PS Para. 8.127:** THFC state that the VSC of this proposal is *"Responding to the compelling need to grow the women's game, and the benefits that arise from its growth"* and *"Positively responding to THFC's needs to provide professional training facilities which will make the Club achieve its potential in Women's football (see Section 3)"*. Both of these arguments focus principally on THFC's commercial benefits, and the benefits to a very small proportion of professional or select athletes (see WR paras. 3, 5 and 6).
- **(F) Harm Not Outweighed:** NPPF para. 103 has not been taken into account - this development would not better than nor outweigh the loss of the former use.

8. SINC Review

We are concerned that the correct procedures set out by the London Wildlife Sites Board regarding Sites of Importance for Nature Conservation (SINC) reviews have not been followed. The last SINC review in Enfield was held in 2020, and was prepared by LUC. From what we have been able to establish, there appear to be some major flaws.

In para. 1.2 of LUC's report, it states *"This review is an addendum to the Enfield Blue and Green Strategy and will form part of the evidence base of the emerging Local Plan. It is the council's duty to ensure that the conservation of biodiversity is considered as part of the plan-making process. The recommendations outlined in this report will need to be subject to consultation with relevant stakeholders, including local natural history experts and representatives of "Friends of..." groups, at the borough level prior to submitting these recommendations to the London Wildlife Sites Board (LWSB). This part of the SINC Review process will need to be led by Enfield Council"*.

However, there has been no stakeholder consultation, nor correspondence from Enfield Council with the LWSB as of May, 2024 (past the Local Plan Regulation 19 stage). There are no further documents from Enfield Council regarding SINC. The report does not seem to come to any conclusion - it just sets out various recommendations, but there is no decision making process recorded. No sites were upgraded.

Furthermore, we believe it is an anomaly that Whitewebbs Park has not been included in any recommendations for SINC upgrade. The land proposed for THFC's development is surrounded by, and connects, three SINC: Hilly Fields, Forty Hall and Whitewebbs Woods. Enfield Council's SINC review's description of the latter applies equally to this adjacent grassland *"the site forms part of a wider network of habitats, which offer important opportunities for a range of protected and notable flora and faunal species in the north of the borough"*. The SINC review recommended upgrades to fields along Turkey Brook at Forty Hall due to their value as a corridor.

The former golf course is, literally, the extension of that corridor through to Hilly Fields and Whitewebbs Woods. Crew's Hill Golf Course was recommended to be upgraded in the review to SINC status due to its grassland. It is an anomaly that Whitewebbs, used as a golf course at the time, was not also accorded SINC status as it has equal importance as a corridor and as an expanse of grassland rich in invertebrates (including priority species), comprising a mosaic, neutral and acid grassland (or similar).

Given this strong evidence, we believe it to be a serious oversight that Whitewebbs Park was left unsurveyed and not considered for such protection in Enfield's latest SINC review. If the Park had been accorded SINC status, it would have had greater protection, including under London Plan Policy G6 1. THFC's plans would have come under greater scrutiny, and likely been rejected. In addition, with its high ecological sensitivity, Whitewebbs Park should have been integrated into the borough's Local Nature Recovery Strategy (LNRS).

9. Forty Hill Conservation Area (FHCA)

In 2008, the FHCA boundary was extended, and the area now borders Whitewebbs Park (see Article 4 Map 2009). THFC's proposed development would negatively affect the FHCA. Enfield Council's 2015 Forty Hill "Conservation Area Character Appraisal" describes the damage THFC's existing training ground has done to this historic area. In para. 2.5.31, in regard to Forty Hall, it states *"the historic setting of the house is vulnerable to developments outside the designated park. By far [the] most important historical vista from the house, northwards along the avenue, now terminates in the anachronistic suburban clutter of the Tottenham Hotspur Football Club training ground to the west of Myddelton House. The purpose of the 2008 boundary extension has been diluted by its construction"*. The Appraisal goes on to state *"Any further development in this area, or in the landscape beyond it would be very damaging"*. From Enfield Council's 2015 Forty Hill "Conservation Area Management Proposals", one of the recommendations states *"The principal development pressures are...from the structures and landscaping associated with sports facilities. Planning controls should be used to minimise the use of these urban features..."*.

11. Conclusion

When all elements of this planning application are taken into account, and weighed against the VSC, there would be a negative impact which would constitute significant harm to the Green Belt and its purposes, providing negligible public/community benefit. Therefore, VSC should not be granted.

We believe this planning application should be refused for the reasons stated above.

Thank you for reading our representation,

Yours sincerely,

Written by:

[REDACTED] on behalf of Guardians of Whitewebbs, a local community campaign group.

Edited by (chiefly WR para. 2):

Guardians of Whitewebbs:

Website: <https://www.avidbeats.com/guardians-of-whitewebbs>

References:

- [Planning Application 24/00987/FUL Documents](#)
- [GLA Stage 1 Report](#)
- [NPPF 2023](#)
- [Ecological Impact Assessment and Biodiversity Baseline Report](#)
- [Natural England and Forestry Commission Standing Advice \("Ancient woodland, ancient trees and veteran trees: advice for making planning decisions"\)](#)
- [Ancient Woodland and Veteran Tree Buffer Zones \(Natural England and Forestry Commission Guidance 2014\)](#)
- [Enfield Local Heritage List \(2018\)](#)
- [Enfield Local Plan](#)
- [Area of Special Character Boundary Review \(2013\)](#)
- [Enfield Characterisation Study \(2011\)](#)
- [Enfield SINC Review 2020](#)
- [Forty Hill Conservation Area](#)

Written Representation for Planning Application 24/00987/FUL

STANCE: OBJECT

Commenter Type: Campaign Group

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- **(C) Attenuation Ponds:** The loss of grassland and some of the site's trees also creates an added risk of flooding. Since hybrid pitches do not absorb much water, THFC would need to keep these dry. While THFC proposes to create attenuation ponds, we do not believe this to be the answer. Not only does it harm the natural landscape, it creates the need for displacing large amounts of earth, in turn harming the soil. From Royal Horticultural Society (RHS): *"Digging damages soil structure by destroying natural drainage channels made by worms, disturbing fungal networks, and releasing carbon that's locked in the soil"*. Attenuation ponds would take up 2 areas of active meadowland, which is already draining well. There is little ecological benefit of these, since the adjacent beaver flooding project and the existing wetland in the wooded margins are solving flooding in a natural fashion.
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the argument for felling these trees because of “*good arboricultural management*” is flawed, since dead and/or decaying trees are vital for the ecosystem, housing an abundance of insects, birds and wildlife. Logika fails to acknowledge the habitat on site, focusing on saproxylic species only in relation to the ancient woodland. This exposes an inexcusable mistake in equating ancient woodland rather than open grown trees with high quality saproxylic fauna. The presence of a rare hoverfly and bumblebee mimic, *Pocota personata*, on an ash tree highlights this. Whitewebbs is the third site in London to record this species in the last 50 years. Saproxylic species generally require decaying wood in open grown trees where there is more light and heat as compared to closed canopy woodland. They also require flowering shrubs like hawthorn nearby. The impacts on saproxylic species of losing significant volumes of high value decaying wood by removing so many trees is not mentioned in the EIA. Proposed tree removals in the Arboricultural Impact Assessment (AIA) are unnecessary and result from the change of use, not inherent risk. As noted above, they also represent significant biodiversity loss. This is not accounted for in the BNG metric because in this calculation, they are just treated as generic trees, not trees with decay and other habitat features.

- **(E) Pollution and Disturbance:** The proposed floodlights and noise from the development would seriously impact wildlife. For example, despite curfews, light spill from floodlighting would have a detrimental effect on bats. This is highly likely to discourage foraging/commuting activities and possibly prevent roosting in adjacent trees and woodlands. Bat specie “Daubenton’s *Myotis*” feed on the surface of Whitewebbs Lake and are light sensitive. This is adjacent to the proposed new access road (WR para. 2 (G)). The building of this, and the traffic that comes with it would be detrimental to bats present in the Whitewebbs Lake area. Furthermore, in Logika’s “Biodiversity Baseline Report”, there seems to be no bat surveys around the Whitewebbs Lake area (Figure 11-3 and 11-4), which is classified at part of the Ancient Woodland and Metropolitan SINCC. We question why this area was overlooked and believe bat surveys should have taken place here if a new road is planned to run past the Lake? There is also a high likelihood that many bird species (particularly those associated with open grassland) would become much rarer in the locality or no longer occur. Noise from the training ground, auxiliary facilities, and the development of both, may also be a concern with regards site aesthetics and perceived tranquillity of nearby SINCCs. For example, the adjacent Enfield Beavers located in Forty Hall Estate could potentially be affected. All these proposed developments (Whitewebbs Park, the nature reserve development at Dickenson’s Meadow, and the future education centre redevelopment in the Western Field) would constitute major disturbance for wild animals, especially for wildlife in an enclosure, that spends time under water.
- **(F) Glyphosate:** The use of glyphosate for the eradication of extensive grassland areas prior to replanting would be immensely harmful. This chemical is prohibited in Europe; in 2019, the Greater London Authority adopted a motion to discourage its usage; and 50 local authorities have either banned or significantly limited its application, particularly in parks. Glyphosate kills plant-life and is toxic to wildlife. As the site is wet, the glyphosate could seep into the soil, potentially affecting the hydrology of the site. The chemical may also find its way into Turkey Brook and Cuffley Brook, and harm aquatic wildlife and their habitats.

- **(G) Whitewebbs Lake:** In THFC's proposals, Whitewebbs Lake's character would be drastically altered, such as destruction to the surrounding ancient woodland to create what THFC calls "*restoring the historic carriageway*" (see WR para. 4) in order to reroute the access road to the Toby Carvery and make the existing road private. The harm this would cause to wildlife and their habitats (including the irreplaceable ancient woodland) would be devastating. It would create air, noise and light pollution. Since there is little to no public transport infrastructure around the Northern area of Whitewebbs where the training ground would be situated, this would require athletes to use their car. This does not "Promote Sustainable Transport" between paras. 108-117 in the NPPF.
- **(H) Wildlife Corridor:** The development and repurposing of the Green Belt would likely reduce the Park's functionality as a wildlife corridor. The passage of small mammals, reptiles, amphibians etc to and from Whitewebbs Wood, Forty Hall Estate and Hilly Fields Country Park SINC's would be impeded via habitat loss and disturbance. The development is also likely to have an adverse impact on flora and fauna e.g. people entering woodlands, grasslands and other habitats and affecting populations of small birds and mammals.
- **(I) Irreplaceable Habitat:** The loss or deterioration of irreplaceable ancient woodland and veteran tree habitat (i.e. around Whitewebbs Lake - see WR para. 2 (G)) should be refused (NPPF para. 186 (c)). THFC's proposals do not meet the "wholly exceptional reasons" set out in NPPF chapter 15 footnote 67, nor does a suitable compensation strategy exist. THFC's tree protection plan does not follow the Natural England and Forestry Commission Standing Advice and therefore cannot protect irreplaceable veteran trees they claim they will retain.
- **(J) Tree Root Protection Areas:** Russel Miller MSc (Arboricultural and Ecology Consultant) states "*The proposed mitigation for intrusions into tree Root Protection Areas (RPAs) are extremely unlikely to work in such a large-scale landscape alteration scheme. The development proposes huge dislocation and movement of soil. The proximity of proposed retained veteran and Grade A trees to these major earthworks means the proposed RPA protection measures will not work. The scale of protection and supervision required to protect tree roots of multiple trees in close proximity to major earth works rarely results in successful tree retention. Furthermore, veteran trees should have extra-large RPAs (minimum 15 x diameter), a metric not recognised or applied in the AIA mitigation proposals. Instead of following this Natural England guidance on 15 x dia for RPAs the AIA adopts BS5837 12 x and a cap of 707m2. The failure to note and acknowledge this special requirement for veteran trees is particularly concerning given the purported mitigation plans for protection of these trees' root areas and their irreplaceability*".
- **(K) Harm Not Outweighed:** Overall, there is no benefit whatsoever regarding the environment, and all of THFC's proposals would involve harm to the Green Belt. For these reasons, this planning application is not in line with NPPF paras. 180, 185, 186 and 191. It is also not an acceptable use of land (NPPF para. 194).

3. Health Benefits

- **(A) Training Centre Focus:** This proposal for an elite/private women's training centre focuses solely on the health and wellbeing of a tiny proportion of the young female generation, many of whom would not even be from Enfield. Most of the public would not be able to engage in sport in this setting, and as stated in WR para. 5 (B), there would be a net loss of community access/public benefit. This is an inappropriate strategy: the planning application doesn't align with NPPF para. 96 (c).
- **(B) The Current Site:** Whitewebbs, as it is, provides excellent health benefits to the community, both physically and mentally. Large numbers of people visit the site regularly to walk, run, cycle, do yoga, meditate, and even play ball games/football. The site in its open parkland state provides an inspiring and calming atmosphere and contributes to good mental health. People of all ages are free to experience the benefits of this site. Exclusion of people to the training ground area would increase public pressure elsewhere. This could lead to more habitat deterioration e.g. disturbance of nesting birds, trampling of sensitive habitats and potential misuse.
- **(C) Lease Area "Improvements":** THFC's claims around "community access" are flawed for the reasons set out in WR para. 5. There is no need for additional walking or cycle routes, as many people are seen using the current paths which have been created from regular use by the public. Creation of these routes would further harm the environment and nature.
- **(D) Harm Not Outweighed:** Overall, there is negligible benefit (and mainly a negative impact), to the health of the public through these proposals.

4. Heritage Benefits/Restoration

- **(A) Character:** Enfield Local Heritage List, May 2018, entry 259 states *"[Whitewebbs still] retains much of the parkland character"*. NPPF para. 205 states *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation"*. THFC's proposals would not conserve the Whitewebbs Park and its assets, and would obscure panoramic views from Whitewebbs Lane looking south and south west; the main driveway (footpath through the Park) would be cut by the training ground fencing, and subsequently the panoramic views looking north and north east would be lost; and dense tree planting would obscure views from the south of the park, near the café, looking north west. The plan is unsound as THFC would destroy Important Local View "6. Whitewebbs Lane" which is protected in Policy DE5 of Enfield Council's Local Plan. In addition to obscuring views, the 21 metre tall floodlights would be out of keeping with the character of the land. THFC proposes to level out the land, which changes the character and landscape of the Park. It would build attenuation ponds, which are also out of keeping with the natural landscape. In and around the lake and north eastern Whitewebbs Woods area would also be seriously reconstructed. THFC claims (PS para. 8.118) that

there would be “*reinstatement of the historic carriageway route to Whitewebbs House*”. However, there is no historic significance of this “carriageway”, and building a new road to the Toby Carvery would consequently cause great disruption and harm to wildlife, the ancient woodland and the character of the Whitewebbs Lake area (WR para. 2 (G)). Whitewebbs Park is also an Area of Special Character (ASC), along with adjacent Forty Hall and Myddleton House, as set out in Enfield Council’s 2013 Boundary Review (pp. 18-19). Not to preserve this ASC is out of line with NPPF para. 143 (d).

- **(B) Northern Clubhouse:** There would be significant harm to the historic character of the Northern Clubhouse/Stable Block. It is listed as entry 257 in Enfield Local Heritage List, May 2018. THFC would approximately double it in size, and would build extra car parking. The justification for this is not convincing, and therefore this proposed extension is not in line with NPPF para. 206.
- **(C) Harm Not Outweighed:** While some heritage assets may be preserved, these are highly minimal and the harm of the development is not outweighed by the historic preservation in this VSC claim. There is overall a negative impact to the Park and its historic assets.

5. Community Access/Public Benefit, Training and Club-led Programmes

- **(A) Statutory Purpose:** While not fully related to planning, it is still important to know when making judgements around VSC that the disposal plans for Whitewebbs are not consistent with the “statutory purpose” of the land, which is to be held as open space land on trust for the public (a purpose for which it was acquired using public funds when it was purchased in 1931 by Enfield Council using public money). The lease and plan would extinguish public rights to access these facilities, and therefore is unsound: see NPPF para. 154 (b).
- **(B) Net Loss of Community Access/Public Benefit:** THFC say (PS para. 7.14) it is “*developing a package of community obligations to be delivered by the Club and its charitable Foundation*”. Please note THFC has a poor record of delivering its Section 106 agreements for their existing training centre. It has still not built the education centre and nature reserve promised in 2008 and 2009 and is now developing plans for doing something similar further along the Green Belt at Dickenson’s Meadow. Do we really need community access to another elite training ground in place of our historic and beautiful public park? THFC would be privatising approximately half of the open space, and it has always been for the public, so there is a net loss of public and community access/benefit. THFC misleadingly indicate in point “4.4 MASTERPLAN - LAND USE/PUBLIC ACCESS” of their “DESIGN AND ACCESS STATEMENT: REVISION 1” that when the site was used as a golf course, there was “*Restricted Access*” to 77% of the open space. This is flawed, since as set out in WR para. 5 (A), the statutory purpose of the land has always been held for the public, whereas in THFC’s proposed development, it would be restricting access to approximately half of the open space.

- **(C) Local Plan:** This planning application is not in line with Enfield Council's current draft Local Plan, as in this plan, Table C1.184 Design Principle A states that development on the site (i.e. Whitewebbs Former Golf Course) "*must maximise publicly accessible space*". Since there would be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park, THFC's planning application is unsound.
- **(D) Programmes/Training Centre Focus:** The points regarding the training centre's primary focus that are set out in WR para. 3 (A) fully apply to this point as well. THFC says it would offer coaching programmes, yet these would still be private and inaccessible to the vast majority of the community. These proposals do not include the older generations at all.
- **(E) Harm Not Outweighed:** There is an overall negative impact on the public/community through these proposals.

6. Socio-economic Benefits

All socio-economic benefits listed between pages 64-65 of THFC's PS are either solely focused on commercial, private and elite benefit, or are flawed. Both grassroots and professional sports offerings would be private and only benefit the select few, and would feed into THFC's own interests and growth as a commercial company. PS para. 8.98.2 is flawed for the reasons set out in WR paras. 3 and 5 (B). PS para. 8.98.3 is flawed for the reasons set out in WR para 2. Evidently, these points have a negative impact on the current use of the Park.

7. Need and Alternative Sites

- **(A) Need:** We question the need for another training centre, when THFC already has 17 pitches and a state-of-the-art facility. THFC has not clearly demonstrated why the women cannot just use these. Even if THFC were not to use their current one, we still question the size of the development, and if it was smaller, THFC could easily find land elsewhere that could take a development without causing so much harm to the Green Belt. In our view, there is no need for private/elite sporting facilities in the borough (refer back to WR paras. 5 and 6).
- **(B) Gender Equality:** THFC makes numerous claims around gender equality. We do not disagree that women's football is as important as men's football, but for true equality, the women should use the same facilities as the men in THFC's existing training centre.
- **(C) Alternative Sites:** THFC has failed to exhaust options of existing brownfield sites (NPPF 146 (a)).
- **(D) Lease Area:** We question the need for so much land in addition to the land needed for the training centre (37Ha extra). We understand that this is needed for

BNG purposes, but if the woodland planting set out in THFC's BNG proposals is unsustainable (as set out in WR para. 2 (A)), we do not believe this is an acceptable use of land.

- **(E) PS Para. 8.127:** THFC state that the VSC of this proposal is *"Responding to the compelling need to grow the women's game, and the benefits that arise from its growth"* and *"Positively responding to THFC's needs to provide professional training facilities which will make the Club achieve its potential in Women's football (see Section 3)"*. Both of these arguments focus principally on THFC's commercial benefits, and the benefits to a very small proportion of professional or select athletes (see WR paras. 3, 5 and 6).
- **(F) Harm Not Outweighed:** NPPF para. 103 has not been taken into account - this development would not better than nor outweigh the loss of the former use.

8. SINC Review

We are concerned that the correct procedures set out by the London Wildlife Sites Board regarding Sites of Importance for Nature Conservation (SINC) reviews have not been followed. The last SINC review in Enfield was held in 2020, and was prepared by LUC. From what we have been able to establish, there appear to be some major flaws.

In para. 1.2 of LUC's report, it states *"This review is an addendum to the Enfield Blue and Green Strategy and will form part of the evidence base of the emerging Local Plan. It is the council's duty to ensure that the conservation of biodiversity is considered as part of the plan-making process. The recommendations outlined in this report will need to be subject to consultation with relevant stakeholders, including local natural history experts and representatives of "Friends of..." groups, at the borough level prior to submitting these recommendations to the London Wildlife Sites Board (LWSB). This part of the SINC Review process will need to be led by Enfield Council"*.

However, there has been no stakeholder consultation, nor correspondence from Enfield Council with the LWSB as of May, 2024 (past the Local Plan Regulation 19 stage). There are no further documents from Enfield Council regarding SINC. The report does not seem to come to any conclusion - it just sets out various recommendations, but there is no decision making process recorded. No sites were upgraded.

Furthermore, we believe it is an anomaly that Whitewebbs Park has not been included in any recommendations for SINC upgrade. The land proposed for THFC's development is surrounded by, and connects, three SINC: Hilly Fields, Forty Hall and Whitewebbs Woods. Enfield Council's SINC review's description of the latter applies equally to this adjacent grassland *"the site forms part of a wider network of habitats, which offer important opportunities for a range of protected and notable flora and faunal species in the north of the borough"*. The SINC review recommended upgrades to fields along Turkey Brook at Forty Hall due to their value as a corridor.

The former golf course is, literally, the extension of that corridor through to Hilly Fields and Whitewebbs Woods. Crew's Hill Golf Course was recommended to be upgraded in the review to SINC status due to its grassland. It is an anomaly that Whitewebbs, used as a golf course at the time, was not also accorded SINC status as it has equal importance as a corridor and as an expanse of grassland rich in invertebrates (including priority species), comprising a mosaic, neutral and acid grassland (or similar).

Given this strong evidence, we believe it to be a serious oversight that Whitewebbs Park was left unsurveyed and not considered for such protection in Enfield's latest SINC review. If the Park had been accorded SINC status, it would have had greater protection, including under London Plan Policy G6 1. THFC's plans would have come under greater scrutiny, and likely been rejected. In addition, with its high ecological sensitivity, Whitewebbs Park should have been integrated into the borough's Local Nature Recovery Strategy (LNRS).

9. Forty Hill Conservation Area (FHCA)

In 2008, the FHCA boundary was extended, and the area now borders Whitewebbs Park (see Article 4 Map 2009). THFC's proposed development would negatively affect the FHCA. Enfield Council's 2015 Forty Hill "Conservation Area Character Appraisal" describes the damage THFC's existing training ground has done to this historic area. In para. 2.5.31, in regard to Forty Hall, it states *"the historic setting of the house is vulnerable to developments outside the designated park. By far [the] most important historical vista from the house, northwards along the avenue, now terminates in the anachronistic suburban clutter of the Tottenham Hotspur Football Club training ground to the west of Myddelton House. The purpose of the 2008 boundary extension has been diluted by its construction"*. The Appraisal goes on to state *"Any further development in this area, or in the landscape beyond it would be very damaging"*. From Enfield Council's 2015 Forty Hill "Conservation Area Management Proposals", one of the recommendations states *"The principal development pressures are...from the structures and landscaping associated with sports facilities. Planning controls should be used to minimise the use of these urban features..."*.

10. Conclusion

When all elements of this planning application are taken into account, and weighed against the VSC, there would be a negative impact which would constitute significant harm to the Green Belt and its purposes, providing negligible public/community benefit. Therefore, VSC should not be granted.

We believe this planning application should be refused for the reasons stated above.

Thank you for reading our representation,

Yours sincerely,

Address: [REDACTED]

Written by:

[REDACTED] on behalf of Guardians of Whitewebbs, a local community campaign group.

Edited by (chiefly WR para. 2):

[REDACTED]

Guardians of Whitewebbs:

[REDACTED]

Website: <https://www.avidbeats.com/guardians-of-whitewebbs>

References:

- [Planning Application 24/00987/FUL Documents](#)
- [GLA Stage 1 Report](#)
- [NPPF 2023](#)
- [Ecological Impact Assessment and Biodiversity Baseline Report](#)
- [Natural England and Forestry Commission Standing Advice \("Ancient woodland, ancient trees and veteran trees: advice for making planning decisions"\)](#)
- [Ancient Woodland and Veteran Tree Buffer Zones \(Natural England and Forestry Commission Guidance 2014\)](#)
- [Enfield Local Heritage List \(2018\)](#)
- [Enfield Local Plan](#)
- [Area of Special Character Boundary Review \(2013\)](#)
- [Enfield Characterisation Study \(2011\)](#)
- [Enfield SINC Review 2020](#)
- [Forty Hill Conservation Area](#)

Written Representation for Planning Application 24/00987/FUL

Revised 20/11/2024

STANCE: OBJECT

Commenter Type: Campaign Group

I am writing on behalf of the Guardians of Whitewebbs. This is our written representation (WR) for the planning application 24/00987/FUL, concerning Whitewebbs Park.

Whitewebbs Park Definition

When referring to Whitewebbs Park, we mean THFC's lease area, including the open space/grassland, of which circa. 50% would be lost to the proposed training centre, and the portion of the ancient woodland around Whitewebbs Lake, which would be seriously reconstructed. ([Site Wide Coloured Landscape Masterplan.](#))

1. Overview

- **(A) Inappropriate Development:** The Greater London Authority (GLA) concluded in their Stage 1 Planning report GLA/2024/0213/S1/01 (GLAS1R) that Tottenham Hotspur Football Club's (THFC) proposed development "would not preserve the openness of the Green Belt compared to what is existing" due to the visual impacts of the training ground boundaries, fencing, floodlights, buildings and extensions (para. 16). The GLA states, therefore, it is "inappropriate development within the Green Belt" and "very special circumstances" would have to exist for the scheme to be approved (GLAS1R, paras. 13-17). Although the GLA didn't mention the 5 purposes of the Green Belt, we also believe that THFC's proposed development is out of line with NPPF para. 143 (d) and (e).
- **(B) Enfield Council states in its Press Notice (7/8/2024):** *"In the opinion of the Council, as Local Planning Authority, this development would involve a departure from the Local Development Plan. Reason: The development site is located within the Metropolitan Green Belt and would result in new development outside of that permitted within Paragraph 149 of the NPPF (2023), Policy G2 of the London Plan (2021), Policy CP33 of the Enfield Core Strategy (2010) and Policy DMD82 of the Enfield Development Management Document (2014). The policies mentioned restrict new development within the Green Belt that impacts its openness."*
- **(C) Very Special Circumstances (VSC):** The NPPF states that "substantial weight" should be given to any harm to the Green Belt and that '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" (para. 153). In its Planning Statement (PS) paras. 8.59-8.129, THFC set out the factors which they consider constitute the

VSC of its proposed development. We consider each of these below, why each is misleading, and why the factors fail to meet the standards in NPPF para. 153.

2. Environmental, Sustainability and Ecological Benefits

- **(A) Biodiversity Net Gain (BNG):** For BNG purposes, THFC proposes to plant c. 2000 trees across the site (PS para. 8.120). However, in our view, there are no benefits in THFC's PS to the environment, sustainability or ecology of the site. As stated in para. 5.1.5 in Denis J Vickers', BSc(Hons), FLS, CBiol, MRSB, MCIEEM (Consultant Ecologist) "Whitewebbs Park (Enfield): Ecological Appraisal and Priority/Protected Species Assessment": *"Biodiversity net gain (BNG) calculations are based principally on habitats and do not adequately take account of faunal species present even if of high conservation status. Therefore, with regards the potential development of Whitewebbs Park, woodland planting is not considered appropriate with regards off-setting the loss of grassland. This will not benefit bird species and invertebrate species associated with open grassland, the populations of which have suffered an unprecedented decline in recent years. Additionally, if woodland planting is chosen to off-set the loss of grassland, the poor-quality secondary woodland which results may take more than 30 years to mature and possibly 100 years plus before it supports a relatively wide range of fungi, lichens, Bryophytes and fauna"*. 50% of the mosaic/neutral/acid grassland would be lost to monoculture football pitches and astroturf. Astroturf/plastic-grass has a large carbon footprint from manufacturing, transport, installation, and non-recyclability. It devastates wildlife during use, shedding microplastics into soil, drainage systems, rivers, and seas. The plastic-grass membrane suffocates life below and contributes to flooding in wet weather. Preserving the open grassland is vital for butterflies, spiders, bees, small mammals and an abundance of insects such as beetles, and with THFC's tree planting proposals, this is not recognised. The habitats THFC propose to create as part of their BNG would take a long time to develop and be of use to wildlife. THFC's ecologists have stated that the site's grassland is chiefly g4 modified grassland, though we describe the grassland as an expanse of grassland rich in invertebrates (including priority species), comprising mosaic, neutral and acid grassland. The status of the grassland as acid/neutral as per GIGL and public data has not been fully accounted for. THFC's survey was initially conducted in a time of drought and many grass species are notoriously difficult to distinguish and identify. We also question how the density of species/m2 was estimated. Additionally, the loss of significant habitat value from the proposed tree felling is not recorded, nor mentioned, in the flawed BNG metric calculation or the ecological impact assessments. The BNG of 27% is likely to be overstated. It cannot be that such a large part of the site is being taken away and yet a gain is being caused. Overall, THFC has considerably overestimated the BNG of its proposals.
- **(B) Re-landscaping:** THFC, as part of building their training pitches, would have to flatten the landscape for pitches. This would involve colossal earth moving works and irrevocable habitat disruption. It would also be out of character with the natural landscape (see WR para. 4 (A)). The part of the site proposed for training pitches has never been significantly landscaped. The British Geological Survey

does not show any additional material deposited here. It represents a historic landscape pristine from when Enfield Chase (forest) was deforested post 1777. Important landscape and soils, such as what is present in Whitewebbs Park (an Area of Special Character) should be protected (NPPF para. 180).

- **(C) Attenuation Ponds:** The loss of grassland and some of the site's trees also creates an added risk of flooding. Since hybrid pitches do not absorb much water, THFC would need to keep these dry. While THFC proposes to create attenuation ponds, we do not believe this to be the answer. Not only does it harm the natural landscape, it creates the need for displacing large amounts of earth, in turn harming the soil. From Royal Horticultural Society (RHS): *"Digging damages soil structure by destroying natural drainage channels made by worms, disturbing fungal networks, and releasing carbon that's locked in the soil"*. Attenuation ponds would take up 2 areas of active meadowland, which is already draining well. There is little ecological benefit of these, since the adjacent beaver flooding project and the existing wetland in the wooded margins are solving flooding in a natural fashion.
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here if a new road is planned to run past the Lake? There is also a high likelihood that many bird species (particularly those associated with open grassland) would become much rarer in the locality or no longer occur. Noise from the training ground, auxiliary facilities, and the development of both, may also be a concern with regards site aesthetics and perceived tranquillity of nearby SINC's. For example, the adjacent Enfield Beavers located in Forty Hall Estate could potentially be affected. All these proposed developments (Whitewebbs Park, the nature reserve development at Dickenson's Meadow, and the future education centre redevelopment in the Western Field) would constitute major disturbance for wild animals, especially for wildlife in an enclosure, that spends time under water.

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- **(G) Whitewebbs Lake:** In THFC's proposals, Whitewebbs Lake's character would be drastically altered, such as destruction to the surrounding ancient woodland to create what THFC calls "*restoring the historic carriageway*" (see WR para. 4) in order to reroute the access road to the Toby Carvery and make the existing road private. The harm this would cause to wildlife and their habitats (including the irreplaceable ancient woodland) would be devastating. It would create air, noise and light pollution. Since there is little to no public transport infrastructure around the Northern area of Whitewebbs where the training ground would be situated, this would require athletes to use their car. This does not "Promote Sustainable Transport" between paras. 108-117 in the NPPF.
- **(H) Wildlife Corridor:** The development and repurposing of the Green Belt would likely reduce the Park's functionality as a wildlife corridor. The passage of small mammals, reptiles, amphibians etc to and from Whitewebbs Wood, Forty Hall Estate and Hilly Fields Country Park SINC's would be impeded via habitat loss and disturbance. The development is also likely to have an adverse impact on flora and fauna e.g. people entering woodlands, grasslands and other habitats and affecting populations of small birds and mammals.
- **(I) Irreplaceable Habitat:** The loss or deterioration of irreplaceable ancient woodland and veteran tree habitat (i.e. around Whitewebbs Lake - see WR para. 2 (G)) should be refused (NPPF para. 186 (c)). THFC's proposals do not meet the "wholly exceptional reasons" set out in NPPF chapter 15 footnote 67, nor does a suitable compensation strategy exist. THFC's tree protection plan does not follow the Natural England and Forestry Commission Standing Advice and therefore cannot protect irreplaceable veteran trees they claim they will retain.
- **(J) Tree Root Protection Areas:** Russel Miller MSc (Arboricultural and Ecology Consultant) states "*The proposed mitigation for intrusions into tree Root Protection Areas (RPAs) are extremely unlikely to work in such a large-scale landscape*

alteration scheme. The development proposes huge dislocation and movement of soil. The proximity of proposed retained veteran and Grade A trees to these major earthworks means the proposed RPA protection measures will not work. The scale of protection and supervision required to protect tree roots of multiple trees in close proximity to major earth works rarely results in successful tree retention. Furthermore, veteran trees should have extra-large RPAs (minimum 15 x diameter), a metric not recognised or applied in the AIA mitigation proposals. Instead of following this Natural England guidance on 15 x dia for RPAs the AIA adopts BS5837 12 x and a cap of 707m2. The failure to note and acknowledge this special requirement for veteran trees is particularly concerning given the purported mitigation plans for protection of these trees' root areas and their irreplaceability".

- **(K) Bats:** There are 11 species of bat which have been logged by GiGL. Together, these account for more than 2,000 occurrences and corroborating evidence. These figures are exceptional. All bat species and their roosts are protected by the Conservation of Habitats and Species Regulations 2010 and Schedule 5 of the Wildlife and Countryside Act 1981. The proposed development would cause considerable harm to these species for the reasons set out in WR para. 2 (E).
- **(L) Badgers:** Badgers should have been "scoped out" by Tottenham Hotspur Football Club's (THFC) ecologists and reasons as to why should have been provided. Since Denis J Vickers conducted his ecological survey, evidence emerged (The Environment Bank Habitat Survey: May 2016 (target note T2)) of a badger sett at the boundary of Dickenson's Meadow with Whitewebbs Park. This should have been investigated by THFC's ecologists, as it is next to the proposed development area. Removal of grassland areas would recede scope for foraging badgers. Should badgers be present on site, this specie is protected under: Protection of Badgers Act 1992; Schedule 6 of the Wildlife Countryside Act 1981; The Animal Welfare Act 2006; and Appendix III of the Convention on the Conservation of European Wildlife and Natural Habitats. This includes protection from damage or obstruction to badger's sett/s.
- **(M) Hedgehogs/small mammals:** Enfield Council has a Biodiversity Duty under Section 41 the NERC Act 2006 to see Species of Principal Importance are provided for in any development. Removal of grassland areas would be detrimental to foraging hedgehogs. The presence of kestrel hunting over the site's grassland indicates that small mammals are likely colonising these habitats.
- **(N) Fungi:** There have been sightings in November 2024 of:
 - i. Golden Waxcap (*Hygrocybe Chlorophana*) - this specie is uncommon in Britain. It grows in grassland. The fact this species is present is a good indicator of "unimproved grassland", which is becoming increasingly scarce.
 - ii. Wrinkled Peach (*Rhodotus Palmatus*) - this specie is on the Global Fungi Red List as Near Threatened. It grows on dead/rotting elm.

Both of the above species were found within 2 of the proposed training pitches. These important species and their related ecology would be destroyed as a result of THFC's proposals. We would describe the grassland as: an expanse of

grassland rich in invertebrates (including priority species), comprising mosaic, neutral and acid grassland.

- **(O) Invertebrates:** No invertebrate surveys have been carried out. We believe this to be a great oversight considering the importance of the grassland for invertebrates and the amount of invertebrates present on the site.
- **(P) Increased pressure:** Reduction of the publicly accessible space would increase public pressure elsewhere, such as in the remaining lease area. This could lead to further habitat deterioration, for example disturbance of nesting birds, trampling of sensitive habitats, potential misuse and nitrification from dog faeces and urine.
- **(Q) Harm Not Outweighed:** Overall, there is no benefit whatsoever regarding the environment or ecology, and all of THFC's proposals would involve harm to the Green Belt. For these reasons, this planning application is not in line with NPPF paras. 180, 185, 186 and 191. It is also not an acceptable use of land (NPPF para. 194).

3. Health Benefits

- **(A) Training Centre Focus:** This proposal for an elite/private women's training centre focuses solely on the health and wellbeing of a tiny proportion of the young female generation, many of whom would not even be from Enfield. Most of the public would not be able to engage in sport in this setting, and as stated in WR para. 5 (B), there would be a net loss of community access/public benefit. This is an inappropriate strategy: the planning application doesn't align with NPPF para. 96 (c).
- **(B) The Current Site:** Whitewebbs, as it is, provides excellent health benefits to the community, both physically and mentally. Large numbers of people visit the site regularly to walk, run, cycle, do yoga, meditate, and even play ball games/football. The site in its open parkland state provides an inspiring and calming atmosphere and contributes to good mental health. People of all ages are free to experience the benefits of this site.
- **(C) Lease Area "Improvements":** THFC's claims around "community access" are flawed for the reasons set out in WR para. 5. There is no need for additional walking or cycle routes, as many people are seen using the current paths which have been created from regular use by the public. Creation of these routes would further harm the environment and nature.
- **(D) Harm Not Outweighed:** Overall, there is negligible benefit (and mainly a negative impact), to the health of the public through these proposals.

4. Heritage Benefits/Restoration

- **(A) Character:** Enfield Local Heritage List, May 2018, entry 259 states *“[Whitewebbs still] retains much of the parkland character”*. NPPF para. 205 states *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation”*. THFC’s proposals would not conserve the Whitewebbs Park and its assets, and would obscure panoramic views from Whitewebbs Lane looking south and south west; the main driveway (footpath through the Park) would be cut by the training ground fencing, and subsequently the panoramic views looking north and north east would be lost; and dense tree planting would obscure views from the south of the park, near the café, looking north west. The plan is unsound as THFC would destroy Important Local View “6. Whitewebbs Lane” which is protected in Policy DE5 of Enfield Council’s Local Plan. In addition to obscuring views, the 21 metre tall floodlights would be out of keeping with the character of the land. THFC proposes to level out the land, which changes the character and landscape of the Park. It would build attenuation ponds, which are also out of keeping with the natural landscape. In and around the lake and north eastern Whitewebbs Woods area would also be seriously reconstructed. THFC claims (PS para. 8.118) that there would be *“reinstatement of the historic carriageway route to Whitewebbs House”*. However, there is no historic significance of this “carriageway”, and building a new road to the Toby Carvery would consequently cause great disruption and harm to wildlife, the ancient woodland and the character of the Whitewebbs Lake area (WR para. 2 (G)). Whitewebbs Park is also an Area of Special Character (ASC), along with adjacent Forty Hall and Myddleton House, as set out in Enfield Council’s 2013 Boundary Review (pp. 18-19). Not to preserve this ASC is out of line with NPPF para. 143 (d).
- **(B) Northern Clubhouse:** There would be significant harm to the historic character of the Northern Clubhouse/Stable Block. It is listed as entry 257 in Enfield Local Heritage List, May 2018. THFC would approximately double it in size, and would build extra car parking. The justification for this is not convincing, and therefore this proposed extension is not in line with NPPF para. 206.
- **(C) Harm Not Outweighed:** While some heritage assets may be preserved, these are highly minimal and the harm of the development is not outweighed by the historic preservation in this VSC claim. There is overall a negative impact to the Park and its historic assets.

5. Community Access/Public Benefit, Training and Club-led Programmes

- **(A) Statutory Purpose:** It is important to know, when making judgements around VSC, that the disposal plans for Whitewebbs are not consistent with the “statutory purpose” of the land, which is to be held in Public Trust (a purpose for which it was acquired when it was purchased in 1931 by Enfield Council using public money). The original lease for Whitewebbs Park, which was agreed on a term of 999 years, said that if the golf course was to close, the Park would revert to public use. The

proposed lease to THFC, along with its plans for the Park would extinguish public rights to access these facilities, and therefore is unsound: see NPPF para. 154 (b).

- **(B) Net Loss of Community Access/Public Benefit:** THFC say (PS para. 7.14) it is *"developing a package of community obligations to be delivered by the Club and its charitable Foundation"*. Please note THFC has a poor record of delivering its Section 106 agreements for their existing training centre. It has still not built the education centre and nature reserve promised in 2008 and 2009 and is now developing plans for doing something similar further along the Green Belt at Dickenson's Meadow. Do we really need community access to another elite training ground in place of our historic and beautiful public park? THFC would be privatising approximately half of the open space, and it has always been for the public, so there is a net loss of public and community access/benefit. THFC misleadingly indicate in point "4.4 MASTERPLAN - LAND USE/PUBLIC ACCESS" of their "DESIGN AND ACCESS STATEMENT: REVISION 1" that when the site was used as a golf course, there was *"Restricted Access"* to 77% of the open space. This is flawed, since as set out in WR para. 5 (A), the statutory purpose of the land has always been held for the public, whereas in THFC's proposed development, it would be restricting access to approximately half of the open space.
- **(C) Local Plan:** This planning application is not in line with Enfield Council's current draft Local Plan, as in this plan, Table C1.184 Design Principle A states that development on the site (i.e. Whitewebbs Former Golf Course) *"must maximise publicly accessible space"*. Since there would be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park, THFC's planning application is unsound.
- **(D) Programmes/Training Centre Focus:** The points regarding the training centre's primary focus that are set out in WR para. 3 (A) fully apply to this point as well. THFC says it would offer coaching programmes, yet these would still be private and inaccessible to the vast majority of the community. These proposals do not include the older generations at all.
- **(E) Harm Not Outweighed:** There is an overall negative impact on the public/community through these proposals.

6. Socio-economic Benefits

All socio-economic benefits listed between pages 64-65 of THFC's PS are either solely focused on commercial, private and elite benefit, or are flawed. Both grassroots and professional sports offerings would be private and only benefit the select few, and would feed into THFC's own interests and growth as a commercial company. PS para. 8.98.2 is flawed for the reasons set out in WR paras. 3 and 5 (B). PS para. 8.98.3 is flawed for the reasons set out in WR para 2. Evidently, these points have a negative impact on the current use of the Park.

7. Need and Alternative Sites

- **(A) Need:** We question the need for another training centre, when THFC already has 17 pitches and a state-of-the-art facility. THFC has not clearly demonstrated why the women cannot just use these. Even if THFC were not to use their current one, we still question the size of the development, and if it was smaller, THFC could easily find land elsewhere that could take a development without causing so much harm to the Green Belt. In our view, there is no need for private/elite sporting facilities in the borough (refer back to WR paras. 5 and 6).
- **(B) Gender Equality:** THFC makes numerous claims around gender equality. We do not disagree that women's football is as important as men's football, but for true equality, the women should use the same facilities as the men in THFC's existing training centre.
- **(C) Alternative Sites:** THFC has failed to exhaust options of existing brownfield sites (NPPF 146 (a)).
- **(D) Lease Area:** We question the need for so much land in addition to the land needed for the training centre (37Ha extra). We understand that this is needed for BNG purposes, but if the woodland planting set out in THFC's BNG proposals is unsustainable (as set out in WR para. 2 (A)), we do not believe this is an acceptable use of land.
- **(E) PS Para. 8.127:** THFC state that the VSC of this proposal is *"Responding to the compelling need to grow the women's game, and the benefits that arise from its growth"* and *"Positively responding to THFC's needs to provide professional training facilities which will make the Club achieve its potential in Women's football (see Section 3)"*. Both of these arguments focus principally on THFC's commercial benefits, and the benefits to a very small proportion of professional or select athletes (see WR paras. 3, 5 and 6).
- **(F) Harm Not Outweighed:** NPPF para. 103 has not been taken into account - this development would not better than nor outweigh the loss of the former use.

8. SINC Review

We are concerned that the correct procedures set out by the London Wildlife Sites Board regarding Sites of Importance for Nature Conservation (SINC) reviews have not been followed. The last SINC review in Enfield was held in 2020, and was prepared by LUC. From what we have been able to establish, there appear to be some major flaws.

In para. 1.2 of LUC's report, it states *"This review is an addendum to the Enfield Blue and Green Strategy and will form part of the evidence base of the emerging Local Plan. It is the council's duty to ensure that the conservation of biodiversity is considered as part of the plan-making process. The recommendations outlined in this report will need to be subject to consultation with relevant stakeholders, including*

local natural history experts and representatives of "Friends of..." groups, at the borough level prior to submitting these recommendations to the London Wildlife Sites Board (LWSB). This part of the SINC Review process will need to be led by Enfield Council".

However, there has been no stakeholder consultation, nor correspondence from Enfield Council with the LWSB as of May, 2024 (past the Local Plan Regulation 19 stage). There are no further documents from Enfield Council regarding SINC. The report does not seem to come to any conclusion - it just sets out various recommendations, but there is no decision making process recorded. No sites were upgraded.

Furthermore, we believe it is an anomaly that Whitewebbs Park has not been included in any recommendations for SINC upgrade. The land proposed for THFC's development is surrounded by, and connects, three SINC: Hilly Fields, Forty Hall and Whitewebbs Woods. Enfield Council's SINC review's description of the latter applies equally to this adjacent grassland *"the site forms part of a wider network of habitats, which offer important opportunities for a range of protected and notable flora and faunal species in the north of the borough"*. The SINC review recommended upgrades to fields along Turkey Brook at Forty Hall due to their value as a corridor. The former golf course is, literally, the extension of that corridor through to Hilly Fields and Whitewebbs Woods. Crew's Hill Golf Course, already a SINC, was recommended in the LUC (2020) and Tyler Grange (2023) SINC Review reports to be upgraded and extended due to its grassland. It is an anomaly that Whitewebbs, used as a golf course at the time, was not also accorded SINC status in the LUC review as it has importance both as a corridor and as an expanse of mosaic, neutral and acid grassland grassland. Additionally, Section 4 "Site evaluation" of Denis J Vickers' ecology report has been ignored in "Biodiversity Net Gain Assessment Part 2 Appendix G". Denis J Vickers concludes in regard to Whitewebbs Park and SINC designation: *"The site adequately met or exceeded most of the criteria cited by the LWSB. Should the site's high biodiversity be confirmed by appropriate phase 2 surveys, designation as a Site of Metropolitan Importance for Nature Conservation would be fully justified"*.

Given this strong evidence, we believe it to be a serious oversight that Whitewebbs Park was left unsurveyed and not considered for such protection in Enfield's latest SINC review. If the Park had been accorded SINC status, it would have had greater protection, including under London Plan Policy G6 1. THFC's plans would have come under greater scrutiny, and likely been rejected. In addition, with its high ecological sensitivity, Whitewebbs Park should have been integrated into the borough's Local Nature Recovery Strategy (LNRS).

9. Forty Hill Conservation Area (FHCA)

In 2008, the FHCA boundary was extended, and the area now borders Whitewebbs Park (see Article 4 Map 2009). THFC's proposed development would negatively affect the FHCA. Enfield Council's 2015 Forty Hill "Conservation Area Character Appraisal" describes the damage THFC's existing training ground has done to this

historic area. In para. 2.5.31, in regard to Forty Hall, it states *“the historic setting of the house is vulnerable to developments outside the designated park. By far [the] most important historical vista from the house, northwards along the avenue, now terminates in the anachronistic suburban clutter of the Tottenham Hotspur Football Club training ground to the west of Myddelton House. The purpose of the 2008 boundary extension has been diluted by its construction”*. The Appraisal goes on to state *“Any further development in this area, or in the landscape beyond it would be very damaging”*. From Enfield Council’s 2015 Forty Hill “Conservation Area Management Proposals”, one of the recommendations states *“The principal development pressures are...from the structures and landscaping associated with sports facilities. Planning controls should be used to minimise the use of these urban features...”*.

10. Conclusion

When all elements of this planning application are taken into account, and weighed against the VSC, there would be a negative impact which would constitute significant harm to the Green Belt and its purposes, providing negligible public/community benefit. Therefore, VSC should not be granted.

We believe this planning application should be refused for the reasons stated above.

Thank you for reading our representation,

Yours sincerely,

[Redacted signature]

Written by:

[Redacted name] on behalf of Guardians of Whitewebbs, a local community campaign group.

[Redacted address]

Guardians of Whitewebbs:

[Redacted contact details]

Website: <https://www.avidbeats.com/guardians-of-whitewebbs>

References:

- [Planning Application 24/00987/FUL Documents](#)
- [GLA Stage 1 Report](#)
- [Press Notice](#)
- [NPPF 2023](#)
- [Ecological Impact Assessment and Biodiversity Baseline Report](#)
- [Natural England and Forestry Commission Standing Advice \(“Ancient woodland, ancient trees and veteran trees: advice for making planning decisions”\)](#)
- [Ancient Woodland and Veteran Tree Buffer Zones \(Natural England and Forestry Commission Guidance 2014\)](#)
- [IUCN Red List Wrinkled Peach](#)
- [Enfield Local Heritage List \(2018\)](#)
- [Enfield Local Plan](#)
- [Area of Special Character Boundary Review \(2013\)](#)
- [Enfield Characterisation Study \(2011\)](#)
- [Enfield SINC Review 2020](#)
- [Tyler Grange Crews Hill and Chase Park SINC Report](#)
- [Forty Hill Conservation Area](#)

Written Representation for Planning Application 24/00987/FUL

Revised 20/11/2024

STANCE: OBJECT

Commenter Type: Campaign Group

I am writing on behalf of the Guardians of Whitewebbs. This is our written representation (WR) for the planning application 24/00987/FUL, concerning Whitewebbs Park.

Whitewebbs Park Definition

When referring to Whitewebbs Park, we mean THFC's lease area, including the open space/grassland, of which circa. 50% would be lost to the proposed training centre, and the portion of the ancient woodland around Whitewebbs Lake, which would be seriously reconstructed. ([Site Wide Coloured Landscape Masterplan.](#))

1. Overview

- **(A) Inappropriate Development:** The Greater London Authority (GLA) concluded in their Stage 1 Planning report GLA/2024/0213/S1/01 (GLAS1R) that Tottenham Hotspur Football Club's (THFC) proposed development "would not preserve the openness of the Green Belt compared to what is existing" due to the visual impacts of the training ground boundaries, fencing, floodlights, buildings and extensions (para. 16). The GLA states, therefore, it is "inappropriate development within the Green Belt" and "very special circumstances" would have to exist for the scheme to be approved (GLAS1R, paras. 13-17). Although the GLA didn't mention the 5 purposes of the Green Belt, we also believe that THFC's proposed development is out of line with NPPF para. 143 (d) and (e).
- **(B) Enfield Council states in its Press Notice (7/8/2024):** *"In the opinion of the Council, as Local Planning Authority, this development would involve a departure from the Local Development Plan. Reason: The development site is located within the Metropolitan Green Belt and would result in new development outside of that permitted within Paragraph 149 of the NPPF (2023), Policy G2 of the London Plan (2021), Policy CP33 of the Enfield Core Strategy (2010) and Policy DMD82 of the Enfield Development Management Document (2014). The policies mentioned restrict new development within the Green Belt that impacts its openness."*
- **(C) Very Special Circumstances (VSC):** The NPPF states that "substantial weight" should be given to any harm to the Green Belt and that '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" (para. 153). In its Planning Statement (PS) paras. 8.59-8.129, THFC set out the factors which they consider constitute the

VSC of its proposed development. We consider each of these below, why each is misleading, and why the factors fail to meet the standards in NPPF para. 153.

2. Environmental, Sustainability and Ecological Benefits

- **(A) Biodiversity Net Gain (BNG):** For BNG purposes, THFC proposes to plant c. 2000 trees across the site (PS para. 8.120). However, in our view, there are no benefits in THFC's PS to the environment, sustainability or ecology of the site. As stated in para. 5.1.5 in Denis J Vickers', BSc(Hons), FLS, CBiol, MRSB, MCIEEM (Consultant Ecologist) "Whitewebbs Park (Enfield): Ecological Appraisal and Priority/Protected Species Assessment": *"Biodiversity net gain (BNG) calculations are based principally on habitats and do not adequately take account of faunal species present even if of high conservation status. Therefore, with regards the potential development of Whitewebbs Park, woodland planting is not considered appropriate with regards off-setting the loss of grassland. This will not benefit bird species and invertebrate species associated with open grassland, the populations of which have suffered an unprecedented decline in recent years. Additionally, if woodland planting is chosen to off-set the loss of grassland, the poor-quality secondary woodland which results may take more than 30 years to mature and possibly 100 years plus before it supports a relatively wide range of fungi, lichens, Bryophytes and fauna"*. 50% of the mosaic/neutral/acid grassland would be lost to monoculture football pitches and astroturf. Astroturf/plastic-grass has a large carbon footprint from manufacturing, transport, installation, and non-recyclability. It devastates wildlife during use, shedding microplastics into soil, drainage systems, rivers, and seas. The plastic-grass membrane suffocates life below and contributes to flooding in wet weather. Preserving the open grassland is vital for butterflies, spiders, bees, small mammals and an abundance of insects such as beetles, and with THFC's tree planting proposals, this is not recognised. The habitats THFC propose to create as part of their BNG would take a long time to develop and be of use to wildlife. THFC's ecologists have stated that the site's grassland is chiefly g4 modified grassland, though we describe the grassland as an expanse of grassland rich in invertebrates (including priority species), comprising mosaic, neutral and acid grassland. The status of the grassland as acid/neutral as per GIGL and public data has not been fully accounted for. THFC's survey was initially conducted in a time of drought and many grass species are notoriously difficult to distinguish and identify. We also question how the density of species/m2 was estimated. Additionally, the loss of significant habitat value from the proposed tree felling is not recorded, nor mentioned, in the flawed BNG metric calculation or the ecological impact assessments. The BNG of 27% is likely to be overstated. It cannot be that such a large part of the site is being taken away and yet a gain is being caused. Overall, THFC has considerably overestimated the BNG of its proposals.
- **(B) Re-landscaping:** THFC, as part of building their training pitches, would have to flatten the landscape for pitches. This would involve colossal earth moving works and irrevocable habitat disruption. It would also be out of character with the natural landscape (see WR para. 4 (A)). The part of the site proposed for training pitches has never been significantly landscaped. The British Geological Survey

does not show any additional material deposited here. It represents a historic landscape pristine from when Enfield Chase (forest) was deforested post 1777. Important landscape and soils, such as what is present in Whitewebbs Park (an Area of Special Character) should be protected (NPPF para. 180).

- **(C) Attenuation Ponds:** The loss of grassland and some of the site's trees also creates an added risk of flooding. Since hybrid pitches do not absorb much water, THFC would need to keep these dry. While THFC proposes to create attenuation ponds, we do not believe this to be the answer. Not only does it harm the natural landscape, it creates the need for displacing large amounts of earth, in turn harming the soil. From Royal Horticultural Society (RHS): *"Digging damages soil structure by destroying natural drainage channels made by worms, disturbing fungal networks, and releasing carbon that's locked in the soil"*. Attenuation ponds would take up 2 areas of active meadowland, which is already draining well. There is little ecological benefit of these, since the adjacent beaver flooding project and the existing wetland in the wooded margins are solving flooding in a natural fashion.
- **(D) Tree Felling:** The issue of felling 137 trees (PS para. 8.57.2) is unsound (NPPF para. 180 (b)). THFC would also fell an additional 70 "Category U" trees - the argument for felling these trees because of *"good arboricultural management"* is flawed, since dead and/or decaying trees are vital for the ecosystem, housing an abundance of insects, birds and wildlife. Logika fails to acknowledge the habitat on site, focusing on saproxylic species only in relation to the ancient woodland. This exposes an inexcusable mistake in equating ancient woodland rather than open grown trees with high quality saproxylic fauna. The presence of a rare hoverfly and bumblebee mimic, *Pocota personata*, on an ash tree highlights this. Whitewebbs is the third site in London to record this species in the last 50 years. Saproxylic species generally require decaying wood in open grown trees where there is more light and heat as compared to closed canopy woodland. They also require flowering shrubs like hawthorn nearby. The impacts on saproxylic species of losing significant volumes of high value decaying wood by removing so many trees is not mentioned in the EIA. Proposed tree removals in the Arboricultural Impact Assessment (AIA) are unnecessary and result from the change of use, not inherent risk. As noted above, they also represent significant biodiversity loss. This is not accounted for in the BNG metric because in this calculation, they are just treated as generic trees, not trees with decay and other habitat features.
- **(E) Pollution and Disturbance:** The proposed floodlights and noise from the development would seriously impact wildlife. For example, despite curfews, light spill from floodlighting would have a detrimental effect on bats. This is highly likely to discourage foraging/commuting activities and possibly prevent roosting in adjacent trees and woodlands. Bat specie *"Daubenton's Myotis"* feed on the surface of Whitewebbs Lake and are light sensitive. This is adjacent to the proposed new access road (WR para. 2 (G)). The building of this, and the traffic that comes with it would be detrimental to bats present in the Whitewebbs Lake area. Furthermore, in Logika's *"Biodiversity Baseline Report"*, there seems to be no bat surveys around the Whitewebbs Lake area (Figure 11-3 and 11-4), which is classified at part of the Ancient Woodland and Metropolitan SIN. We question why this area was overlooked and believe bat surveys should have taken place

here if a new road is planned to run past the Lake? There is also a high likelihood that many bird species (particularly those associated with open grassland) would become much rarer in the locality or no longer occur. Noise from the training ground, auxiliary facilities, and the development of both, may also be a concern with regards site aesthetics and perceived tranquillity of nearby SINC's. For example, the adjacent Enfield Beavers located in Forty Hall Estate could potentially be affected. All these proposed developments (Whitewebbs Park, the nature reserve development at Dickenson's Meadow, and the future education centre redevelopment in the Western Field) would constitute major disturbance for wild animals, especially for wildlife in an enclosure, that spends time under water.

- **(F) Glyphosate:** The use of glyphosate for the eradication of extensive grassland areas prior to replanting would be immensely harmful. This chemical is prohibited in Europe; in 2019, the Greater London Authority adopted a motion to discourage its usage; and 50 local authorities have either banned or significantly limited its application, particularly in parks. Glyphosate kills plant-life and is toxic to wildlife. As the site is wet, the glyphosate could seep into the soil, potentially affecting the hydrology of the site. The chemical may also find its way into Turkey Brook and Cuffley Brook, and harm aquatic wildlife and their habitats.
- **(G) Whitewebbs Lake:** In THFC's proposals, Whitewebbs Lake's character would be drastically altered, such as destruction to the surrounding ancient woodland to create what THFC calls "*restoring the historic carriageway*" (see WR para. 4) in order to reroute the access road to the Toby Carvery and make the existing road private. The harm this would cause to wildlife and their habitats (including the irreplaceable ancient woodland) would be devastating. It would create air, noise and light pollution. Since there is little to no public transport infrastructure around the Northern area of Whitewebbs where the training ground would be situated, this would require athletes to use their car. This does not "Promote Sustainable Transport" between paras. 108-117 in the NPPF.
- **(H) Wildlife Corridor:** The development and repurposing of the Green Belt would likely reduce the Park's functionality as a wildlife corridor. The passage of small mammals, reptiles, amphibians etc to and from Whitewebbs Wood, Forty Hall Estate and Hilly Fields Country Park SINC's would be impeded via habitat loss and disturbance. The development is also likely to have an adverse impact on flora and fauna e.g. people entering woodlands, grasslands and other habitats and affecting populations of small birds and mammals.
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alteration scheme. The development proposes huge dislocation and movement of soil. The proximity of proposed retained veteran and Grade A trees to these major earthworks means the proposed RPA protection measures will not work. The scale of protection and supervision required to protect tree roots of multiple trees in close proximity to major earth works rarely results in successful tree retention. Furthermore, veteran trees should have extra-large RPAs (minimum 15 x diameter), a metric not recognised or applied in the AIA mitigation proposals. Instead of following this Natural England guidance on 15 x dia for RPAs the AIA adopts BS5837 12 x and a cap of 707m2. The failure to note and acknowledge this special requirement for veteran trees is particularly concerning given the purported mitigation plans for protection of these trees' root areas and their irreplaceability".

- **(K) Bats:** There are 11 species of bat which have been logged by GiGL. Together, these account for more than 2,000 occurrences and corroborating evidence. These figures are exceptional. All bat species and their roosts are protected by the Conservation of Habitats and Species Regulations 2010 and Schedule 5 of the Wildlife and Countryside Act 1981. The proposed development would cause considerable harm to these species for the reasons set out in WR para. 2 (E).
- **(L) Badgers:** Badgers should have been "scoped out" by Tottenham Hotspur Football Club's (THFC) ecologists and reasons as to why should have been provided. Since Denis J Vickers conducted his ecological survey, evidence emerged (The Environment Bank Habitat Survey: May 2016 (target note T2)) of a badger sett at the boundary of Dickenson's Meadow with Whitewebbs Park. This should have been investigated by THFC's ecologists, as it is next to the proposed development area. Removal of grassland areas would recede scope for foraging badgers. Should badgers be present on site, this specie is protected under: Protection of Badgers Act 1992; Schedule 6 of the Wildlife Countryside Act 1981; The Animal Welfare Act 2006; and Appendix III of the Convention on the Conservation of European Wildlife and Natural Habitats. This includes protection from damage or obstruction to badger's sett/s.
- **(M) Hedgehogs/small mammals:** Enfield Council has a Biodiversity Duty under Section 41 the NERC Act 2006 to see Species of Principal Importance are provided for in any development. Removal of grassland areas would be detrimental to foraging hedgehogs. The presence of kestrel hunting over the site's grassland indicates that small mammals are likely colonising these habitats.
- **(N) Fungi:** There have been sightings in November 2024 of:
 - i. Golden Waxcap (*Hygrocybe Chlorophana*) - this specie is uncommon in Britain. It grows in grassland. The fact this species is present is a good indicator of "unimproved grassland", which is becoming increasingly scarce.
 - ii. Wrinkled Peach (*Rhodotus Palmatus*) - this specie is on the Global Fungi Red List as Near Threatened. It grows on dead/rotting elm.

Both of the above species were found within 2 of the proposed training pitches. These important species and their related ecology would be destroyed as a result of THFC's proposals. We would describe the grassland as: an expanse of

grassland rich in invertebrates (including priority species), comprising mosaic, neutral and acid grassland.

- **(O) Invertebrates:** No invertebrate surveys have been carried out. We believe this to be a great oversight considering the importance of the grassland for invertebrates and the amount of invertebrates present on the site.
- **(P) Increased pressure:** Reduction of the publicly accessible space would increase public pressure elsewhere, such as in the remaining lease area. This could lead to further habitat deterioration, for example disturbance of nesting birds, trampling of sensitive habitats, potential misuse and nitrification from dog faeces and urine.
- **(Q) Harm Not Outweighed:** Overall, there is no benefit whatsoever regarding the environment or ecology, and all of THFC's proposals would involve harm to the Green Belt. For these reasons, this planning application is not in line with NPPF paras. 180, 185, 186 and 191. It is also not an acceptable use of land (NPPF para. 194).

3. Health Benefits

- **(A) Training Centre Focus:** This proposal for an elite/private women's training centre focuses solely on the health and wellbeing of a tiny proportion of the young female generation, many of whom would not even be from Enfield. Most of the public would not be able to engage in sport in this setting, and as stated in WR para. 5 (B), there would be a net loss of community access/public benefit. This is an inappropriate strategy: the planning application doesn't align with NPPF para. 96 (c).
- **(B) The Current Site:** Whitewebbs, as it is, provides excellent health benefits to the community, both physically and mentally. Large numbers of people visit the site regularly to walk, run, cycle, do yoga, meditate, and even play ball games/football. The site in its open parkland state provides an inspiring and calming atmosphere and contributes to good mental health. People of all ages are free to experience the benefits of this site.
- **(C) Lease Area "Improvements":** THFC's claims around "community access" are flawed for the reasons set out in WR para. 5. There is no need for additional walking or cycle routes, as many people are seen using the current paths which have been created from regular use by the public. Creation of these routes would further harm the environment and nature.
- **(D) Harm Not Outweighed:** Overall, there is negligible benefit (and mainly a negative impact), to the health of the public through these proposals.

4. Heritage Benefits/Restoration

- **(A) Character:** Enfield Local Heritage List, May 2018, entry 259 states *“[Whitewebbs still] retains much of the parkland character”*. NPPF para. 205 states *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation”*. THFC’s proposals would not conserve the Whitewebbs Park and its assets, and would obscure panoramic views from Whitewebbs Lane looking south and south west; the main driveway (footpath through the Park) would be cut by the training ground fencing, and subsequently the panoramic views looking north and north east would be lost; and dense tree planting would obscure views from the south of the park, near the café, looking north west. The plan is unsound as THFC would destroy Important Local View “6. Whitewebbs Lane” which is protected in Policy DE5 of Enfield Council’s Local Plan. In addition to obscuring views, the 21 metre tall floodlights would be out of keeping with the character of the land. THFC proposes to level out the land, which changes the character and landscape of the Park. It would build attenuation ponds, which are also out of keeping with the natural landscape. In and around the lake and north eastern Whitewebbs Woods area would also be seriously reconstructed. THFC claims (PS para. 8.118) that there would be *“reinstatement of the historic carriageway route to Whitewebbs House”*. However, there is no historic significance of this “carriageway”, and building a new road to the Toby Carvery would consequently cause great disruption and harm to wildlife, the ancient woodland and the character of the Whitewebbs Lake area (WR para. 2 (G)). Whitewebbs Park is also an Area of Special Character (ASC), along with adjacent Forty Hall and Myddleton House, as set out in Enfield Council’s 2013 Boundary Review (pp. 18-19). Not to preserve this ASC is out of line with NPPF para. 143 (d).
- **(B) Northern Clubhouse:** There would be significant harm to the historic character of the Northern Clubhouse/Stable Block. It is listed as entry 257 in Enfield Local Heritage List, May 2018. THFC would approximately double it in size, and would build extra car parking. The justification for this is not convincing, and therefore this proposed extension is not in line with NPPF para. 206.
- **(C) Harm Not Outweighed:** While some heritage assets may be preserved, these are highly minimal and the harm of the development is not outweighed by the historic preservation in this VSC claim. There is overall a negative impact to the Park and its historic assets.

5. Community Access/Public Benefit, Training and Club-led Programmes

- **(A) Statutory Purpose:** It is important to know, when making judgements around VSC, that the disposal plans for Whitewebbs are not consistent with the “statutory purpose” of the land, which is to be held in Public Trust (a purpose for which it was acquired when it was purchased in 1931 by Enfield Council using public money). The original lease for Whitewebbs Park, which was agreed on a term of 999 years, said that if the golf course was to close, the Park would revert to public use. The

proposed lease to THFC, along with its plans for the Park would extinguish public rights to access these facilities, and therefore is unsound: see NPPF para. 154 (b).

- **(B) Net Loss of Community Access/Public Benefit:** THFC say (PS para. 7.14) it is *"developing a package of community obligations to be delivered by the Club and its charitable Foundation"*. Please note THFC has a poor record of delivering its Section 106 agreements for their existing training centre. It has still not built the education centre and nature reserve promised in 2008 and 2009 and is now developing plans for doing something similar further along the Green Belt at Dickenson's Meadow. Do we really need community access to another elite training ground in place of our historic and beautiful public park? THFC would be privatising approximately half of the open space, and it has always been for the public, so there is a net loss of public and community access/benefit. THFC misleadingly indicate in point "4.4 MASTERPLAN - LAND USE/PUBLIC ACCESS" of their "DESIGN AND ACCESS STATEMENT: REVISION 1" that when the site was used as a golf course, there was *"Restricted Access"* to 77% of the open space. This is flawed, since as set out in WR para. 5 (A), the statutory purpose of the land has always been held for the public, whereas in THFC's proposed development, it would be restricting access to approximately half of the open space.
- **(C) Local Plan:** This planning application is not in line with Enfield Council's current draft Local Plan, as in this plan, Table C1.184 Design Principle A states that development on the site (i.e. Whitewebbs Former Golf Course) *"must maximise publicly accessible space"*. Since there would be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park, THFC's planning application is unsound.
- **(D) Programmes/Training Centre Focus:** The points regarding the training centre's primary focus that are set out in WR para. 3 (A) fully apply to this point as well. THFC says it would offer coaching programmes, yet these would still be private and inaccessible to the vast majority of the community. These proposals do not include the older generations at all.
- **(E) Harm Not Outweighed:** There is an overall negative impact on the public/community through these proposals.

6. Socio-economic Benefits

All socio-economic benefits listed between pages 64-65 of THFC's PS are either solely focused on commercial, private and elite benefit, or are flawed. Both grassroots and professional sports offerings would be private and only benefit the select few, and would feed into THFC's own interests and growth as a commercial company. PS para. 8.98.2 is flawed for the reasons set out in WR paras. 3 and 5 (B). PS para. 8.98.3 is flawed for the reasons set out in WR para 2. Evidently, these points have a negative impact on the current use of the Park.

7. Need and Alternative Sites

- **(A) Need:** We question the need for another training centre, when THFC already has 17 pitches and a state-of-the-art facility. THFC has not clearly demonstrated why the women cannot just use these. Even if THFC were not to use their current one, we still question the size of the development, and if it was smaller, THFC could easily find land elsewhere that could take a development without causing so much harm to the Green Belt. In our view, there is no need for private/elite sporting facilities in the borough (refer back to WR paras. 5 and 6).
- **(B) Gender Equality:** THFC makes numerous claims around gender equality. We do not disagree that women's football is as important as men's football, but for true equality, the women should use the same facilities as the men in THFC's existing training centre.
- **(C) Alternative Sites:** THFC has failed to exhaust options of existing brownfield sites (NPPF 146 (a)).
- **(D) Lease Area:** We question the need for so much land in addition to the land needed for the training centre (37Ha extra). We understand that this is needed for BNG purposes, but if the woodland planting set out in THFC's BNG proposals is unsustainable (as set out in WR para. 2 (A)), we do not believe this is an acceptable use of land.
- **(E) PS Para. 8.127:** THFC state that the VSC of this proposal is *"Responding to the compelling need to grow the women's game, and the benefits that arise from its growth"* and *"Positively responding to THFC's needs to provide professional training facilities which will make the Club achieve its potential in Women's football (see Section 3)"*. Both of these arguments focus principally on THFC's commercial benefits, and the benefits to a very small proportion of professional or select athletes (see WR paras. 3, 5 and 6).
- **(F) Harm Not Outweighed:** NPPF para. 103 has not been taken into account - this development would not better than nor outweigh the loss of the former use.

8. SINC Review

We are concerned that the correct procedures set out by the London Wildlife Sites Board regarding Sites of Importance for Nature Conservation (SINC) reviews have not been followed. The last SINC review in Enfield was held in 2020, and was prepared by LUC. From what we have been able to establish, there appear to be some major flaws.

In para. 1.2 of LUC's report, it states *"This review is an addendum to the Enfield Blue and Green Strategy and will form part of the evidence base of the emerging Local Plan. It is the council's duty to ensure that the conservation of biodiversity is considered as part of the plan-making process. The recommendations outlined in this report will need to be subject to consultation with relevant stakeholders, including*

local natural history experts and representatives of "Friends of..." groups, at the borough level prior to submitting these recommendations to the London Wildlife Sites Board (LWSB). This part of the SINC Review process will need to be led by Enfield Council".

However, there has been no stakeholder consultation, nor correspondence from Enfield Council with the LWSB as of May, 2024 (past the Local Plan Regulation 19 stage). There are no further documents from Enfield Council regarding SINC. The report does not seem to come to any conclusion - it just sets out various recommendations, but there is no decision making process recorded. No sites were upgraded.

Furthermore, we believe it is an anomaly that Whitewebbs Park has not been included in any recommendations for SINC upgrade. The land proposed for THFC's development is surrounded by, and connects, three SINC: Hilly Fields, Forty Hall and Whitewebbs Woods. Enfield Council's SINC review's description of the latter applies equally to this adjacent grassland *"the site forms part of a wider network of habitats, which offer important opportunities for a range of protected and notable flora and faunal species in the north of the borough"*. The SINC review recommended upgrades to fields along Turkey Brook at Forty Hall due to their value as a corridor. The former golf course is, literally, the extension of that corridor through to Hilly Fields and Whitewebbs Woods. Crew's Hill Golf Course, already a SINC, was recommended in the LUC (2020) and Tyler Grange (2023) SINC Review reports to be upgraded and extended due to its grassland. It is an anomaly that Whitewebbs, used as a golf course at the time, was not also accorded SINC status in the LUC review as it has importance both as a corridor and as an expanse of mosaic, neutral and acid grassland grassland. Additionally, Section 4 "Site evaluation" of Denis J Vickers' ecology report has been ignored in "Biodiversity Net Gain Assessment Part 2 Appendix G". Denis J Vickers concludes in regard to Whitewebbs Park and SINC designation: *"The site adequately met or exceeded most of the criteria cited by the LWSB. Should the site's high biodiversity be confirmed by appropriate phase 2 surveys, designation as a Site of Metropolitan Importance for Nature Conservation would be fully justified"*.

Given this strong evidence, we believe it to be a serious oversight that Whitewebbs Park was left unsurveyed and not considered for such protection in Enfield's latest SINC review. If the Park had been accorded SINC status, it would have had greater protection, including under London Plan Policy G6 1. THFC's plans would have come under greater scrutiny, and likely been rejected. In addition, with its high ecological sensitivity, Whitewebbs Park should have been integrated into the borough's Local Nature Recovery Strategy (LNRS).

9. Forty Hill Conservation Area (FHCA)

In 2008, the FHCA boundary was extended, and the area now borders Whitewebbs Park (see Article 4 Map 2009). THFC's proposed development would negatively affect the FHCA. Enfield Council's 2015 Forty Hill "Conservation Area Character Appraisal" describes the damage THFC's existing training ground has done to this

historic area. In para. 2.5.31, in regard to Forty Hall, it states *“the historic setting of the house is vulnerable to developments outside the designated park. By far [the] most important historical vista from the house, northwards along the avenue, now terminates in the anachronistic suburban clutter of the Tottenham Hotspur Football Club training ground to the west of Myddelton House. The purpose of the 2008 boundary extension has been diluted by its construction”*. The Appraisal goes on to state *“Any further development in this area, or in the landscape beyond it would be very damaging”*. From Enfield Council’s 2015 Forty Hill “Conservation Area Management Proposals”, one of the recommendations states *“The principal development pressures are...from the structures and landscaping associated with sports facilities. Planning controls should be used to minimise the use of these urban features...”*.

10. Conclusion

When all elements of this planning application are taken into account, and weighed against the VSC, there would be a negative impact which would constitute significant harm to the Green Belt and its purposes, providing negligible public/community benefit. Therefore, VSC should not be granted.

We believe this planning application should be refused for the reasons stated above.

Thank you for reading our representation,

Yours sincerely,

[Redacted signature]

Written by:

[Redacted name] on behalf of Guardians of Whitewebbs, a local community campaign group.

Edited by (chiefly WR para. 2):

[Redacted name]

Guardians of Whitewebbs:

[Redacted address]

Website: <https://www.avidbeats.com/guardians-of-whitewebbs>

References:

- [Planning Application 24/00987/FUL Documents](#)
- [GLA Stage 1 Report](#)
- [Press Notice](#)
- [NPPF 2023](#)
- [Ecological Impact Assessment and Biodiversity Baseline Report](#)
- [Natural England and Forestry Commission Standing Advice \(“Ancient woodland, ancient trees and veteran trees: advice for making planning decisions”\)](#)
- [Ancient Woodland and Veteran Tree Buffer Zones \(Natural England and Forestry Commission Guidance 2014\)](#)
- [IUCN Red List Wrinkled Peach](#)
- [Enfield Local Heritage List \(2018\)](#)
- [Enfield Local Plan](#)
- [Area of Special Character Boundary Review \(2013\)](#)
- [Enfield Characterisation Study \(2011\)](#)
- [Enfield SINC Review 2020](#)
- [Tyler Grange Crews Hill and Chase Park SINC Report](#)
- [Forty Hill Conservation Area](#)



KATE OSAMOR MP

HOUSE OF COMMONS

LONDON SW1A 0AA

Mr Sadiq Khan
The Mayor of London
City Hall
The Queen's Walk
LONDON SE1 2AA

20 February 2025
MP Case Ref: CD/KO63298

Dear Sadiq

Whitewebbs Park

I am writing to you regarding planning application 24:00987:FUL, which proposes the development of a football training centre at Whitewebbs Park in Enfield.

Many of my constituents have requested that I write to you in your role as the Mayor of London to ask that this application is called in. While Whitewebbs Park is not within my constituency, many residents in Edmonton and Winchmore Hill do make use of this green space.

A central concern for my constituents is the exclusion of the public from Whitewebbs Park if the development proceeds. This space holds a special place for many, and they are distressed at the prospect of losing such a large and open parkland, which is seldom available in London. Public parks are crucial for community health and well-being, providing spaces for exercise, reducing stress, and fostering community connections.

Public parks also contribute to social equity by offering free recreational spaces for all community members, regardless of income, which is especially important in a city like London. Removing access to Whitewebbs Park could disproportionately affect lower-income families who rely on public spaces for recreation.

My constituents tell me that Whitewebbs Park is home to ancient woodland, grassland, and diverse wildlife and my constituents believe that allowing this development would cause irreversible damage to this unique environment.

Concerningly, I understand there are plans to use the chemical Glyphosate to clear large grasslands as part of the development. This substance has been banned or restricted in many countries and by local authorities across the UK due to its environmental impact. Concerns have been raised about the potential for Glyphosate to seep into the soil and run off into surrounding water systems, further impacting wildlife outside the immediate development area, such as the beaver colony at nearby Forty Hall.

Furthermore, Tottenham Hotspur already possesses a vast and high-tech facility in Crew Hill, near the proposed development site at Whitewebbs Park. This raises the question of why they need more land when they already have a such a large facility at their disposal.

Additionally, I understand Tottenham Hotspur and Enfield Council have failed to explore development on alternative brownfield sites. Given the football club's immense wealth, my constituents feel there is nothing preventing them from purchasing alternative land elsewhere and stopping plans to develop Whitewebbs Park.

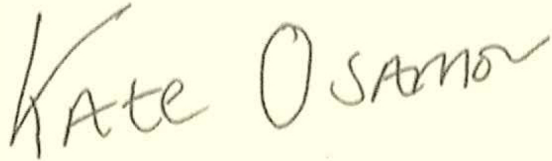
Constituents have also raised concerns about Tottenham Hotspur's previous disregard for

S106 agreements at its current men's training centre and Enfield Council's lack of enforcement. There are fears that Tottenham Hotspur will continue to disregard S106 agreements if this development is allowed to progress.

These are just a few of the concerns that have been raised with me regarding the proposed development and therefore I would urge you to consider calling this application in.

I would be grateful if you could provide a response that addresses these concerns, which I can then pass on to my constituents.

Yours sincerely

A handwritten signature in dark ink, reading "Kate Osamor". The signature is written in a cursive, flowing style. The first name "Kate" is written in a larger, more prominent script, and the surname "Osamor" follows in a similar but slightly smaller script. The ink appears to be a dark blue or black.

Kate Osamor MP
Member of Parliament for Edmonton and Winchmore Hill

Written Representation for Planning Application 24/00987/FUL

Revised 20/11/2024

STANCE: OBJECT

Commenter Type: Campaign Group

I am writing on behalf of the Guardians of Whitewebbs. This is our written representation (WR) for the planning application 24/00987/FUL, concerning Whitewebbs Park.

Whitewebbs Park Definition

When referring to Whitewebbs Park, we mean THFC's lease area, including the open space/grassland, of which circa. 50% would be lost to the proposed training centre, and the portion of the ancient woodland around Whitewebbs Lake, which would be seriously reconstructed. ([Site Wide Coloured Landscape Masterplan.](#))

1. Overview

- **(A) Inappropriate Development:** The Greater London Authority (GLA) concluded in their Stage 1 Planning report GLA/2024/0213/S1/01 (GLAS1R) that Tottenham Hotspur Football Club's (THFC) proposed development "would not preserve the openness of the Green Belt compared to what is existing" due to the visual impacts of the training ground boundaries, fencing, floodlights, buildings and extensions (para. 16). The GLA states, therefore, it is "inappropriate development within the Green Belt" and "very special circumstances" would have to exist for the scheme to be approved (GLAS1R, paras. 13-17). Although the GLA didn't mention the 5 purposes of the Green Belt, we also believe that THFC's proposed development is out of line with NPPF para. 143 (d) and (e).
- **(B) Enfield Council states in its Press Notice (7/8/2024):** *"In the opinion of the Council, as Local Planning Authority, this development would involve a departure from the Local Development Plan. Reason: The development site is located within the Metropolitan Green Belt and would result in new development outside of that permitted within Paragraph 149 of the NPPF (2023), Policy G2 of the London Plan (2021), Policy CP33 of the Enfield Core Strategy (2010) and Policy DMD82 of the Enfield Development Management Document (2014). The policies mentioned restrict new development within the Green Belt that impacts its openness."*
- **(C) Very Special Circumstances (VSC):** The NPPF states that "substantial weight" should be given to any harm to the Green Belt and that '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" (para. 153). In its Planning Statement (PS) paras. 8.59-8.129, THFC set out the factors which they consider constitute the

VSC of its proposed development. We consider each of these below, why each is misleading, and why the factors fail to meet the standards in NPPF para. 153.

2. Environmental, Sustainability and Ecological Benefits

- **(A) Biodiversity Net Gain (BNG):** For BNG purposes, THFC proposes to plant c. 2000 trees across the site (PS para. 8.120). However, in our view, there are no benefits in THFC's PS to the environment, sustainability or ecology of the site. As stated in para. 5.1.5 in Denis J Vickers', BSc(Hons), FLS, CBiol, MRSB, MCIEEM (Consultant Ecologist) "Whitewebbs Park (Enfield): Ecological Appraisal and Priority/Protected Species Assessment": *"Biodiversity net gain (BNG) calculations are based principally on habitats and do not adequately take account of faunal species present even if of high conservation status. Therefore, with regards the potential development of Whitewebbs Park, woodland planting is not considered appropriate with regards off-setting the loss of grassland. This will not benefit bird species and invertebrate species associated with open grassland, the populations of which have suffered an unprecedented decline in recent years. Additionally, if woodland planting is chosen to off-set the loss of grassland, the poor-quality secondary woodland which results may take more than 30 years to mature and possibly 100 years plus before it supports a relatively wide range of fungi, lichens, Bryophytes and fauna"*. 50% of the mosaic/neutral/acid grassland would be lost to monoculture football pitches and astroturf. Astroturf/plastic-grass has a large carbon footprint from manufacturing, transport, installation, and non-recyclability. It devastates wildlife during use, shedding microplastics into soil, drainage systems, rivers, and seas. The plastic-grass membrane suffocates life below and contributes to flooding in wet weather. Preserving the open grassland is vital for butterflies, spiders, bees, small mammals and an abundance of insects such as beetles, and with THFC's tree planting proposals, this is not recognised. The habitats THFC propose to create as part of their BNG would take a long time to develop and be of use to wildlife. THFC's ecologists have stated that the site's grassland is chiefly g4 modified grassland, though we describe the grassland as an expanse of grassland rich in invertebrates (including priority species), comprising mosaic, neutral and acid grassland. The status of the grassland as acid/neutral as per GIGL and public data has not been fully accounted for. THFC's survey was initially conducted in a time of drought and many grass species are notoriously difficult to distinguish and identify. We also question how the density of species/m2 was estimated. Additionally, the loss of significant habitat value from the proposed tree felling is not recorded, nor mentioned, in the flawed BNG metric calculation or the ecological impact assessments. The BNG of 27% is likely to be overstated. It cannot be that such a large part of the site is being taken away and yet a gain is being caused. Overall, THFC has considerably overestimated the BNG of its proposals.
- **(B) Re-landscaping:** THFC, as part of building their training pitches, would have to flatten the landscape for pitches. This would involve colossal earth moving works and irrevocable habitat disruption. It would also be out of character with the natural landscape (see WR para. 4 (A)). The part of the site proposed for training pitches has never been significantly landscaped. The British Geological Survey

does not show any additional material deposited here. It represents a historic landscape pristine from when Enfield Chase (forest) was deforested post 1777. Important landscape and soils, such as what is present in Whitewebbs Park (an Area of Special Character) should be protected (NPPF para. 180).

- **(C) Attenuation Ponds:** The loss of grassland and some of the site's trees also creates an added risk of flooding. Since hybrid pitches do not absorb much water, THFC would need to keep these dry. While THFC proposes to create attenuation ponds, we do not believe this to be the answer. Not only does it harm the natural landscape, it creates the need for displacing large amounts of earth, in turn harming the soil. From Royal Horticultural Society (RHS): *"Digging damages soil structure by destroying natural drainage channels made by worms, disturbing fungal networks, and releasing carbon that's locked in the soil"*. Attenuation ponds would take up 2 areas of active meadowland, which is already draining well. There is little ecological benefit of these, since the adjacent beaver flooding project and the existing wetland in the wooded margins are solving flooding in a natural fashion.
- **(D) Tree Felling:** The issue of felling 137 trees (PS para. 8.57.2) is unsound (NPPF para. 180 (b)). THFC would also fell an additional 70 "Category U" trees - the argument for felling these trees because of *"good arboricultural management"* is flawed, since dead and/or decaying trees are vital for the ecosystem, housing an abundance of insects, birds and wildlife. Logika fails to acknowledge the habitat on site, focusing on saproxylic species only in relation to the ancient woodland. This exposes an inexcusable mistake in equating ancient woodland rather than open grown trees with high quality saproxylic fauna. The presence of a rare hoverfly and bumblebee mimic, *Pocota personata*, on an ash tree highlights this. Whitewebbs is the third site in London to record this species in the last 50 years. Saproxylic species generally require decaying wood in open grown trees where there is more light and heat as compared to closed canopy woodland. They also require flowering shrubs like hawthorn nearby. The impacts on saproxylic species of losing significant volumes of high value decaying wood by removing so many trees is not mentioned in the EIA. Proposed tree removals in the Arboricultural Impact Assessment (AIA) are unnecessary and result from the change of use, not inherent risk. As noted above, they also represent significant biodiversity loss. This is not accounted for in the BNG metric because in this calculation, they are just treated as generic trees, not trees with decay and other habitat features.
- **(E) Pollution and Disturbance:** The proposed floodlights and noise from the development would seriously impact wildlife. For example, despite curfews, light spill from floodlighting would have a detrimental effect on bats. This is highly likely to discourage foraging/commuting activities and possibly prevent roosting in adjacent trees and woodlands. Bat specie *"Daubenton's Myotis"* feed on the surface of Whitewebbs Lake and are light sensitive. This is adjacent to the proposed new access road (WR para. 2 (G)). The building of this, and the traffic that comes with it would be detrimental to bats present in the Whitewebbs Lake area. Furthermore, in Logika's *"Biodiversity Baseline Report"*, there seems to be no bat surveys around the Whitewebbs Lake area (Figure 11-3 and 11-4), which is classified at part of the Ancient Woodland and Metropolitan SIN. We question why this area was overlooked and believe bat surveys should have taken place

here if a new road is planned to run past the Lake? There is also a high likelihood that many bird species (particularly those associated with open grassland) would become much rarer in the locality or no longer occur. Noise from the training ground, auxiliary facilities, and the development of both, may also be a concern with regards site aesthetics and perceived tranquillity of nearby SINC's. For example, the adjacent Enfield Beavers located in Forty Hall Estate could potentially be affected. All these proposed developments (Whitewebbs Park, the nature reserve development at Dickenson's Meadow, and the future education centre redevelopment in the Western Field) would constitute major disturbance for wild animals, especially for wildlife in an enclosure, that spends time under water.

- **(F) Glyphosate:** The use of glyphosate for the eradication of extensive grassland areas prior to replanting would be immensely harmful. This chemical is prohibited in Europe; in 2019, the Greater London Authority adopted a motion to discourage its usage; and 50 local authorities have either banned or significantly limited its application, particularly in parks. Glyphosate kills plant-life and is toxic to wildlife. As the site is wet, the glyphosate could seep into the soil, potentially affecting the hydrology of the site. The chemical may also find its way into Turkey Brook and Cuffley Brook, and harm aquatic wildlife and their habitats.
- **(G) Whitewebbs Lake:** In THFC's proposals, Whitewebbs Lake's character would be drastically altered, such as destruction to the surrounding ancient woodland to create what THFC calls "*restoring the historic carriageway*" (see WR para. 4) in order to reroute the access road to the Toby Carvery and make the existing road private. The harm this would cause to wildlife and their habitats (including the irreplaceable ancient woodland) would be devastating. It would create air, noise and light pollution. Since there is little to no public transport infrastructure around the Northern area of Whitewebbs where the training ground would be situated, this would require athletes to use their car. This does not "Promote Sustainable Transport" between paras. 108-117 in the NPPF.
- **(H) Wildlife Corridor:** The development and repurposing of the Green Belt would likely reduce the Park's functionality as a wildlife corridor. The passage of small mammals, reptiles, amphibians etc to and from Whitewebbs Wood, Forty Hall Estate and Hilly Fields Country Park SINC's would be impeded via habitat loss and disturbance. The development is also likely to have an adverse impact on flora and fauna e.g. people entering woodlands, grasslands and other habitats and affecting populations of small birds and mammals.
- **(I) Irreplaceable Habitat:** The loss or deterioration of irreplaceable ancient woodland and veteran tree habitat (i.e. around Whitewebbs Lake - see WR para. 2 (G)) should be refused (NPPF para. 186 (c)). THFC's proposals do not meet the "wholly exceptional reasons" set out in NPPF chapter 15 footnote 67, nor does a suitable compensation strategy exist. THFC's tree protection plan does not follow the Natural England and Forestry Commission Standing Advice and therefore cannot protect irreplaceable veteran trees they claim they will retain.
- **(J) Tree Root Protection Areas:** Russell Miller MSc (Arboricultural and Ecology Consultant) states "*The proposed mitigation for intrusions into tree Root Protection Areas (RPAs) are extremely unlikely to work in such a large-scale landscape*

alteration scheme. The development proposes huge dislocation and movement of soil. The proximity of proposed retained veteran and Grade A trees to these major earthworks means the proposed RPA protection measures will not work. The scale of protection and supervision required to protect tree roots of multiple trees in close proximity to major earth works rarely results in successful tree retention. Furthermore, veteran trees should have extra-large RPAs (minimum 15 x diameter), a metric not recognised or applied in the AIA mitigation proposals. Instead of following this Natural England guidance on 15 x dia for RPAs the AIA adopts BS5837 12 x and a cap of 707m2. The failure to note and acknowledge this special requirement for veteran trees is particularly concerning given the purported mitigation plans for protection of these trees' root areas and their irreplaceability".

- **(K) Bats:** There are 11 species of bat which have been logged by GiGL. Together, these account for more than 2,000 occurrences and corroborating evidence. These figures are exceptional. All bat species and their roosts are protected by the Conservation of Habitats and Species Regulations 2010 and Schedule 5 of the Wildlife and Countryside Act 1981. The proposed development would cause considerable harm to these species for the reasons set out in WR para. 2 (E).
- **(L) Badgers:** Badgers should have been "scoped out" by Tottenham Hotspur Football Club's (THFC) ecologists and reasons as to why should have been provided. Since Denis J Vickers conducted his ecological survey, evidence emerged (The Environment Bank Habitat Survey: May 2016 (target note T2)) of a badger sett at the boundary of Dickenson's Meadow with Whitewebbs Park. This should have been investigated by THFC's ecologists, as it is next to the proposed development area. Removal of grassland areas would recede scope for foraging badgers. Should badgers be present on site, this specie is protected under: Protection of Badgers Act 1992; Schedule 6 of the Wildlife Countryside Act 1981; The Animal Welfare Act 2006; and Appendix III of the Convention on the Conservation of European Wildlife and Natural Habitats. This includes protection from damage or obstruction to badger's sett/s.
- **(M) Hedgehogs/small mammals:** Enfield Council has a Biodiversity Duty under Section 41 the NERC Act 2006 to see Species of Principal Importance are provided for in any development. Removal of grassland areas would be detrimental to foraging hedgehogs. The presence of kestrel hunting over the site's grassland indicates that small mammals are likely colonising these habitats.
- **(N) Fungi:** There have been sightings in November 2024 of:
 - i. Golden Waxcap (*Hygrocybe Chlorophana*) - this specie is uncommon in Britain. It grows in grassland. The fact this species is present is a good indicator of "unimproved grassland", which is becoming increasingly scarce.
 - ii. Wrinkled Peach (*Rhodotus Palmatus*) - this specie is on the Global Fungi Red List as Near Threatened. It grows on dead/rotting elm.

Both of the above species were found within 2 of the proposed training pitches. These important species and their related ecology would be destroyed as a result of THFC's proposals. We would describe the grassland as: an expanse of

grassland rich in invertebrates (including priority species), comprising mosaic, neutral and acid grassland.

- **(O) Invertebrates:** No invertebrate surveys have been carried out. We believe this to be a great oversight considering the importance of the grassland for invertebrates and the amount of invertebrates present on the site.
- **(P) Increased pressure:** Reduction of the publicly accessible space would increase public pressure elsewhere, such as in the remaining lease area. This could lead to further habitat deterioration, for example disturbance of nesting birds, trampling of sensitive habitats, potential misuse and nitrification from dog faeces and urine.
- **(Q) Harm Not Outweighed:** Overall, there is no benefit whatsoever regarding the environment or ecology, and all of THFC's proposals would involve harm to the Green Belt. For these reasons, this planning application is not in line with NPPF paras. 180, 185, 186 and 191. It is also not an acceptable use of land (NPPF para. 194).

3. Health Benefits

- **(A) Training Centre Focus:** This proposal for an elite/private women's training centre focuses solely on the health and wellbeing of a tiny proportion of the young female generation, many of whom would not even be from Enfield. Most of the public would not be able to engage in sport in this setting, and as stated in WR para. 5 (B), there would be a net loss of community access/public benefit. This is an inappropriate strategy: the planning application doesn't align with NPPF para. 96 (c).
- **(B) The Current Site:** Whitewebbs, as it is, provides excellent health benefits to the community, both physically and mentally. Large numbers of people visit the site regularly to walk, run, cycle, do yoga, meditate, and even play ball games/football. The site in its open parkland state provides an inspiring and calming atmosphere and contributes to good mental health. People of all ages are free to experience the benefits of this site.
- **(C) Lease Area "Improvements":** THFC's claims around "community access" are flawed for the reasons set out in WR para. 5. There is no need for additional walking or cycle routes, as many people are seen using the current paths which have been created from regular use by the public. Creation of these routes would further harm the environment and nature.
- **(D) Harm Not Outweighed:** Overall, there is negligible benefit (and mainly a negative impact), to the health of the public through these proposals.

4. Heritage Benefits/Restoration

- **(A) Character:** Enfield Local Heritage List, May 2018, entry 259 states *“[Whitewebbs still] retains much of the parkland character”*. NPPF para. 205 states *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation”*. THFC’s proposals would not conserve the Whitewebbs Park and its assets, and would obscure panoramic views from Whitewebbs Lane looking south and south west; the main driveway (footpath through the Park) would be cut by the training ground fencing, and subsequently the panoramic views looking north and north east would be lost; and dense tree planting would obscure views from the south of the park, near the café, looking north west. The plan is unsound as THFC would destroy Important Local View “6. Whitewebbs Lane” which is protected in Policy DE5 of Enfield Council’s Local Plan. In addition to obscuring views, the 21 metre tall floodlights would be out of keeping with the character of the land. THFC proposes to level out the land, which changes the character and landscape of the Park. It would build attenuation ponds, which are also out of keeping with the natural landscape. In and around the lake and north eastern Whitewebbs Woods area would also be seriously reconstructed. THFC claims (PS para. 8.118) that there would be *“reinstatement of the historic carriageway route to Whitewebbs House”*. However, there is no historic significance of this “carriageway”, and building a new road to the Toby Carvery would consequently cause great disruption and harm to wildlife, the ancient woodland and the character of the Whitewebbs Lake area (WR para. 2 (G)). Whitewebbs Park is also an Area of Special Character (ASC), along with adjacent Forty Hall and Myddleton House, as set out in Enfield Council’s 2013 Boundary Review (pp. 18-19). Not to preserve this ASC is out of line with NPPF para. 143 (d).
- **(B) Northern Clubhouse:** There would be significant harm to the historic character of the Northern Clubhouse/Stable Block. It is listed as entry 257 in Enfield Local Heritage List, May 2018. THFC would approximately double it in size, and would build extra car parking. The justification for this is not convincing, and therefore this proposed extension is not in line with NPPF para. 206.
- **(C) Harm Not Outweighed:** While some heritage assets may be preserved, these are highly minimal and the harm of the development is not outweighed by the historic preservation in this VSC claim. There is overall a negative impact to the Park and its historic assets.

5. Community Access/Public Benefit, Training and Club-led Programmes

- **(A) Statutory Purpose:** It is important to know, when making judgements around VSC, that the disposal plans for Whitewebbs are not consistent with the “statutory purpose” of the land, which is to be held in Public Trust (a purpose for which it was acquired when it was purchased in 1931 by Enfield Council using public money). The original lease for Whitewebbs Park, which was agreed on a term of 999 years, said that if the golf course was to close, the Park would revert to public use. The

proposed lease to THFC, along with its plans for the Park would extinguish public rights to access these facilities, and therefore is unsound: see NPPF para. 154 (b).

- **(B) Net Loss of Community Access/Public Benefit:** THFC say (PS para. 7.14) it is *"developing a package of community obligations to be delivered by the Club and its charitable Foundation"*. Please note THFC has a poor record of delivering its Section 106 agreements for their existing training centre. It has still not built the education centre and nature reserve promised in 2008 and 2009 and is now developing plans for doing something similar further along the Green Belt at Dickenson's Meadow. Do we really need community access to another elite training ground in place of our historic and beautiful public park? THFC would be privatising approximately half of the open space, and it has always been for the public, so there is a net loss of public and community access/benefit. THFC misleadingly indicate in point "4.4 MASTERPLAN - LAND USE/PUBLIC ACCESS" of their "DESIGN AND ACCESS STATEMENT: REVISION 1" that when the site was used as a golf course, there was *"Restricted Access"* to 77% of the open space. This is flawed, since as set out in WR para. 5 (A), the statutory purpose of the land has always been held for the public, whereas in THFC's proposed development, it would be restricting access to approximately half of the open space.
- **(C) Local Plan:** This planning application is not in line with Enfield Council's current draft Local Plan, as in this plan, Table C1.184 Design Principle A states that development on the site (i.e. Whitewebbs Former Golf Course) *"must maximise publicly accessible space"*. Since there would be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park, THFC's planning application is unsound.
- **(D) Programmes/Training Centre Focus:** The points regarding the training centre's primary focus that are set out in WR para. 3 (A) fully apply to this point as well. THFC says it would offer coaching programmes, yet these would still be private and inaccessible to the vast majority of the community. These proposals do not include the older generations at all.
- **(E) Harm Not Outweighed:** There is an overall negative impact on the public/community through these proposals.

6. Socio-economic Benefits

All socio-economic benefits listed between pages 64-65 of THFC's PS are either solely focused on commercial, private and elite benefit, or are flawed. Both grassroots and professional sports offerings would be private and only benefit the select few, and would feed into THFC's own interests and growth as a commercial company. PS para. 8.98.2 is flawed for the reasons set out in WR paras. 3 and 5 (B). PS para. 8.98.3 is flawed for the reasons set out in WR para 2. Evidently, these points have a negative impact on the current use of the Park.

7. Need and Alternative Sites

- **(A) Need:** We question the need for another training centre, when THFC already has 17 pitches and a state-of-the-art facility. THFC has not clearly demonstrated why the women cannot just use these. Even if THFC were not to use their current one, we still question the size of the development, and if it was smaller, THFC could easily find land elsewhere that could take a development without causing so much harm to the Green Belt. In our view, there is no need for private/elite sporting facilities in the borough (refer back to WR paras. 5 and 6).
- **(B) Gender Equality:** THFC makes numerous claims around gender equality. We do not disagree that women's football is as important as men's football, but for true equality, the women should use the same facilities as the men in THFC's existing training centre.
- **(C) Alternative Sites:** THFC has failed to exhaust options of existing brownfield sites (NPPF 146 (a)).
- **(D) Lease Area:** We question the need for so much land in addition to the land needed for the training centre (37Ha extra). We understand that this is needed for BNG purposes, but if the woodland planting set out in THFC's BNG proposals is unsustainable (as set out in WR para. 2 (A)), we do not believe this is an acceptable use of land.
- **(E) PS Para. 8.127:** THFC state that the VSC of this proposal is *"Responding to the compelling need to grow the women's game, and the benefits that arise from its growth"* and *"Positively responding to THFC's needs to provide professional training facilities which will make the Club achieve its potential in Women's football (see Section 3)"*. Both of these arguments focus principally on THFC's commercial benefits, and the benefits to a very small proportion of professional or select athletes (see WR paras. 3, 5 and 6).
- **(F) Harm Not Outweighed:** NPPF para. 103 has not been taken into account - this development would not better than nor outweigh the loss of the former use.

8. SINC Review

We are concerned that the correct procedures set out by the London Wildlife Sites Board regarding Sites of Importance for Nature Conservation (SINC) reviews have not been followed. The last SINC review in Enfield was held in 2020, and was prepared by LUC. From what we have been able to establish, there appear to be some major flaws.

In para. 1.2 of LUC's report, it states *"This review is an addendum to the Enfield Blue and Green Strategy and will form part of the evidence base of the emerging Local Plan. It is the council's duty to ensure that the conservation of biodiversity is considered as part of the plan-making process. The recommendations outlined in this report will need to be subject to consultation with relevant stakeholders, including*

local natural history experts and representatives of "Friends of..." groups, at the borough level prior to submitting these recommendations to the London Wildlife Sites Board (LWSB). This part of the SINC Review process will need to be led by Enfield Council".

However, there has been no stakeholder consultation, nor correspondence from Enfield Council with the LWSB as of May, 2024 (past the Local Plan Regulation 19 stage). There are no further documents from Enfield Council regarding SINC. The report does not seem to come to any conclusion - it just sets out various recommendations, but there is no decision making process recorded. No sites were upgraded.

Furthermore, we believe it is an anomaly that Whitewebbs Park has not been included in any recommendations for SINC upgrade. The land proposed for THFC's development is surrounded by, and connects, three SINC: Hilly Fields, Forty Hall and Whitewebbs Woods. Enfield Council's SINC review's description of the latter applies equally to this adjacent grassland *"the site forms part of a wider network of habitats, which offer important opportunities for a range of protected and notable flora and faunal species in the north of the borough"*. The SINC review recommended upgrades to fields along Turkey Brook at Forty Hall due to their value as a corridor. The former golf course is, literally, the extension of that corridor through to Hilly Fields and Whitewebbs Woods. Crew's Hill Golf Course, already a SINC, was recommended in the LUC (2020) and Tyler Grange (2023) SINC Review reports to be upgraded and extended due to its grassland. It is an anomaly that Whitewebbs, used as a golf course at the time, was not also accorded SINC status in the LUC review as it has importance both as a corridor and as an expanse of mosaic, neutral and acid grassland grassland. Additionally, Section 4 "Site evaluation" of Denis J Vickers' ecology report has been ignored in "Biodiversity Net Gain Assessment Part 2 Appendix G". Denis J Vickers concludes in regard to Whitewebbs Park and SINC designation: *"The site adequately met or exceeded most of the criteria cited by the LWSB. Should the site's high biodiversity be confirmed by appropriate phase 2 surveys, designation as a Site of Metropolitan Importance for Nature Conservation would be fully justified"*.

Given this strong evidence, we believe it to be a serious oversight that Whitewebbs Park was left unsurveyed and not considered for such protection in Enfield's latest SINC review. If the Park had been accorded SINC status, it would have had greater protection, including under London Plan Policy G6 1. THFC's plans would have come under greater scrutiny, and likely been rejected. In addition, with its high ecological sensitivity, Whitewebbs Park should have been integrated into the borough's Local Nature Recovery Strategy (LNRS).

9. Forty Hill Conservation Area (FHCA)

In 2008, the FHCA boundary was extended, and the area now borders Whitewebbs Park (see Article 4 Map 2009). THFC's proposed development would negatively affect the FHCA. Enfield Council's 2015 Forty Hill "Conservation Area Character Appraisal" describes the damage THFC's existing training ground has done to this

historic area. In para. 2.5.31, in regard to Forty Hall, it states *“the historic setting of the house is vulnerable to developments outside the designated park. By far [the] most important historical vista from the house, northwards along the avenue, now terminates in the anachronistic suburban clutter of the Tottenham Hotspur Football Club training ground to the west of Myddelton House. The purpose of the 2008 boundary extension has been diluted by its construction”*. The Appraisal goes on to state *“Any further development in this area, or in the landscape beyond it would be very damaging”*. From Enfield Council’s 2015 Forty Hill “Conservation Area Management Proposals”, one of the recommendations states *“The principal development pressures are...from the structures and landscaping associated with sports facilities. Planning controls should be used to minimise the use of these urban features...”*.

10. Conclusion

When all elements of this planning application are taken into account, and weighed against the VSC, there would be a negative impact which would constitute significant harm to the Green Belt and its purposes, providing negligible public/community benefit. Therefore, VSC should not be granted.

We believe this planning application should be refused for the reasons stated above.

Thank you for reading our representation,

Yours sincerely,

[Redacted Signature]

Written by:

[Redacted Name] on behalf of Guardians of Whitewebbs, a local community campaign group.

Edited by (chiefly WR para. 2):

[Redacted Name]

Guardians of Whitewebbs:

[Redacted Name] sam@avidbeats.com

Website: <https://www.avidbeats.com/guardians-of-whitewebbs>

References:

- [Planning Application 24/00987/FUL Documents](#)
- [GLA Stage 1 Report](#)
- [Press Notice](#)
- [NPPF 2023](#)
- [Ecological Impact Assessment and Biodiversity Baseline Report](#)
- [Natural England and Forestry Commission Standing Advice \(“Ancient woodland, ancient trees and veteran trees: advice for making planning decisions”\)](#)
- [Ancient Woodland and Veteran Tree Buffer Zones \(Natural England and Forestry Commission Guidance 2014\)](#)
- [IUCN Red List Wrinkled Peach](#)
- [Enfield Local Heritage List \(2018\)](#)
- [Enfield Local Plan](#)
- [Area of Special Character Boundary Review \(2013\)](#)
- [Enfield Characterisation Study \(2011\)](#)
- [Enfield SINC Review 2020](#)
- [Tyler Grange Crews Hill and Chase Park SINC Report](#)
- [Forty Hill Conservation Area](#)

2nd June 2015

To our London Mayor

From: [REDACTED]

Enfield Planning Application **Ref. No. 24/00987/FUL - Whitewebbs Park , Ancient Woodland and meadows**

Dear Mr Mayor

Here is my appeal from the heart for you to assess this application fairly and holistically on our behalf. Please step in for us and refuse this application or, at the very least, review aspects of it which are suspect.

It seems that Spurs together with Enfield Council want to change this treasured Park and the surrounding area of wonderful Greenbelt beyond recognition. I feel this deeply, as do many who have lived here for egenerations or chosen to live here because it is so green.

HERITAGE

I want to address the issue of allowing our history and heritage be eroded away.

[REDACTED] have visited Whitewebbs Park regularly. I lived originally in Eastern Enfield and like many of us, post war children, we really benefitted physically and mentally from having access to the countryside of Whitewebbs and later Forty Hall. We used to walk there and often spend the day. I used to enter the park form the entrances on Whitewebbs Lane. **The history of the Park is important to Enfield residents and is part of our heritage.**

Aside: In my view the Public Golf course, which opened in 1932, does not weaken the green belt claim to commercial sports development . This Golf Course was always considered part of the park and has always been open to visitors and walkers. There is a public path right down the middle of the golf course and others around the edge. I used it from around 1960, maybe earlier.

Whitewebbs is located on the edge of London and was originally part of the ancient forest, the Enfield Chase, used by Henry VIII and Elisabeth I .Connected with the infamous Gunpowder Plot against the government, legend has it that Guy Fawkes met with Robert Catesby at Whitewebbs in 1605 which was being rented by wealthy Catholic noblewoman.

Whitewebbs estate, including the park and house, was sold to Middlesex County Council (MCC) in 1931 by Sir Duncan Orr-Lewis, **specifically for the purpose of creating a public open space, including parks, walks, and sports grounds.** MCC then leased the park and woodland to Enfield Urban District Council for 999 years. Enfield Council later inherited the park after Middlesex became part of Greater London.

You are our Mayor of London. Do you not now have the responsibility of safeguarding our heritage? Is this not Enfield Council's responsibility too but the Council has not even addressed it within the planning application? Please see below quotes on our rights.

The right to cultural heritage in international human rights instruments and jurisprudence. UNESCO for one.,

*I quote..“The right to culture and cultural heritage is explicitly protected in several human rights instruments, including Article 27 of the 1948 Universal Declaration of Human Rights, Article 15.1”. “**cultural heritage is an important component of the cultural identity of communities, groups and individuals . . . so that its intentional destruction may have adverse consequences on human dignity and human rights.**”*

In addition Enfield Council have not given any importance to their own guidelines which protect the Conservation Area of Forty Hill and Bulls Cross with Forty Hall and Myddleton House and note that further development closeby will deleteriously affect its historical setting forever.

LOCAL PLAN

If we had known in 2021 that Spurs had put in a submission to Enfield Council to redesignate, within Enfield's Local Plan, a whole area that they were intent on acquiring initially for their new Women's Training Centre as well as their original Training Grounds maybe we could have objected at the time. This is not a sports facility built for public access and promote sporting excellence for everyone. In fact no public access to the original Training Ground is currently promised and only very limited elite access to the new Training Grounds over 10 years is promised. This is a facility to further the wealth of Tottenham Hotspur, whose holding companies are based in the Bahamas, and support visiting soccer and American Football teams too to financially benefit Spurs.

The land and adjacent land is already designated under 13 criteria which protect it from development. Please do not weaken these protections. This development and its construction process is potentially destructive. Nature, wildlife, biodiversity and human dependence on them is at risk.

Including: Conservation area, London National Park, SINC, Local Open Space, Area of Special Character, Nature Recovery, Forty Hall Conservation Area, Archaeological Importance, Scheduled Monument/Local Heritage, Registered Parks & Gardens, Flood Zones 2/3, North Thames Basin National Character Area

I have no idea if Enfield responded to Spurs comments by re-designating the land. Is this in line with your new London Plan? Spurs seem pro-actively preparing the ground for much more development to fulfil their own corporate vision and gain.

Whitewebbs lane and the connecting roads/lanes and infrastructure are not suitable for such high level development during the construction process and beyond.

NATURE and the loss of our Enjoyment of the Natural World

Others will address comprehensively where many of us believe that Enfield Council have favoured Tottenham Hotspurs' so-called expert opinions regarding the lack of harm of this Commercial Sporting Development. Bring to precious meadows, ancient woodland and waterways. It seems evident to me, reading the planners' interpretations of laws and guidance for the development and against; nature conservation, protection of biodiversity, public access to it and the devastating felling of mature and veteran trees [All of which offer protection to all of us as part of London's Greenbelt] that Enfield are biased. Why? Aren't they meant to be working for the people of Enfield?

Spurs will offer a select few access to their proposed facilities and for only 10 years (the lease is for 25 yrs but will it never revert back to the people, will it?)

Have Council's forgotten that Natural England's mandate includes promoting access to the countryside and open spaces, encouraging open-air recreation, and ensuring facilities for the study, understanding, and enjoyment of the natural environment. Whitewebbs provides all this and always has. We the public need this and are willing to support it no matter what. We can raise funds to do so and engage wildlife and Woodland Trusts to assist in protecting this piece of our planet. Are you?

SINC – Why not?

Adjacent to the proposed site for Spurs' new training ground are two Sites of Importance for Nature Conservation. Spurs have been working with Enfield Council on past and future developments since 2005. These sites were reviewed in 2007, 2011 and 2020 with no changes to the Metropolitan SINC designation. Why throughout this process was Whitewebbs 'Golf Course'/meadow and public land not assessed? Enfield's latest "planning-policy-information-review-of-enfields-sites-of-local-and-borough-importance-for-nature-conservation"-was 2012. Is it legal that this location was omitted?

TREES

WOODLAND TRUST

There are unresolved discrepancies between Spurs assessment of veteran trees and the Woodland Trust. Shouldn't these be resolved? Why have Spurs ecologists not rated them as Veteran?

We all acknowledge that mature trees with large canopies are so valuable for protecting air quality and much more. Planting saplings is no substitute at all. Native trees will naturally choose to work alongside the valuable new meadows.

TREES - Construction Damage – Protective Amendment? (Council officers have rendered this useless

At the Planning Meeting, a planning councillor on behalf of several, voiced concern for and asked for more protection for the trees adjacent to what was being called “re-instatement of the ancient carriageway” which runs from the North Lodge access following a footpath past the pond and later turning left (Eastwards) to join the Toby Carvery Car park. This route took it past several oaks, probably 4-500 years old, potentially Veteran. See the photo. This one is less than one metre away from the ‘road’ to be constructed. As a result of the councillors request the meeting adjourned and Spurs agents and council officers had a private discussion about this. Enfield Council Planning Committee passed these two useless amendments as follows..

*“1 That the orange route on the plan (proposed reinstatement of the historic carriageway for use by Toby Carvery customers) be restricted to not include vehicular access, **and be pedestrian only.***

2 A condition for the access point on the blue route on the plan (upgraded vehicular access for proposed training centre, the limes and toby carvery service vehicles) to make sure the junction is sufficient to accommodate additional vehicular movements, that any trees/vegetation around the junction are looked at.

This in theory sounds good however, **the Planning Department confirmed to me later that constriction of this new access road had been granted so could still go ahead, damaging tree roots, disturbing wild life as follows:**

“1. The orange route

Response: The route of the proposed historical carriageway has been approved as submitted by the committee. Unless the applicant submitted a planning application to change the route, the local planning authority has no power to unilaterally amend an approved proposal

Response: The paved material of the proposed historical carriageway has been approved as submitted by the committee. Unless the applicant submitted a planning application to change the use of the materials, the local planning authority has no power to unilaterally amend an approved proposal.

Response: The bollards have been approved as submitted by the committee. Unless the applicant submitted a planning application to remove the bollards, the local planning authority has no power to unilaterally amend an approved proposal.

d) Will this condition be dependant on No 2 the Blue Route.

Response: In a broad sense, the two routes are independent of each other.

There is one 500 year old oak whose trunk is less than one metre from the proposed new access and other just a few metres. This is totally disregarding all protections.

My conclusion is that **the construction of this new access road will go ahead, currently there is no permission for vehicles, but the construction process alone will disrupt the root systems and mycelium of many trees and wildlife will be disturbed continually by lighting and bollards will not be a good look, all for no reason.**

Or will Spurs just request the permission to revert to vehicle use later?

COMMUNICATION

The Planning Inspector has criticised Enfield Council for poor communication. I personally could not get sight of the comments registered for and against the application. They were never published on the Planning Portal. I was initially refused by email access but later sent just a few. I gave up trying.

After the planning Meeting in February, I requested to be kept informed of the Section 106 and Conditions and received this from the Council.

“Planning Response: The local planning authority is currently addressing post-committee matters and preparing all necessary documents for the referral. The goal is to complete this process as soon as possible. However, since it involves not only the local planning authority, it’s not possible to provide a precise timeframe at this stage.”

My conclusion is that the construction of this new access road will go ahead, currently there is no permission for vehicles, but the construction process alone will disrupt the root systems and mycelium of many trees and wildlife will be disturbed by lighting and bollards will not be a good look for no reason. Or will Spurs just request the permission to revert to vehicle use later? I suspect so.

A ridiculous amendment affording no extra protection whatsoever. If you decide to allow this application, can you at least do something about this please?

PUBLIC TRUST

Spurs and their agents have been in touch constantly with Enfield Council’ planning department since around 2005. The original Training ground was granted in April 2008 and many additions which were originally refused to protect nature and biodiversity have since been granted and conditions rescinded without consultation i.e. ‘behind closed doors’. Now there is the redesignation under the Local Plan too. What else will we discover? This has resulted mistrust of both Spurs and the council. We do not trust the relationship between Enfield Council’s planners and councillors with Spurs and their agents.

In my view trust in our government, local and national has diminished greatly and needs to be restored. Can we trust you Mr Mayor to look carefully at this application and do the right thing and not support the wealth of big business over and above the rights of your people?

I have requested further information related to this application on 27th April and other than that they have passed the enquiries to the relevant departments. To date, I have received no response.

I really am worried that Enfield Council ,as both land owner and planning authority, the planning department’s long standing relationship with Spurs as well as publicly acknowledged receipts of benefits from Spurs by several planning committee councillors, as well as the Leader of our Council have not been unbiased in their recommendation for this application to be granted and have forgotten that their responsibility is to the people of Enfield. They have appeared to be minded to grant this application at whatever cost to support the Corporation of Tottenham Hotspur.

Some are calling Enfield, the London Borough of Spurs!

Can you help restore mine and others trust in democracy? Please reject/ refuse this application.

Yours sincerely



Dear Mayor of London/GLA Planning Team and Secretary of State/Planning Casework Unit,

I request that the planning application 24/00987/FUL (London Borough of Enfield), submitted by Tottenham Hotspur Football Club (THFC), for a football training centre and ancillary buildings at Whitewebbs Park, Enfield, Middx, be **called in** by the Mayor of London, under Article 7 of the Mayor of London Order (2008), and by the Secretary of State, exercising her power under s77(2)(b) of the Town and Country Planning Act 1990.

I write as a regular visitor to the Park and area, having moved here in [REDACTED] and then lived in the area for many years before moving.

I believe it should be refused for the reasons set out below.

Fundamentally, this development does not conform with the London Plan and is, indeed, deemed "inappropriate development" by the Greater London Authority (GLA) - please see its Stage 1 response REF: GLA/2024/0213/S1/01. The GLA concludes that "very special circumstances" are necessary to outweigh the harm to the Green Belt and its purposes. I do not believe that this application meets the criteria for "very special circumstances", as it provides benefits to just one group of individuals, ie. The Club's own football team.

Nature Conservation assessment

As you will be aware, the "Guardians of Whitewebbs" have recently made a formal complaint (COM 101001267200) against Enfield Borough Council's failure to carry out correct Sites of Importance for Nature Conservation (SINC) procedures in its most recent SINC review in 2020. This is a potential conflict of interest insofar as it is now being proposed that land designations would be changed through the New Enfield Local Plan. The Borough is now rushing this planning application (24/00987/FUL) through the Development Management Stage, prior to Stage 2 New Enfield Local Plan Hearings, presumably to avoid scrutiny of the application during those hearings (which are, I understand, yet to commence).

Together, I believe that these failings all constitute a failure in Enfield Council's "duty to conserve and enhance biodiversity" under both Section 102 of the Environment Act 2021 and Section 40 of the Natural Environment and Rural Communities Act 2006. In my view, therefore, the Borough's assessment of the planning application has potentially been prejudiced.

In the immediate future, the assessment of planning applications 24/00987/FUL (and the related non-material amendments application 24/01012/NMA) would be prejudiced by Whitewebbs Park's omission from the SINC review, its land designation change, and Enfield Council's failure to properly address Guardians of Whitewebbs' initial complaint. I understand that The Guardians of Whitewebbs have recently escalated their complaint to the Borough to the internal review/Final Stage.

Summary of why I believe the application should be called in and refused:

I strongly oppose this planning application. The area is part of an historic parkland which contains a range of older trees and its surrounding ecosystem.

The proposed development is incompatible with Green Belt protections, would cause irreversible ecological damage.

I also object to the loss of public access to 50% of the open space in the Park, which was bought in 1937 and opened as a park in order, inter alia, to protect it from development.

In considering the Planning Application, it is very much to be hoped that the Mayor will look at the proposed use of the land to support the development of football dispassionately. It is, indeed, a much loved sport but it has also become a very large business that has the financial resources to retain specialist expertise and to carry out major development of the scale of White Hart Lane stadium as well as the provision of substantial training facilities of the kind proposed here. Individuals do not have access to the kind of financial resources that the promoter here has.

You will also be aware of suggestions, which I am not in a position to comment on their veracity, that some elected representatives on the Council have benefitted, from time to time, from free admission to matches. Although these presumably these should have been declared under the Council's procedures it would be disappointing if this had led to an inability to consider the planning application dispassionately.

My concern has been significantly increased as a result of the felling of a very old oak tree near to the Toby Carvery building in April. This led to the loss of a very ancient tree and the process that led to the decision to do this seems to have been very haphazard with the Borough itself apparently unaware that the tree was in its land rather than that which is current leased to Toby Carvery. This incident gives me limited confidence that any of the parties involved have adequate processes to identify the risk of serious environmental damage to what remains of Whitewebbs Park and/or to take steps to protect it. Although the Leader of Enfield Council apparently asked the Police to investigate the incident as potential Criminal Damage, it seems that this has not happened and, given Police resources are so stretched, this outcome is not surprising although it is very disappointing.

In more detail, I draw the following points to your attention:

1. Violation of Green Belt Protections

- The **Greater London Authority (GLA)** has identified the proposal as **inappropriate development** in the Green Belt.
- **Enfield Council itself** acknowledges that the plan **departs from the Local Development Plan** and contradicts the **National Planning Policy Framework (NPPF)**.
- The required **“Very Special Circumstances” (VSC)** **do not exist** to justify overriding Green Belt protections.

2. Environmental and Ecological Destruction

- **50% of Whitewebbs Park's biodiverse grassland** and 207 trees, including veteran trees, would be lost, eliminating habitats for priority species.
- The replacement of natural grassland with heavily managed and **synthetic football pitches** would introduce microplastics, soil degradation, and long-term ecological harm.
- THFC has **failed to conduct critical ecological surveys**, meaning the full impact on protected species, including bats and invertebrates, remains unknown.
- Biodiversity Net Gain calculations are flawed, undervaluing the unimproved grassland and failing to factor in existing natural reforestation.
- Construction of a road through ancient woodland would cause irrevocable damage to irreplaceable habitat. The 'Wholly Exceptional Circumstances' test set out in NPPF 193c is plainly not met.

3. Loss of Public Access and Community Benefit

- **The Park was purchased with public funds** and intended for continued public use. The proposed development completely closes public access to **50% of the park**.
- THFC's claims of **community benefits are misleading** - the facility will primarily serve an elite sports group (the further development of THFC's football teams) and offer no public access (just as the existing adjacent THFC facility, itself a controversial development on Green Belt land arising from an earlier sale of this parkland, does).
- Harm and any benefit cannot be assessed without a **Full Parkland Management Plan**.

4. Procedural Failures and Mismanagement of SINC Review

- Enfield Council **failed to conduct a proper Sites of Importance for Nature Conservation (SINC) review** in 2020. This planning application should not be considered prior to the resolution of Guardians of Whitewebbs' **formal complaint** and the **Local Plan Stage 2 Hearings**.
- Whitewebbs Park meets the ecological criteria for a **Metropolitan Importance SINC** but was unfortunately **excluded by the Borough from designation**, reducing its legal protections.
- These failures **raise serious legal and environmental concerns** regarding Enfield Council's handling of conservation policies.

5. Harm to Heritage and Conservation Areas

- The proposal would **destroy key panoramic views** protected under Enfield's Local Plan.
- It contradicts the **Forty Hill Conservation Area** guidelines as the previous THFC developments for urban sprawl and damage to historic landscapes.
- The **proposed changes, including massive re-landscaping, would permanently alter the park's historic character**.

Conclusion and London-wide/National Impact

- The planning application violates both regional (i.e. the London Plan) and national policies related to Green Belt and public open space policies, threatens biodiversity, restricts public access, and undermines conservation efforts.
- The application could lead to considerable impacts that extend beyond the local vicinity, particularly concerning the precedent it may set for the privatisation of parkland and the consequent reduction of public access - please see Public Interest Law Centre's press statement "**There is no real protection in law for public parks if this judgment stands**" regarding the 2023 judicial review judgement:
<https://www.pilc.org.uk/news/enfield-residents-continue-to-fight/>
- The planning application has, and continues to, spark considerable **national controversy** and attention, as demonstrated by the extensive coverage in the national media (just search "Whitewebbs Park").
- Given the **lack of justification for Green Belt development, significant environmental harm**, and **procedural failures**, this planning application should be called in and **rejected** in favour of preserving Whitewebbs Park and other important green spaces for future generations.

Thank you.

Yours sincerely.

[Redacted Signature]

Written Representation for Planning Application 24/00987/FUL

FINAL Version | Revised 3/2/2025

STANCE: OBJECT

Commenter Type: Campaign Group

I am writing on behalf of the Guardians of Whitewebbs. This is our written representation (WR) for the planning application [24/00987/FUL](#), concerning Whitewebbs Park.

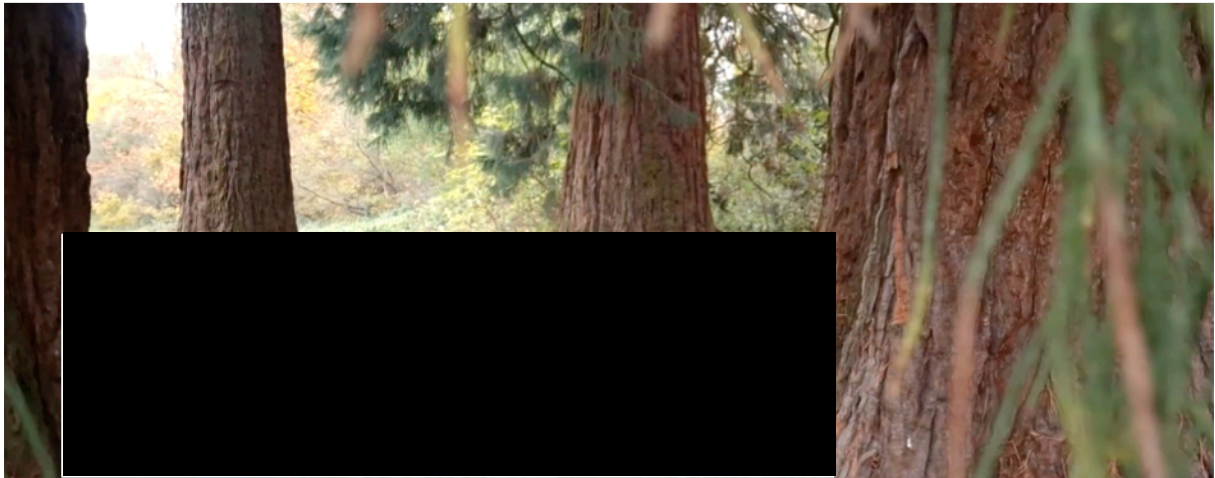
Guardians of Whitewebbs



The [Guardians of Whitewebbs](#) (GOWW) is a local campaign group, campaigning to save Whitewebbs Park. Our [missions](#) are to:

- Protect, conserve, and improve the entire green space and ecology of Whitewebbs Park now and for successive generations.
- Organise community based activities, such as nature walks and art sessions.
- Oppose any development of the Park which would endanger its ecosystem.
- Engage in and support development and works in the Park which support its flora and fauna.
- Engage in and support other works in the Park with a human or social benefit which do not endanger its flora and fauna.
- Promote and educate about rewilding, ecology, the environment (e.g. arboriculture and grassland), and wildlife.

The many community events we have held, for example [nature walks](#), '[Tree Shrine Making](#)' and '[Green Sketching](#)', have been well attended.



Councillors including [Cllr Reece Fox](#), [Cllr Hannah Dyson](#) and [Cllr Emma Supple](#) have shown their support for our campaign.

Our [Instagram](#) has approx 1400 followers, and our WhatsApp and newsletter [sign ups](#) total over 130.

We work closely with [Friends of Whitewebbs](#).



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1. Overview

In this written representation, we will principally demonstrate why the granting of Very Special Circumstances is not justified, and why any (albeit minimal) benefit that may arise from Tottenham Hotspur Football Club's (THFC) development does not outweigh the significant harm that it will cause. We will also discuss other issues which have major implications for this application, for example Enfield Council's failure to carry out correct procedures in its last review of Sites of Importance for Nature Conservation (SINCs) in 2020.

Whitewebbs Park Definition

When referring to Whitewebbs Park, we mean THFC's lease area, including the open space/grassland, of which circa. 50% would be lost to the proposed training centre, and the portion of the ancient woodland around Whitewebbs Lake. ([Site Wide Coloured Landscape Masterplan](#).)

- **(A) Inappropriate Development:** The Greater London Authority (GLA) concluded in its [Stage 1 Planning Report](#) GLA/2024/0213/S1/01 (GLAS1R) that THFC's proposed development *"would not preserve the openness of the Green Belt compared to what is existing"* due to the visual impacts of the training ground boundaries, fencing, floodlights, buildings and extensions (para. 16). The GLA states, therefore, it is *"inappropriate development within the Green Belt"* and "very special circumstances" would have to exist for the scheme to be approved (GLAS1R, paras. 13-17). Although the GLA did not mention the 5 purposes of the Green Belt, we also believe that THFC's proposed development is noncompliant with NPPF para. 143 (a), (c), (d) and (e).
- **(B) Enfield Council states in its [Press Notice](#) (7/8/2024):** *"In the opinion of the Council, as Local Planning Authority, this development would involve a departure from the Local Development Plan. Reason: The development site is located within the Metropolitan Green Belt and would result in new development outside of that permitted within Paragraph 149 of the NPPF (2023), Policy G2 of the London Plan (2021), Policy CP33 of the Enfield Core Strategy (2010) and Policy DMD82 of the Enfield Development Management Document (2014). The policies mentioned restrict new development within the Green Belt that impacts its openness."*
- **(C) Very Special Circumstances (VSC):** The NPPF states that "substantial weight" should be given to any harm to the Green Belt and that *"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"* (para. 153). In its Planning Statement (PS)

paras. 8.59-8.129, THFC set out the factors which they consider constitute the VSC of its proposed development. We consider each of these below, why each is misleading, and why the factors fail to meet the standards in NPPF para. 153.

2. Environment, Sustainability and Ecology

- **(A) Biodiversity Net Gain (BNG):** For BNG purposes, THFC proposes to plant c. 2000 trees across the site (PS para. 8.120). However, in our view, there are no benefits to the environment, sustainability or ecology of the site in THFC's PS. As stated in para. 5.1.5 of [Denis J Vickers'](#), BSc(Hons), FLS, CBiol, MRSB, MCIEEM (Consultant Ecologist) "[Whitewebbs Park \(Enfield\): Ecological Appraisal and Priority/Protected Species Assessment](#)" (November 2023):

"Biodiversity net gain (BNG) calculations are based principally on habitats and do not adequately take account of faunal species present even if of high conservation status. Therefore, with regards the potential development of Whitewebbs Park, woodland planting is not considered appropriate with regards off-setting the loss of grassland. This will not benefit bird species and invertebrate species associated with open grassland, the populations of which have suffered an unprecedented decline in recent years. Additionally, if woodland planting is chosen to off-set the loss of grassland, the poor-quality secondary woodland which results may take more than 30 years to mature and possibly 100 years plus before it supports a relatively wide range of fungi, lichens, Bryophytes and fauna".

Fifty per cent of the mosaic/neutral/acid grassland would be lost to monoculture football pitches and astroturf. Astroturf/plastic-grass has a large carbon footprint from manufacturing, transport, installation, and non-recyclability. It devastates wildlife during use, shedding microplastics into soil, drainage systems, rivers, and seas. The plastic-grass membrane suffocates life below and contributes to flooding in wet weather. Preserving the open grassland is vital for butterflies, spiders, bees, small mammals and an abundance of insects such as beetles. THFC's tree planting proposals further reduce this habitat. The habitats THFC propose to create as part of their BNG would take a long time to develop and be of use to wildlife. THFC's ecologists have stated that the site's grassland is chiefly g4 modified grassland. However, we believe it is more correctly categorised as an expanse of grassland rich in invertebrates (including priority species), comprising mosaic, modified, neutral and acid grassland. The status of the grassland as acid/neutral as per GIGL and public data has not been fully accounted for. THFC's survey was initially conducted in a time of drought. Many grass species are notoriously difficult to distinguish and identify. We also question how the density of species/m² was estimated. Additionally, the loss of significant habitat value from the proposed tree felling is not recorded, nor mentioned, in the flawed BNG metric

calculation or the ecological impact assessments. The BNG of 27% is likely to be overstated. It cannot be that such a large part of the site can be taken away and yet a gain achieved. Overall, we believe that THFC has considerably overestimated the BNG of its proposals.

- **(B) Re-landscaping:** THFC, as part of building its training pitches, would have to flatten the landscape for pitches. This would involve colossal earth moving works and irrevocable habitat disruption. The result would be out of character with the natural landscape (see WR para. 4 (A)). The part of the site proposed for training pitches has never been significantly landscaped. The British Geological Survey does not show any additional material deposited here. It represents a historic landscape pristine from when Enfield Chase (forest) was deforested post 1777. Important landscape and soils, such as those present at Whitewebbs Park (an Area of Special Character) should be protected (NPPF para. 180).
- **(C) Attenuation Ponds:** The loss of grassland and trees creates an added flood risk. Since hybrid pitches do not absorb much water, THFC would need to keep these dry. While THFC proposes to create attenuation ponds, we do not believe this to be the answer. Not only does it harm the natural landscape, it creates the need for displacing large amounts of earth, in turn harming the soil. From Royal Horticultural Society (RHS):

“Digging damages soil structure by destroying natural drainage channels made by worms, disturbing fungal networks, and releasing carbon that’s locked in the soil.”

Attenuation ponds would take up 2 areas of active meadowland, which are already draining well. There is little ecological benefit of attenuation ponds, since the adjacent beaver flooding project and the existing wetland in the wooded margins are solving flooding in a natural fashion.

- **(D) Tree Felling:** The proposal to fell 137 trees (PS para. 8.57.2) is unsound (NPPF para. 180 (b)). Furthermore, THFC plans to fell an additional 70 “Category U” trees in pursuit of “*good arboricultural management*”. However, this is flawed, since dead and/or decaying trees are vital for the ecosystem, housing an abundance of insects, birds and wildlife. Logika fails to acknowledge this habitat on site, only focusing on saproxylic species in relation to the ancient woodland, making the mistake of equating ancient woodland rather than open grown trees with high quality saproxylic fauna. The presence of a rare hoverfly and bumblebee mimic, *Pocota personata*, on an ash tree highlights this. Whitewebbs is the third site in London to record this species in the last 50 years. Saproxylic species generally require decaying wood in open grown trees where there is more light and heat as compared to closed canopy woodland. They also require flowering shrubs like hawthorn nearby. The impacts on saproxylic species of losing significant volumes of high value decaying wood by removing so many trees is not

addressed in the Environmental Impact Assessment (EIA). The proposed tree removals in the Arboricultural Impact Assessment (AIA) are unnecessary and, we believe, result from the change of use, not from inherent risk. As noted above, they also represent significant biodiversity loss. This is not accounted for in the BNG metric, because in this calculation, they are just treated as generic trees, not trees with decay and other habitat features.

- **(E) Pollution and Disturbance:** The proposed floodlights and noise from the development would seriously impact wildlife. For example, despite curfews, light spill from floodlighting would have a detrimental effect on bats. This is highly likely to discourage foraging/commuting activities and possibly prevent roosting in adjacent trees and woodlands. The proposed new access road to the Toby Carvery would create huge amounts of disturbance to wildlife (see WR para. 8). There is also a high likelihood that many bird species (particularly those associated with open grassland) would become much rarer in the locality or absent. Noise from the training ground, auxiliary facilities, and the development of both, would also impact on the aesthetics of the Park, and tranquillity of nearby SINC's. For example, the adjacent Enfield Beavers located in Forty Hall Estate could be affected. All these proposed developments (Whitewebbs Park, the nature reserve development at Dickenson's Meadow, and the future education centre redevelopment in the Western Field) would constitute major disturbance for wild animals, especially for wildlife in an enclosure.
- **(F) Glyphosate:** The use of glyphosate to eradicate extensive grassland areas prior to replanting would be immensely harmful. This chemical is prohibited in Europe; in 2019, the Greater London Authority adopted a motion to discourage its usage; and 50 UK local authorities have either banned or significantly limited its application, particularly in parks. As examples, glyphosate kills plant-life, disrupts and alters soil biology, and is toxic to wildlife. As the site is wet, the glyphosate would seep into the soil, potentially affecting the hydrology of the site and adjacent areas, including the beavers' enclosure. The chemical may also find its way into Turkey Brook and Cuffley Brook, and harm aquatic wildlife and their habitats. We are concerned that the OUTLINE PARKLAND MANAGEMENT PLAN lacks detail in relation to glyphosate's usage (please see WR para. 10, which details why we believe that the FULL WHITEWEBBS PARKLAND MANAGEMENT PLAN should be provided pre-planning consent).
- **(G) Wildlife Corridor:** The development and repurposing of the Green Belt would likely reduce the Park's functionality as a wildlife corridor. The passage of small mammals, reptiles, amphibians etc to and from Whitewebbs Wood, Forty Hall Estate and Hilly Fields Country Park SINC's would be impeded via habitat loss and disturbance.
- **(H) Irreplaceable Habitat:** The loss or deterioration of irreplaceable ancient woodland and veteran tree habitat should be refused (NPPF para. 186 (c)).

THFC's proposals do not meet the "wholly exceptional reasons" set out in NPPF chapter 15 footnote 67, nor does a suitable compensation strategy exist. THFC's tree protection plan does not follow the Natural England and Forestry Commission [Standing Advice](#) and therefore cannot protect the irreplaceable veteran trees it claims it will retain. We also argue that the grassland area is irreplaceable habitat, due to the fact that numerous veteran trees are present in this area (WR para. 9).

- **(I) Tree Root Protection Areas:** Russell Miller MSc (Arboricultural and Ecology Consultant) states

"The proposed mitigation for intrusions into tree Root Protection Areas (RPAs) are extremely unlikely to work in such a large-scale landscape alteration scheme. The development proposes huge dislocation and movement of soil. The proximity of proposed retained veteran and Grade A trees to these major earthworks means the proposed RPA protection measures will not work. The scale of protection and supervision required to protect tree roots of multiple trees in close proximity to major earth works rarely results in successful tree retention. Furthermore, veteran trees should have extra-large RPAs (minimum 15 x diameter), a metric not recognised or applied in the AIA mitigation proposals. Instead of following this [Natural England guidance](#) on 15 x dia for RPAs the AIA adopts BS5837 12 x and a cap of 707m2. The failure to note and acknowledge this special requirement for veteran trees is particularly concerning given the purported mitigation plans for protection of these trees' root areas and their irreplaceability".

Additionally, THFC has not left much room between its attenuation ponds and the veteran and ancient trees bordering the eastern bridleway, within the boundary of Dickenson's Meadow. These trees have RPZs that extend into the east side of Whitewebbs Park. We would argue that a bigger gap between these RPZs and the attenuation pond is required. There is a lack of detail about RPZs in relation to attenuation ponds in the Arboricultural Impact Assessment (i.e. para. 4.22 is the only reference to attenuation ponds). This should be included in the CONSTRUCTION AND ENVIRONMENTAL MANAGEMENT PLAN, which we argue should be published now (WR para. 11), before this planning application is considered, since there would be so much environmental harm in a sensitive irreplaceable habitat that would arise from the construction of this development.

- **(J) Bats:** There are 11 species of bat which have been logged by GiGL. Together, these account for more than 2,000 occurrences and corroborating evidence. These figures are exceptional. All bat species and their roosts are protected by the Conservation of Habitats and Species Regulations 2010 and Schedule 5 of the Wildlife and Countryside Act 1981. The proposed development would cause considerable harm to these species.

- **(K) Badgers:** Badgers should have been “scoped out” by THFC's ecologists and reasons as to why should have been provided. Since Denis J Vickers conducted his ecological survey, evidence has emerged (The Environment Bank Habitat Survey: May 2016 (target note T2)) of a badger sett at the boundary of Dickenson's Meadow with Whitewebbs Park. This should have been investigated by THFC's ecologists, as it is next to the proposed development area. Removal of grassland areas would reduce foraging for badgers. If badgers be present on site, this species is protected under Protection of Badgers Act 1992; Schedule 6 of the Wildlife Countryside Act 1981; The Animal Welfare Act 2006; and Appendix III of the Convention on the Conservation of European Wildlife and Natural Habitats. This includes protection from damage or obstruction to badger's sett/s.
- **(L) Hedgehogs/small mammals:** Enfield Council has a Biodiversity Duty under Section 41 of the Natural Environment and Rural Communities Act 2006 to see that Species of Principal Importance are provided for in any development. Removal of grassland areas would be detrimental to foraging hedgehogs. The presence of kestrel hunting over the site's grassland indicates that small mammals are likely to be colonising these habitats.
- **(M) Fungi:** There have been sightings within the proposed training ground area in November 2024 of:
 - i. Golden Waxcap (*Hygrocybe Chlorophana*) - this species is uncommon in Britain. Its presence is a good indicator of “unimproved grassland”, which is becoming increasingly scarce.
 - ii. Wrinkled Peach (*Rhodotus Palmatus*) - this species is on the [Global Fungi Red List](#) as Near Threatened. It grows on dead/rotting elm.

These important species and their related ecology would be destroyed as a result of THFC's proposals.

- **(N) Invertebrates:** No invertebrate surveys have been carried out, which we believe to be a great oversight considering the importance of the grassland for invertebrates and the amount of invertebrates present on the site. In Denis J Vickers' ecological survey, it states that:

"All grassland was found relatively rich in invertebrates including locally and nationally uncommon species."

- **(O) Increased pressure:** Reduction of the publicly accessible space would increase public pressure elsewhere, such as in the remaining lease area. This could to lead to further habitat deterioration, for example disturbance of nesting birds, trampling of sensitive habitats, potential misuse and nitrification from dog faeces and urine.

- **(P) Harm Not Outweighed:** Overall, there is no benefit whatsoever regarding the environment or ecology, and all of THFC's proposals would involve harm to the Green Belt. For these reasons, this planning application is not in line with NPPF paras. 180, 185, 186 and 191. It is also not an acceptable use of land (NPPF para. 194).

3. Health

- **(A) Training Centre Focus:** This proposal for an elite/private women's training centre focuses solely on the health and wellbeing of a tiny proportion of the young female generation, many of whom would not even be from Enfield. Most of the public would not be able to engage in sport in this setting, and as stated in WR para. 5 (B), there would be a net loss of community access/public benefit. This is an inappropriate strategy: the planning application doesn't align with NPPF para. 96 (c).
- **(B) The Current Site:** Whitewebbs, as it is, provides excellent health benefits to the community, both physically and mentally. Large numbers of people visit the site regularly to walk, run, cycle, do yoga, meditate, spot wildlife, make art/paint/draw, and even play ball games/football. The site in its open parkland state provides an inspiring and calming atmosphere and contributes to good mental health. People of all ages are free to experience the benefits of this site.
- **(C) Lease Area "Improvements":** THFC's claims in relation to "community access" are flawed for the reasons set out in WR para. 5. There is no need for additional walking or cycle routes, as many people are seen using the current paths which have been created from regular use by the public. Creation of these routes would further harm the environment and nature.
- **(D) Harm Not Outweighed:** Overall, we do not believe there is a benefit to the health of the public through these proposals - in fact there is mainly a negative impact - and therefore the harm due to the loss of Green Belt would not be outweighed.

4. Heritage and Restoration

- **(A) Character:** [Enfield Local Heritage List](#), December 2024, entry 259 states:

"[Whitewebbs still] retains much of the parkland character".

NPPF para. 205 states:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.”

THFC’s proposals would not conserve Whitewebbs Park and its assets. Panoramic views from Whitewebbs Lane looking south and south west would be obscured; the main driveway (tarmac footpath through the Park) would be cut by the training ground fencing and the panoramic views looking north and north east would be lost; and dense tree planting would obscure views from the south of the Park, near the café, looking north west. The plan is unsound as THFC would destroy Important Local View “6. Whitewebbs Lane” which is protected in Policy DE5 of Enfield Council’s [Local Plan](#). In addition to obscuring views, the 21 metre tall floodlights would be out of keeping with the character of the land. THFC proposes to level the land, which would also change the character and landscape of the Park. It would build attenuation ponds, which are also out of keeping with the natural landscape. The proposed new access road to the Toby Carvery would create significant harm to the character of the Whitewebbs Lake area. Whitewebbs Park is also an [Area of Special Character](#) (ASC), along with adjacent Forty Hall and Myddleton House, as set out in Enfield Council’s 2013 Boundary Review (pp. 18-19). Failure to preserve this ASC is out of line with NPPF para. 143 (d).

- **(B) Northern Clubhouse:** There would be significant harm to the historic character of the Northern Clubhouse/Stable Block (see WR para. 9).
- **(C) Harm Not Outweighed:** The harm of the proposed development is not outweighed by the negligible historic preservation in this VSC claim. Furthermore, the proposals constitute an overall negative impact both to the Park and to its historic assets.

5. Community Access, Public Benefit, Club-led Programmes

- **(A) Statutory Purpose:** It is important to know, when making judgements concerning VSC, that the disposal plans for Whitewebbs are inconsistent with the “statutory purpose” of the land, which is that it is to be held in Public Trust (a purpose for which it was purchased in 1931 by Enfield Council using public money). The original lease for Whitewebbs Park, which was agreed on a term of 999 years, said that if the golf course were to close, the Park would revert to public use. The proposed lease to THFC, along with its plans for the Park would extinguish public rights to access these facilities, and therefore is unsound (NPPF para. 154 (b)).

- **(B) Net Loss of Community Access/Public Benefit:** THFC say (PS para. 7.14) it is *"developing a package of community obligations to be delivered by the Club and its charitable Foundation"*. Please note THFC has a poor record of delivering its Section 106 agreements for its existing training centre (WR para. 11). Do we really need community access to another elite training ground in place of our historic and beautiful public park? THFC would be privatising approximately half of the open space. This open space has always been for the public, therefore there is a net loss of public and community access/benefit. THFC misleadingly indicates in point "4.4 MASTERPLAN - LAND USE/PUBLIC ACCESS" of their "DESIGN AND ACCESS STATEMENT: REVISION 1" that when the site was used as a golf course, there was "Restricted Access" to 77% of the open space. This is incorrect, since the land has always been accessible open space with no fenced off areas when it was a golf course, whereas in THFC's proposed development, it would be restricting access to approximately half of the open space.
- **(C) Local Plan:** This planning application is not in line with Enfield Council's current draft Local Plan, as in this plan, Table C1.184 Design Principle A states that development on the site (i.e. Whitewebbs Former Golf Course) *"must maximise publicly accessible space"*. Since there would be a loss of approximately 50% of the open Green Belt space in Whitewebbs Park, THFC's planning application is unsound.
- **(D) Programmes/Training Centre Focus:** The points regarding the training centre's primary focus that are set out in WR para. 3 (A) fully apply to this point as well. THFC says it would offer coaching programmes, yet these would still be private and inaccessible to the vast majority of the community. These proposals are unlikely to include the older generations (who form the majority of the Park's users) at all.
- **(E) Harm Not Outweighed:** There is an overall negative impact on the public/community through these proposals.

6. Socio-economic

All socio-economic benefits listed between pages 64-65 of THFC's PS are either solely focused on commercial, private and elite benefit, or are flawed. Both grassroots and professional sports offerings would be private and only benefit the select few, and would feed into THFC's own interests and growth as a commercial company. PS para. 8.98.2 is flawed for the reasons set out in WR paras. 3 and 5 (B). PS para. 8.98.3 is flawed for the reasons set out in WR para 2. Evidently, these points have a negative impact on the current use of the Park.

7. Need and Alternative Sites

- **(A) Need:** We question the need for another training centre, when THFC already has 17 pitches and a state-of-the-art facility. THFC has failed to demonstrate why the women's teams cannot use these. Even if there were an argument for a new training ground, we still question its size. If the proposed development was smaller, THFC could easily find land elsewhere without causing so much harm to the Green Belt and a public park. In our view, there is no need for more private/ elite sporting facilities in the borough (refer back to WR paras. 5 and 6).
- **(B) Gender Equality:** THFC makes numerous claims around gender equality. We do not disagree that women's football is as important as men's football, but for true equality, the women should use the same facilities as the men in THFC's existing training centre.
- **(C) Alternative Sites:** THFC has failed to exhaust options of existing brownfield sites (NPPF 146 (a)).
- **(D) Lease Area:** We question the need for so much land in addition to the land needed for the training centre (37Ha extra). We can see that this land is needed to achieve BNG, but (as set out in WR para. 2 (A)), we do not believe this is an acceptable use of land or means of achieving BNG.
- **(E) PS Para. 8.127:** THFC state that the VSC of this proposal is *"Responding to the compelling need to grow the women's game, and the benefits that arise from its growth"* and *"Positively responding to THFC's needs to provide professional training facilities which will make the Club achieve its potential in Women's football (see Section 3)"*. Both of these arguments focus principally on THFC's commercial benefits, and the benefits to a very small proportion of professional or select athletes (see WR paras. 3, 5 and 6).
- **(F) Harm Not Outweighed:** NPPF para. 104 has not been taken into account - this development would not be better than nor outweigh the loss of the former use.

8. Roads and Ancient Woodland

Descriptions

We would like to point out that all three routes being created or expanded in the plans are described as "carriageway", "access" and "link", and in other ways. In fact, they are all roads. Therefore we would summarise that the plans involve the construction and widening of three roads, two of which are through designated ancient woodland.

Openness

The open characteristic of the Green Belt (NPPF para. 153 and 154 (b)) would be significantly harmed by the construction of the operational link, a new hard standing road; the widening of the existing Toby Carvery access road; and the construction of a new access road to the Toby Carvery via Whitewebbs Lake. The construction of the operational link road and the repurposing and widening of the existing Toby Carvery access road would constitute a significant new roadway, the purpose of which would not be public access, but the applicant's service vehicles and site visitors.

Irreplaceable Habitat

With regards to ancient woodland, we have raised the considerable objection, still requiring justification from the applicant, that in order to construct in ancient woodland, there must be "wholly exceptional reasons" (NPPF para. 193). The relative size of the construction and the method do not mitigate this requirement. We note that no construction specification has yet been supplied. This is not an academic matter. Any "no dig" methods will require some amount of hand digging or clearance, and any building of a road is "development" in the way the NPPF intends. Meanwhile, the special and irreplaceable quality of ancient woodland inheres in its soil structure accumulated over a very long time. (See particularly Petersen 1977, Ball and Stevens 1981, and SHI0038: Woodland Trust evidence to parliament 2016).

With further regards to the detriment to irreplaceable habitat of ancient woodland, we submit that it is not possible to consider this application properly without the approximate numbers and tonnage size of construction vehicles. Compaction of tree roots, which can be caused by footfall as well as vehicle passage, is a major factor in numerous diseases including as one example Kretzschmaria Deusta, which often causes tree failure. The plans as they stand involve widening roads and using them as access ways for construction routes that pass multiple mature and candidate veteran oak trees (*Quercus Robur*).

Proposed New Access Road to the Toby Carvery

In THFC's proposals, Whitewebbs Lake's character would be drastically altered, such as destruction to the surrounding ancient woodland to create what THFC calls "*restoring the historic carriageway*" in order to reroute the access road to the Toby Carvery and make the existing road private. We strongly object to the proposed change of use of this public footpath to include vehicular access.

THFC claims (PS para. 8.118) that there would be "*reinstatement of the historic carriageway route to Whitewebbs House.*" However, there is no historic significance of this "carriageway", and building a new road to the Toby Carvery would cause great disruption and harm to wildlife, their habitats (including the irreplaceable habitat of

ancient woodland), the ancient woodland and the character of the Whitewebbs Lake area. It would create air, noise and light pollution.

For example, bat species “Daubenton’s Myotis” feeds on the surface of Whitewebbs Lake and is light sensitive. The building of this road, and the traffic that comes with it would be detrimental to bats present in the Whitewebbs Lake area. Furthermore, in Logika’s [“Biodiversity Baseline Report”](#), there seems to be no bat surveys around the Whitewebbs Lake area (Figure 11-3 and 11-4), which is classified at part of the Ancient Woodland and Metropolitan SINc. We believe bat surveys should have taken place here if a new road is planned to run past the Lake. Without a bat survey of the lake area, there is no information as to how much harm the construction of this road would cause to this protected species. Therefore, we believe THFC must conduct a full bat survey across its whole lease area.

Location

Since there is little to no public transport infrastructure around the Northern area of Whitewebbs, where the training ground would be situated, athletes would have to drive there. This does not “Promote Sustainable Transport” between paras. 108-117 in the NPPF.

9. Mislabeled Veteran Trees and Irreplaceable Habitat in the Grassland Area

The Woodland Trust has recently verified and added numerous veteran trees in Whitewebbs Park to its Ancient Tree Inventory (ATI). These additions include trees within and on the eastern boundaries of Tottenham Hotspur Football Club’s (THFC) proposed women’s training academy area. Our objection is that a number of veteran trees have not been properly listed or accounted for by THFC, and multiple trees have been mislabeled and graded much lower than they are in the “REVISED: ARBORICULTURAL IMPACT ASSESSMENT”. Therefore, irreplaceable habitat cannot be properly taken into account when assessing the proposals. Many high quality and mature trees have also not been accounted for correctly, regularly being labeled as “Category U”. In addition, PS para. 8.57.2 is flawed due to this mislabelling of trees.

In addition to the neighbouring ancient woodland, we believe that Whitewebbs Park (former golf course area) is also an irreplaceable habitat and that there must be “wholly exceptional reasons” to build on it. THFC has not demonstrated that it meets this requirement, as set out in NPPF para. 193.

We are concerned that, according to the proposals (see list below), certain veteran trees will be felled. We are also concerned that even if others won’t be felled, heavy

construction vehicles and landscaping could damage the Root Protection Zones. A full CONSTRUCTION AND ENVIRONMENTAL MANAGEMENT PLAN (CEMP), which we raise in WR para. 10 (and have raised in previous objections), is made even more crucial due to this lack of detail around Root Protection Zones (RPZ) and how they will be fully accounted for in the construction phase. (Please refer back to Russell Miller's quote in WR para. 2 (I).)

The use of glyphosate in the grassland areas (WR para. 2 (F)) would be devastating to these veteran trees and irreplaceable habitat the grassland area. As stated in para. 5.2.1.1 of Natural England's "Veteran Trees: A guide to good management" (2000):

"The most sympathetic type of grassland to surround veteran trees (though not commonly found) is unimproved. Unimproved grassland should be managed with great care following the guidelines in Crofts & Jefferson 1999; this management will also be favourable to veteran trees. In general, the 'improvement' of grassland through reseedling or the application of fertilisers can be detrimental both to veteran trees and to grassland."

Regarding mislabeled veteran trees within the proposed training ground area, here is a list comparing the Woodland Trust's descriptions and those of THFC:
(References taken from the [ATI](#) and THFC's REVISED: ARBORICULTURAL IMPACT ASSESSMENT).

Woodland Trust description: ID: 266062 | Common Ash | Veteran Tree | With lichen and invertebrates

THFC description: REF: T126 | Common Ash | Early Mature | Fell to ground level (Directional fell) | Root Protection Area: 0

Woodland Trust description: ID: 252239 | Common Ash | Veteran Tree

THFC description: REF: T128 | Common Ash | Over Mature

Woodland Trust description: ID: 252240 | Pedunculate Oak | Veteran Tree | With invertebrates

THFC description: Incorrectly labelled on map as either T129 or T130, which are both listed as Norway Maple and mature, of which T130 would be felled. It is unclear why this veteran oak has been overlooked or mislabelled.

Woodland Trust description: ID: 266042 | Common Sycamore | Veteran Tree | With lichen and invertebrates

THFC description: Assume to be in G5, which is scheduled for "partial removal", however the trees are not individually listed. This tree should definitely be listed individually, since it is veteran.

Woodland Trust description: ID: 214516 | Pedunculate Oak | Veteran Tree | With lichen and moss

THFC description: T58 | Pedunculate Oak | Mature

Woodland Trust description: ID: 266028 | Common Horse Chestnut | Notable Tree

THFC description: T61 | Horse Chestnut | Category U | Fell to ground level (Directional fell) | Root Protection Area: 0

10. Northern Clubhouse Extension and Accommodation

A significant consideration is that the Stable Block (former Golf Club Shop/Northern Clubhouse) is listed as entry 257 in Enfield Local Heritage List 2024.

We object to the proposed construction at the Northern Clubhouse/Stable Block. This is described consistently throughout the documents as an “extension” of the existing building (PS para. 1.5 and passim). However, upon examining the plans, the new building is to create 2,739sqm of new floorspace for a building that is presently only 564sqm, for a total floorspace of 3,303sqm.

We submit, first, that this is in no acceptable understanding of the word, an “extension”. This is effectively a new build. We ask for emendation of the statements to reflect this to give councillors full information.

Secondly, we would like to point out a lack of clarity when it comes to the usage of this extremely large new building. It is described, in many places, as a “training centre” (PS para. 1 and passim). This evokes classrooms and perhaps gymnasia for the training of skills pertinent to football. However, at PS para. 7 and then throughout, reference is made to the building as “accommodation”, including ambiguously as at PS para. 8.63 where the same word has a meaning more generically similar to “usage by”. But in other places, notably PS para. 8.67, “player/staff accommodation” is referred to, and referred to as being “shared” with the lodge at the existing training ground. Therefore, at PS para. 8.79 the PS refers to a shared function of player and staff accommodation between these two sites.

We have visited the Whitewebbs Lane training ground, and are aware that this lodge is high quality accommodation, benefiting from a nearby private barbecue and garden area.

We ask the applicant to clarify, and emend the Planning Statement accordingly, whether the building is to include accommodation and whether that is for the benefit of players, staff or both. The details of this accommodation are also needed, i.e., whether it is for sleeping, entertaining... We therefore ask for a further change of

phraseology from “Training centre” to “Training Centre and Bedrooms”, or similar, to reflect to the planning committee the exact use of the site.

However, if indeed a series of what are essentially hotel suites are being built as part of the plans, we put forward the argument that these require a separate or different application, as they would not appear to fit the remit described exactly and generally in the applicant's plans, as being “Sui Generis (football training centre)”. They appear to have a wider usage, or, if they do not, some serious justification needs to be given as to why visitors and staff could not live locally, or use local accommodation. The success of these plans hangs on VSC, and therefore it appears of extreme importance to show how these extend to the housing of players and staff onsite, in a new build Green Belt construction.

The justification for this construction is unconvincing, and therefore this proposed extension is not in line with NPPF para. 213.

11. Lack of Detail

THFC states in the [OUTLINE PARK MANAGEMENT PLAN](#) that *“The full Whitewebbs Parkland Management Plan will be prepared and agreed with Enfield Council post consent”* and also *“The OPMP does not provide information on the approach to construction or how construction effects (for example dust creation, noise and temporary drainage) will be managed. These elements will be covered within a Construction and Environmental Management Plan (CEMP) that will be provided and agreed with Enfield Council post-consent.”*

We believe that the FULL WHITEWEBBS PARKLAND MANAGEMENT PLAN (FWPMP) and the CONSTRUCTION AND ENVIRONMENTAL MANAGEMENT PLAN (CEMP) should have been provided and included in the documents of this application for the public’s consultation, because this information is highly material. These documents are necessary for the planning application to be properly considered by Enfield Council and the planning committee, and for the Mayor of London/GLA as part of the Stage 2 GLA planning process. For example:

- It is vital that the FWPMP is provided now, as critical details including the maintenance of the Park are not discussed in the outline version. The nebulously defined 'maintenance' of the Park is included as part of the VSC/public benefit of THFC's proposals, yet without the full details of this maintenance, it clearly cannot be properly weighed against the expected harm of the proposals by the LPA or GLA.
- It is vital that the CEMP is provided now, as we are certain that THFC's proposals will have a vast detrimental impact on the environment of the Park and the

surrounding area (just two examples include the colossal earthworks/re-landscaping and the use of glyphosate). Without the information that would be provided in the CEMP, again, the application cannot be properly weighed against the expected harm of the proposals by the LPA or GLA.

Regarding the footpath and bridleway in the North of the Park, running East to West, there is no detail as to how pedestrians, cyclists and horses will all be able to use this path. This could pose an extraordinary safety risk as the path is so narrow. It is vital that these footpaths (which are so important to the users of the Park, and for any public benefit to be fairly weighed against harm of the proposals) are worked out in detail now so that the plans are secured as part of the planning process.

Given that the management plans are so unclear, and paired with the farcical fund of £2,000,000 for the lease agreement, it is even more vital that the FWPMP is provided now, so that it is clear what the distribution of costs and responsibilities are between Enfield Council and THFC. How will this money pay for the elaborate promises from THFC?

It is particularly important to see the detailed proposals for management due to THFC's shocking failure to honour S106 agreements from its existing men's training centre, and Enfield Council's failure to hold it to account (see WR para. 11).

Additionally, the operational link road material seems to be missing a tree mitigation plan.

12. SINC Review and Procedures

██████████ on behalf of the Guardians of Whitewebbs, made a formal complaint to Enfield Council on 9th January 2025 (REF: 101001267200). Planning committee members and relevant officers will be aware of this.

Our complaint regards:

1. The failure to carry out Sites of Importance for Nature Conservation (SINC) procedures correctly in the Council's last SINC review in 2020, conducted by LUC (document: "[Review of Sites of Importance for Nature Conservation An Addendum to the Enfield Blue and Green Strategy](#)").
2. The failure to recognise the importance of local nature recovery strategies.

Policy:

Under [Section 102 of the Environment Act 2021](#) and [Section 40 of the Natural Environment and Rural Communities Act 2006](#), Enfield Council has a "*duty to conserve and enhance biodiversity*." Our investigations suggest that Enfield Council

has not followed guidance in regard to SINC procedures set out by [London Wildlife Sites Board](#) (LWSB) in 2019 and [National Guidance](#) set out by the Department for Environment, Food & Rural Affairs (DEFRA) in 2006. We believe this could constitute a failure to meet legal responsibilities as per [Section 102 para. \(5\) \(2A\) \(a\) of the Environment Act 2021](#).

Evidence:

Here is a useful [introduction](#) from City Hall on SINC's and their importance.

In para. 1.2 of LUC's report (copied from LWSB Advice Note para. A. 4.), it states:

"This review is an addendum to the Enfield Blue and Green Strategy and will form part of the evidence base of the emerging Local Plan. It is the council's duty to ensure that the conservation of biodiversity is considered as part of the plan-making process. The recommendations outlined in this report will need to be subject to consultation with relevant stakeholders, including local natural history experts and representatives of "Friends of..." groups, at the borough level prior to submitting these recommendations to the London Wildlife Sites Board (LWSB). This part of the SINC Review process will need to be led by Enfield Council".

However, there has been no stakeholder consultation, nor correspondence from Enfield Council with the LWSB as of [December, 2024](#) (past the [New Enfield Local Plan](#) Regulation 19 stage).

As a key example, a "Local Sites Partnership", as detailed in DEFRA's National Guidance, is central to the whole SINC designation process, but in 2020 there was no "Local Sites Partnership" nor "Site Selection Panel" to evaluate and select sites. In para. 27 of the guidance, it states *"...the Local Sites partnership remains the final arbiter for the evaluation and selection process"*. Enfield Council deemed itself as the final arbiter, bypassing any community involvement or input from relevant organisations within the review process. The National Guidance document was written to create consistency and transparency, which seems to have been absent in Enfield's processes.

In section "A. Roles and responsibilities of London Boroughs" of the LWSB guidance, it states:

1. It is the responsibility of London Boroughs to obtain and maintain up to date data on all land of nature conservation interest that is located within the administrative borough boundary, irrespective of land ownership. The borough also needs to be aware of the distribution of priority habitats and key species of wildlife, especially those species that are legally protected.

2. The Borough must have access to a current evidence base relating to habitats, species, etc. from which to support site selection, de-selection or changes to boundaries. NB Greenspace Information for Greater London CIC (GIGL) is the primary data holder in London. The Mayor expects all London boroughs to enter into data exchange agreements with GIGL.

3. The Borough should secure the services of qualified ecologists to survey relevant land within the borough boundary, evaluate this land against the criteria set out in Appendix 1 of this document and provide a set of recommendations on which sites should be accorded SINC status (and at which grade).

4. (Please see above.)

5. On the basis of survey data and other relevant evidence and the advice provided by the local Site Selection Panel, the relevant Borough Officer should produce a schedule of proposed SINC or changes to SINC.

6. The relevant Borough Officer will use appropriate internal processes, primarily those linked to its Development Plan process, to approve the Borough's SINC.

Enfield Council appears to have failed to consult GIGL and use its up-to-date data in Enfield Council's 2020 SINC review. Enfield Council was therefore unlikely to have been aware of all priority habitats and key species of wildlife. For example, THFC's ecological surveys of Whitewebbs Park identify multiple Habitats of Principal Importance and highly protected species (including grass snakes, Great Crested Newts and 10 bat species). As Enfield Council will be aware, other points in the LWSB guidance have not been met, as the SINC review is incomplete.

In a [question](#) (REF: 2023/2445) to the Mayor of London on 22nd June 2023, London Assembly Member Hina Bokhari asked:

“Will you urge Ealing Council to urgently adhere to well established GLA procedures while carrying out its Site of Importance for Nature Conservation (SINC) review to include setting up and consulting with a panel of local experts and seeking out and surveying any new sites of nature conservation importance which come to light as part of that process?”

The Mayor of London answered on 27th June 2023:

"I urge all boroughs to follow the procedures in my guidance for SINC reviews. My London Plan requires all boroughs to identify SINC when developing their Local Plans using up to date evidence."

"My London Environment Strategy (Appendix 5) sets out criteria and procedures for identifying SINC. I also have provided a detailed advice note, setting a step-by-step process for selecting and confirming SINC. This criteria and guidance are clear that councils should establish a local Site Selection Panel to receive independent advice from local experts, other relevant organisations and 'friends of' groups to inform the survey and SINC selection process in order to demonstrate best practice has been followed."

As the Mayor of London states in his reply, the requirements set out in LWSB guidance are very clear, and it is also very clear Enfield Council has not followed them, nor National Guidance from DEFRA.

In early 2021, Matthew Frith, director of policy and research at the London Wildlife Trust, [wrote to Enfield Council](#) in response to its "Green and Blue Strategy Consultation" in 2020, and while it was not directly part of the consultation, he raised the issue of SINC procedures. In regards to SINC he wrote:

"...I wanted to know whether there had been any prior consultation involved in their development. I am aware that the Trust may have missed calls for input, because our relationship with the Council is weaker than it used to be. The Greater London Authority's advice on SINC reviews, informed by the London Wildlife Sites Board (LWSB, and referenced in the Review (para 2.7)), requires demonstration of consultation of with stakeholders (we are conducting a review of SINC for Hackney, and are doing so as part of that process)."

Matthew then reiterated LWSB Advice Note para. A. 1. He added:

"Submission to the LWSB chaired by the GLA for sign-off usually involves ensuring that a level of consultation at the borough level has taken place, as advised. As a member of the LWSB we are aware of the constraints over the past 10 months, and as such it has not formally met. However, there's no reference I can see within the SINC Review that it has been through a local consultation process or is planned to be submitted to the LWSB."

"We are very mindful of resource constraints on the Council as well as that of the current Covid pandemic and the impacts this has had. We would like to know whether there is an opportunity to input into both at some stage, given somehow site-specific details might be affected as exhibited below."

There appears to be no formal response to Matthew Frith's consultation response. There are no further documents from Enfield Council regarding SINC. LUC's report does not seem to come to any conclusion - it just sets out various recommendations, but there is no decision making process recorded. No sites were upgraded, despite material recommendations made by LUC to do so.

Implications:

This section regards the implications this failed SINC review has had, and could have, for the decision making process for the planning application for Whitewebbs Park.

We believe it is a major oversight that Whitewebbs Park has not been included in any recommendations for SINC upgrade. The land proposed for THFC's development is surrounded by, and connects, three Metropolitan SINC's: [Hilly Fields](#), [Forty Hall](#) and [Whitewebbs Wood](#). Enfield Council's SINC review's description of the latter applies equally to the adjacent grassland present in Whitewebbs Park:

"...the site forms part of a wider network of habitats, which offer important opportunities for a range of protected and notable flora and faunal species in the north of the borough."

The SINC review recommended upgrades to fields along Turkey Brook at Forty Hall due to their value as a corridor. The former golf course is, literally, the extension of that corridor through to Hilly Fields and Whitewebbs Woods. [Russell Miller](#), MSc (consultant ecologist and arboriculturalist) said in a December 2024 interview with the [Enfield Dispatch](#):

"The big issue with Enfield's SINC review is that it failed to look at any potential new sites – which means they effectively prevented Whitewebbs from being designated. Whitewebbs [the former golf course] is surrounded on three sides by [existing] SINC's. Usually you do a desk study and a field study, but even if you just did the desk study, it's in the middle of three designated sites, which means it's a wildlife corridor, because it links them together. Even if the quality of the site itself wasn't as high, you would be minded to designate it on that basis alone. The purpose of the SINC review is to protect wildlife areas from development. I am deeply suspicious about how Whitewebbs didn't get designated. It just feels irrational if you are looking at it objectively. The SINC review fails to look at new sites, it raises the status of [other] golf courses, and it fails to look at biological records – when grass snakes and great crested newts have been found at Whitewebbs. You can understand why councils are cutting corners but there is still a statutory duty to protect local ecology."

Crew's Hill Golf Course, already a SINC, was recommended for upgrade and extension in both the LUC (2020) and [Tyler Grange \(2023\)](#) SINC Review reports due to its grassland. It is an anomaly that Whitewebbs, also used as a golf course at the time, was not also accorded SINC status in the LUC review as it has importance both as a corridor and as an expanse of mosaic, neutral and acid grassland grassland. Denis J Vickers' ecological survey concludes that:

"The site adequately met or exceeded most of the criteria cited by the LWSB. Should the site's high biodiversity be confirmed by appropriate phase 2 surveys, designation as a Site of Metropolitan Importance for Nature Conservation would be fully justified".

Given this strong evidence, we believe it to be a serious oversight that Whitewebbs Park was left unsurveyed and was not considered for such protection in Enfield's latest SINC review. If the Park had been accorded SINC status, it would have had greater protection, including under [London Plan \(2021\) Policy G6 1](#). THFC's plans would have come under greater scrutiny, and likely been rejected immediately. In addition, with its high ecological sensitivity, Whitewebbs Park should have been integrated into the borough's [Local Nature Recovery Strategy](#) (LNRS), referenced in Section 102 para. (5) (2A) (a) of the Environment Act 2021.

Land Designations:

In relation to the Draft New Enfield Local Plan, and with particular note to local nature recovery strategies in Section 102 para. (5) (2A) (a) of the Environment Act 2021, Quod, on behalf of THFC, [submitted a request](#) (document title: 3827 THFC New Enfield Local Plan Reps - Sept 2021 (1) (3)) to merge site allocation descriptions at the [Regulation 18 Stage](#) in 2021. Quod requested that the site allocation for Whitewebbs Park (SA57) should be changed from Enfield Council's designation as "Nature Recovery" to "Professional Sport, Recreation, and Community Sports/ Leisure Uses", and that the Former Whitewebbs Golf Course should be incorporated into the SA62 Site Allocation (Land at Tottenham Hotspur Football Club Training Ground), thereby extending SA62 to the West. Enfield Council subsequently implemented THFC's request into its [Regulation 19 Stage](#).

Implementation:

- **Regulation 18 Site Allocation Title (Tottenham Hotspur Training Ground):** "SA62 Land at and within the vicinity of Tottenham Hotspur Football Club Training Ground, Hotspur Way, Whitewebbs Lane"
- **Regulation 18 Site Allocation Description (Tottenham Hotspur Training Ground):** "Sporting"
- **Regulation 18 Site Allocation Title (Whitewebbs):** "SA57 Whitewebbs Golf Course, Beggar's Hollow, Enfield"

- Regulation 18 Site Allocation Description (Whitewebbs): *"Nature Recovery"*

- Regulation 19 Site Allocation Title: *"SA RUR.07 WHITEWEBBS GOLF COURSE AND LAND AT TOTTENHAM HOTSPUR'S TRAINING GROUND"*

- Regulation 19 Site Allocation Land Use Requirements: *"The site should provide nature recovery uses and the site could provide professional sport, recreation and community sports/leisure uses, including ancillary related facilities."*

Essentially, the two site allocations (SA57 and SA62) in the Regulation 18 stage have been merged in the Regulation 19 stage (SA RUR.07). The fact that Enfield Council implemented Quod and THFC's requests (contrary to Enfield Council's original Draft Local Plan and to the current/original lease agreement of Whitewebbs Park) in its Regulation 19 stage is a potential conflict of interest, since both Quod and THFC are interested parties. The current/original lease agreement of Whitewebbs Park is Green Belt land held in Public Trust on a lease term of 999 years. The lease stated that if the golf course was to close, it would revert to public use, so this is what happened when the golf course closed in 2021. It is presumptuous to have merged the Site Allocation at this stage, since no new lease has been granted.

Conclusion:

Should Enfield Council have followed correct SINC procedures in their 2020 review, we believe Whitewebbs Park would be awarded much greater protection, and therefore the proposed development of this historic Green Belt site should have been rejected and not put forth for development (including in the New Enfield Local Plan). There could have been a very different story for this area, had Whitewebbs Park been considered for SINC status and its designation remained solely as nature recovery in the New Enfield Local Plan. Most importantly of all, though, there would have been a different story if there had been a proper, clear consultation with relevant stakeholders and the people of Enfield, whom a lot of this land was purchased for by the public's own Council.

Request:

We believe that Enfield Council must carry out its SINC review correctly and to comply with LWSB and/or National Guidance. Without a proper SINC review, it is impossible for the planning committee to make an informed decision in regard to Whitewebbs Park (planning application 24/00987/FUL). This could add up to a failure to conserve and enhance biodiversity as set out in the Environment Act 2021.

13. Forty Hill Conservation Area

In 2008, the [Forty Hill Conservation Area](#) (FHCA) boundary was extended, and the area now borders Whitewebbs Park (see Article 4 Map 2009). THFC's proposed development would negatively affect the FHCA. Enfield Council's 2015 Forty Hill "Conservation Area Character Appraisal" describes the damage THFC's existing training ground has done to this historic area. In para. 2.5.31, in regard to Forty Hall, it states:

"The historic setting of the house is vulnerable to developments outside the designated park. By far [the] most important historical vista from the house, northwards along the avenue, now terminates in the anachronistic suburban clutter of the Tottenham Hotspur Football Club training ground to the west of Myddelton House. The purpose of the 2008 boundary extension has been diluted by its construction".

The Appraisal goes on to state:

"Any further development in this area, or in the landscape beyond it would be very damaging".

From Enfield Council's 2015 Forty Hill "Conservation Area Management Proposals", one of the recommendations states:

"The principal development pressures are...from the structures and landscaping associated with sports facilities. Planning controls should be used to minimise the use of these urban features..."

14. Broken Promises

We would like to add that THFC has an extremely poor track record of keeping its S106 agreements from its existing men's training centre, and similarly, Enfield Council has an extremely poor track record of enforcing them - the Dickenson's Meadow nature reserve (promised in 2009) is only now being built, hastily in advance of the planning committee meeting to decide the fate of Whitewebbs Park. The education centre (promised in 2008) on Western Field is now a temporary facility for THFC's women's team, featuring a football pitch, spectator stands and a private building. It was envisaged that each schoolchild would have the opportunity to visit 3 times in their school career - so many years have passed, and many people have completely missed any opportunity to visit. Why is it that THFC has taken so long on these, and has been allowed to take so long, and also to turn one of its promises into

something to suit itself? Will it do the same with its (to be confirmed) S106 agreements for Whitewebbs Park?

15. Conclusion and Contact Details

When all elements of this planning application are taken into account, and weighed against the VSC, there would be a negative impact which would constitute significant harm to the Green Belt and its purposes, while providing negligible public/community benefit. Therefore, VSC should not be granted.

We believe this planning application should be refused for all of the reasons stated above.

Thank you for reading our representation,

Yours sincerely,

[Redacted signature]

Written by:

[Redacted] on behalf of Guardians of Whitewebbs, a local community campaign group.

Edited by:

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