

ENFIELD LOCAL PLAN

Q080664

POLICY DESIGNATION

FOR TOTTENHAM HOTSPUR FOOTBALL CLUB TRAINING CENTRE AND SURROUNDING LAND

SEPTEMBER 2021

VERSION 3

STRICTLY COMMERCIAL AND IN CONFIDENCE

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PART I
INTRODUCTION

1.0 INTRODUCTION

- 1.1 Tottenham Hotspur Football Club (THFC) have been in discussions with Enfield Council (EC) regarding a site-specific designation for their training centre and adjacent land, including the former Whitewebbs Golf Club, in the Enfield Local Plan.
- 1.2 A Site specific designation (SA62) has been included in the Regulation 18 version of the Local Plan for the Training Centre, and land to its north, but not the former Whitewebbs Golf Course (Designated SA57). In discussions with officers, it is agreed the designation should extend over the former golf course site.
- 1.3 The purpose of the designation establishes a policy recognition of the site's appropriateness for *"professional and community sports, recreation and leisure facilities"*.¹
- 1.4 The designation consolidates four different parcels of land (see Section 2) under a single designation, ensuring that a comprehensive and integrated approach to current and future uses on the site can be pursued over the longer term in an appropriate manner.
- 1.5 The site is presently within the Green Belt. It is not proposed as part of this designation to remove the site from the Green Belt, rather, it is to establish that the uses proposed within the designation are, in principle, appropriate, subject to satisfying Green Belt policy requirements and other development management considerations.
- 1.6 The designation is underpinned by a site-specific policy (SA62), which defines a geographical area, in which, (ii) a range of uses are supported in principle, subject to satisfying Green Belt tests and is enacted through Policy CL4 which outlines a range of development management requirements that must be satisfied if any development is promoted in this area.
- 1.7 Notably the designation and the uses proposed for support within the policy are considered appropriate¹ under Green Belt policy, i.e., outdoor sport, outdoor recreation, where they *'preserve the openness of the Green Belt and do not conflict with the purpose of including land within it'*.²
- 1.8 This report considers the area subject to the proposed designation (Section 2), and the site's general sustainability, and how its designation will satisfy the sustainability objectives set out in the Enfield Local Plan (Section 3).
- 1.9 Section 4 addresses the existing socio-economic profile of the Borough and the contribution the designation will make towards the socio-economic objectives of the Local Plan. A full consideration of the following environmental matters follows, both in terms of the site's existing character, and how its designation will meet the various objectives of the Local Plan, including landscape and visual impact (Section 5), transport (Section 6), biodiversity (Section 7), heritage (Section 8) and other general planning considerations (Section 9). Section 10 concludes the report.
- 1.10 In summary, their report supported the proposed designation of the Training Ground and adjoining land, in a single allocation.

¹ Defined at Paragraph 149 of the NPPF.

² Paragraph 149(b) of the NPPF.

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PART II

THE SITE

2.0 THE SITE

2.1 SITE DESCRIPTION

- 2.1.1 The site proposed for designation is shown in Figures 2.1 and 2.2, and incorporates four components of land, namely:
- The existing Training Centre for THFC.
 - The Western Field and adjoining Dickinsons Meadow.
 - Whitewebbs Park and Golf Course.
 - THFC land north of the Training Centre.
- 2.1.2 The Training Centre was granted planning consent in April 2008 (LPA Ref: TP/07/1623) and opened in 2012. It is now widely regarded as one of the best facilities of its type in the world. The Training Centre accommodates the Club's football operations, including all of the training, medical and catering facilities associated with the First Team and Academy.
- 2.1.3 The facility has been designed with environmental protection and sustainability at its heart. The focus on enhancing and reinstating key features of the local environment including restoring historic hedgerows and field boundaries, as well as significant additional planting, bug hotels, an organic kitchen garden and orchard. The Club has planted thousands of new and semi-mature trees and tens of thousands of new plants, hedges and flowers across our Training Centre to establish an ecological habitat.
- 2.1.4 The Club has put in technologies throughout the Training Centre to deliver sustainable operations, including adapting a fabric first approach, as well as utilising renewable energy, including 75m² Solar Panels and air source heat pumps. The buildings design includes insulation, solar shading and building fabric thermal performance that reduce the need for additional energy usage.
- 2.1.5 A sedum 'green roof' has been installed to significant portions of the main building to enable the capture and re-harvesting of rainwater across the site. A comprehensive drainage and extraction system is in place through the installation of an attenuation pond and two onsite bore holes that extract water with licences and agreement from the Environment Agency.
- 2.1.6 A 45-bed player accommodation facility known as The Lodge opened in 2018 (LPA Ref: 14/03915/FUL) and provides overnight accommodation on-site in conjunction with the use of the Training Centre. It is used primarily for the THFC First Team, but has hosted the England and Brazil national men's teams and the USA women's team.
- 2.1.7 In 2018, The Lodge reached the Finals of the London Construction Awards for sustainability, architecture and women in construction.
- 2.1.8 The two existing facilities represent a combined Club investment of over £130m in Enfield.

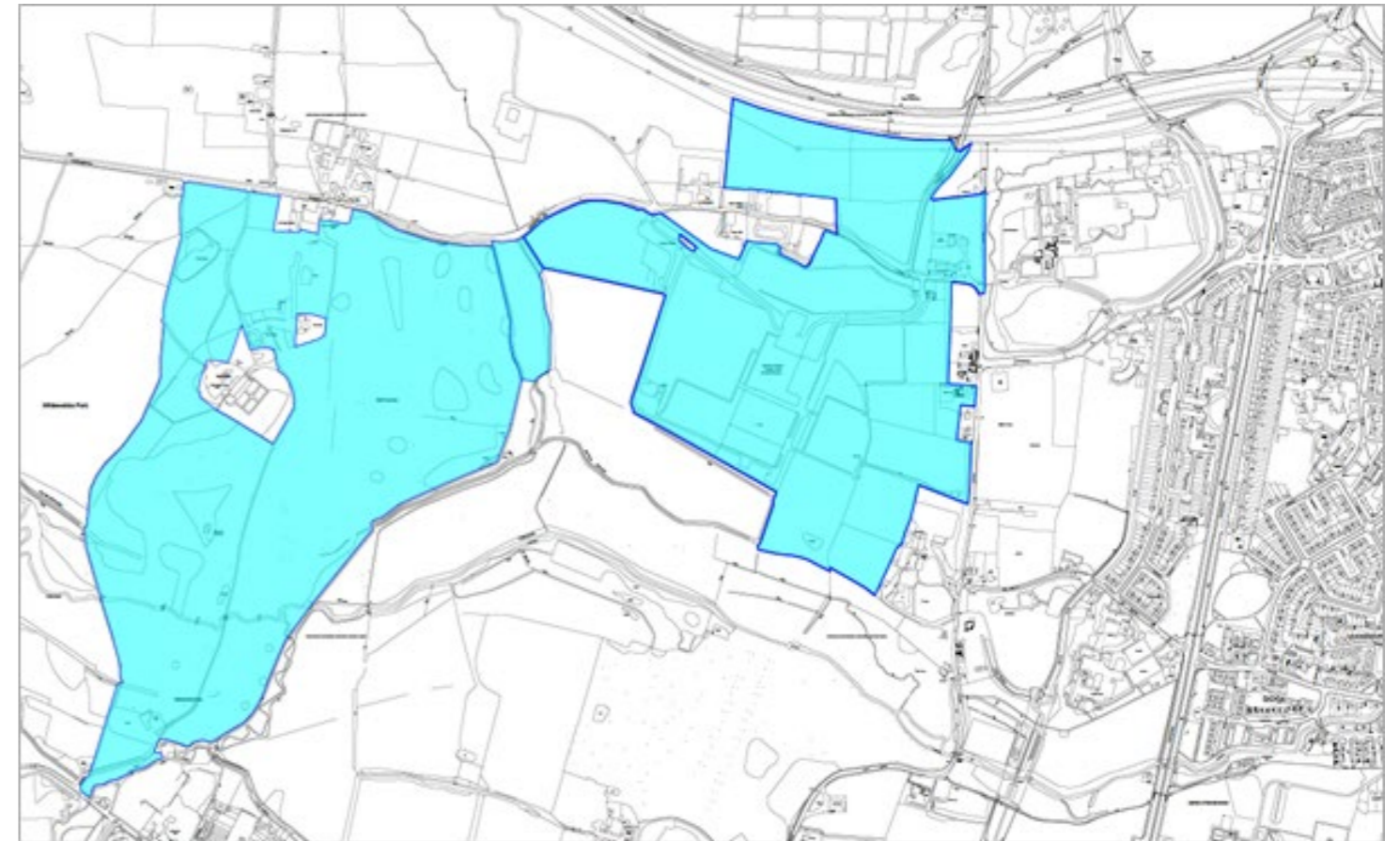


FIGURE 2.1 - Proposed site designation area

2.0 THE SITE

2.1.9 Since 2010, the Club has fulfilled a £2.3m commitment to deliver at least 70,000 community coaching hours in Enfield in partnership with its charitable Tottenham Hotspur Foundation and Global Coaching team. This has led to the delivery, by the Tottenham Hotspur Foundation, of 19 new programmes across the London Borough of Enfield and surrounding areas. The community programmes have engaged over 2,500 people across all age groups, both able-bodied and disabled.

2.1.10 The Training Centre has won seven gold awards from Enfield in Bloom and three trophies from the London Garden Society.

2.1.11 In granting planning consent for both the Training Centre and the Lodge, EC concluded that both professional sports facilities were appropriate for this part of Enfield's Green Belt, and the developments would deliver substantial benefits which amounted to very special circumstances (VSC)⁵. These included:

- i. The need for the development and a lack of alternative sites.
- ii. The significant contribution to national, regional and international football.
- iii. The greater recognition of Enfield and London at a national and international level in relation to world class sporting facilities.
- iv. The Training Centre's benefits arising from demolishing a previous sports pavilion and the reinstatement of historic hedgerows.
- v. The very high sustainability credentials of the Lodge (BREEAM Excellent).
- vi. Community benefits, involving a Community Partnership Programme to advance education, providing 70,000 coaching hours, allowing community access to the Training Centre and dedicating a community office and education centre.

2.1.12 More recently, EC have granted planning consent (LPA Ref: 17/01178/FUL) for an extension to the Training Centre, known as the Western Field. This development includes a new community accessible pitch (with spectator stands/retractable floodlighting), adjoining nature reserve (Dickinsons Meadow) and a single storey building for education, sports and leisure use.

2.1.13 The development was deemed appropriate development, and one which did not harm the open character of the Green Belt. Proven VSC were therefore not required. An accompanying S106 Agreement for the Western Field development secured a range of community benefits including access to the scheme for EC schools equating to a minimum of 90 school visits per annum (one for each of Enfield's primary, secondary and special schools), alongside the provision of a dedicated space within the new building for use by schools (replacing the previous obligation to provide a dedicated office/education centre in the Training Centre). This community access was considered by EC to bring about social, education and wellbeing benefits for Enfield.

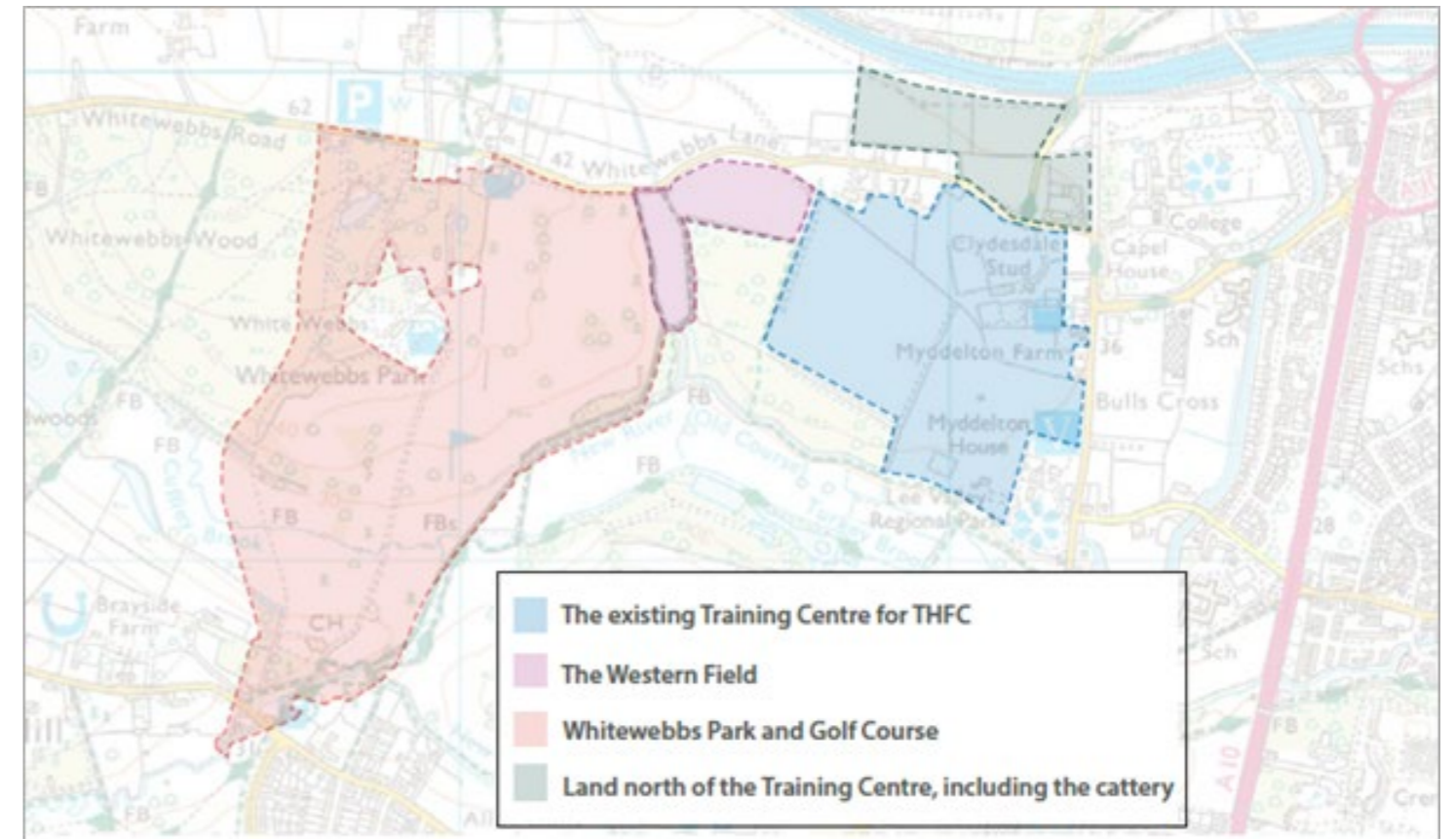


FIGURE 2.2 - Proposed Designation - Site Areas

2.1.14 The site is proposed for temporary use for training facilities for the Club's Women and Girls teams, prior to their relocation to permanent purpose built facilities on the northern part of the former Whitewebbs Golf Course, subject to planning consent.

2.1.15 The land to the north of the Training Centre extends to c.9.4ha and is, in part, previously developed land (PDL) and, in part, undeveloped (but traversed by pylons).

2.1.16 The western part of the proposed designation contains the former Whitewebbs Park and Golf Course, which is an 18-hole municipal golf course, which THFC have agreed to take a leasehold interest on the land from EC.

⁵ NPPF - Green Belt test, paragraph 148.

2.0 THE SITE

2.2 GREEN BELT

2.2.1 The site falls within the Green Belt. It is not intended to remove the site from the Green Belt as part of the designation, but to “overlay” a new policy designation, which supports a range of uses in principle, subject to satisfying a range of development management tests (see below).

2.2.2 However, any new development which is deemed inappropriate by reference to Green Belt policy⁶ within the designation will need to demonstrate VSC. Other forms of development which are not inappropriate, preserve the openness of the Green Belt, and do not conflict with the purposes of including land within the Green Belt will not need to prove VSC.

2.2.3 What constitutes VSC is to be determined on the specifics of the case of any proposals, but clearly it has already been acknowledged that THFC’s operations have been deemed highly beneficial to the Borough in raising its recognition nationally and internationally as a host of world class sporting facilities, whilst providing broad economic, community and environmental benefits for the Borough.

2.2.4 The proposed designation will help to support and further these benefits.



FIGURE 2.3 - Site Aerial

2.3 OTHER DESIGNATIONS

2.3.1 Within the emerging Local Plan, the site is the subject of several planning designations in addition to the Green Belt, as well as being covered by a range of environmental designations. These include:

- Local Plan designations including: Sport/Leisure, Conservation Area, London National Park City, SMINC, Local Open Space, Area of Special Character, Nature Recovery (for site SA57 only).
- Site of Metropolitan Importance for Nature Conservation (Whitewebbs Wood and land to the south of the Training Centre).
- Forty Hall Conservation Area (part).
- Area of Archaeological Importance (entirety).
- Scheduled Monument (within Whitewebbs Wood) and Local Heritage Asset (Whitewebbs Park).
- Registered Parks and Gardens (Forty Hall and the Lee Valley Regional Park to the south (the latter incorporates the south-east of the Training Centre).
- Flood Zones 2/3 (part only).
- Within the Northern Thames Basin National Character Area.

2.3.2 Within the vicinity of the site, are heritage assets which have implications for the development of the designated land. These are shown in the enclosed Heritage Assessment (**Appendix 2**) and include the Clay Hill Conservation Area; the Forty Hall Estate to the south (Grade I and II buildings), Myddelton House to the south-east (Grade II); Bulls Cross, being the Pied Bull Public House and Orchard Lodge to the east (Grade II); the King and Tinker Public House to the north (Grade II); and Whitewebbs Farmhouse and Barn to the north (Grade II).

2.3.3 There are also six environmental designations of national and/or international importance within 5km of the Training Centre, being Lee Valley 2.6km north-east (Ramsar, SPA and SSSI); Chingford Reservoir 3.1km south-east (SSSI); Waltham Abbey 3.5km north-east (SSSI); Cornmill Stream and Old River Lea 3.7km north-east (SSSI); Chestnut Park 3.7km north (Local Nature Reserve); and Epping Forest 4.9km south-east (SAC). These areas are all sufficiently distant from the site and it is not considered that sports and recreational facilities would cause an increased pressure upon these designations.

2.3.4 The implications of these designations on the site’s appropriateness for development, and how they should be addressed in development management considerations are explained in the next sections of this Report.

⁶ Paragraph 146/149 of the NPPF.

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PART III

SUPPORTING ANALYSIS

3.0 SUSTAINABILITY ASSESSMENT

- 3.1 The site proposed for designation is appropriate and sustainable in principle for the purposes of sport, recreation and leisure, especially those uses focussed on outdoor activities.
- 3.2 Notably that part of the site developed for the Training Centre (and Lodge) has in the past been found environmentally appropriate, planning policy compliant, and more so beneficial to the regeneration of the Borough, in providing nationally and internationally recognised professional sporting facilities, with community access.
- 3.3 The Green Belt around Enfield (as well as the rest of London) has the fundamental spatial aim of preventing urban sprawl by keeping land permanently open, whilst also providing an important resource for leisure, recreation, and biodiversity. It is an important resource for the health and wellbeing of the residents of Enfield.
- 3.4 This report demonstrates that the proposed designation of an area surrounding THFC's Training Centre, including the Training Centre itself, has the propensity to deliver a wide range of socio economic and community benefits.
- 3.5 The designation also presents an opportunity to improve access to high quality open spaces, whilst creating opportunities for sport and physical activity benefiting the health and wellbeing of communities.⁷
- 3.6 It is recognised in the NPPF that local planning authorities should positively plan *"...to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged land and derelict land."*⁸
- 3.7 It is the part of the overarching spatial strategy of the local plan (Policy SP SS1) for rural areas to be managed for a range of sustainable uses including: food production, forestry, eco-tourism, recreation, education, leisure, sporting excellence along with nature recovery.
- 3.8 The designation also presents an opportunity to accommodate new development within the existing environmental capacity of the area, without harm and furthermore to enhance the local environment, whilst satisfying the objectives of Policy SP SS1.
- 3.9 EC have a range of cross cutting corporate themes and objectives that underpin the emerging Local Plan, including:
- Improving accessibility to, and in, this part of the Enfield's Green Belt to the benefit of all.
 - Increasing the wider community's access to nature.

- Improving east - west connectivity through the Borough and increasing sustainable movement.
 - Levelling up the social and economic inequalities, with residents of eastern parts of the borough being far more deprived than those in the western part of the Borough. This deprivation is across a range of matters, including access to nature, open spaces, employment, education health and wellbeing.
 - Levelling up inequalities through gender, by improving and providing equal access to all sectors of the community.
 - Improving green and blue networks, whilst protecting and "recovering" biodiversity within the Borough.
 - Ensuring that Enfield is an "intergenerational" place, where the needs of all generations are satisfied, and space and opportunities are provided for those generations.
- 3.10 The designation is aligned with these themes and objectives, and as such this Report demonstrates the designation would be sustainable by:
- Improving the physical and mental health and wellbeing of residents, providing new sports, recreation and leisure facilities for wider community use.
 - Encouraging social inclusion and increased community safety
 - Supporting economic growth, providing employment for local people that support a strong and resilient local economy.
 - Supporting sustainable travel choices and links with surrounding public transport nodes, alongside improved pedestrian and cycle connectivity.
 - Sustaining and enhancing the significance of heritage assets, whilst enhancing the quality and character of the landscape.
 - Supporting EC's drive to minimise carbon emissions, increase resilience to climate change and minimise air pollution.
- 3.11 **Appendix 2** provides a high-level assessment of the site's designation for professional and community-based sport, recreation and leisure uses, against the 20 strategic objectives in the draft Local Plan (at Table 2.1) This follows an assessment of the proposals against the objectives of EC's 11A which is contained in Appendix 3

⁷ Paragraph 96 of the NPPF

⁸ Paragraph 141 of the NPPF

4.0 SOCIO ECONOMICS

4.1 INTRODUCTION

4.1.1 This section sets out the potential social and economic benefits of the proposed designation. It considers the economic and community effects of the existing training facility on-site and what further benefits might arise from an expansion to the training and other ancillary facilities on-site. It also considers these in the context of emerging local planning policy objectives and priorities.

4.2 EMERGING POLICY CONTEXT

4.2.1 To support the preparation of its New Enfield Local Plan 2041, EC published a scoping report for an IIA, which identified key objectives across a number of topic areas including: communities; economy and employment; and health. These issues have been incorporated into the Local Plan's strategic objectives (Table 2.1 of the emerging Local Plan). A summary of these topics and the objectives associated with them is provided below.

4.3 COMMUNITIES

4.3.1 Enfield is home to an ethnically diverse population. Data from the ONS mid-year population survey in 2018 identified Enfield as the 14th most ethnically diverse borough in London (out of 33 boroughs – including the City of London). Not only is the Borough's population growing, it is also aging. The proportion of older residents is expected to rise significantly over the coming years. This will create different demands and needs in respect of housing and other infrastructure.

4.3.2 Parts of the Borough are very deprived and there is a need to address these inequalities including by promoting social inclusion through access to education, training, employment, better quality housing and other facilities. Measures of deprivation show a clear east-west divide in terms of inequality and deprivation – this needs to be addressed.

4.3.3 The objectives identified in relation to communities include:

- Improved access to services, facilities and wider community infrastructure for new and existing residents whilst being mindful of the potential for community needs to change over time;
- Enabling social cohesion to develop through good urban design e.g. using healthy streets indicators and the provision of community spaces;
- Ensuring new development provides for existing communities as well as new ones.

4.4 ECONOMY + EMPLOYMENT

4.4.1 There is recognition that a strong economy is an essential element of a healthy and functional society and plays a significant role in quality of life. Data from the 2011 Census indicated higher than average levels of economic inactivity amongst working age residents across the borough and one of the highest levels of unemployment in London. The proportion of working age residents in Enfield with no qualifications is also high compared to the London average.

4.4.2 In that context, a key objective for Enfield is to support a strong, diverse and resilient economy that provides opportunities for all. This can be achieved, in part, by diversifying employment opportunities and growing a higher wage economy.

4.5 HEALTH

4.5.1 Health is influenced by many factors including physical, social, environmental and economic conditions. Poor health tends to be more prevalent in poorer quality environments and amongst those living in deprived areas – as such, areas with lower health outcomes e.g. high rates of premature death, lower life expectancy, and high rates of obesity tend to reflect the east-west divide that is seen in measures of deprivation. There are a number of ways the local plan process can help to improve the health and well-being of residents including by:

- Improving access to and links with green infrastructure;
- Improving the quality of green infrastructure; and
- Promoting and encouraging opportunities for residents to use active transport as part of their everyday lives.

4.5.2 THFC is an existing employer in Enfield and an active part of the local community. Any plans for future expansion of our existing site will seek to address the current challenges facing the borough and contribute to the objectives set out in the emerging local plan and background evidence.

4.5.3 In the post Covid-19 recovery period, the creation of local employment opportunities and responding positively to health will be increasingly important. The proposed allocation is well positioned to respond positively to these matters.

4.6 EDUCATION

4.6.1 THFC have signed up to a broad range of community obligations including the ongoing implementation of a Community Partnership Programme to advance education, and access for local schools to the emerging Western Field/Nature Reserve which benefits from planning permission. As part of the original Training Centre proposals, THFC committed to providing 70,000 coaching hours (equating to a minimum value of £1.75m) and community access to the Training Centre, and similar obligations could be developed as part of the designations.

The consented Western Field development (which is within the proposed designation) includes S106 commitments to deliver a Schools Visits Programme for Enfield schools, alongside the inclusion of a dedicated education/office space within the emerging building. THFC have extant community obligations including the ongoing Community Partnership Programme to advance education of the public in respect of physical education, literacy, numeracy, personal and social health and education, leisure and tourism, which extends to their junior/academy players and the wider community.

4.7 SOCIO-ECONOMIC BENEFITS OF THE EXISTING FACILITIES

4.7.2 As set out earlier in this report, THFC has an established training facility based on-site and a 45-room player lodge building. The training facility comprises 15 grass pitches including four which are dedicated solely for first team use.

4.7.3 These existing facilities currently support 190 jobs across 133 different roles in a range of different sectors and at different skill levels. These include: grounds and maintenance staff; catering and hospitality staff; coaching staff; medical team e.g. doctors, physiotherapists, nutritionists, soft tissue therapists, physical trainers etc. There are four ongoing apprenticeships. Over half of the staff employed at the Training Centre live in Enfield.

4.7.4 There are also plans to provide a new community pitch as well as an educational and environmental centre (including a nature reserve) at Western Field and Dickinsons Meadow. This permission is extant and has not yet been implemented.

4.7.5 All of the applications referenced above have a range of community engagement and access-specific obligations associated with them to ensure the benefits accruing from the proposals to the local community are maximised. The Training Centre S106 agreement, for example, required the following commitments from THFC:

- Establish a Community Football Partnership Management Committee which would then be responsible for managing and agreeing with the Council a programme of sports-based community activities;
- Create and maintain a community-based programme, for a 10-year period from the date of commencement, to:
 - Promote community participation in healthy recreation;
 - Advance the education of the public in the subjects of physical education, literacy, numeracy, personal and social health and education, leisure and tourism – in particularly through supporting education, training or re-training initiatives and providing work experience opportunities for local unemployed people.

- Allocate up to 70,000 coaching hours in the local community – by suitably qualified staff i.e. those holding qualifications recognised by the Football Association and/or other relevant body;
- Enable community access to first team and academy training facilities for an average of 20hrs per week (at a fixed rate of £30 per hour) over a ten-year period.
- Establish a dedicated community office and education centre (providing a minimum of 200sqm of floorspace). NB – this obligation was subsequently removed from this S106 agreement and included as part of the Western Field S106;

4.7.6 The Myddelton Lodge S106 included obligations relating to local employment and skills targets during the construction phase of the development.

4.7.7 These community and employment benefits were considered, amongst other matters, as being VSC and warranting planning consent despite the general presumption against development in the Green Belt.

4.7.8 The Western Field and Dickinsons Meadow planning approval secured further community benefits which focus on community/schools access to and use of the site and facilities. The proposals comprised a mixed-use education, sports and leisure building and sports pitches on the ‘Western Field’ and a related nature reserve on Dickinsons Meadow. The benefits secured through the S106 agreement included:

- Delivery of the dedicated community and education centre (replacing and enhancing the obligation from the Training Centre S106 for this use to be provided in the Academy Building);
- To provide a Schools Visits Programme. This included a minimum of 90 school visits per annum to the nature reserve proposed as part of the scheme;
- To commitment to manage the nature reserve for a 10-year period from consent.

4.7.9 The design of the multi-purpose building proposed as part of the Western Field application was informed through discussions with local primary and secondary school teachers.

4.7.10 The Western Field proposals enable THFC to meet (and, where possible, exceed) the legal obligations relating to the existing training facility development.

4.7.11 At the time the Western Field application was made, THFC (in partnership Enfield Council) had delivered over 41,000 hours of coaching and education programming across the borough between 2012 and 2017. The Club has since exceeded its 70,000 hours commitment.

4.8 FUTURE/ADDITIONAL SOCIO-ECONOMIC BENEFITS

- 4.8.1 THFC have ambitions to deliver further professional and community sports and leisure facilities on-site. Whilst the precise nature of these future proposals is not yet known, it is expected that they will take the form of a mixture of formal sports provision as well as additional opportunities for informal recreation that will serve to benefit not just those associated with THFC but also the wider Enfield community.
- 4.8.2 THFC propose to build on the work that has been done with and in the local community and would anticipate further commitments to be sought by the London Borough of Enfield towards both employment and training and education-related activities both on and off-site and during the construction and operational phases of any proposed development.
- 4.8.3 At this stage, it is only possible to anticipate the scope, rather than quantify, the likely socio-economic benefits that are expected to accrue from any future proposals for the area identified as part of this designation, which could include:
- Net additional jobs across a similar range of employment sectors currently supported on-site;
 - Further opportunities for THFC to engage with local employment brokerage organisations in order to fill vacancies from amongst local people where possible and appropriate;
 - Training and upskilling opportunities for existing and new staff;
 - Work experience for unemployed people;
 - Community engagement programmes including: site visits for schools, colleges, universities and local community groups and coaching/education programmes both on and off-site;
 - Increased opportunities to use local suppliers and businesses to meet demands on-site; and
 - Increased public access to green infrastructure and high-quality sports facilities.

4.9 CONCLUSIONS

- 4.9.1 The Training Centre has been a presence in Enfield for almost 10 years. It has also been an active part of the local community during that time and the Club proposes to continue and build on those links and relationships further to create a lasting legacy in the wider area.
- 4.9.2 There are clear synergies between what THFC is trying to deliver in this location in terms of benefits to the local and wider community and the objectives identified in the IIA Scoping Report. These benefits and their potential contribution to those objectives are summarised below:
- Economic strength – through providing additional jobs and diversifying the type of jobs that are available in the borough. Here there is a focus on sport-specific, recreational and leisure-related employment;
 - Improved access to employment opportunities – by supporting training and upskilling amongst its employees and by providing work experience opportunities for unemployed individuals in the community, THFC is contributing to removing barriers to jobs for those who find it difficult to access employment and also by enabling people to access higher paid jobs;
 - Community-based education and coaching – provides opportunities for people (particularly children) to take part in sport and to understand the benefits of sport and exercise in their everyday lives. This has the potential to making a lasting impact on the community's health and well-being;
 - Establishing and enhancing ecological habitat and opportunities for learning about those habitats.
- 4.9.3 The site's designation will present an opportunity to establish a policy framework for improving community commitments as well as consolidate and review the obligations associated with previous planning applications made for parcels of the site. It may be appropriate to carry over and/or extend the duration of any existing community and economic commitments made by THFC and to consider ways of expanding the scope of the obligations in a way that reflects the objectives of the emerging Local Plan.

5.0 LANDSCAPE + VISUAL IMPACT

- 5.1 **Appendix 4** provides a high-level landscape and visual appraisal of the area proposed for designation, which demonstrates the Site has a complex pattern of woodlands, historic parkland, mature and veteran trees, tree lined boundaries and hedgerows, open areas and historic features which creates a varied landscape full of interest and diversity and ecological value.
- 5.2 Within the site many of the individual areas have an open character due to large areas of grassland. This includes managed grassland at the Training Centre (sports pitches) and Whitewebbs Park (golf course fairways) or areas of unmanaged grassland at Western Field or land to the north of the Training Centre, which is also previously developed in part.
- 5.3 The presence of mature trees and the hedge to the edges of the site often present a treelined horizon limiting interconnecting views to adjacent areas of development. The large woodland areas within the area proposed for designation are prominent on the skyline and important in local views (as set out in the IIA Scoping Report). Sport and leisure use of the site would present the opportunity for retention of considerable amounts of open space and therefore a sense of openness.
- 5.4 As noted in Section 3, the NPPF recognises the beneficial role of Green Belt both from a sport and recreation purpose, but also from an environmental perspective and that planning positively for its improvement is in the interests of sustainable planning:
- 'local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged land and derelict land'*
- 5.5 The IIA framework also includes the following objectives for landscape and green infrastructure:
- 'Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes through appropriate location, layout and design of new development, including the preservation of important open gaps and key views, and contribute to London-wide Green Infrastructure objectives including in respect of the Lea Valley Regional Park.'*
- 5.6 The uses proposed within the designation provide an opportunity for beneficial use of the Green Belt and reinforcement of the objectives stated within the IIA framework. By providing access and opportunities for outdoor sport and recreation and ensuring positive landscape management, valuable open areas of green infrastructure can be safeguarded for future generations, whilst positive planning policy obligations can improve green infrastructure from a visual and landscape perspective (as well as biodiversity – see Section 7).

- 5.7 It is proposed as part of the development management policy criteria for any development in the designation to include the preservation of key views and open gaps in accordance with the IIA framework, and to encourage enhancement of landscape character where appropriate, including restoration of historic landscapes.
- 5.8 Positive development management within the policy designation in relation to species selection and management can encourage biodiversity and resilience to climate change with an understanding of how the landscape is likely to change and adapt over the next 50 - 100 years.
- 5.9 Policy designation of the Site can also encourage and protect positive management of the woodlands and trees that are important within local landscape character.



FIGURE 5.1 - Site Aerial

6.1 INTRODUCTION

6.1.1 This Section (supported by **Appendix 5**) presents relevant transport planning information under the following four headings:

- Sustainability Measures
- Baseline Transport Information
- M25 Junction 25 Improvement Scheme
- Travel Planning

6.1.2 Underpinning the Policy SP CL4 is a transport development management obligation designed to *'minimise the need to travel, support modal shift away from the private car and address traffic congestion within the borough and along key routes through neighbouring areas, with a focus on emission reduction, health impacts, and the delivery of pedestrian friendly urban design'*⁹. These objectives will govern the development planning and the assessment of the future planning applications.

6.1.3 The objectives of the IIA have been established *'to help to deliver high density mixed urban form that will be essential to delivering London wide housing targets'*. The subject area is thus aggregated travel demand, on a daily basis, from major trip generating land uses.

6.1.4 The designation recognises the site's appropriateness for professional and community sports, recreation and leisure facilities. These forms of development would be trip attractors on an occasional basis. That being said this Section will consider many of the same issues considered in the IIA.

6.1.5 The evidence base is therefore specific to the locality of the proposed designation area, which is focussed on the Training Centre which is a development of both national and international significance.

6.2 SUSTAINABILITY MEASURES

6.2.1 In the last 10 years THFC has implemented a large number of development projects in North London. These projects have all come forward with a range of planning obligations which THFC has successfully implemented. Furthermore, THFC has also undertaken many unilateral initiatives to enhance the sustainability of their developments, including the new Tottenham Hotspur Stadium and the Training Centre. For example, THFC undertakes Customer Experience research for virtually every event at the new stadium including the event-by event monitoring of transport patterns.

6.2.2 THFC has an excellent record for sustainable development. THFC has very recently been assessed to be top of the Premier League Sustainability rankings. The audit was undertaken by the United Nations-backed Sport Positive Summit in conjunction with BBC Sport. THFC was awarded 21 points out of 21 available.

6.2.3 THFC was awarded bonus points for actively engaging fans in a move towards positive behavioural change that reduces environmental impacts in their own lives and, additionally, by way of THFC tracking and reporting on the percentage of fans taking various modes of transportation to games and events.

⁹ Aecom Scoping Report IIA Framework

6.0 TRANSPORT

6.3 BASELINE TRANSPORT INFORMATION

6.3.1 An evidence base has been assembled to assist the consideration of the proposed designation. Recent travel patterns are an important context within which to consider future transport-related outcomes. Desktop research has identified valuable sources of time-series transport information that pre-dates the Covid-19 pandemic. The Training Centre was completed and opened in 2012.

6.3.2 The transport information has been considered for the latest available 10-year period. The first consideration is the key routes in the neighbouring area, as shown in Figure 6.1.

6.4 TRAFFIC FLOWS

6.4.1 There is a Traffic Count Point (DfT) on Bullsmoor Lane to the west of the Great Cambridge Road for which there is information from 2000 to 2016. In the early part of the Millennium traffic flows increased by 10% up to 2006. Since that time traffic flows have fallen from 14,649 to 12,358 in terms of Annual Average Daily Flows (AADF) – a net reduction of 16% during which time the Training Centre was opened. There were no significant short term increases in traffic flows on what is the primary vehicle access route to the Training Centre.

6.4.2 Bullsmoor Lane to the east of the A10 is a busier street. Between 2009 and 2019 the traffic flows reduced by 18% (AADFs fell from 24,985 to 20,447). The A10 Great Cambridge Road is part of the national Primary Route Network. There are two Count Point sites in the local area. The first is just south of the M25 junction and the second is near the Turkey Street underpass of the A10. The traffic flows have increased by between 3% and 5% in the most recently available 10-year period.

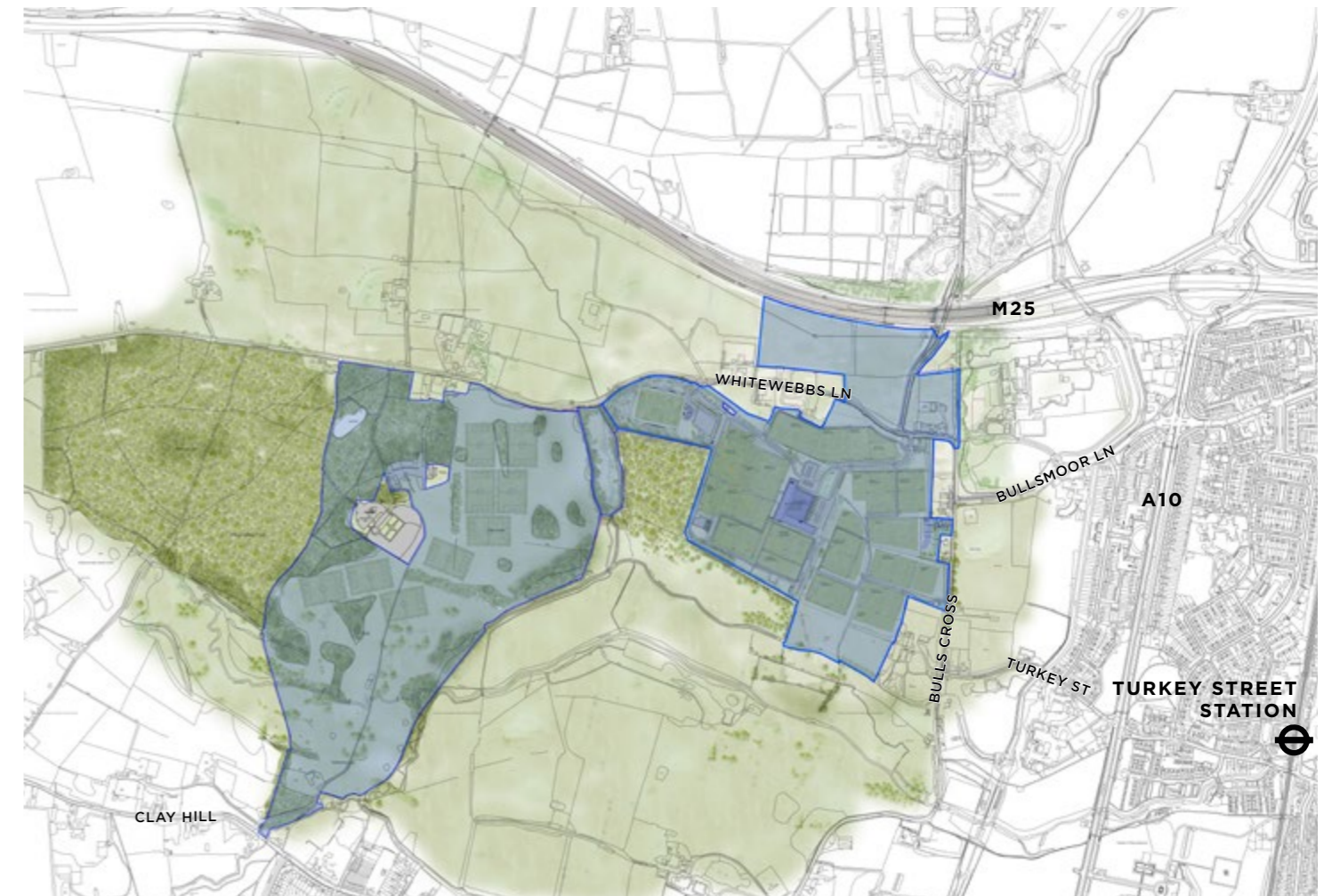


FIGURE 6.1 - Local Area Transport Routes

6.5 LB ENFIELD 2011 CAR OWNERSHIP INFORMATION

- 6.5.1 It is inevitable that the 2021 Census will show a significant reduction to average car ownership per household and the overall level of private vehicles. Similarly, there will be a large increase in the number of No Car households. These changes will relate to Greater London as a whole, the London Borough of Enfield and other adjoining local authority areas.
- 6.5.2 In 2011 the level of car ownership in Enfield was higher than the Greater London average and very much higher than the Haringey figures. Enfield is likely to show a level in 2021 similar to the Greater London average in 2011. This is predictable because local roads in North London have shown reduced traffic levels in the last 10 years, including Bullsmoor Lane. In Haringey in 2011 there was a 10.6% increase in occupied households since 2001 and an 11.7% reduction in cars per household thus showing a net reduction in the number of private vehicles in the borough. Similar results can be expected for Enfield in 2021. The corollary is large increases in rail use for all trip purposes.

6.6 LOCAL RAILWAY STATIONS

- 6.6.1 There were slight reductions to the annualized passenger flows in the last month of the year 2019-2020 due to the Covid-19 pandemic so we have compared the year 2018-2019 with 2008-2009.
- 6.6.2 Turkey Street station – passenger numbers have increased by 113.7% in the 10-year period. The station use in 2018-2019 was 980,294 passenger entries and exits per annum. The service is operated by Arriva on behalf of TfL London Overground. All the trains were replaced in 2020 with much higher capacity rolling stock. The service is within the Southbury loop from London Liverpool Street and terminates at Cheshunt station.
- 6.6.3 Turkey Street runs east to west between the A1010 Hertford Road and Bull’s Cross by way of an underpass of the A10 Great Cambridge Road and a pedestrian/cycle only road closure on a narrow bridge near the Old Ignations Football Club to the west of the A10. The station is in easy walking distance of the eastern side of the nearest point of the designation. The walking distance from Turkey Street station to Bull’s Cross, the eastern boundary of the designated area, is around 1 kilometre – a 12-minute walk.
- 6.6.4 Crews Hill station – passenger numbers have increased by 66.6% in the 10-year period. The station use in 2018-2019 was 139,344 passenger entries and exits per annum. The rapid growth in passenger numbers until 2013 has been reversed in recent years – probably as a result of reduced employment in the station locality. The station is operated by Great Northern which is part of the Govia Thameslink Railway family of rail services. The rolling stock was fully replaced from March 2019. The service operates from London Moorgate on the Hertford (North) loop line.

6.7 M25 JUNCTION 25 IMPROVEMENT SCHEME

6.7.1 This Highways England project definition is as follows:

In December 2014 the Department for Transport (DfT) published the Road Investment Strategy (RIS) for 2015-2020. The work confirmed the case for the need for an improvement at M25 Junction 25, and considered the options available to take forward to the options identification stage.

Based on the RIS statement, the scheme is described in the Client Scheme Requirements for Junction 25 as an “upgrade of the junction between the M25 and the A10 at Cheshunt, providing greater capacity for traffic”.

- 6.7.2 It has taken 10 years to bring this project to fruition. The contract for the main highway improvement works, costing some £30m, commenced in the Spring of 2021. These works will be substantially complete in 2 years time. The primary objective is that the queues and delays at the junction in 2037 should not be significantly worse than as observed in 2015.
- 6.7.3 It is anticipated that traffic growth between 2012 and 2037 (the design year) will be of the order of 20% additional traffic. Without the improvements this would result in considerable increases in the queues and delay at Junction 25.
- 6.7.4 The highway works on the boundary of the borough will address traffic congestion and facilitate traffic growth related to development activity. The key time periods are the weekday AM and PM peak periods. The designation for professional and community sports, recreation and leisure facilities will, however, tend to attract trips outside of the conventional peak hours.
- 6.7.5 During the construction works there will be traffic management measures to facilitate the necessary contractor access to the various work sites which will result in some congestion during the 2-year period of the main works contract.

6.8 TRAVEL PLANNING

6.8.1 THFC has implemented a large number of Travel Plans in recent years. As part of the further development promoted under the designation, travel planning will be a key foundation and will have the following objectives:

- To protect the local and wider environment by encouraging and reinforcing sustainable personal transport choices and minimise car-based travel (by reference to the agreed modal split targets and the integral car driver mode share) in relation to all activities held at or taking place at the Training Centre to satisfy the prevailing planning and transport policy requirements at a national, London and local level including the Mayor's Transport Strategy and Enfield Council UDP/LDF;
- In promoting sustainable travel, to seek in particular to maximise the extent to which journeys are made by physically active modes in order to confer the resultant health benefits;
- To mitigate as far as reasonably practicable the negative transport, public safety, environmental and amenity impacts (including cumulative impacts) in relation to travel and parking activities caused by activities approved in the designated area to local communities, the Green Belt, nearby activities, the surrounding urban areas and on the environment generally (including local amenity); and
- To improve access to development within the designated area irrespective of personal mobility, any form of disability or special educational needs.

6.8.2 It is likely the Travel Plan will be supported by highway improvements, car parking and associated management measures, servicing and delivery plans and various initiatives to dovetail the developments with the local transport networks such as bespoke shuttle bus services on busy days.

6.8.3 The Local Area Management Plan (LAMP) for the Tottenham Hotspur Stadium includes a wide range of measures to encourage walking and cycling and to offer bespoke shuttle bus and minibus services for travel to the Stadium. Similar measures would be considered to support the proposed designation, where the travel demands of proposals are commensurate with the need to improve such connectivity, particularly related to the connections to Turkey Street station and other nearby railway stations.

7.0 BIODIVERSITY

7.1 LOCAL CONTEXT

- 7.1.1 The site provides an interface between urban Enfield and rural land around Cuffley and is within the Northern Thames Basin National Character Area.
- 7.1.2 The area proposed for future development is under no ecological designation, although directly adjacent to the designation is Whitewebbs Wood which is identified as a Site of Metropolitan Importance for Nature Conservation (SMINC). The woodland adjacent to the site between Whitewebbs Park and the Training Ground is also identified as a SMINC.
- 7.1.3 Within 5 km of the proposed land are six sites with National and International environmental designation (see **Table 1**). However, given proposals for sports and recreational facilities it is not considered that the proposed development will cause an increase in pressures upon the designated sites (e.g. from recreation).
- 7.1.4 According to guidance from Natural England, assessment of impact to the designated sites will only be required should discharge of water or liquid waste of more than 20m³/day to ground (i.e. to seep away) or to surface water, such as a beck or stream.

SITE	PROXIMITY TO PROPOSAL LAND	DESIGNATIONS
Lee Valley	2.6 km north east	Ramsar Special Protection Area Site of Special Scientific Interest (Turnford & Chestnut Pits)
Chingford Reservoir	3.1 km south east	Site of Special Scientific Interest
Waltham Abbey	3.5 km north east	Site of Special Scientific Interest
Cornmill Stream + Old River Lea	3.7 km north east	Site of Special Scientific Interest
Chestnut Park	3.7 km north	Local Nature Reserve
Epping Forest	4.9 km south east	Special Area of Conservation

TABLE 1 - Designated sites within 5km of the proposal area

7.2 SITE HABITAT BASELINE

- 7.2.1 The wider site is of low ecological value but contains features of interest including boundary hedgerows and trees, and small areas of woodland. Bordering the site are areas of woodland which are of high value to local biodiversity. Turkey Brook runs to the South of the site; a tributary of which runs between the golf course and the training centre.
- 7.2.2 The existing Training Centre is predominantly sports pitches with low ecological value; a 2.2 ha area of semi-natural open space is present in the south of the site.
- 7.2.3 The Western Field consists of modified grassland, and some immature broadleaved trees. It is of low ecological value. West and south-west of the Western Field lies Dickinsons Meadow which consists of moderate condition grassland below an immature plantation of native, broadleaved trees, with scrub at the parcel edges. THFC have secured an extant planning permission for the redevelopment of the Western Field and adjoining Dickinsons Meadow for a new nature reserve and ecological area that will have considerable biodiversity merit.
- 7.2.4 Whitewebbs Park and Golf Course provides a network of grassland and woodland belt features, the site is of moderate ecological value. To the west of the golf course is Whitewebbs Woodland; a Habitat of Principle importance and a SMINC. The woodland contains two large ponds and Turkey Brook runs through the Southern part of the golf course and woodland.
- 7.2.5 Land north of the Training Centre, consists of 3 farmland fields estimated to be of low-moderate ecological value.



FIGURE 7.1 - Existing Training Centre Site Images

7.0 BIODIVERSITY

7.3 CONSTRAINTS

7.3.1 Features of potentially high biodiversity throughout the site include:

- Woodland to the east and north of the golf course, and in small belts across the golf course.
- Tree belts.
- Hedgerow.
- Watercourse.
- Woodland ponds.
- Existing semi-natural open space.

7.3.2 Through appropriate development management criteria within the policy designation Policy SP CL4, these features can be protected from negative impact from development and buffered to protect against indirect disturbance. Further, they could be incorporated into a biodiversity net gain plan, enabling nature recovery to take place across the designated site.

7.4 OPPORTUNITIES

7.4.1 The proposals have the opportunity to provide substantial enhanced value for biodiversity and wildlife through measures including:

- Biodiversity management of the woodlands at Dickinsons Meadow.
- Creation of biodiversity buffers to protect and enhance woodland, hedgerow and watercourse buffers on and adjacent to the site.
- Creation of wildlife corridors to provide connectivity between nearby woodlands and through the future developments.
- Optimising management of the designated land for biodiversity and wildlife.
- Creation of semi-natural open-space, such as to the south of the former WPC golf course.
- Installation of species-specific structures to provide roosting and nesting opportunities for wildlife.
- Watercourses which run through the site will be assessed to determine scope for enhancement. Measures will be taken to minimise run off into these features.

7.4.2 Through the development management criteria of Policy SP CL4 (criterion vi, 3rd bullet, and criterion vii), the designation provides an opportunity improve community access to nature, allowing benefits for wildlife and community interaction with their environment. Creation of semi-natural open-space and increased provision of woodland walks will provide enhancements to recreation and wellbeing opportunities and has the potential to relieve pressure on the nearby designated sites.

7.5 BIODIVERSITY NET GAIN

7.5.1 The designation, along with generic Policy SP BG3, will commit future development to biodiversity net gain (BNG). The Club would intend that where possible these enhancements will be delivered at and adjacent to the designated site, but should offsite compensation be required biodiversity offsetting provides opportunities for enhancements elsewhere within Enfield for long-term provision of habitat for local wildlife.

7.6 CONCLUSION

7.6.1 The site is predominately of habitats of low value for biodiversity. The designation will establish a set of development management principles to retain, protect and enhance all features of high value biodiversity on site, including the adjacent SMINCs.

7.6.2 Through the development management criteria of the designation, there will be an objective for features of moderate biodiversity value to be retained and managed to contribute to biodiversity net gain.

7.6.3 Development for the range of uses proposed in the designation will not cause any harm to the designations beyond the site.

8.0 HERITAGE

8.1 SYNOPSIS

8.1.1 A summary of the heritage context of the area proposed for designation is set out below:

- Much of the Northern and Eastern edges of the Site lie within the extended Forty Hill Conservation Area.
- A small area of woodland on the southern edge is within the Clay Hill Conservation Area.
- The site is within the setting of several Listed Buildings at Bulls Cross, Whitewebbs Road, Clay Hill and Forty Hill.
- The site falls within an Area of Archaeological Importance.
- There is a Scheduled Monument adjacent the Site at Whitewebbs Wood.
- There is a Local Heritage Asset (Whitewebbs Park).
- The site incorporates parts or settings of 3 Registered Parks and Gardens (Forty Hall, Myddelton House and Lee Valley Regional Park).

8.2 FORTY HILL CONSERVATION AREA

8.2.1 The view from Forty Hall towards the Training Centre incorporates the survival of part of an eighteenth-century avenue and is therefore identified as a highly sensitive key view within the Forty Hall Character Appraisal.

8.2.2 The trees screen the foreground of the Training Centre, and therefore the views from Forty Hall, its landscape and key views of the Site will be limited, provided the development avoids the identified open views and is scaled appropriately to below the tree- and hedge-line.

8.2.3 The key views to be avoided are the former avenue which is to the east of the Training Centre, and views between Forty Hall and Myddelton House as shown in Figure 9 of the Heritage Assessment Report **Appendix 2**.

8.2.4 Immediately North of Myddelton House, the small paddock field providing visual separation between the current Training Centre and the boundary of the car park is within the Registered Park and Garden and as part of any future development within the designation should be retained as an open field.

8.2.5 The Forty Hill Conservation Area lies to the east of and very close to Clay Hill: together, they form a combined area of interesting and distinct landscape, historical and architectural character. The Clay Hill Conservation Area encompasses some parts of the former Forty Hill estate.



FIGURE 8.1 - Site overlaid on Figure 1 Forty Hill Location Map.
The Conservation Area is outlined in green and Site in blue.



FIGURE 8.2 - Extract from Forty Hill Conservation Area Appraisal Figure 9 Character Analysis showing key views

8.0 HERITAGE

8.3 CLAY HILL CONSERVATION AREA

8.3.1 It is unlikely that any development would be possible within Beggars Hollow (the small woodland area of Site within the Clay Hill Conservation Area boundary), and there is only limited potential for development within the setting of the Conservation Area in the direction of the Brooks and Whitewebbs Wood, as these are within the identified key views – please see Figure 4 of the Heritage Assessment Report (**Appendix 2**).

8.4 AREA OF ARCHAEOLOGICAL IMPORTANCE

8.4.1 As part of the development, consultation with English Heritage and on-site investigations, including the appropriate recording and dissemination of archaeological evidence, is to be allowed for.

8.5 SCHEDULED MONUMENT

8.5.1 There is a Scheduled Monument adjacent the Site at Whitewebbs Wood. This comprises Flash Road Aqueduct List No. 1001989 (Flash Lane SAM 111).

8.5.2 The Scheduled Aqueduct has a visual, functional, aesthetic and historic setting which includes the New River watercourse, pond, weir and roadway. Where these are within the Site, they should also be preserved in-situ.

8.6 REGISTERED PARKS AND GARDENS

8.6.1 The site incorporates parts of 2 Registered Parks and Gardens (Myddelton House and Lee Valley Regional Park). It is within the setting of the Registered Park and Garden at Forty Hall.

8.6.2 Where these are within the Site, they should also be preserved in-situ and enhanced where possible.

8.7 LOCAL HERITAGE ASSET

8.7.1 There are two Local Heritage Assets within the Site:

- Myddelton
- Whitewebbs Park

8.7.2 The locally designated heritage assets are to be retained.

8.8 CONCLUSION

8.8.1 The proposed use of the site is practical, subject to a detailed design, based on the criteria for development.

8.8.2 Subject to design, the proposal would comply with Local and National policies relating to designated and undesignated heritage assets.

9.0 OTHER MATTERS RELEVANT TO THE SITE'S DESIGNATION

- 9.1 Designating the site for professional and community sport is considered below against the other topic areas of the IIA including:
- Air quality.
 - Climate change adaption.
 - Climate change mitigation.
 - Water.
- 9.2 Large parts of the designation would remain as green infrastructure and open space, maintaining a landscaped site that responds positively to climate change. Appropriate species selection and management can encourage biodiversity and resilience to climate change, and these would be secured through development management requirements within the policy designation.
- 9.3 Sustainable transport measures to minimise potential air quality implications of any development coming forward as part of the designation would be secured through the policies development management criteria.
- 9.4 THFC have already demonstrated a commitment to developing high-quality, well designed and sustainable buildings at the Training Centre, and this would be continued within the designation. The most recent development, namely the Lodge, was built to BREEAM Excellent standards.
- 9.5 THFC have adopted sustainable practices within the existing developments on the site. Amongst other matters this has included, a range of measures including water supplied to all THFC's pitches by 2 licensed bores, with an irrigation computer and software to the very latest technology which monitors water sustainability. In addition, THFC operate a water recovery system that overrides our bore holes and pumps drainage water back into our holding tanks. The surplus drainage water is held in a naturally filtered attenuation pond before being discharged into Turkey Brook. All road surface water is discharged in the same way having been through a petrol/oil interceptor. Most fertilisers used are organic therefore any nitrates present are minimal / unidentifiable at pond source.
- 9.6 As part of the future developments supported under Policy, blue infrastructure and water sustainability will be encouraged through development management criterion viii.

10.0 CONCLUSION

- 10.1 Designation of the land identified at Figure 2.2 for professional and community-based sport, recreational and leisure use has substantial merit, and will assist EC in meeting a range of their corporate social, economic and environmental objectives (see Section 3). The Club support Policy SP CL4 in principle, the designation of SA62, and the inclusion of land in SA57 into the SA62 designation

It is demonstrated in this document that designation of the area can bring about transformational change to the local community through improved access to sport and physical activity, especially benefiting the community's health and wellbeing.

The environmental appropriateness of the designated area (including SA57) is demonstrated, and through the adoption of specific development management criteria within the designation, appropriate and environmentally sound use and development will be facilitated through the designation.

10.2 THE DESIGNATION - USES (INAPPROPRIATE AND APPROPRIATE DEVELOPMENT)

- 10.2.1 Outdoor sport and recreational uses are in principle deemed to be appropriate development within the Green Belt, so long as the uses and the facilities associated with those uses preserve the openness of the Green Belt and do not conflict with any of the five purposes of including the land within it. The policy designation supports the delivery of such uses, where they satisfy the development management criteria.
- 10.2.2 Those uses or facilities which do not fall within the definition of appropriate development (i.e., by definition they are inappropriate development in the Green Belt) but are deemed acceptable in principle within the policy designation, must satisfy both the VSC test of national Green Belt policy and meet the development management criteria.
- 10.2.3 The professional sport facilities operated by THFC represent facilities of a high social, community and economic worth to the Borough, which contributed to the VSC for those facilities. Further development of sports facilities associated with the THFC operation which may not fall to be appropriate development under Green Belt policy have the propensity to represent VSC in the future, where they for example have proven socio economic, community and environmental benefits that would benefit the Borough and/or may have a spatial need to locate on the designated site.

10.3 DEVELOPMENT MANAGEMENT CRITERIA

- 10.3.1 The policy designation provides a range of development management criteria which are to be satisfied by any development which comes forward under the designation, whether that development is deemed appropriate or inappropriate under Green Belt policy. The Club support these criteria, subject to some modifications and extension of the SA57 designation.

ENFIELD LOCAL PLAN

POLICY DESIGNATION FOR THFC TRAINING CENTRE +
SURROUNDING LANDS

APPENDIX 1
HERITAGE APPRAISAL

HERITAGE ASSESSMENT

TOTTENHAM HOTSPUR FOOTBALL CLUB (THFC) TRAINING CENTRE
AND ADJOINING LAND,
ENFIELD



1. INTRODUCTION

Corrie Newell Historic Buildings Consultancy (CNHBC) has been working in collaboration with F3 Architects on the proposals for allocation of the THFC Site for professional and community sports and leisure.

This report is to be read in conjunction with the reports and drawings submitted by Quod and F3 for the Regulation 18 consultation for the Enfield Local Plan in April 2021.

Corrie Newell is a full member of the Royal Institute of British Architects and of the Institute of Historic Building Conservation, and has over 30 years' experience working with heritage sites.

Corrie Newell BA Arch Hons RIBA ARB IHBC

2. SUMMARY OF PROPOSAL

- 2.1 This Heritage Assessment supports the proposal for a Site Specific Allocation in the emerging Enfield Local Plan for professional and community sports and leisure facilities at the THFC Training Centre and surrounding land.
- 2.2 The Site Promotion Area includes the following areas:
- Existing Training Centre
 - Western Field
 - Northern Land and
 - Whitewebbs Park and Golf Course.
- 2.3 For the purposes of this study, the Site area is coloured blue on the Location Map dated 16/3/2021.

3. CONSTRAINTS

- 3.1 In assessing heritage impact, the statutory duty, imposed by The Planning (Listed Buildings and Conservation Areas) Act 1990, is to pay special regard to the desirability of preserving listed buildings and their setting (s66), and preserving or enhancing the character or appearance of a Conservation Area (s72).
- 3.2 Policy 44 of the Development Management Document requires development to conserve and enhance the special interest, significance and setting of heritage assets.
- 3.3 The National Planning Policy Framework (in particular section 12) and National Planning Policy Guidance require informed decision making on the significance, character and appearance of Heritage Assets.

4. SIGNIFICANCE

Designations –

Summary:

- 4.1 Much of the Northern and Eastern edges of the Site lie within the extended Forty Hill Conservation Area. A small area of woodland on the southern edge is within the Clay Hill Conservation Area.
- 4.2 The site is within the setting of a number of Listed Buildings at Bulls Cross, Whitewebbs Road, Clay Hill and Forty Hill.
- 4.3 The site falls within an Area of Archaeological Importance.
- 4.4 There is a Scheduled Monument adjacent the Site at Whitewebbs Park.
- 4.5 There is a Local Heritage Asset (Whitewebbs Park).
- 4.6 The site incorporates parts or settings of 3 Registered Parks and Gardens (Forty Hall, Myddelton House and Lee Valley Regional Park).

Conservation Areas

Forty Hill Conservation Area

4.7 Forty Hill Conservation Area was designated in 1968. It includes the historic hamlets of Forty Hill, Maiden's Bridge and Bulls Cross, and the three small country estates, Forty Hall, Myddelton House and Capel Manor. The Conservation Area was extended in 1987 and again in 2008, when it incorporated all the documented land of the former Elyng deer park. The Conservation Area Appraisal dates from 2015.

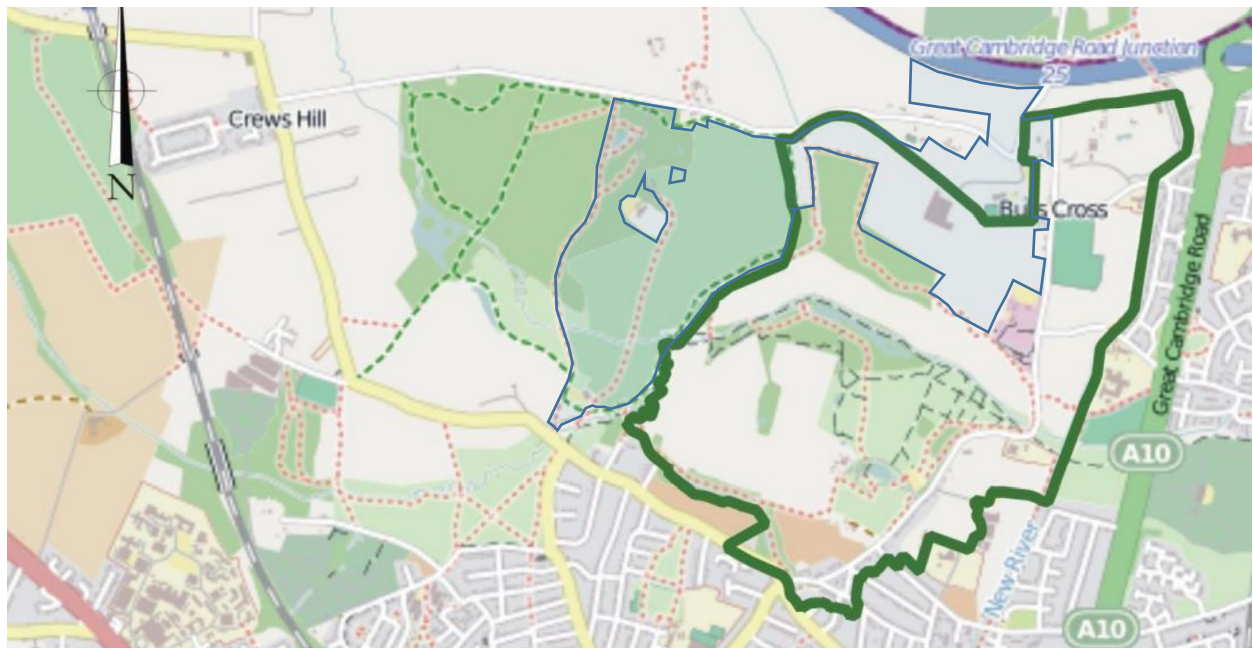


Figure 1. Site overlaid on Figure 1 Forty Hill Location Map. The Conservation Area is outlined in green and Site in blue.

- 4.8 The Site comprises the North-Western section of the Conservation Area, which is part of the former Deer Park, and subsequently part of the C19 extended garden of Myddelton House.
- 4.9 Figure 6 of the Conservation Area Appraisal shows that the former deer park includes Western Field, the fields along the south of Whitewebbs Road and west of Myddelton House. The deer park has been substantially subdivided by later field boundaries, other development and woodlands, making it no longer discernible on the ground, although there may be aerial evidence such as curved corners of fields referred to in the Conservation Area Appraisal. Whilst openness is significant, the later boundaries, paddocks and woods are not a part of the reason for its designation and are therefore of Low to No significance to the Conservation Area.
- 4.10 The land forming the south-eastern part of the Site comprises the existing Training Area and is part of the Myddelton House character area. Historic maps show that this area was a former sports ground throughout much of the C20, and the Conservation Area Appraisal confirms that the current buildings replace former sports buildings. The Training Area is of Medium/Low significance to the Conservation Area.
- 4.11 The pre-C19 landscape south of Myddelton House and Cuffley Brook is part of the Forty Hall character area and is outside the Site. This incorporates the planned landscape of Forty Hall, all the key views identified in the Conservation Area Appraisal, and views from the position of the former Elyng Hall, Forty Hall and the Registered Gardens. As a result it is of High significance.
- 4.12 A small open field provides a buffer between Myddelton House and the Training Area (para 2.6.6), and is part of the Myddelton Park and Garden, which is of High significance. This field and the field to its west is partly within the Site shown on the Proposals Map. It is also significant as the open

backdrop to the key views identified in the Conservation Area Appraisal (Para 2.5.31) and incorporates significant elements of the early landscape such as curved corners (para 2.6.6).

4.13 Those elements of significance potentially affected by development on the site would be:

- Forty Hall - Forty Hall dates from the seventeenth century and later, and is listed Grade 1, with listed ancillary buildings and a Grade II Registered Park and Garden. The house is at a distance, some c. 750m to the south of the Training Centre, and there is mature tree screening between this and the Training Centre. The view from Forty Hall towards the Training Centre incorporates the survival of part of an eighteenth century avenue and is therefore identified as a Highly sensitive key view within the Forty Hall Character Appraisal.

The trees screen the foreground of the Training Centre, and therefore the views from Forty Hall, its landscape and key views of the Site will be limited, provided the development avoids the identified open views and is scaled appropriately to below the tree- and hedge-line.

- Myddelton House – The House dates from the early nineteenth century and is a Grade II Listed Building, with ancillary stables which are also listed Grade II. It has a significant later garden setting on the southern side of the house, on the opposite side to the Training Centre. Its backdrop towards the Training Centre comprises modern car parking and service areas, which have Low significance. There are no key views identified within the Forty Hill Character Appraisal in the direction of the Site. The key views are between this House and Forty Hall.

The key views to be avoided are the former avenue which is to the east of the Training Centre, and views between Forty Hall and Myddelton House as shown in Conservation Area Appraisal Figure 9 below:



Extract from Forty Hill Conservation Area Appraisal Figure 9 Character Analysis showing key views.

The C19 extent of the Myddelton House garden is shown by a red dotted line in Conservation Area Appraisal Figure 9 that reflects the boundary of the Registered Park and Garden (see right). Part of this is within the Site (see right). This is outside the current garden boundary and comprises a small paddock field.

Immediately North of Myddelton House, the small paddock field providing visual separation between the current Training Centre and the boundary of the car park is within the Registered Park and Garden and should be retained as an open field.

Figure 5 (Right). Overlay of Proposal Map boundary and Myddelton House group.



- Bulls Cross Character Area F. This comprises the former hamlet of Bulls Cross. Paragraph 2.10.5 confirms the key characteristics contributing to the special interest are:
 - The retention of the character and appearance of a linear rural hamlet, which has changed little since the late 19th century.
 - The presence of a group of attractive buildings. Most of the buildings make a positive contribution to the appearance of the area as a whole and have a cohesive vernacular character. The two earliest buildings, The Pied Bull public house and The Orchards are of particular historic interest.
 - The compact plan form of the settlement, with a tight cluster of buildings set close to the road, makes a strong contribution to the atmosphere of a rural hamlet.
 - Property boundaries, generally white painted picket fences, give the area a uniform and distinctive appearance.

The Location Map shows potentially the Site may extend to Bulls Cross, in which case separation is required in order to clearly retain the identity of the group as a linear rural hamlet, and to protect the rural backdrops.

- 4.14 Beyond the above character areas, the Conservation Area includes the historic hamlets of Forty Hill and Maiden's Bridge, and a further small country estate, Capel Manor. These are separated from the Site by other development and roadways and there is no significant intervisibility.

Clay Hill Conservation Area

4.15 Clay Hill Conservation Area was designated in 1983. It was extended southwards, to include Hilly Fields Park in 2008. The current Conservation Area Appraisal was adopted in 2015. It incorporates some Article 4(2) areas but these latter are not in the proximity of the Site.

4.16 Paragraphs 1.3.1 and 1.3.2 confirm its designation as one of the old village centres that make up the current suburban areas of Enfield, and that *Clay Hill is a predominately rural area centred on a small, scattered, linear settlement with origins in the medieval period.*

4.17 It has added significance because of its relationship with the Forty Hill Conservation Area. Paragraph 2.1.1 confirms:

“The Forty Hill Conservation Area lies to the east of and very close to Clay Hill: together, they form a combined area of interesting and distinct landscape, historical and architectural character. The Clay Hill Conservation Area encompasses some parts of the former Forty Hill estate.”

4.18 Paragraph 2.1.2 describes its setting, which incorporates the Site, which should be preserved:

“The Conservation Area marks the southern limit of a rural landscape that stretches north to Goffs Oak and Cheshunt in Hertfordshire. This landscape consists of gently rolling hills formed of ridges running from east to west, interspersed by shallow valleys drained by small streams flowing eastwards into the River Lea. It is divided into small fields and patches of woodland concentrated around the streams and on hill tops.”

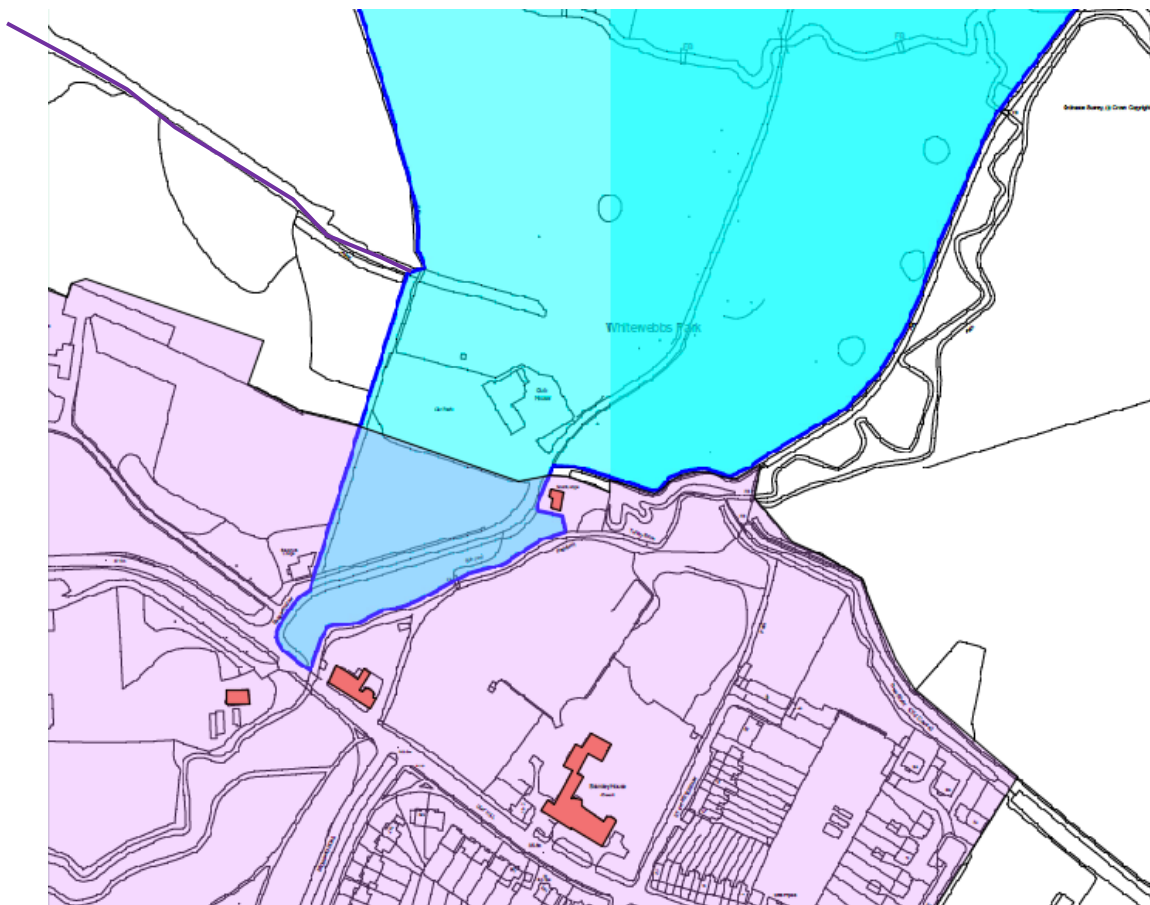


Figure 4. Overlay of Site (blue) and Clay Hill Conservation Area (pink) boundaries. The adjacent listed buildings are shown red and are described below.

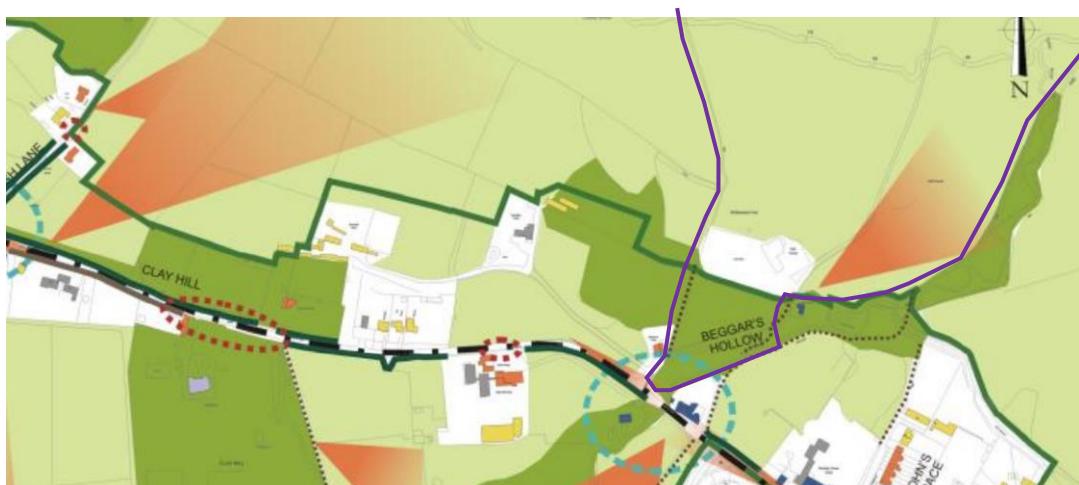
4.19 The significance of the Conservation Area derives from the history of the development:

- The earliest settlement of C16-C17, including the road layout, small cottages, Inns and the New River watercourse of 1609-1612.
 - The Cuffley Brook stream and Flash Lane Aqueduct within the Site and the Rose and Crown Inn abutting the southern tip of the Site are noted as key elements of this phase.
 - The Rose and Crown and Fallow Buck Inn, simple vernacular structures, demonstrate the area's early role as a transport link by C18. They are Grade II Listed.
- C18 expansion of Clay Hill as a desirable area for the middle and upper classes, evidenced by large houses with formal classical frontages, intended to be highly visible status symbols.
 - Bramley House (1750) is noted as one of only two examples of this phase and is Grade II Listed. Whilst potentially inter-visible from the southern part of the Site, the C20 extensions are between the original build and the Site (Conservation Area Appraisal Figure 4 Map 2).
- Circa 1800 enclosure of land leading to the development of C19 country villas in extensive lands, including the largest, Whitewebbs Park, in the Site. The southern tip of Whitewebbs Park is included in the Conservation Area boundary (see map below).
 - These villas were supported by cottages and lodges, including the 2 Grade II gothic lodges abutting the southern boundary of the Site.
 - South Lodge, surrounded on almost three sides by the Site, is described as the best of the lodges and as having a setting, partially hidden in dense woodland, which enhances its picturesque charm. (Para 2.7.2).
- C20 development and threats have led to designation as a Conservation Area.

4.20 The significance also derives from:

- The settlement pattern, which is largely dictated by the land form; the principal road, Clay Hill, a medieval route on the crest of the ridge which only dips down at the Rose and Crown public house, to cross the Turkey Brook. (2.4.1). Development along the road is spacious and unplanned in character (2.4.2).
- The rural character of the landscape, with long narrow fields, divided by hedgerows, stretching down from the central spine to the Turkey and Cuffley Brooks (2.4.3).

4.21 Figure 9 (extract below) defines the areas of woodland, open land and developed areas and shows three key views potentially over the Site. These are from Fallow Lane (Character Area E) and from Beggars Hollow (Character Area B).



Extract from Conservation Area Appraisal Figure 9 Character Analysis showing key views.

The northern Conservation Area Boundary is green and the Site boundary is added in purple.

4.22 The Site is within Character Area B (The Rose and Crown and Beggars Hollow). This is described in section 2.7, as where the tightly packed settlement pattern gives way to woodland interspersed with small patches of open ground.

4.23 The views northwards from Flash Lane Character Area E are described as where walls and hedges are replaced by post and rail fences and individual trees, which allow views over the rolling countryside to the north.

It is unlikely that any development would be possible within Beggars Hollow (the small woodland area of Site within the Clay Hill Conservation Area boundary), and there is only limited potential for development within the setting of the Conservation Area in the direction of the Brooks, as these are within the identified key views.

There is a tightly contained area of existing development immediately north of Beggars Hollow Wood, which is shielded by the woodland from much of the Conservation Area, but this forms the setting of the Listed Building, South Lodge.

Listed Buildings

4.24 There are no Listed Buildings within the Site. There are nearby LBs within groupings as follows:



Figure 1. Aerial photograph showing the position of the Western Field (circled in red) in relation to the listed buildings and intervening screening. (Google Maps)

- ① Forty Hall - Forty Hall, Pavilions and Gateway (Grade I), Barns, Stable Coach House, Dower House, Wall, Lodge and Entrance Gate (all Grade II)

- ② Myddelton House - Myddelton House, Wall, Cross, Bridge, Garden Terrace and Stable Block (all Grade II).
- ③ Bulls Cross - Pied Bull Public House and Orchard Lodge; ④ Bulls Cross Lodge, (all Grade II).
- ⑤ Capel Manor - Capel Manor (Grade II*), Garden Walls and Stables / Coach House (Grade II).
- ⑥ Whitewebbs Road - The King and Tinker PH, Whitewebbs Farmhouse and Barn (all Grade II).
- ⑦ Clay Hill – South Lodge, Clay Hill House Lodge, The Rose and Crown Public House, and Bramley House (all Grade II).

4.25 The listed buildings are of High significance, and their historic settings are also of High significance.

4.26 Forty Hall① and Myddelton House② are each surrounded by a Grade II Registered Park and Garden. These former country houses and the farmsteads have settings which are more extensive in principle due to their visual and functional relationships with surrounding land and landscapes, so are considered although further from the boundary of the Site.

The settings of Forty Hall①, Capel Manor⑤ and Myddelton Hall② are assessed in the Forty Hill Conservation Area Character Appraisal. The relevant Paragraph 2.7.1 confirms that all large houses in the Conservation Area are physically and visually separated from the surrounding area.

4.27 ① Forty Hall is the grandest of the group. The House dates mainly from the C17 and C18, with ancillary listed C17 Pavilions, Gateway, Dower House, Stable/Coach House and Barn, and later Lodge, Entrances and Walls. Their immediate settings are intimate but there is a longer primary view towards the north-east from the Hall along the former Elsyng Hall garden avenue. This is not in the direction of the Site. The former lands incorporate the river valley and plateau and these contribute generally to the setting and backdrop of the house and estate. The Site is part of the former Elsyng Hall estate and therefore the historic context of Forty Hall. View 7 shows that the application site is beyond trees which hide it from the Forty Hall setting. The Site is outside the visual setting of the listed buildings and garden, being on the flat plateau north-west of Forty Hall and hidden beyond a number of substantial tree belts.

4.28 ② Myddelton House dates from the early C19 and has C18 garden walling and landscape structures of the early C19. Other landscape features that complement the house and are listed in the group comprise a former Market Cross and a garden Terrace. This house is also within an intimate historic setting, with no visual connection between this and the application site.

4.29 ③ There are two listed vernacular buildings on the western side of Bulls Cross, comprising the C17 Pied Public House and C18 Orchard Lodge, which are both within contained village settings. The eastern edge of THFC Training Ground forms part of the backdrop to the rear boundaries of the two Listed buildings.

Visual separation is to be incorporated in the design to retain the distinct character and rural backdrop to these buildings.

4.30 ④ Bulls Cross Lodge is a former mid C19 Lodge. It has a self-contained setting to the north of Whitewebbs Road. Its primary setting is that of a wooded backdrop that separates it from the application site and intervening road and development. The Site Location Plan shows the Site incorporates the open fields in front of the Lodge, which form part of its open rural setting.

Visual openness is to be incorporated in the design to retain the distinct rural setting to this building.

- 4.31 ⑤ Capel Manor dates mainly from the C18 and has garden walls of the same date. There is a later C19 listed Stable Coach House range. The setting of Capel Manor is intimate and self-contained within brick garden walls, and there is limited intervisibility due to modern development between this and the Site.
- 4.32 ⑥ The King and Tinker Public House is a C17 vernacular roadside public house, with a later extension and an ancillary building in the direction of the site. It is a self-contained property, visible from the road but otherwise within an enclosed curtilage of trees.

Visual separation is to be incorporated in the design to retain a wooded backdrop and characteristic enclosure of this building.

Whitewebbs Farm contains a Farmhouse and Barn, both C17 listed buildings. They are part of a separate farmstead set well back from the road within a curtilage of later buildings. The primary setting is that of the farmstead and remaining fields to the north of Whitewebbs Road, away from the Site.

- 4.33 ⑦ Clay Hill – The Rose and Crown Public House is a C17 or earlier timber framed building, re-fronted in C18 in brick with C19 windows. Clay Hill House Lodge is an Early-Mid C19 Lodge house. Both are in a key visual position at a junction within the built-up village and little affected by development outside the settlement. Bramley House now Hospital is a Mid C18 former house with C19 and C20 extensions. The later elements of the building are between this and site.

South Lodge is an Early-Mid C19 Lodge house abutting the Site with a rural wooded setting.

The woodland is to be retained in the design to provide the characteristic setting of this building.

Area of Archaeological Importance

- 4.34 Within the Enfield Local Plan, the whole Site falls within the Whitewebbs Hill, Bulls Cross and Forty Hill Area of Archaeological Importance. It is of multiple period interest. The designation does not preclude development, but ensures development takes into account potential for new archaeological finds, and demonstrates how it respects and enhances previously identified assets.
- 4.35 **As part of the development, consultation with English Heritage and on-site investigations, including the appropriate recording and dissemination of archaeological evidence, is to be allowed for.**

Scheduled Monument

- 4.36 There is a Scheduled Monument adjacent the Site at Whitewebbs Park. This comprises Flash Road Aqueduct List No. 1001989 (Flash Lane SAM 111). It consists of a small C19 two-arch brick bridge with stone dressings and a cast iron aqueduct which once carried the New River over a small brook (Cuffley Brook). The casting includes the date of 1820.

The List entry describes its significance as:

“Despite later repairs and alterations, Flash Lane Aqueduct survives well. It is a major survival of part of the New River watercourse, one of the most significant and ambitious developments in water supply in England. As part of improvements to New River, it is testament to 19th century

developments in construction technique, engineering and ever increasing sophistication of water provision; forming a forerunner to the modern supply system.”

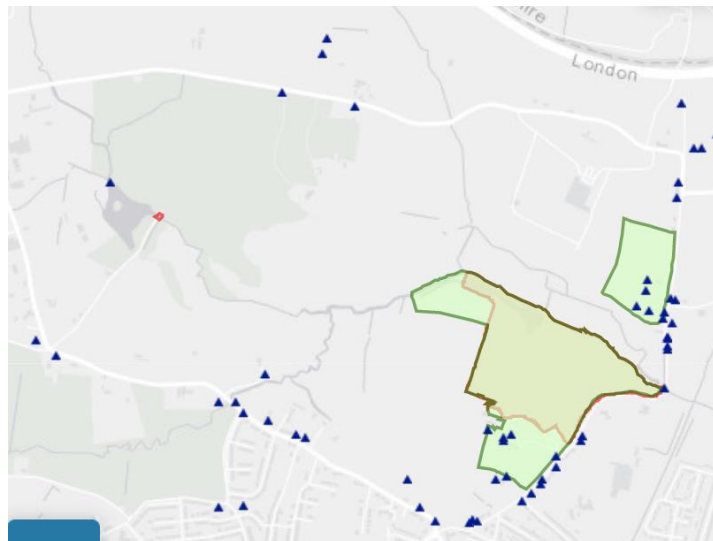


Figure 8. Location of Flash Road Aqueduct.

- 4.37 The Heritage Environment Record includes the Site and Monument Records on the Aqueduct and record Ref MLO22927 of an excavation by The Industrial Archaeology Group of the Enfield Archaeology Society in 1968/1969.
- 4.38 **The Scheduled Aqueduct is Highly significant and has a visual, functional, aesthetic and historic setting which includes the New River watercourse, part of which is within the Site and should be preserved insitu. The pond, weir and roadway are within the setting and their visual connection with the Aqueduct and New River is of high significance.**

Registered Parks and Gardens

- 4.39 The site incorporates parts of 2 Registered Parks and Gardens (Myddelton House and Lee Valley Regional Park). It is within the setting of the Registered Park and Garden at Forty Hall.



- 4.40 The Registered park and garden at Myddelton House was developed as a garden in early C18 and early C19, and from late C19 to mid C20 as a renowned plantsman's garden by the owner, E. A. Bowles.

Although the major part of the Site is within separate ownership, part of the northern part of the asset is within the Site. The historic maps sequence shows this part was open fields rather than the garden, but it does provide a landscape buffer between Myddelton House and garden, and the surrounding land and sports field.

- 4.41 Lee Valley Regional Park comprises some 10,000-acres, following the course of the River Lee from Ware in Hertfordshire, into London. The Council's map shows that this comprises the Myddelton Registered Park and Garden, including the extent of the C19 garden west of the current site.
- 4.42 The Registered Garden at Forty Hall is Listed Grade II. Its significance is that of Late C18 pleasure grounds overlying C17 gardens, providing the setting for a mansion house, accompanied by C17 and C18 parkland within which lies the site of a Tudor palace and the remains of its associated water gardens.

Where these are within the Site, they should also be preserved in-situ and enhanced where possible. As they are well described within the Conservation Area, the assessments of significance above apply to the Registered Parks and Gardens.

Local Heritage Asset

- 4.43 There are two Local Heritage Assets within the Site:
- Myddelton Farmhouse – a Mid-C19 house in Bulls Cross. It is included on the local list due to Age and Architectural Quality.
 - Whitewebbs Park – Remains of early C19 parkland, bought in 1931 and made into a Public Park and Public Golf Course. It contains a number of separately listed assets outside the Site. It is included due to Age, Historic Association, Landmark Status, Designed Landscape and Social Value.
- 4.44 A group of Local Heritage Assets adjacent the Site within Whitewebbs Park comprise:
- Whitewebbs House – a C16 mansion, rebuilt in 1791 and substantially remodelled in C19. Including contemporary stable block and garden walls. It is included on the local list due to Historic Association, Architectural Quality and Landmark Status.
 - Conduit House, Whitewebbs Woods – C17 square brick building adjacent the Lake, possibly pump building for the New River. It is included on the local list due to Historic Association, Architectural Quality and Landscape Status.
 - The Pumping Station is considerably beyond the Site, within a built-up area and there is no intervisibility.
- 4.45 **The locally designated heritage assets are to be retained.**

5. CONCLUSION

- 5.1 The proposed use of the Site is practical subject to a detailed design, based on the criteria for development noted above.
- 5.2 Subject to design, the proposal would comply with Local and National policies relating to designated and undesignated Heritage Assets.

ENFIELD LOCAL PLAN

POLICY DESIGNATION FOR THFC TRAINING CENTRE +
SURROUNDING LANDS

APPENDIX 2

ASSESSMENT AGAINST THE 20 STRATEGIC OBJECTIVES
OF THE DRAFT LOCAL PLAN



Appendix 2

ENFIELD LOCAL PLAN - STRATEGIC OBJECTIVES (TABLE 2.1)

Objectives		Assessment of Extended Policy Designation – Site SA62 (Combined with SA57) – Against the Strategy Objectives
	A nurturing place	
1	To address unequal access to jobs and opportunities by protecting employment floorspace and promoting the development of new workspaces. To tackle spatial disparities by building more quality homes, delivering an uplift in infrastructure to support growth being planned for – including social infrastructure and improving environments in the east.	<p>(i) THFC have previously committed to construction opportunities and skills training for local people, and this would be continued as part of any future development within the designation.</p> <p>(ii) THFC are committed to providing employment opportunities for local people, from all sectors of the community and will explore potential ways that this could be delivered as part of the designation.</p> <p>(iii) The designation would provide new sports, recreation and leisure facilities which will provide for wide community access.</p> <p>(iv) THFC have extant community obligations including the ongoing <i>Community Partnership Programme</i> to advance education of the public in respect of physical education, literacy, numeracy, personal and social health and education, leisure and tourism.</p> <p>(v) The consented Western Field development (which is within the proposed designation) includes S106 commitments to deliver a Schools Visits Programme for Enfield schools, alongside the inclusion of a dedicated education/office space within the emerging building.</p>



Note continued

2	<p>To reduce health inequalities by requiring Health Impact Assessments as part of significant development proposals.</p> <p>To use good design to create walkable connected communities, supporting active and socially connected lives, helping to deliver on the priorities of the Enfield Joint Health and Wellbeing Strategy.</p>	<p>(i) The designation is underpinned by a vision to improve community access to high-quality sports, leisure and recreation facilities, supporting healthy lifestyles and contributing towards narrowing health inequalities within the Borough.</p> <p>(ii) THFC have signed up to a broad range of community obligations including the ongoing implementation of a <i>Community Partnership Programme</i> to advance education, and access for local schools to the emerging Western Field/Nature Reserve which benefits from planning permission. As part of the original Training Centre proposals, THFC committed to providing 70,000 coaching hours (equating to a minimum value of £1.75m) and community access to the Training Centre, and similar obligations could be developed as part of the designations.</p> <p>(iii) THFC would maintain the existing and emerging green infrastructure to a high standard, as evidenced by their existing Training Centre, and link these into surrounding green and blue networks where appropriate to do so.</p> <p>(iv) Health Impact Assessments would support any planning application(s) where appropriate and required by policy.</p>
3	<p>To increase the supply of housing to ensure that more people can access good quality homes². To protect family housing and support the delivery of new family homes to help ensure that people who grew up in the borough will have the opportunity to remain.</p>	<p>n/a – the proposed designation does not propose any residential development and relates solely to professional and community sports and leisure facilities.</p>



Note continued

4	<p>To provide a variety of housing options to meet the needs of everyone, regardless of income, age and ability. To maximise the supply of affordable housing, by resisting the loss of affordable homes and securing 50% of all new homes as genuinely affordable. To deliver wheelchair accessible and supported housing, and support developments that seek to meet the needs of specific communities, including older people, disabled and vulnerable people, students, and Gypsies and Travellers.</p>	<p>n/a – the proposed designation does not propose any residential development and relates solely to professional and community sports and leisure facilities.</p>
5	<p>To ensure the delivery of a joined-up, liveable and inclusive public realm network by requiring development to improve its connectivity, legibility, permeability, accessibility and visual appearance. To make walking and cycling the natural choice by embedding the healthy streets approach into new developments.</p>	<p>(i) The proposed uses will provide an opportunity for beneficial use of the Green Belt, which would protect and enhanced the landscape. By providing access and opportunities for outdoor sport and recreation, and ensuring positive landscape management, valuable open areas of green and blue infrastructure can be safeguarded and enhanced.</p> <p>(ii) The site proposed for designation is also within walkable distance of several local bus services and improved connections to these services could be considered where appropriate. THFC has implemented several Travel Plans in recent years, and this would continue in the future. As part of any future developments, measures would be introduced where appropriate to encourage and reinforce sustainable personal transport choices. Turkey Street Station is within a walkable distance of the Training Centre and measures to improve pedestrian routes could be considered.</p> <p>(iii) THFC will explore measures to improve access from Crews Hill station to the west and Turkey Street to the east, with the option of bespoke shuttle buses on busy days from key surrounding transport nodes and improved pedestrian/cycle links from nearby residential areas.</p>



Note continued

6	<p>To deliver active travel routes to make it easy to get around safely and sustainably, and support improvements to the public transport network (including safeguarding land for Crossrail 2). To strengthen east-west links through new routes and access improvements.</p>	<p>(i) The site proposed for designation is also within walkable distance of several local bus services and improved connections to these services could be considered where appropriate. THFC has implemented several Travel Plans in recent years, and this would continue in the future. As part of any future developments, measures would be introduced where appropriate to encourage and reinforce sustainable personal transport choices. Turkey Street Station is within a walkable distance of the Training Centre and measures to improve pedestrian routes could be considered.</p> <p>(ii) THFC will explore measures to improve access from Crews Hill station to the west and Turkey Street to the east, with the option of bespoke shuttle buses on busy days from key surrounding transport nodes and improved pedestrian/cycle links from nearby residential areas.</p>
7	<p>To maximise opportunities to experience greenery and the natural world by delivering tree lined streets and improved biodiversity and exceeding urban greening factor targets set out in the London Plan. To use biophilic design principles to link up urban Enfield (including Edmonton, Ponders End, Southbury, Brimsdown and Southgate) to wider natural networks across the borough.</p>	<p>(i) The proposed uses will provide an opportunity for beneficial use of the Green Belt, which would protect and enhanced the landscape. By providing improved community access and opportunities for outdoor sport and recreation, and ensuring positive landscape management, valuable open areas of green and blue infrastructure can be safeguarded and enhanced.</p> <p>(ii) The site is predominantly of habitats of low value for biodiversity. The site has the opportunity to provide substantial enhanced value for biodiversity and wildlife through measures including: biodiversity of woodlands; biodiversity management of woodland, hedgerow and watercourse buffers; creation of wildlife corridors to provide connectivity between woodlands and future developments; creation of semi-natural open space; installation of species-specific structures to provide roosting and nesting opportunities; and potential enhancement of watercourses.</p>



Note continued

8	<p>To tackle the climate emergency head-on by ensuring that all major development is zero carbon, evidenced through detailed energy assessments. To support renewable and low-carbon energy generation, including through connection to decentralised energy networks.</p>	<p>(i) THFC has an excellent sustainability record, being recently ranked at the top of the Premier League sustainability rankings (being awarded the maximum 21 points available, i.e. 100%). A large part of THFC's existing operations, alongside those that would arise from the proposed designation, are for outdoor sport and recreation, i.e. uses that have little emissions from their operations. THFC are also committed to highly sustainable development as evidenced on-site – the Lodge achieved a BREEAM 'Excellent' rating.</p> <p>(ii) The agglomeration of professional and community sports/leisure and recreational facilities would minimise the need for journeys to other destinations around, and beyond, the Borough. The mix of uses that would be provided are complementary to each other.</p> <p>(iii) The existing Training Centre is evidence of the THFC's commitment to a high-quality green and blue infrastructure. The provision of sports and leisure facilities would, by their very nature, deliver a significant amount of green infrastructure which THFC would supplement with high-quality landscaping.</p> <p>(iv) Significant parts of the designation would be delivered as green infrastructure, maintaining a landscaped site that responds positively to climate change. Any buildings proposed would be designed to respond to climate change and address prevailing policy requirements at that point in time. The use of appropriate species selection and management as part of any future development will encourage biodiversity and resilience to climate change.</p>
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Note continued

9	<p>To support the objectives of the North London Waste Plan by managing waste further up the waste hierarchy. To safeguard air and water quality and manage sources of noise and pollution in line with the agent of change principle.</p>	<p>(i) Proposed development will consider the potential efficient use of recycled and secondary materials, with an appropriate Waste Management Plan supporting any such proposals.</p> <p>(ii) THFC's current water usage for pitches is supplied by 2 licensed bore holes. The Club have recently upgraded their irrigation computer and software to the very latest technology as they continue to monitor water use sustainability. In addition, THFC operate a water recovery system that overrides these bore holes and pumps drainage water back into their holding tanks. The surplus drainage water is held in a naturally filtered attenuation pond before being discharged into Turkey Brook. All road surface water is discharged in the same way having been through a petrol/oil interceptor. Most fertilisers used are organic therefore any nitrates present are minimal / unidentifiable at pond source. The Club regularly test and record water that is discharged offsite.</p>
10	<p>To mitigate the effects of global heating and a changing climate by requiring developments to effectively manage heat risk, incorporate sustainable drainage and support measures to sustainably manage flood risk, including through optimisation of the blue-green network.</p>	<p>(i) Significant parts of the designation would be delivered as green infrastructure, maintaining a landscaped site that responds positively to climate change.</p> <p>(ii) The majority of the designation is free from any flooding constraints. Dickinson's Meadow is partly within Flood Zone 2, making it ideally suited to the proposed (consented) Nature Reserve. Parts of the southern boundary beyond the existing Training Centre but including small parts of the existing Whitewebbs Golf Course, lie within Flood Zones 2/3. Appropriate development management can control the risk of flooding.</p> <p>(iii) The designation would deliver, in its majority, green open spaces (e.g. sports pitches) which would not increase flood risk elsewhere. Any build form proposed can be appropriate located beyond any flood areas given that these comprise a very small part of the designation only.</p> <p>(iv) SUDS will be incorporated where appropriate, which can reduce the prospect of flooding beyond the designation.</p>



Note continued

11	<p>To protect and enhance the River Lee and Turkey Brook, Salmons Brook and Pymmes Brook through de-culverting, naturalisation, restoration and the creation of new wetlands. To protect the Green Belt and Metropolitan Open Land and local open spaces and encourage improvements to quality and accessibility to meet the needs of a growing population.</p>	<p>(i) The designation would deliver, in its majority, green open spaces (e.g. sports pitches) which would not increase flood risk elsewhere. SUDS will be incorporated where appropriate, which can reduce the prospect of flooding beyond the designation.</p> <p>(ii) THFC monitor their water use sustainably and operate a water recovery system that holds surplus drainage water in naturally filtered attenuation ponds before being discharged to Turkey Brook.</p> <p>(iii) The proposed uses will provide an opportunity for beneficial use of the Green Belt, which would protect and enhanced the landscape. By providing community access and opportunities for outdoor sport and recreation, and ensuring positive landscape management, valuable open areas of green and blue infrastructure can be safeguarded and enhanced.</p>
12	<p>To deliver green infrastructure improvements, including accessible new woodland, rewilded river corridors and new parks and open spaces to support growth. To facilitate the creation of a major green infrastructure corridor in the north of the borough, supporting Enfield's role as a gateway to London as a National Park City.</p>	<p>(i) The existing Training Centre is evidence of the THFC's commitment to a high-quality green and blue infrastructure. The provision of sports and leisure facilities would, by their very nature, deliver a significant amount of green infrastructure which THFC would supplement with high-quality landscaping.</p> <p>(ii) THFC would maintain the existing and emerging green infrastructure to a high standard, as evidenced by their existing Training Centre, and link these into surrounding green and blue networks where appropriate to do so.</p> <p>(iii) Surrounding woodland and trees are important to the setting of the site and the local landscape character. These can be protected and enhanced through development management.</p>



Note continued

	The workshop of London	
13	To deliver an uplift in employment floorspace to meet the needs of businesses. To capitalise on rising demand for logistics and manufacturing by focusing growth in Strategic Industrial Locations and Locally Significant Industrial Sites and the provision of new sites in appropriate locations.	<p>(i) The allocation would generate new on-site employment through its operation, as well as providing new job opportunities during the construction phases.</p> <p>(ii) THFC have previously committed to construction opportunities and skills training for local people, and this would be continued as part of any future development within the designation. THFC are committed to providing employment opportunities for local people, from all sectors of the community and will explore potential ways that this could be delivered as part of the designation.</p>
14	To celebrate and make the most of our industrial heartlands, protecting floorspace capacity in employment areas and encouraging industrial intensification. To ensure new development maximises the blue-green connectivity of employment areas, contributing to positive placemaking to attract businesses and investment.	<p>(i) The allocation would not lead to the loss of any existing industrial floorspace capacity, as none is present.</p>
15	To support new office development in Enfield Town, the district centres and Meridian Water. To encourage the delivery of workspaces of a range of sizes and configurations to provide the spaces that small to medium enterprises need to thrive, including flexible and affordable workspaces, and co-working options close to residential communities.	<p>n/a – the proposed designation does not propose any office development and relates solely to professional and community sports and leisure facilities.</p>



Note continued

16	To diversify town centres, enabling them to serve as growing and vibrant hubs with quality public spaces providing an attractive setting for civic activities, shopping, leisure, culture and social interaction, supplemented by local centres and parades which provide amenities and services within easy reach of where people live.	(i) The designation is not located within a town/local centre and this criterion is therefore largely not applicable. However, the designation would seek to complement proposed regeneration elsewhere in the Borough (including at Turkey Street).
	A distinct leading part of London	
17	To strengthen the rural parts of Enfield as a leading destination in the London National Park City – a place for people to come and experience nature, with opportunities to walk and cycle through connected habitats of rewilded corridors and experience the highlights of historic and leisure attractions. To support the varied qualities of the rural parts of Enfield, including food growing, nature recovery, thriving economic contributor and landscape value.	<p>(i) The proposed uses will provide an opportunity for beneficial use of the Green Belt, which would protect and enhanced the landscape. By providing improved community access and opportunities for outdoor sport and recreation, and ensuring positive landscape management, valuable open areas of green and blue infrastructure can be safeguarded and enhanced.</p> <p>(ii) The site is predominantly of habitats of low value for biodiversity. The site has the opportunity to provide substantial enhanced value for biodiversity and wildlife through measures including: biodiversity of woodlands; biodiversity management of woodland, hedgerow and watercourse buffers; creation of wildlife corridors to provide connectivity between woodlands and future developments; creation of semi-natural open space; installation of species-specific structures to provide roosting and nesting opportunities; and potential enhancement of watercourses.</p>



Note continued

18	<p>To protect existing community facilities and ensure that new homes are supported by high quality infrastructure, including education, health, sports, cultural facilities and digital infrastructure, creating safe green attractive neighbourhoods with a good quality of life. To work with partners to ensure essential facilities will be within easy reach of where people live, and can be properly funded through planning contributions, alongside wider sources of infrastructure funding.</p>	<p>(i) The designation would provide new sports, recreation and leisure facilities which will provide for wide community access. The designation is underpinned by a vision to improve community access to high-quality sports, leisure and recreation facilities, supporting healthy lifestyles and contributing towards narrowing health inequalities within the Borough.</p> <p>(ii) THFC have extant community obligations including the ongoing <i>Community Partnership Programme</i> to advance education of the public in respect of physical education, literacy, numeracy, personal and social health and education, leisure and tourism.</p> <p>(iii) THFC have signed up to a broad range of community obligations including the ongoing implementation of a <i>Community Partnership Programme</i> to advance education, and access for local schools to the emerging Western Field/Nature Reserve which benefits from planning permission. As part of the original Training Centre proposals, THFC committed to providing 70,000 coaching hours (equating to a minimum value of £1.75m) and community access to the Training Centre, and similar obligations could be developed as part of the designations.</p> <p>(iv) THFC will explore measures to improve access from Crews Hill station to the west and Turkey Street to the east, with the option of bespoke shuttle buses on busy days from key surrounding transport nodes and improved pedestrian/cycle links from nearby residential areas. The designation would also seek to complement proposed regeneration elsewhere in the Borough (including at Turkey Street).</p>
19	<p>To focus growth and investment to the Borough's major and district centres (Enfield Town, Angel Edmonton, Edmonton Green, Palmers Green, Southgate) to support the delivery of new homes, jobs, leisure and cultural facilities. To work with partners to deliver a cultural renaissance in Enfield.</p>	<p>(i) The designation is not located within a town/local centre and this criterion is therefore largely not applicable. However, the designation would seek to complement proposed regeneration elsewhere in the Borough (including at Turkey Street).</p> <p>(ii) The designation would also capitalise on the established leading sports facilities which already exist at the THFC Training Centre.</p>



Note continued

20	<p>To draw on the valuable character and heritage of Enfield's communities in managing growth. To use place-based policies to put local distinctiveness at the heart of placemaking and manage proposals for tall buildings to ensure that new development can be sensitively accommodated. To ensure that designated heritage assets and views (strategic and local) are protected and enhanced.</p>	<p>(i) The proposed designation is partly within the Forty Hall Conservation Area and there are several listed buildings (and a Scheduled Monument) within, and surrounding, its boundary.</p> <p>(ii) Supporting heritage analysis confirms that the special historic significance of these assets can be protected and enhanced through appropriate development design. This analysis confirms that the site's designation is entirely appropriate for the proposed uses subject to design mitigation which could include the following:</p> <ul style="list-style-type: none">- Existing trees screen the foreground of the existing Training Centre from Forty Hall and should be retained. Key views within the designation from Forty Hall will be limited, and development within any open views avoided, and through appropriate development management any future proposals can be scaled appropriately to be below the established tree and hedge line.- Retention of the small paddock field that lies outside of the Myddelton House garden, but within the boundary of the Registered Park and Garden (RPG), as an open field. The RPG would be kept free from development and protected.- Ensuring separation between the site and Bulls Cross, protecting the identity of this as a linear rural hamlet with a rural backdrop.- Inclusion of visual separation and visual openness in the subsequent design, to retain the rural setting of listed buildings.- Retention of Whitewebbs wood to protect the rural setting of South Lodge.- Preservation of the Scheduled Aqueduct within Whitewebbs Park.- Retention of two local heritage assets – Myddelton Farmhouse and Whitewebbs Park.
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ENFIELD LOCAL PLAN

POLICY DESIGNATION FOR THFC TRAINING CENTRE +
SURROUNDING LANDS

APPENDIX 3

INTEGRATED IMPACT ASSESSMENT



Integrated Impact Appraisal

IIA Objective		Appraisal Questions	Commentary
1	Ensure the Local Plan serves to minimise LBE's per capita CO2 emissions such that the Borough is on track to achieve carbon neutrality by 2030.	<ul style="list-style-type: none"> (i) Minimise greenhouse gas emissions from industrial and commercial activities? (ii) Improve strategic public transport infrastructure? (iii) Ensure a complementary mix of land uses within compact communities that minimises the length of journeys to services and facilities, in addition to employment opportunities? (iv) Increase the proportion of journeys made on foot or by cycle, and developments are of a sufficient density to support and enhance local services and public transport provision? (v) Provide roadside green infrastructure, particularly trees, which could help absorb carbon dioxide? 	<ul style="list-style-type: none"> (i) THFC has an excellent sustainability record, being recently ranked at the top of the Premier League sustainability rankings (being awarded the maximum 21 points available, i.e. 100%). A large part of THFC's existing operations, alongside those that would arise from the proposed designation, are for outdoor sport and recreation, i.e. uses that have little emissions from their operations. THFC are also committed to highly sustainable development as evidenced on-site – the Lodge achieved a BREEAM 'Excellent' rating. (ii) Improvements, of a commensurate scale and scope, to the strategic public transport infrastructure would be brought forward as part of any development. The Club would explore measures to improve access from Crews Hill station to the west and Turkey Street to the east, with the option of bespoke shuttle buses to meet demands from key surrounding transport nodes and improved pedestrian links. The site proposed for designation is also within walkable distance of several local bus services and improved connections to these services will be considered where appropriate. (iii) The agglomeration of professional and community sports/leisure and recreational facilities would minimise the need for journeys to other destinations around, and beyond, the Borough. The mix of uses that would be provided are complementary to each other. (iv) THFC has implemented several Travel Plans in recent years, and this would continue in the future, with measures to encourage and reinforce sustainable personal transport choices in relation to all activities where appropriate. Turkey Street Station is within a walkable distance of the site proposed for designation and measures to improve pedestrian routes will be provided where necessary as part of any future development within the designated area. (v) The existing Training Centre is evidence of the THFC's commitment to a high-quality green and blue infrastructure. The provision of sports and leisure facilities would, by their very nature, deliver a significant amount of green infrastructure which THFC would supplement with high-quality landscaping.
2	Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought.	<ul style="list-style-type: none"> (i) Require the incorporation of sustainable design and construction techniques in development? (ii) Ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping? (iii) Reduce the risk of damage to people, property and infrastructure from extreme weather events? (iv) Flood risk is addressed separately under IIA Objective 17. 	<ul style="list-style-type: none"> (i) Significant parts of the designation would be delivered as green infrastructure, maintaining a landscaped site that responds positively to climate change. (ii) Any buildings proposed would be designed to respond to climate change and address prevailing policy requirements at that point in time. (iii) The use of appropriate species selection and management as part of any future development will encourage biodiversity and resilience to climate change.
3	Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialised housing, including housing for the elderly and disabled people.	<ul style="list-style-type: none"> (i) Provide for a range of housing type and tenures to meet identified housing needs? (ii) Provide affordable housing to meet identified needs? (iii) Address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes? (iv) Provide specialise accommodation for those with disabilities? 	n/a – the proposed designation does not propose any residential development and relates solely to professional and community sports and leisure facilities.



IIA Objective	Appraisal Questions	Commentary
	(v) Make provision for homes that can be adapted to support independent living for older and disabled people?	
4 Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough.	(i) Improve access to healthcare and provide new or enhanced local health services to support new and growing communities? (ii) Contribute to narrowing health inequalities? (iii) Improve access to outdoor sport and indoor sport and leisure facilities, in addition to recreation facilities? (iv) Improve access to open space and the countryside, including Lee Valley Regional Park, recognising its sensitivity to human disturbance? (v) Provide, steward and maintain green infrastructure assets and networks, ensuring that these are linked into new and existing developments, to improve the connectivity of green space and green networks? (vi) Limit the risk of air, noise and light pollution on local people?	(i) The designation is underpinned by a vision to improve community access to high-quality sports, leisure and recreation facilities, supporting healthy lifestyles and contributing towards narrowing health inequalities within the Borough. (ii) THFC have signed up to a broad range of community obligations including the ongoing implementation of a <i>Community Partnership Programme</i> to advance education, and access for local schools to the emerging Western Field/Nature Reserve which benefits from planning permission. As part of the original Training Centre proposals, THFC committed to providing 70,000 coaching hours (equating to a minimum value of £1.75m) and community access to the Training Centre, and similar obligations could be developed as part of the designations. (iii) THFC would maintain the existing and emerging green infrastructure to a high standard, as evidenced by their existing Training Centre, and link these into surrounding green and blue networks where appropriate to do so. (iv) The designation is not within a densely populated residential area. It would predominantly comprise green open spaces and sports uses which, coupled with the proposed sustainable transport initiatives (above), would minimise the risk of air, noise and light pollution on local people. Through development management, amenity impacts can be minimised to appropriate levels.
5 Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.	(i) Will it maintain and improve access to key services and facilities for all sectors of the population? / Ensure proposals retain or re-provide existing social infrastructure? (ii) Will it improve access to community facilities? (iii) Make provision for religious places of worship? (iv) Provide new and improved education facilities, which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers? (v) Improve education attainment, qualification levels and participation in education and training?	(i) The designation would provide new sports, recreation and leisure facilities which will provide for wide community access . (ii) THFC have extant community obligations including the ongoing <i>Community Partnership Programme</i> to advance education of the public in respect of physical education, literacy, numeracy, personal and social health and education, leisure and tourism. (iii) The consented Western Field development (which is within the proposed designation) includes S106 commitments to deliver a Schools Visits Programme for Enfield schools, alongside the inclusion of a dedicated education/office space within the emerging building. (iv) THFC have also previously committed to construction opportunities and skills training for local people, and this would be continued as part of any future development.
6 Encourage social inclusion, promotion of equality and a respect through diversity.	(i) Reduce poverty and social exclusion in those areas most affected? (ii) Develop social cohesion through good urban design, using the healthy streets indicators and community spaces that act as a catalyst for community cohesion? (iii) Make provision for open space within town centres and new developments, encouraging interaction amongst residents? (iv) Make the public realm safe and attractive to use by pedestrians?	(i) All facilities that would come forward under the designation would benefit from commitments to provide access to all sectors of the community, not excluding any potential users and encouraging social inclusion. As evidenced by the existing Training Centre and community programmes, community access would be available to all irrespective of background, affordability or disability. (ii) The facilities would be high-quality, attractive and safe to use for all users.
7 Reduce crime and increase community safety.	(i) Support targeted interventions to reduce crime and increase community safety, guided by LBE's Crime and Community Safety team, and ensure high quality new developments that are future proofed? (ii) Reduce levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting etc.?	(i) The designation would provide a high-quality and safe area for the provision of sports and leisure activities, including for the local community. The spaces would be managed to ensure a safe environment and would be accessible to all parts of the community.



IIA Objective		Appraisal Questions	Commentary
		<ul style="list-style-type: none"> (iii) Encourage access to, and the provision of, community and youth facilities in more deprived neighbourhoods? (iv) Increase the perception of safety from crime? 	(ii) Any development would be progressed in agreement with LBE's Crime and Community Safety Team, alongside any other key stakeholders of relevance (e.g. the Metropolitan Police, Secured by Design etc.).
8	Focus on delivering the 'Vision Zero' target for road safety.	<ul style="list-style-type: none"> (i) Apply healthy street principles to ensure pedestrians and cyclists can travel safely? (ii) Ensure safe street design so as to encourage walking and cycling? 	(i) Any development proposed under the designation would be required to address the potential for improved pedestrian and cycle links to/from surrounding residential communities and local transport nodes, including for example Turkey Street to the east. Turkey Street is within a walkable distance of the designation and could provide safe and healthy routes for pedestrians and cyclists.
9	Support a strong, diverse and resilient economy that provides opportunities for all.	<ul style="list-style-type: none"> (i) Support the growth of Strategic Industrial Locations and Locally Significant Industrial Sites? (ii) Ensure a sufficient supply of land to meet local employment needs? (iii) Provide opportunities for start-up companies and expansion of local companies, particularly in high-performance technologies, business and professional services? (iv) Help diversify employment opportunities locally, including employment within the social enterprise, voluntary and community sectors and a growing higher wage economy? (v) Improve access to jobs for local people from all sectors of the community that will reduce inequality between standards of living? 	<ul style="list-style-type: none"> (i) THFC have previously committed to construction opportunities and skills training for local people, and this would be continued as part of any future development within the designation. (ii) THFC are committed to providing employment opportunities for local people, from all sectors of the community and will explore potential ways that this could be delivered as part of the designation.
10	Support the vitality of the Borough's town and local centres.	<ul style="list-style-type: none"> (i) Enhance the vitality and vibrancy of town and local centres? (ii) Encourage the retention of and expansion of town and local centre commercial and retail uses? (iii) Provide for a range of homes within the town and local centres? (iv) Promote regeneration in the Borough? (v) Provide, protect or enhance locations for cultural activities, including the arts? 	(i) The designation is not located within a town/local centre and this criterion is therefore largely not applicable. However, the designation would seek to complement proposed regeneration elsewhere in the Borough (including at Turkey Street).
11	Minimise air pollution.	<ul style="list-style-type: none"> (i) Protect and improve air quality in the Borough which is entirely designated as an Air Quality Management Area (AQMA)? (ii) Support reduced air pollution in existing hotspots and avoid the creation of new air pollution hotspots, contribution to the achievement of the national and London-wide targets. (iii) Minimise air pollution caused by traffic and commercial uses? (iv) Address traffic congestion within the Borough and along key routes through neighbouring areas, with a focus on emission reduction, health impacts and the deliver of pedestrian friendly urban design? (v) Mitigate the impacts of unenclosed waste facilities on dust and particulate pollution in less industrialised areas? 	<ul style="list-style-type: none"> (i) The designation would deliver large parts as green/open space which will mitigate air pollution. Sustainable transport measures would be incorporated to minimise air pollution caused by traffic, including the potential for enhanced pedestrian/cycle links, improved links to local bus services and possible bus shuttle services from local transport nodes. (ii) The provision of electric vehicle charging points within the any relevant development support the transition to electric vehicles.
12	Minimise the need to travel and support a modal shift away from the private car.	<ul style="list-style-type: none"> (i) Make provision for safe and easy access to public transport services? (ii) Promote and facilitate the use of electric cars and sustainable modes of transport? 	(i) THFC will explore measures to improve access from Crews Hill station to the west and Turkey Street to the east, with the option of bespoke shuttle buses on busy days from key surrounding transport nodes and improved pedestrian/cycle links from nearby residential areas.



IIA Objective		Appraisal Questions	Commentary
		(iii) Promote compact, mixed-use development, which encourages walking and cycling for short journeys?	<p>(ii) The site proposed for designation is also within walkable distance of several local bus services and improved connections to these services could be considered where appropriate.</p> <p>(iii) An agglomeration of a professional and community sports/leisure/recreation facilities will help to minimise the need for journeys to other destinations around, and beyond, the Borough. The mix of uses that would be provided are complementary to each other.</p> <p>(iv) THFC has implemented several Travel Plans in recent years, and this would continue in the future. As part of any future developments, measures would be introduced where appropriate to encourage and reinforce sustainable personal transport choices. Turkey Street Station is within a walkable distance of the Training Centre and measures to improve pedestrian routes could be considered.</p>
13	Delivery biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks.	<p>(i) Maintain the integrity of the Epping Forest SAC?</p> <p>(ii) Protect locally designated and non-designated sites from both the direct and indirect adverse effects of development?</p> <p>(iii) Avoid impacts of development and human disturbance on Lee Valley Regional Park?</p> <p>(iv) Safeguard and strengthen local ecological/green infrastructure networks that contribute to ecological connectivity both within Enfield Borough and their links with ecological networks in neighbouring boroughs?</p> <p>(v) Deliver targeted enhancements that improve the functioning of networks and are supportive of established conservation objectives?</p> <p>(vi) Ensure that known biodiversity of brownfield sites is given due weight reflecting its ecological interest and value?</p> <p>(vii) Deliver biodiversity net gain through individual development contributions?</p>	<p>(i) The site is predominantly of habitats of low value for biodiversity.</p> <p>(ii) The site has the opportunity to provide substantial enhanced value for biodiversity and wildlife through measures including: biodiversity of woodlands; biodiversity management of woodland, hedgerow and watercourse buffers; creation of wildlife corridors to provide connectivity between woodlands and future developments; creation of semi-natural open space; installation of species-specific structures to provide roosting and nesting opportunities; and potential enhancement of watercourses.</p> <p>(iii) Whilst there are a number of international environmental designations within a 5km radius of the site (including Epping Forest SAC amongst others), the distance of the site and the nature of the proposed uses are not considered to have any material adverse impact on these designations.</p>
14	Sustain and enhance the significance of heritage assets.	<p>(i) Support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated?</p> <p>(ii) Facilitate enhancements to the fabric and setting of the historic environment?</p> <p>(iii) Support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets)?</p> <p>(iv) Protect, maintain and enhance scheduled monuments and archaeological sites, and their setting?</p> <p>(v) Protect, maintain and enhance registered parks and gardens and their settings?</p> <p>(vi) Improve participation in cultural activities?</p> <p>(vii) Promote greater understanding and enhancement of the Borough's historic environment, such as parks and open spaces, and areas with a particular heritage significance?</p> <p>(viii) Help foster heritage-led regeneration?</p>	<p>(i) The proposed designation is partly within the Forty Hall Conservation Area and there are several listed buildings (and a Scheduled Monument) within, and surrounding, its boundary.</p> <p>(ii) Supporting heritage analysis confirms that the special historic significance of these assets can be protected and enhanced through appropriate development design. This analysis confirms that the site's designation is entirely appropriate for the proposed uses subject to design mitigation which could include the following:</p> <ul style="list-style-type: none"> - Existing trees screen the foreground of the existing Training Centre from Forty Hall and should be retained. Key views within the designation from Forty Hall will be limited, and development within any open views avoided, and through appropriate development management any future proposals can be scaled appropriately to be below the established tree and hedge line. - Retention of the small paddock field that lies outside of the Myddelton House garden, but within the boundary of the Registered Park and Garden (RPG), as an open field. The RPG would be kept free from development and protected. - Ensuring separation between the site and Bulls Cross, protecting the identity of this as a linear rural hamlet with a rural backdrop. - Inclusion of visual separation and visual openness in the subsequent design, to retain the rural setting of listed buildings. - Retention of Whitewebbs wood to protect the rural setting of South Lodge.



IIA Objective		Appraisal Questions	Commentary
			<ul style="list-style-type: none"> - Preservation of the Scheduled Aqueduct within Whitewebbs Park. - Retention of two local heritage assets – Myddelton Farmhouse and Whitewebbs Park.
15	Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes.	<ul style="list-style-type: none"> (i) Protect and enhance the landscape and townscape through the appropriate location, layout and design of new development, including the preservation of important open gaps and key views? (ii) Protect and enhance the local distinctiveness and contribution to a sense of place? (iii) Contribute to London-wide Green Infrastructure objectives, including in respect of the Lee Valley Regional Park? 	<ul style="list-style-type: none"> (i) The proposed uses will provide an opportunity for beneficial use of the Green Belt, which would protect and enhanced the landscape. By providing access and opportunities for outdoor sport and recreation, and ensuring positive landscape management, valuable open areas of green and blue infrastructure can be safeguarded and enhanced. (ii) Key views can be maintained through the design and siting of any development, and the landscape character can be enhanced in certain cases, including the potential restoration of historic landscapes. (iii) Appropriate species selection and management can encourage biodiversity and resilience to climate change with an understanding of how the landscape is likely to change and adapt over the next 50-100 years. (iv) Surrounding woodland and trees are important to the setting of the site and the local landscape character. These can be protected and enhanced through development management.
16	To achieve efficient use of land and materials.	<ul style="list-style-type: none"> (i) Avoid development of high-quality agricultural land? (ii) Ensure the re-use and redevelopment of brownfield sites? (iii) Make efficient use of recycled and secondary materials? (iv) Encourage minimisation, reuse and recycling of waste? (v) Protect mineral resources and ensure development avoids sterilisation of local mineral reserves? 	<ul style="list-style-type: none"> (i) Parts of the designation are previously developed, brownfield land, and provide an opportunity to minimise the loss of the most versatile undeveloped land. (ii) The designation would also maximise the synergies of expanding existing sports/leisure facilities, rather than developing an alternative site elsewhere. (iii) Proposed development will consider the potential efficient use of recycled and secondary materials, with an appropriate Waste Management Plan supporting any such proposals. (iv) There would be no sterilisation of local mineral reserves arising.
17	To manage and reduce the risk of flooding.	<ul style="list-style-type: none"> (i) Minimise the risk of flooding to people, property and infrastructure from rivers? (ii) Avoid development in locations at risk from flooding or which could increase the risk of flooding elsewhere, taking into account the impacts of climate change? (iii) Create developments that incorporate Sustainable Urban Drainage Systems (SUDS) (including their long-term maintenance) to reduce the rate of run-off and the risk of surface water flooding and combined sewer overflows? 	<ul style="list-style-type: none"> (i) The majority of the designation is free from any flooding constraints. Dickinson's Meadow is partly within Flood Zone 2, making it ideally suited to the proposed (consented) Nature Reserve. (ii) Parts of the southern boundary beyond the existing Training Centre but including small parts of the existing Whitewebbs Golf Course, lie within Flood Zones 2/3. Appropriate development management can control the risk of flooding. (iii) The designation would deliver, in its majority, green open spaces (e.g. sports pitches) which would not increase flood risk elsewhere. Any build form proposed can be appropriate located beyond any flood areas given that these comprise a very small part of the designation only. (iv) SUDS will be incorporated where appropriate, which can reduce the prospect of flooding beyond the designation.
18	Minimise water use and protect water quality.	<ul style="list-style-type: none"> (i) Ensure that development does not lead to the deterioration of groundwater, surface water or river water quality? (ii) Locate development where adequate foul drainage, sewerage treatment facilities, adequate potable water supply and surface water drainage can be made available? (iii) Require the incorporation of SUDS? 	<ul style="list-style-type: none"> (i) THFC's current water usage for pitches is supplied by 2 licensed bore holes. The Club have recently upgraded their irrigation computer and software to the very latest technology as we continue to monitor our water sustainability. (ii) In addition, THFC operate a water recovery system that overrides our bore holes and pumps drainage water back into their holding tanks. (iii) The surplus drainage water is held in a naturally filtered attenuation pond before being discharged into Turkey Brook. (iv) All road surface water is discharged in the same way having been through a petrol/oil interceptor.



IIA Objective	Appraisal Questions	Commentary
	(iv) Increase water efficiency, particularly in new developments through innovative design measures?	(v) Most fertilisers used are organic therefore any nitrates present are minimal / unidentifiable at pond source. We regularly test and record water that is discharged offsite.

ENFIELD LOCAL PLAN

POLICY DESIGNATION FOR THFC TRAINING CENTRE +
SURROUNDING LANDS

APPENDIX 4
LANDSCAPE APPRAISAL



Tottenham Hotspur Football Club (THFC) Training Centre and surrounding land, Enfield

Landscape Appraisal

Document Title	Project Number	Prepared for	Prepared by	Date	Reviewed by
Landscape Appraisal	1441	THFC	Ed Payne	March 2021	Eleanor Houldcroft

Revision	Description	Prepared by	Date	Reviewed by
A	Document revised following comments from Planning Consultant	Rosie Turner	29.03.2021	Eleanor Houldcroft



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Introduction

1.1 PURPOSE OF THE DOCUMENT

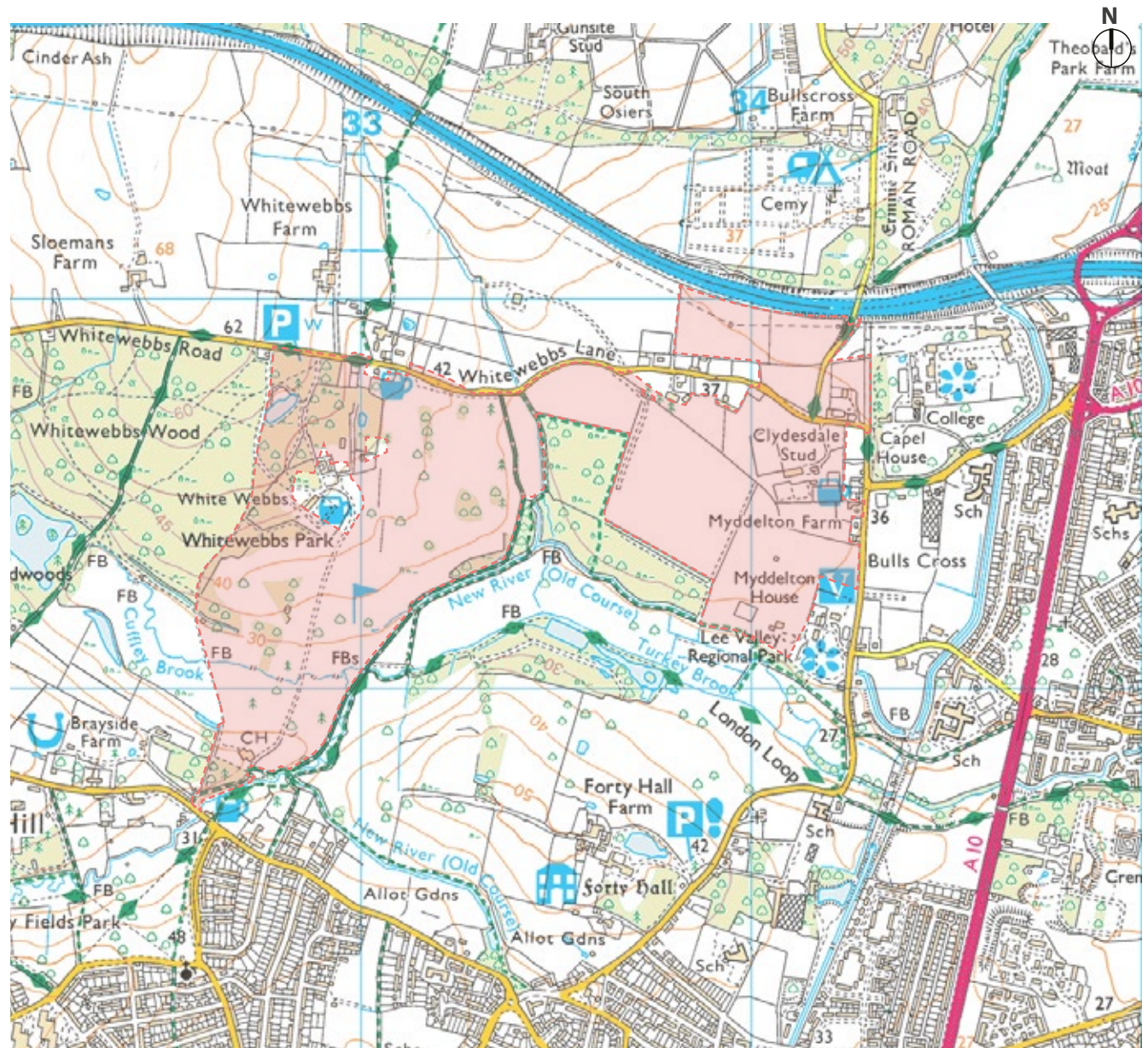
Tottenham Hotspur Football Club (THFC) are promoting their Training Centre and surrounding land for a Site-specific allocation in the emerging Enfield Local Plan (Regulation 18 Consultation). The entirety of the promotion Site lies within the Green Belt (see Figure 1 for the boundary of the Site).

The purpose of the allocation is to establish recognition of the Site's appropriateness for "professional and community sports and leisure facilities". It will not remove the Site from the Green Belt; rather, it will establish that such uses are supported by Enfield Council in principle subject to satisfying Green Belt policy requirements and other development management considerations.

The allocation would be underpinned by a Site-specific policy which defines the geographical boundary, recognises those uses that are appropriate, in principle, and outlines a range of development management requirements that must be met.

The Landscape Agency Ltd (TLA) has been appointed by THFC to provide a review of the Site in terms of landscape setting and character, including a brief appraisal of its contribution to the Green Belt.

 Site boundary



▲ Extent of the Site



M25

WHITEWEBBS LANE

WHITEWEBBS WOOD

TOTTENHAM HOTSPUR
FOOTBALL CLUB TRAINING
GROUND

WHITEWEBBS PARK

BULLS CROSS

FORTY HALL COUNTRY
PARK

▲ Extent of Site boundary (Aerial Map)



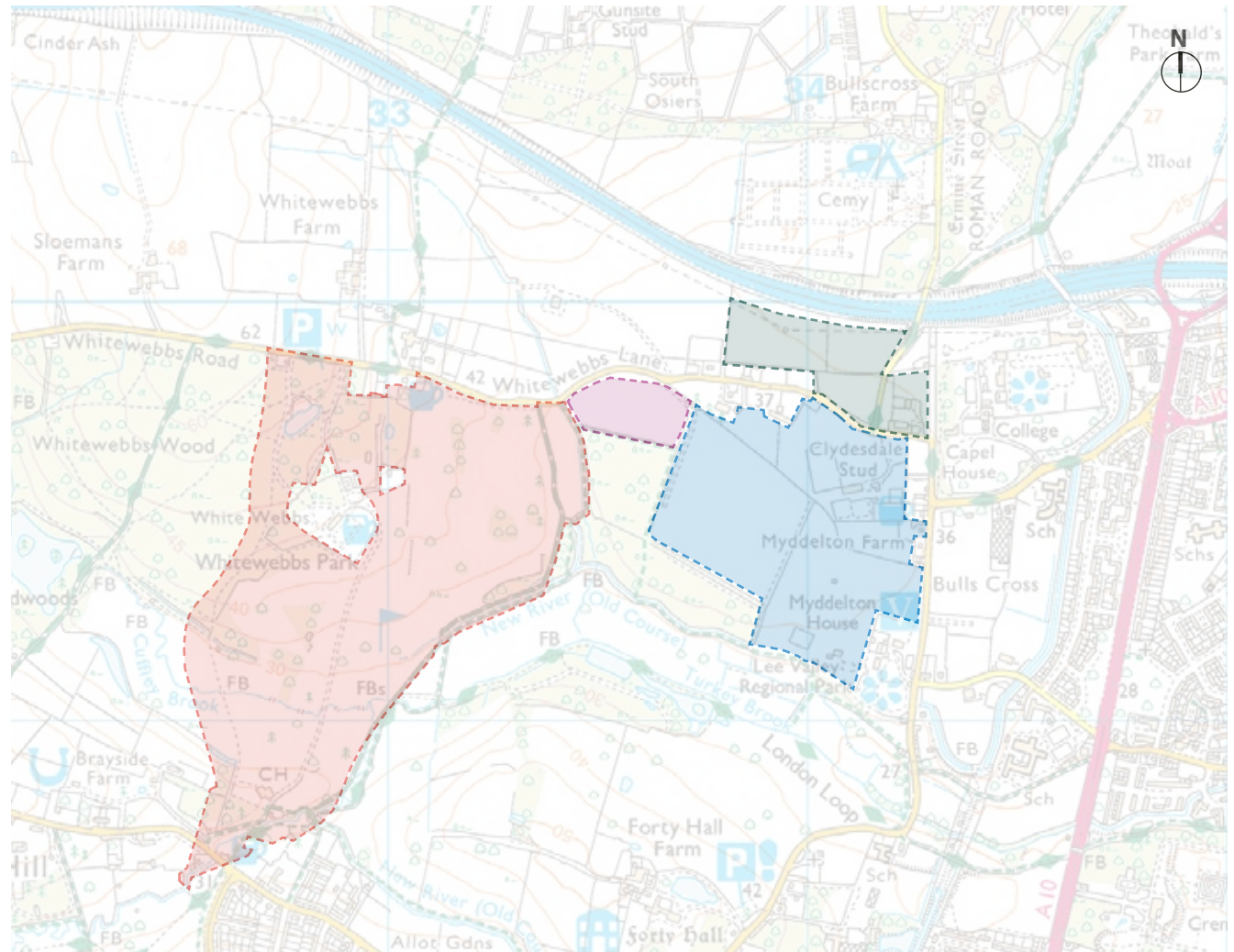
1.2 THE SITE

The Site, as shown on the adjacent plan, is located to the north of Enfield with the M25. The Site comprises four areas:

- The existing Training Centre for THFC**
 - Football club training centre comprising 15 grass pitches, main building, car parking, maintenance building and attenuation pond.
- The Western Field**
 - Unmanaged grassland field to the west of the training centre.
 - A large area of woodland is located along the southern boundary.
- Whitewebbs Park and Golf Course**
 - Large area of parkland in the borough of Enfield partly converted to a golf course.
 - Contains many veteran and mature trees within open areas of grassland.
- Land north of the Training Centre, including the cattery**
 - Area of unmanaged grassland and scrub located to the north of Whitewebbs Lane.
 - The M25 runs along the northern edge of this area.

The entirety of the Site falls within Green Belt with a large proportion to the east covered under Forty Hill Conservation Area.

Whitewebbs Lane runs east - west to the northern edge of the Training Ground, Whitewebbs Golf Course and Western Field. Bulls Cross runs along the eastern edge of the Site. Bulls Cross Ride cuts through the land north of the Training Centre providing access north across the M25.



▲ Areas of the Site












Landscape Baseline

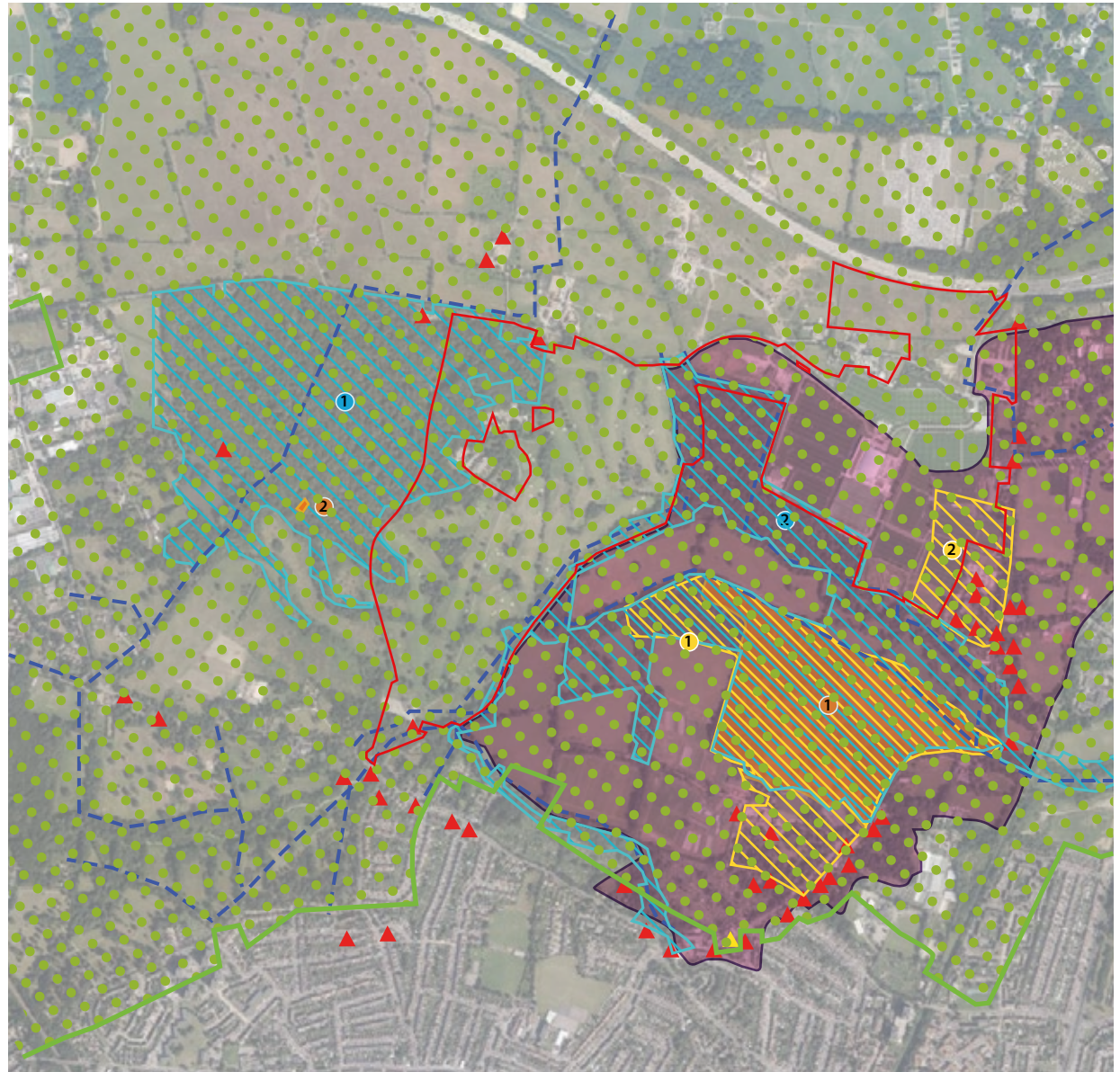
2.1 LANDSCAPE DESIGNATIONS

This section outlines the statutory designations that cover the Site and its immediate context. It summarises designations, both at a national and local level.

Designations include:

KEY

-  Site
-  Green Belt - Metropolitan Green Belt
-  Conservation Area - Forty Hall
-  Scheduled Ancient Monument
 - 1. Elsyng Palace
 - 2. Flash Road aqueduct
-  Registered Parks and Gardens
 - 1. Forty Hall
 - 2. Myddelton House
-  Sites of Metropolitan Importance for Nature Conservation
 - 1. Whitewebbs Wood
 - 2. Forty Hall Park & Estate
- Listed Building**
 -  Grade I
 -  Grade II
-  Public Right of Way



▲ Landscape Designations

2.1.1 THE METROPOLITAN GREEN BELT

The Green Belt in Enfield forms part of the wider area of Metropolitan Green Belt around London. The wider Metropolitan Green Belt covers around 514,000 hectares across 67 local authorities distributed between the regions of London, the East and South East historically designated to prevent further coalescence and preserve historic settlement patterns within the overall Belt around London.

The National Planning Policy Framework (NPPF) sets out government's planning policies for England and how these are expected to be applied. Paragraph 134 of the NPPF defines the five purposes of the green belt:

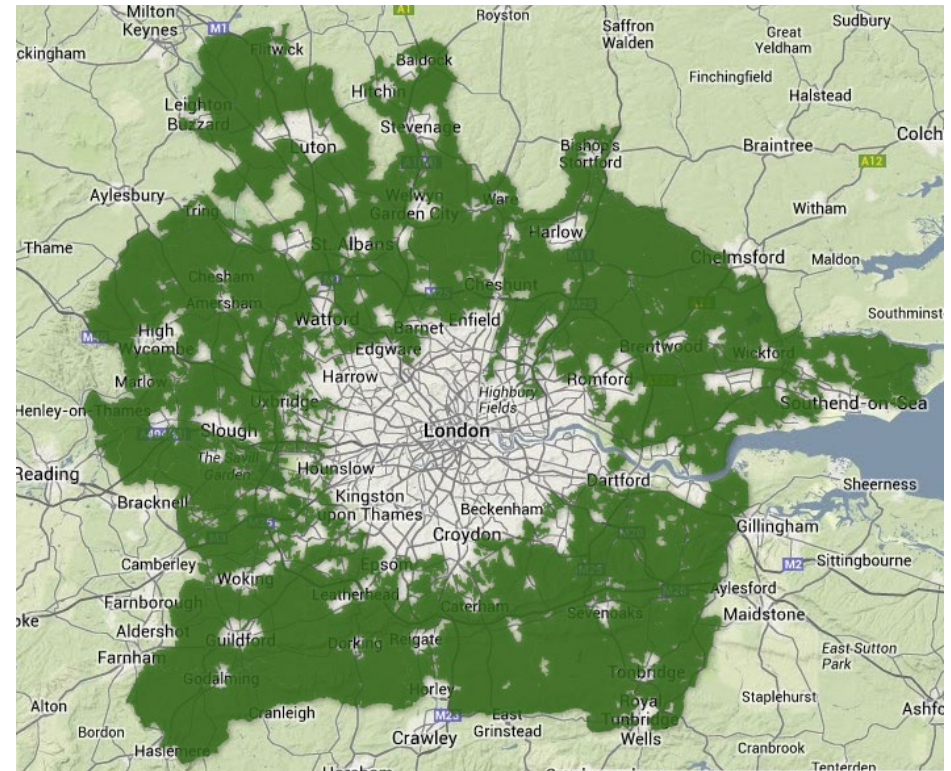
1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.2.2 SCHEDULED ANCIENT MONUMENTS

ELSYNG PALACE

List Entry Number: 1002040

A monument with medieval origins, later converted to an early Tudor courtier house belonging to Sir Thomas Lovell which was then taken over and adapted within the grounds of Forty Hall, a royal palace by Henry VIII. The monument includes the buried archaeological remains of the manor and palace of Elsyng, its associated ponds, ridge and furrow, and terraces possibly belonging to a former garden. The monument represents a rare example of a royal palace where the buried remains have seen little disturbance by later activity and are therefore extremely well-preserved



▲ Extent of the Metropolitan Green belt around London

FLASH ROAD AQUEDUCT

List Entry Number: 1001989

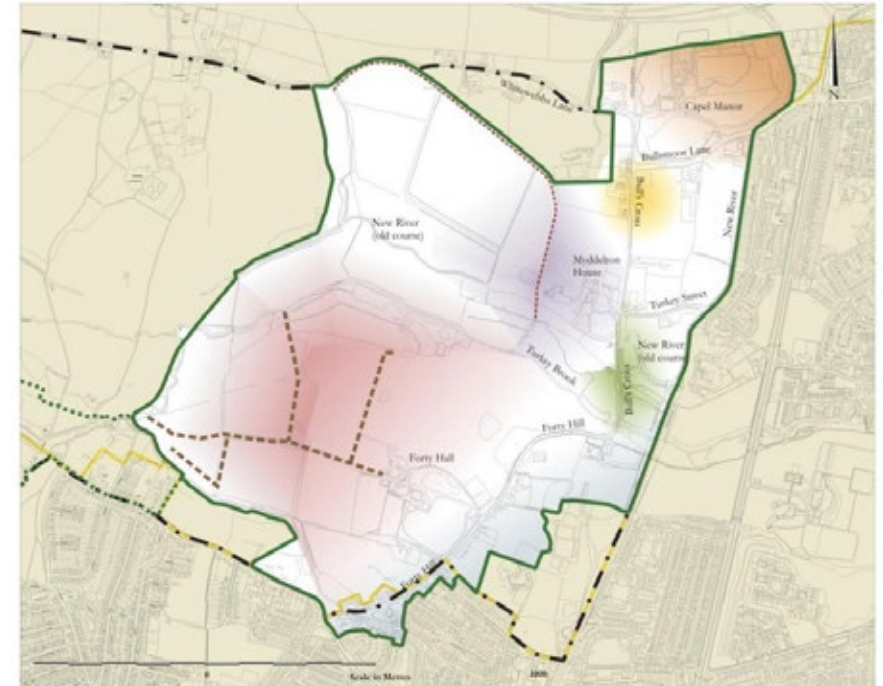
The monument includes a 19th century multi-span bridge and cast iron aqueduct, which once carried the New River over Cuffley Brook. It is situated at the foot of a river valley on the southern edge of Whitewebbs Wood. Despite later repairs and alterations, Flash Lane Aqueduct survives well. It is a major survival of part of the New River watercourse, one of the most significant and ambitious developments in water supply in England.

2.2.3 FORTY HILL CONSERVATION AREA

FORTY HILL CONSERVATION AREA CHARACTER APPRAISAL

The Forty Hill Conservation Area Character Appraisal was originally adopted and published in 2006. The key characteristics that give the Forty Hill Conservation Area its special interest can be defined as follows:

- The long history of occupation - With continuity of occupation back to medieval times, and evidence of use in the Roman and prehistoric periods, Forty Hill is an area rich in history and archaeology.
- The presence of the intact core of three historic country estates - including the houses, kitchen gardens, stables and immediate settings of formal gardens and parkland.
- The survival of three historic hamlets, Forty Hall, Bulls Cross and Maiden's Bridge, each with a distinctive, linear settlement pattern. In all the areas, the low density of development, often including large spaces between buildings, is an important factor.
- The presence of extensive open land. This helps to preserve the individual nature of each settlement and gives the historic estates and hamlets an attractive landscape setting, particularly where it is parkland, woodland or agricultural land rather than playing fields.
- The architectural quality of many of the buildings. The Conservation Area contains a variety of important historic buildings, ranging from simple vernacular houses and spacious classical houses, to a house (Forty Hall) of outstanding national importance.
- Distinctive property boundaries. A mixture of high walls, hedges, railings and picket fences gives each character area a highly distinctive appearance.
- The relative absence of modern development in the area. The appearance, superficially at least, of much of the area has not significantly altered since the 19th century.



Forty Hill Conservation Area Character Appraisal:
Character areas



▲ Forty Hill Conservation Area

FORTY HILL CONSERVATION AREA MANAGEMENT PROPOSALS, FEBRUARY 2015

This document outlines the management proposals for managing change in, and the conservation and enhancement of, Enfield's conservation areas, to ensure that they retain the special qualities that led to their designation. The summary of issues affecting the Conservation Area highlighted in the document include:

- Inappropriate alterations to buildings
- Poor quality treatment of property boundaries
- Poor quality streetworks
- Derelict or untidy buildings or land
- Loss of the traditional settlement pattern
- Deferral of the conservation and restoration of elements of Forty Hill park
- The impact of municipal-style playing fields and the football training grounds west of Myddelton House
- The conversion of single dwellings into multiple-occupancy dwellings.

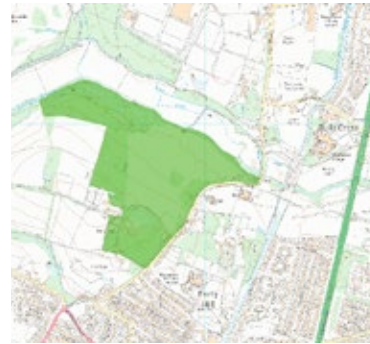
2.2.4 REGISTERED PARKS & GARDENS

FORTY HALL REGISTERED PARK & GARDEN

Grade: II Listed

List Entry Number: 1001357

Late C18 pleasure grounds overlying C17 gardens, providing the setting for a mansion house, accompanied by C17 and C18 parkland within which lies the site of a Tudor palace and the remains of its associated water gardens



▲ Forty Hall

The site was originally that of Elsynge Palace (scheduled ancient monument), acquired and enlarged by Sir Thomas Lovell in 1492. Lying adjacent to the Royal Enfield Chase, the Palace attracted many royal visitors and became a royal residence housing the children of Henry VIII.

The grounds, including the drive and pond, are shown in much their present form on surveys of 1773 and 1785 when the estate of Eliab Breton (d 1785), the then owner, was sold. The estate passed through a number of different private ownerships until purchased by Enfield Urban District Council from Derek Parker Bowles in 1951 and converted into a museum, in which use it remains, with much of the grounds forming a public park.



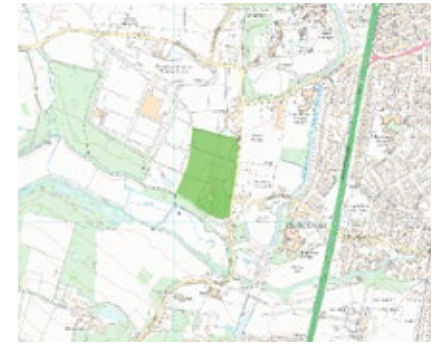
▲ Forty Hill

MYDDELTON HOUSE

Grade: II Listed

List Entry Number: 1000243

A botanical garden that is home to a host of rare and unusual plants and lost London treasures. The site was first developed as a garden in early C18 and early C19, and from late C19 to mid C20 as a renowned plantsman's garden by the owner, E A Bowles. Myddelton House was salvaged from disrepair with a Heritage Lottery Fund



▲ Myddelton House

in 2011 and restored to tell the story of the famous botanist's life and gardening style.

Myddelton House (listed grade II) is located in the south-east quarter of the registered Site, overlooking the gardens to the east and south. The extensive gardens and pleasure grounds include a series of garden areas, with different designs or planting themes including a wild garden, fern garden, rose garden, pergola garden and large pond. Bowles, a very keen plant-hunter and collector, was responsible for raising or introducing a large number of plants, especially bulbs.



▲ Gardens and pleasure grounds at Myddelton House



2.2.5 SITES OF METROPOLITAN IMPORTANCE FOR NATURE CONSERVATION

Whitewebbs Wood and Forty Hall Park and Estate to the south of the Training Centre are designated as Sites of Metropolitan Importance for Nature Conservation. These are areas within the wider London district designated because of their importance for nature conservation. The following information has been extracted from 'Enfield's Local Plan Evidence Base - Sites of Importance for Nature Conservation Citations, March 2013'

WHITEWEBBS WOOD

Grade: Metropolitan Reference: M011

Size: 56.2 hectares

Access: Free public access to all of the Site

Main habitats: Amenity grassland, ancient woodland, pond/lake, scattered trees, scrub, secondary woodland, semi improved neutral grassland, veteran trees



▲ Whitewebbs Wood

Citation

An extensive ancient woodland which includes uncommon examples of coppiced hornbeam. More mixed stands include ash, elm and field maple. Stands of birch and willow provide further structural variation. Also notable are the large beech trees.

Beneath hornbeam the ground flora is typically sparse but elsewhere is dominated by bramble and bracken, with numerous ancient woodland indicators.

The London rarities spurge laurel (*Daphne laureola*), broad-leaved helleborine (*Epipactis helleborine*) and cyperus sedge (*Carex pseudocyperus*) also occur.

The breeding avifauna includes marsh tit (now very rare in London), and mandarin duck. The specially-protected great crested newt is also present.

FORTY HALL PARK AND ESTATE

Grade: Metropolitan Reference: M155

Size: 61.4 hectares

Access: Free public access to the majority of the Site

Main habitats: Broadleaved woodland, acid grassland, lowland meadow, ponds and lake, rivers and streams, veteran trees

Citation

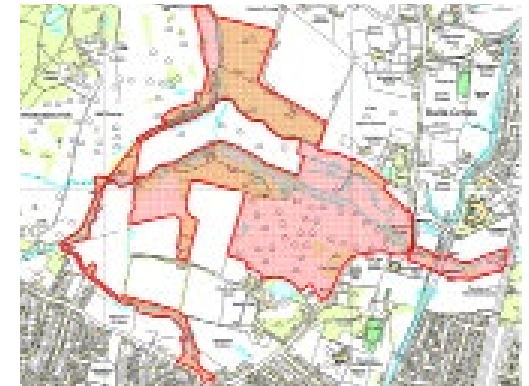
Forty Hall Estate is a large section of relict countryside, apparently inhabited since the 13th Century, with a 17th Century manor house. The Site includes important grassland communities of significance, hedgerows, scrub, secondary woodland and a number of pedunculate oaks of considerable antiquity.

The most important meadow areas are covered in a mosaic of acid and unimproved grassland. One meadow includes a large population of harebell, as well as pignut, eary hair-grass, burnet-saxifrage, cuckoo-flower and bird's-foot, all of which are scarce in Enfield. Additionally, there is a significant population of heath woodrush, which is rare in Greater London. An avenue of ancient trees contains mistletoe, a London Biodiversity Action Plan priority species. Musk-mallow, another locally scarce plant, occurs in a meadow to the west of Bulls Cross.

The invertebrate fauna appears to be important, especially in the ancient parkland trees; several nationally scarce species including the jewel beetle (*Agrilus pannonicus*) are found here. The Site contains a diverse range of breeding birds, including song thrush, blackcap and garden warbler.

There is an area of largely unmanaged old secondary woodland to the north of the Site with significant numbers of ivy-clad trees, as well as standing and lying dead wood. Nine species of bats are known to fly in/near this area, including a possible record of the very uncommon *Barbastelle*. The stag beetle, a UK BAP species, is also known from this area; it is uncommon in north London.

The Turkey Brook here is clean with natural banks and a natural course, and kingfishers probably breed alongside. Some species indicative of ancient woodland are present including English bluebell and wood anemone. Ponds within the Site support the specially-protected great crested newt. There is full public access to the parkland but access elsewhere is on footpaths only. The Site is managed by Capel Manor College.



▲ Forty Hall Park and Estate

2.3 HISTORIC APPRAISAL

A brief overview of the historic development of the landscape has been carried out to better understand the Site and its setting.

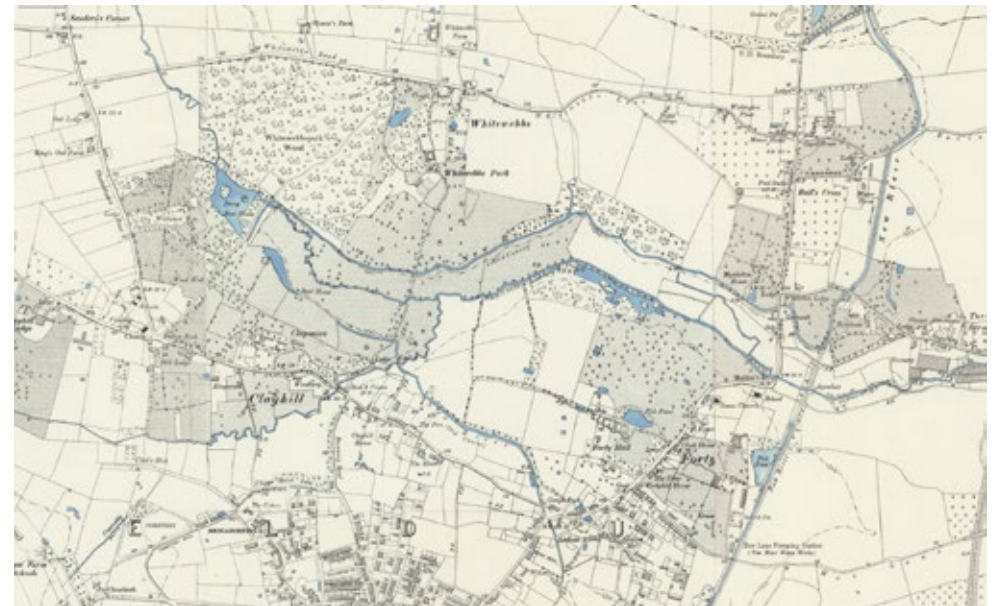
The following historic maps show an accurate representation of the landscape and a record of how elements have changes.

Key observations include:

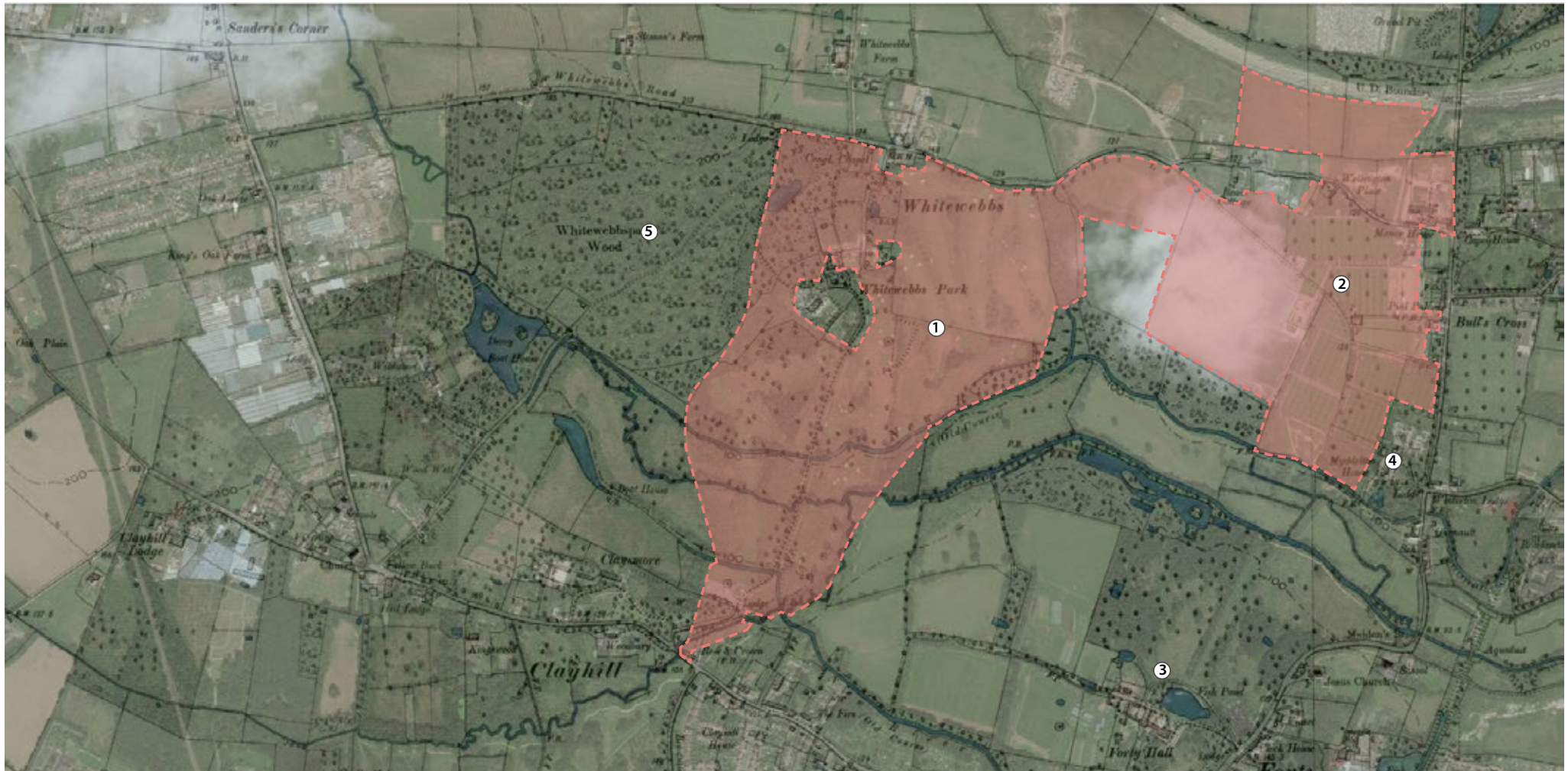
- The designed parkland setting associated with the three key properties of Myddelton House, Forty Hall and Whitewebbs Park can be clearly seen as a darker shading on the plan.
- Many trees are accurately shown, including the tree lined drives to Whitewebbs Park and double avenue in the parkland to the north of Forty Hall.
- The key blocks of large woodland including Whitewebbs Wood are shown and are largely still intact today, including tree lined field boundaries. Orchards are shown near Bulls Cross which have since been lost.
- Water was a key element of the designed landscapes with a connected system crossing through all three parkland areas.
- The character of Whitewebbs Park has been degraded through the conversion to a golf course but much of historic landscape to Forty Hall is well preserved.



▲ Historic o/s map (1898)



▲ Historic o/s map (1866)



▲ Historic o/s map (1898)/existing aerial overlay

- ① Whitewebbs Park (now golf course)
- ② Training Centre partially occupies an area of Bulls Cross which is shown as orchard
- ③ Forty Hall
- ④ Myddelton House
- ⑤ Whitewebbs Wood

2.4 LOCAL LANDSCAPE CHARACTER ASSESSMENT

ENFIELD CHARACTERISATION STUDY, 2011

The Enfield Characterisation Study, produced by Urban Practitioners and The Landscape Partnership was commissioned by the London Borough of Enfield to act as an evidence base study to the Local Development Framework to inform and support the development of planning policy. As well as supporting formal planning documents the Study provides a general reference document for the council and professionals working in the area.

The report provides a comprehensive description of the physical form of the borough, its origins, landscapes, places, streets and buildings to provide an understanding of the particular attributes which make En field borough what it is today.

The study divides Enfield into urban and landscape typologies to provide a useful insight into the variety of characters found across the area. The Site falls into the following landscape classifications:

RURAL GREEN SPACE:

Rural Parklands - 2b: Whitewebbs Park And Forty Hall

Farmland Ridge And Valleys - 1d: Theobolds Estate South

URBAN GREEN SPACE

Golf Courses - Whitewebbs Golf Course

RURAL GREEN SPACE

2B WHITEWEBBS PARK AND FORTY HALL

Overview

The historic parkland of Whitewebbs Park contain a variety of different habitats including substantial areas of Ancient and Semi-natural and Ancient Replanted woodland which now form areas of significant nature conservation importance. They represent some of the largest areas of nature conservation interest in the borough.

Key issues

- Management of the landscapes (including veteran tree maintenance, tree planting, hedgerow and boundary maintenance).
- Management of the historic buildings and landscape features to ensure their long term protection and survival.
- Balancing the historic and ecological conservation interests of the parklands with the increasing demands for recreational activities and facilities.
- Improving accessibility of the parklands particularly for residents on the east and south side of the borough.
- Incorporating large public car parks sensitively within the historic landscapes.

Implications

- The borough's rural parklands should be retained and protected against future development.
- Conservation management plans for both the Rural Parkland areas should be implemented. Funding should be sought to secure this.
- Protection of the Green Belt qualities.

1D: THEOBOLDS ESTATE SOUTH

Overview

The northernmost section of the Site is classified as farmland ridge and valleys, the largest and most widespread landscape character type in the borough. This is a very attractive undulating agricultural landscape which is sparsely populated and has a geometric field pattern

Key issues

- High quality landscape is a major asset to the borough.
- Protection of the Green Belt.
- Maintaining agricultural activities.
- Protection of the special qualities of the landscape.
- Improving access to the countryside.
- Landscape management (hedgerows, woodlands and hedgerow trees).
- Enhancing nature conservation (ecological corridors).

Implications

- The existing ownership of agricultural land by the Council and tenancy arrangements has helped to maintain a high quality of agricultural landscape.
- The establishment of new planting belts and set-aside areas to create ecological corridors through the agricultural landscape should be encouraged.
- The continuation of regular landscape management measures to maintain hedgerows, trees, boundaries and rights of way is essential

URBAN GREEN SPACE - WHITEWEBBS PARK GOLF COURSE

Overview

Most of the golf courses within the Borough are set within wider landscapes and are not necessarily discernible from the surroundings. However, their presence contributes to the sense of green and provides a sense of affluence. Golf courses provide important amenity space and due to their matrix of ponds, mature trees and woodland blocks most golf courses have good biodiversity value. Although golf courses provide some benefits to the wider communities, most of them are privately owned which means that large areas of green space in the borough are reserved for exclusive use.

Due to their settings, the borough's golf courses are also historically important and feature elements of significance which help document Enfield's past. Whitewebbs Park Golf Course contains the remains of the New River which was constructed in the early seventeenth century.

Key issues

- Golf courses constitute a significant proportion of the borough's green space but offer only one activity and are inflexible in their use.
- The courses are exclusive spaces, most are private and all require payment to use.
- Golf courses contribute to the greenness of the borough and have some biodiversity value however they require high maintenance often involving the application of chemicals.
- The borough has many more golf courses than the London average.
- Golf courses offer fine views internally but views into the courses from adjacent areas are limited adding to the sense of exclusivity.

Implications

- The function of golf courses as significant areas of undeveloped green space in the borough should be protected. However, future alternative uses of the green space could be considered if demand for golf courses continues to decline.
- Alternative uses for some of the borough's golf courses should be reviewed
- Opportunities for increasing public access to golf courses should be encouraged
- Planting of large scale forest trees in golf courses should be encouraged where appropriate to further increase tree cover in the borough

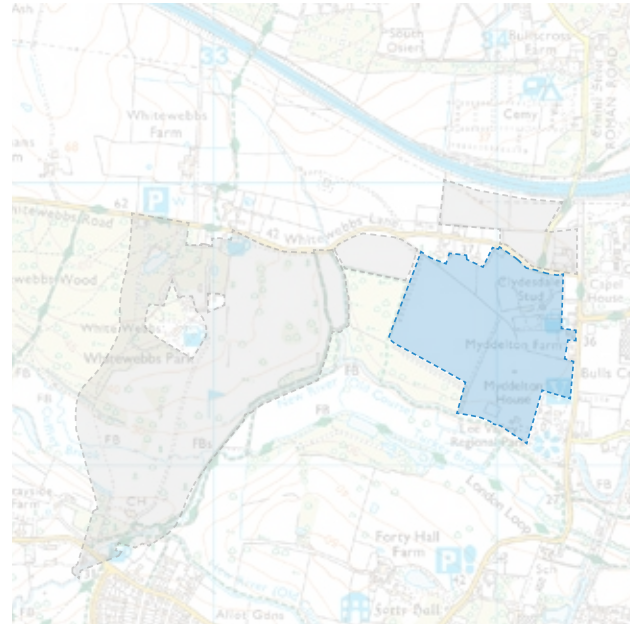
2.5 LANDSCAPE CHARACTER AREAS

The Site is divided into four key areas. Further to the existing landscape character assessment, this section summarises the broad landscape character for each individual area:

- The existing Training Centre for THFC.
- The Western Field.
- Whitewebbs Park and Golf Course.
- Land north of the Training Centre, including the cattery.

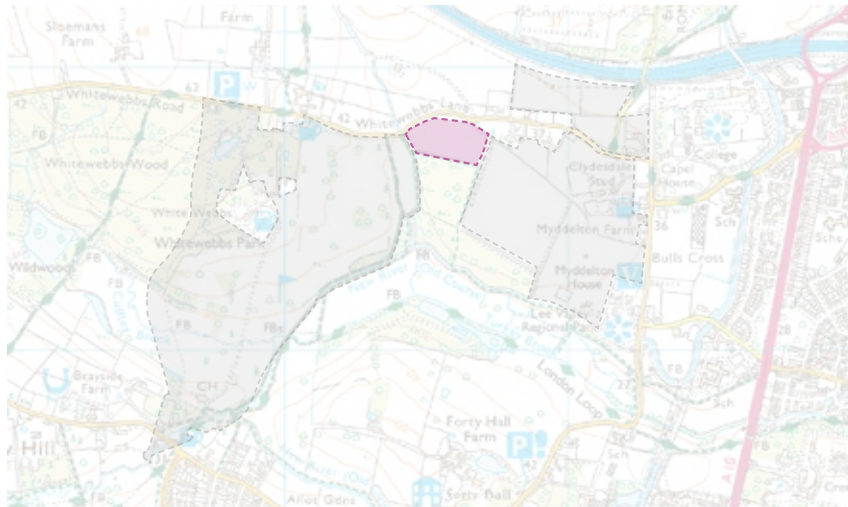
THFC TRAINING CENTRE

- Large areas of mown grass and areas of ornamental planting. Sports pitches dominate the landscape along with a network of paths.
- The overall immediate landscape setting is of an open green character with a tree lined horizon enclosing the Site.
- The landscape is highly manicured and well maintained with large stretches of ornamental planting and hedging dividing and enclosing training pitches.
- The southern and western boundary is well defined and enclosure through mature tree planting and woodland. To the north and east the boundaries are defined by Bulls Cross and Whitewebbs Lane.
- Built form within the landscape is limited with the main training centre building located with the centre of the Site. However its organic form and low profile does not dominate views from within the Site.
- Other buildings such as the maintenance yard and Myddelton Lodge are well screened and do not dominate views.



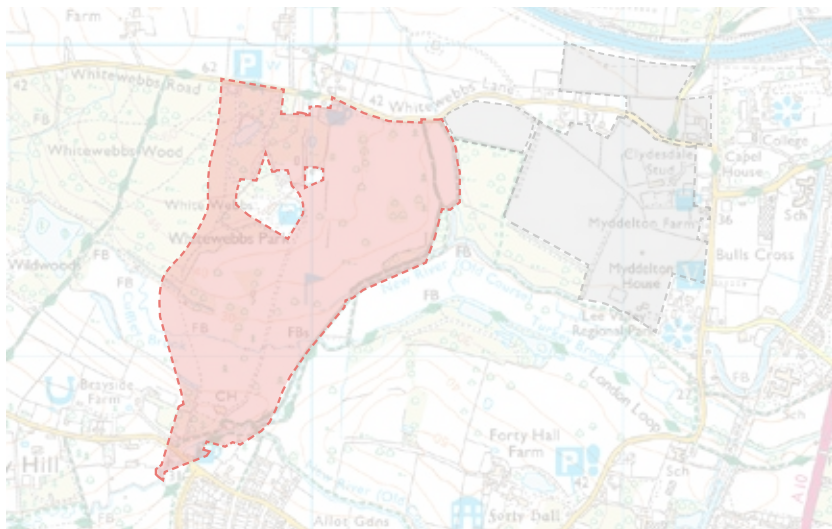
WESTERN FIELD

- Western field is characterised by a large area of open grassland located to the west of THFC training centre.
- The Site is well screened from the east, west and south by woodland. Whitewebbs lane runs adjacent to the northern boundary.
- Topography of the Site is characterised by man-made engineered banks to the edges forming a level area to the interior. This largely screens views out of the Site.
- In 2017, planning consent was granted for a new education and environmental facility on the site of Western Field. The approved proposals include a purpose-built education facility alongside a multi-use sports pitch and a nature reserve with boardwalks, wildflower walks and meadow. This will create an environment where nature conservation, recreation and sport can be brought together to provide a high-quality, hands-on learning experience.



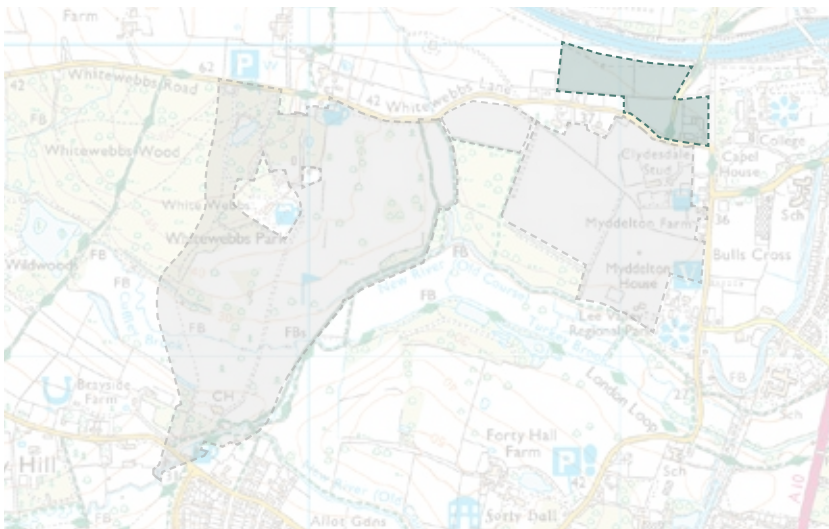
WHITEWEBBS PARK AND GOLF COURSE

- Whitewebbs Park, containing a public golf course and areas of woodland, is situated on former parkland laid out after the 1803 enclosure of the former Enfield parish common land.
- Although now transformed into a golf course much of the original 19th century parkland structure can be seen with clumps of mature parkland tree planting and the main drive.
- The existing Whitewebbs Park Golf Course and adjacent woodland is an area of significant natural potential and is well used and enjoyed by the local community as a natural outdoor amenity.
- The Golf Course adjoins the Forty Hill Conservation Area to its west and the Clay Hill Conservation Area to its south.
- The Site is open in character, especially along the golf course fairways however the large areas of woodland to both east and west and substantial clumps of tree planting within the park restrict views out towards the wider landscape.



LAND NORTH OF THE TRAINING CENTRE

- Land to the north of the training centre comprises an open area of unmanaged grassland with localised areas of scrub.
- The M25 runs adjacent to the northern boundary and forms a significant feature in the landscape.
- The area comprises two large parcels of land to the north whilst to the south there is a less open character with smaller parcels of land associated with a property known as The Bungalow.
- Bulls Cross Ride cuts through the Site providing access north towards the Western Cemetery. This route provides wider views west from an elevated position as the road rises to cross the M25.
- Views south and east are largely constrained by existing mature boundary hedgerows and trees in and around the Site.





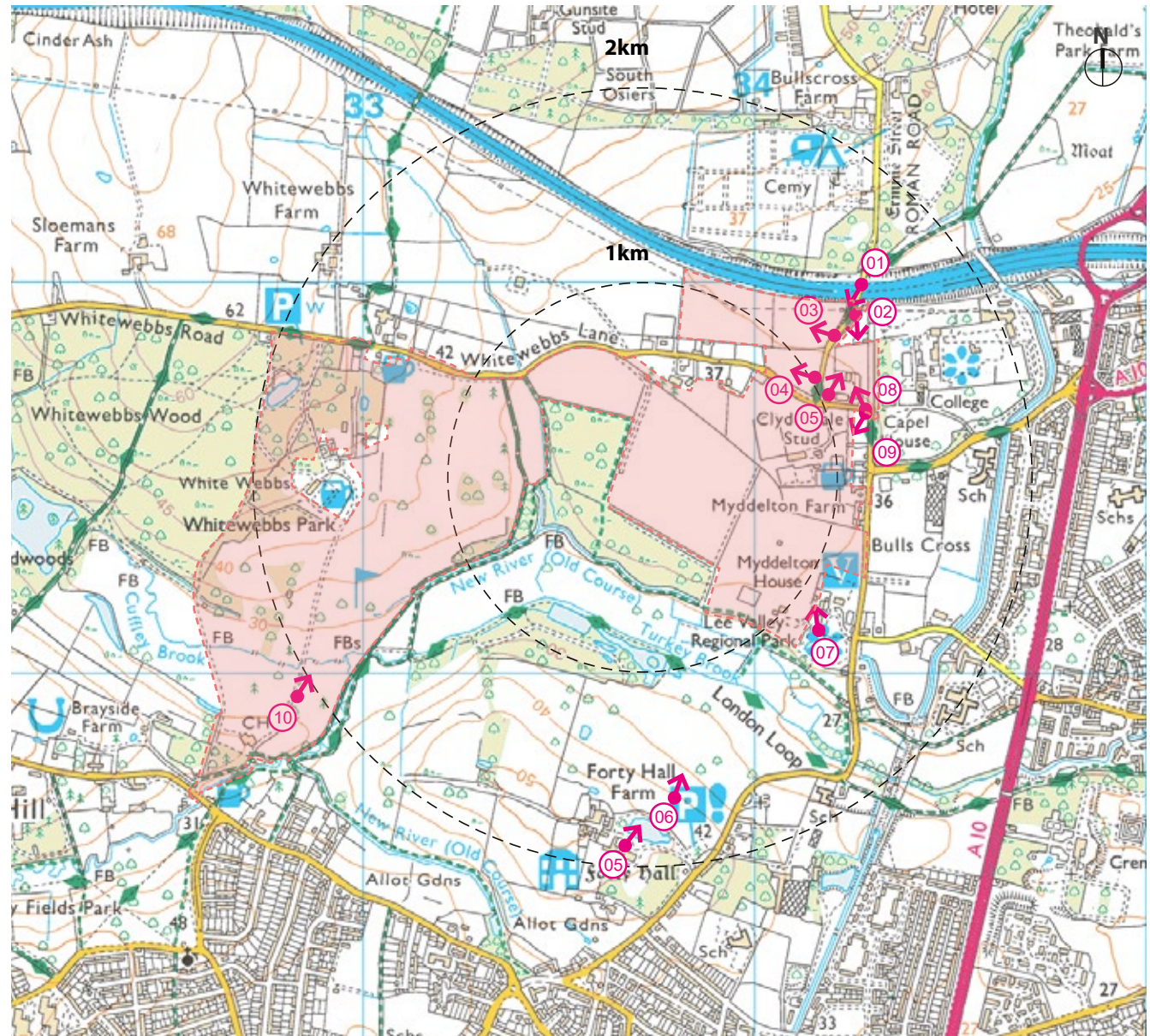
Outline Visual Appraisal

3.1 OUTLINE VISUAL APPRAISAL

A field survey has been conducted from public receptors up to 2.5km from the Site. A mix of short to long views were taken.

The study assessed the visibility of the Site and its setting within the wider landscape.

- The Site is largely screened due to the relatively flat topography and presence of either mature woodland or built form of Enfield to the east and south.
- Within the Site many of the areas have an open character due to large areas of grassland. This includes managed grassland at the training centre (sports pitches) and Whitewebbs Park (golf course fairways) or areas of unmanaged grassland at Western Field or land to the north of the Training Centre. However the presence of mature trees and the hedge to the edges of the Site often present a tree lined horizon limited views to the wider landscape.
- Glimpsed views both into and of the Site are afforded where gaps in vegetation allow.
- The majority of short range views into the Site are from public rights of way passing through woodland to the south or alongside Whitewebbs Lane to the north. In both cases the presence of mature trees and hedgerows limits views. Permitted paths through Whitewebbs park do provide open views of the historic parkland.



▲ Viewpoint locations

VIEWPOINT 1

Bulls Cross Ride crossing M25

The Site

Existing vegetation along field boundaries

Pylons impact upon the character of this area



▲ Looking southwest towards the Site from bridge crossing M25.

This represents views from the north looking into the Site from an elevated position crossing the M25. Most views of the Site from north of the M25 are restricted due to layered vegetation and tree cover along the M25 restricting intervisibility.

VIEWPOINT 2

The Site

Bulls Cross Ride crossing M25



▲ Looking south towards the Site from bridge crossing M25.

This represents views looking into the Site from the north from an elevated position crossing the M25. Note vegetation cover is denser in this section of the Site compared to viewpoint 1 which includes more open areas of grassland.

VIEWPOINT 3

Hedges and vegetation to field boundary

The Site

M25



▲ Looking west into the Site from Bulls Cross Ride.

This represents views looking west into the Site from Bulls Cross Ride. The M25 forms a dominate feature in the landscape on the norther edge of the Site, as do the electricity pylons. Note that grassland is unmanaged and includes areas of scrub and pioneer vegetation.

VIEWPOINT 4

Hedges and vegetation to field boundary

The Site



▲ Looking west into the Site from Bulls Cross Ride.

This represents views looking west into the Site from Bulls Cross Ride. The relatively flat topography and mature vegetation to the field boundaries prevent any wider views of the landscape.

VIEWPOINT 5



▲ Looking north from front of Forty Hall.

This represents views from visitors to Forty Hall looking north towards the Site and Tottenham Hotspur Training Centre. Mature trees and layered vegetation restricts intervisibility and the Site is relatively well screened from this position.

VIEWPOINT 6

Avenue tree planting within grounds of Forty Hall
Country Park

The Site



▲ Looking north towards the Site from grounds of Forty Hall.

This represents views from visitors to Forty Hall and is taken from within the grounds closer to the Site than from viewpoint 5. Avenue tree planting frames views north towards Tottenham Hotspur Training Centre. However boundary tree planting and layered vegetation in the foreground restricts any clear views of the Site.

VIEWPOINT 7

The Site

Myddelton House visitor car park



▲ Looking north towards the Site from Myddelton House Car Park access.

This represents views from Myddelton House looking north. Views of the Site are obscured by existing mature vegetation and the relatively flat topography.

VIEWPOINT 8

Walls and railings

The Site

Unmanaged grassland



▲ Looking north towards the Site from Bulls Cross

This represents views from the junction of Bulls Cross with Whitewebbs Lane. The view is of land to the north of the Training Centre. This includes an area of unmanaged grassland including a number of built features including a 1.5 storey dwelling and boundary wall with railings. Due to the built elements and mature boundary vegetation there is an enclosed character the this area.

VIEWPOINT 9

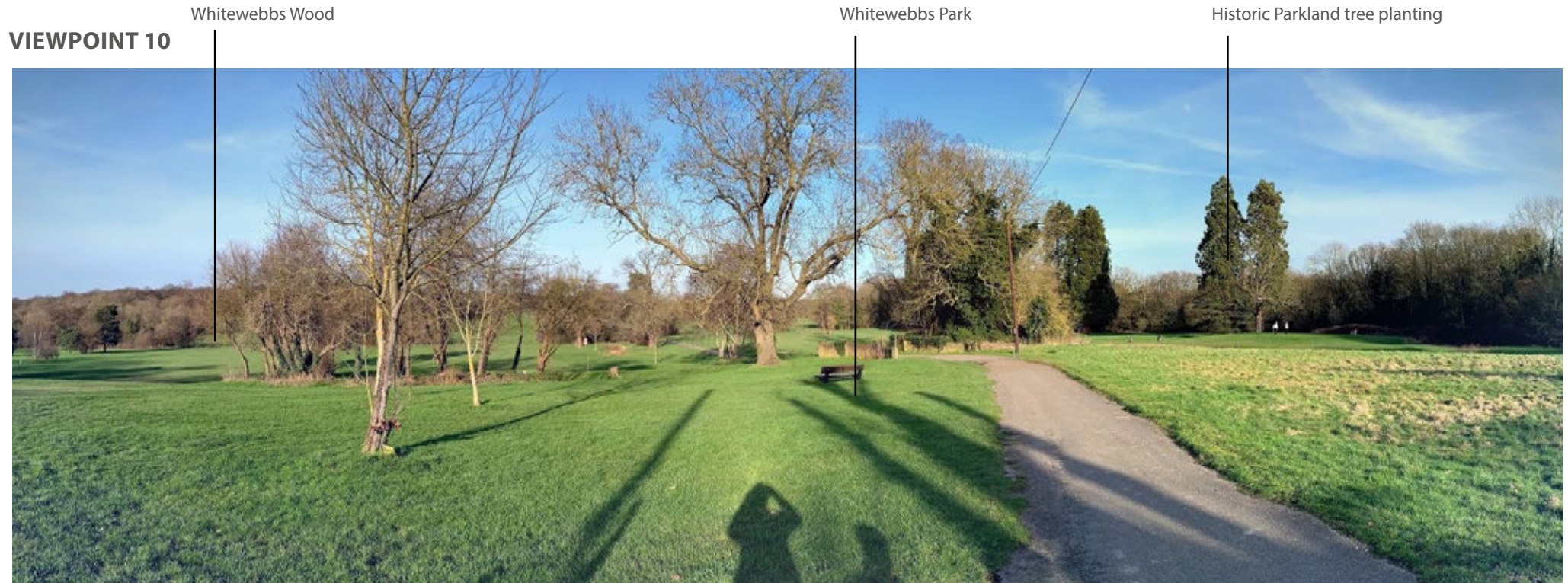
Mature trees and vegetation to northern
edge of training centre

The Site



▲ Looking south towards the Training Centre

This represents views from the junction of Bulls Cross with Whitewebbs Lane looking south across an open area of grass that falls outside the north boundary of the Training Centre. Mature trees and boundary vegetation restrict medium to long range views south towards the Site.



▲ Looking northeast from Whitewebbs Park

This represents views from within Whitewebbs park looking northeast across the historic parkland and current golf course. Historic parkland tree planting can be seen and the large swathes of mown grass provide an open character. However long range interconnecting views are prevented by large areas of woodland that surround the parkland.



Outline Landscape
Assessment

4.1 NATIONAL POLICY

"The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open, the essential characteristics of Green Belts are their openness and degree of permanence."

Paragraph 133 of NPPF

NPPF Paragraph 80 contains the five purposes of the Green Belt

- *To check the unrestricted sprawl of large built-up areas;*
- *To prevent neighbouring towns merging into one another;*
- *To assist in safeguarding the countryside from encroachment;*
- *To preserve the setting and special character of historic towns;*
- *To assist in urban regeneration, by encouraging the recycling of derelict and other land.*

The construction of new buildings is "inappropriate development" unless any of the exceptions listed in NPPF paragraph 145 apply, including:

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

4.2 ASSESSMENT OF THE SITE AGAINST THE GREEN BELT PURPOSES

The Green Belt around Enfield is defined as important for:

"its contribution to the overall suburban and rural setting; the opportunities it provides for access to the open countryside, for outdoor sport and recreation; and for the diverse uses including agriculture, nature conservation and its historic significance."

(Enfield Local Plan Evidence Base: Detailed Green Belt Boundary Review, 2013)

This section will establish that the uses proposed within the designation (professional and community sports and leisure facilities) are, in principal, appropriate and do not conflict with its ability to perform under the 5 green belt purposes.

PURPOSE	ASSESSMENT
1. To check the unrestricted sprawl of unrestricted areas	<ul style="list-style-type: none"> The Site protects the open land within close proximity of Enfield and prevents sprawl south of the M25 where development would not otherwise be restricted by a barrier. The Site also helps protect against ribbon development along Bulls Cross and Whitewebbs Ln.
2. To prevent neighbouring towns from merging.	<ul style="list-style-type: none"> The Site contributes to preventing development which would result in the significant erosion of the gap between Enfield and Cheshunt.
3. To assist in safeguarding the countryside from encroachment.	<ul style="list-style-type: none"> The Site has a complex pattern of woodlands, historic parkland, mature and veteran trees, tree lined boundaries and hedgerows, open areas, historic features and formal gardens which creates a varied landscape full of interest and diversity and of high ecological value. The historic parkland represents one of the largest areas of nature conservation interest in the borough. The large woodland areas within the Site are prominent on the skyline and important in local views (as set out in the IIA Scoping Report). Sport and leisure use of the Site ensures retention of considerable amounts of open space and therefore provides long views and a sense of openness.
4. To preserve the setting and special character of historic towns;	<ul style="list-style-type: none"> The Site is important in protecting the setting of the Forty Hill Conservation Area, including views and vistas between the settlements of Forty Hill, Maiden's Bridge and Bulls Cross and the surrounding countryside.
5. To assist in urban regeneration by encouraging the recycling of derelict or other urban land	<ul style="list-style-type: none"> Restricting development within the Site assists in encouraging the re-use of previously developed (brown field) sites within the urban area.

4.3 OPENNESS

The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open.

The Site contains large areas of open historic parkland and managed grassland, which ensure retention of a strong sense of openness.

The large areas of woodland and mature trees are prominent on the skyline and ensure that elements associated with outdoor sport and recreation of limited effect on openness.

4.4 ENHANCEMENT OF GREEN BELT FUNCTIONS

Guidance in the NPPF states that “local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged land and derelict land”

The uses proposed within the designation provide an opportunity for beneficial use of the Green Belt, by providing access and opportunities for outdoor sport and recreation and ensuring positive landscape management. The uses will retain the majority of the Site as open landscape and minimise effects upon the landscape and visual amenity.

The uses proposed within the designation will ensure the majority of the Site remains open. It would protect existing Public Rights of Way and provide new permissive routes.

4.5 CORE OBJECTIVES OF ENFIELD INTEGRATED IMPACT ASSESSMENT

The following tables outlines core objectives relevant to Landscape within Enfield Council's Integrated Impact Assessment and how the Site responds to these.

OBJECTIVE	SITE RESPONSE
<p>Biodiversity</p> <p>Deliver biodiversity net gain at an ambitious scale through individual development contributions and a wider strategic focus on avoiding/mitigating impacts to valued habitats and land that contributes to ecological connectivity and delivering targeted enhancements that improve the functioning of networks and are supportive of established conservation objectives.</p>	<ul style="list-style-type: none"> Protect and enhance the matrix of habitats across the Site. Incorporate further habitat enhancement where possible and respect key biodiversity corridors.
<p>Heritage and townscape</p> <p>Sustain and enhance the significance of heritage assets, support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated; facilitate enhancements to the fabric and setting of the historic environment; and support access to, interpretation and understanding of the historic environment.</p>	<ul style="list-style-type: none"> Protect and maintain special qualities of Forty Hill Conservation Area and other relevant heritage assets. Protect and enhance historic component of Whitewebbs park and explore opportunities for restoration.
<p>Landscape and green infrastructure</p> <p>Protect and enhance the character, quality and diversity of the borough’s landscapes and townscapes through appropriate location, layout and design of new development, including the preservation of important open gaps and key views, and contribute to London-wide Green Infrastructure objectives including in respect of the Lea Valley Regional Park.</p>	<ul style="list-style-type: none"> Retaining exiting vegetation cover and encourage positive management of existing trees and woodland. Respect key views and open character where appropriate. Enhance the quality and character of the landscape setting where possible.



Conclusion

5 CONCLUSION

The Site has a complex pattern of woodlands, historic parkland, mature and veteran trees, tree lined boundaries and hedgerows, open areas and historic features which creates a varied landscape full of interest and diversity and ecological value.

Within the Site many of the individual areas have an open character due to large areas of grassland. This includes managed grassland at the Training Centre (sports pitches) and Whitewebbs Park (golf course fairways) or areas of unmanaged grassland at Western Field or land to the north of the Training Centre. The presence of mature trees and the hedge to the edges of the Site often present a tree lined horizon limiting interconnecting views to adjacent areas of development. The large woodland areas within the Site are prominent on the skyline and important in local views (as set out in the IIA Scoping Report). Sport and leisure use of the Site ensures retention of considerable amounts of open space and therefore a sense of openness.

Guidance in the NPPF states that:

'local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged land and derelict land'

The IIA framework also includes the following objectives for Landscape and green infrastructure:

'Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes through appropriate location, layout and design of new development, including the preservation of important open gaps and key views, and contribute to London-wide Green Infrastructure objectives including in respect of the Lea Valley Regional Park.'

The uses proposed within the designation provide an opportunity for beneficial use of the Green Belt and reinforcement of the objectives stated within the IIA framework. By providing access and opportunities for outdoor sport and recreation and ensuring positive landscape management, valuable open areas of green infrastructure can be safeguarded.

Policy for the Site should include not only preserve key views and open gaps in accordance with the IIA framework, but encourage enhancement of landscape character where appropriate, including restoration of historic landscapes. Species selection and management should encourage biodiversity and resilience to climate change with an understanding of how the landscape is likely to change and adapt over the next 50 - 100 years. Policy for the Site should also encourage and protect positive management of the woodlands and trees that are important within local landscape character.

T 01904 691 630
E enquiries@landscapeagency.co.uk
W www.landscapeagency.co.uk



ENFIELD LOCAL PLAN

POLICY DESIGNATION FOR THFC TRAINING CENTRE +
SURROUNDING LANDS

APPENDIX 5

TRANSPORT APPRAISAL

APPENDIX CHAPTER

Introduction

The transport strategy, and detailed measures, will be designed to *'minimise the need to travel, support modal shift away from the private car and address traffic congestion within the borough and along key routes through neighbouring areas, with a focus on emission reduction, health impacts, and the delivery of pedestrian friendly urban design'*. These objectives will govern the development planning and the assessment of the future planning applications.

The above Aecom Scoping Report 11A Framework objectives have been established *'to help to deliver high density mixed urban form that will be essential to delivering London wide housing targets'*. The subject area is thus aggregated travel demand, on a daily basis, from major trip generating land uses.

The designation being promoted by Tottenham Hotspur FC is to establish policy recognition of the site's appropriateness for professional and community sports, recreation and leisure facilities. These forms of development would be trip attractors on an occasional basis. That being said in this chapter will consider many of the same issues considered in the Scoping Report.

The evidence base is therefore specific to the locality of the Hotspur Way Training Centre which is a development of both national and international significance.

The site is presently within the Green Belt. It is not proposed as part of this designation to remove the site from the Green Belt, rather, it is to establish that the uses proposed within the designation are, in principle, appropriate, subject to satisfying Green Belt policy requirements and other development management considerations.

In this Appendix we present relevant transport planning information under the following four headings;

- Sustainability Measures
- Baseline Transport Information
- M25 Junction 25 Improvement Scheme
- Travel Planning

Sustainability Measures

In the last 10 years Tottenham Hotspur FC has implemented a large number of development projects. These have all come forward with a range of planning obligations which the Club have successfully implemented. Furthermore, the Club has also undertaken many unilateral initiatives to enhance the sustainability of their developments, including the new Tottenham Hotspur Stadium and the Hotspur Way Training Centre. For example, the Club undertakes Customer Experience research for virtually every event at the new stadium including the event-by event monitoring of transport patterns.

Tottenham Hotspur has very recently been assessed to be top of the Premier League Sustainability rankings.

The audit was undertaken by the United Nations-backed Sport Positive Summit in conjunction with BBC Sport. Tottenham Hotspur were awarded 21 points out of 21 available. The key transport considerations included the following;

Sustainable Transport

- The new stadium is actively promoted as a 'Public Transport Destination', with service improvements, new shuttle bus and regional coach services, better pedestrian connections, real-time travel information points, clear signage and regular transport updates on the Club's website, in match day programmes and directly to fans from several sources
- The Club has a sustainable transport plan in place for both its fans and staff, overseen by an appointed Travel Plan Coordinator

- Recent analysis has shown that the Club is close to achieving its target of no more than 23% of supporters (i.e. 14,250) travelling by private car on match days – a significant reduction in the percentage of fans that travelled by car to attend matches at the old White Hart Lane (on average 22,500 out of a total of 36,000)
- The Club has installed new bike racks locally around the stadium and is actively encouraging fans to consider cycling on match days – especially during the recent return of fans when public transport usage may have reduced
- The Club has launched a ‘Cycle To Work’ scheme for staff in conjunction with Cycle Solutions, with additional bike racks installed at its offices
- The Club has access to a pool of fully electric Audi e-tron cars for day-to-day business use, in order to limit its carbon footprint. Charging stations are available across Club sites
- A major focus on public transport will reduce impacts from vehicle traffic around the stadium on match days and there has already been a significant shift in travel patterns to the stadium area
- In 2003, over 60% of fans came by car. For weekend fixtures that figure reduced to 42% in 2014 and we plan to bring that number down to a maximum of 24% in the future

Communication/Engagement

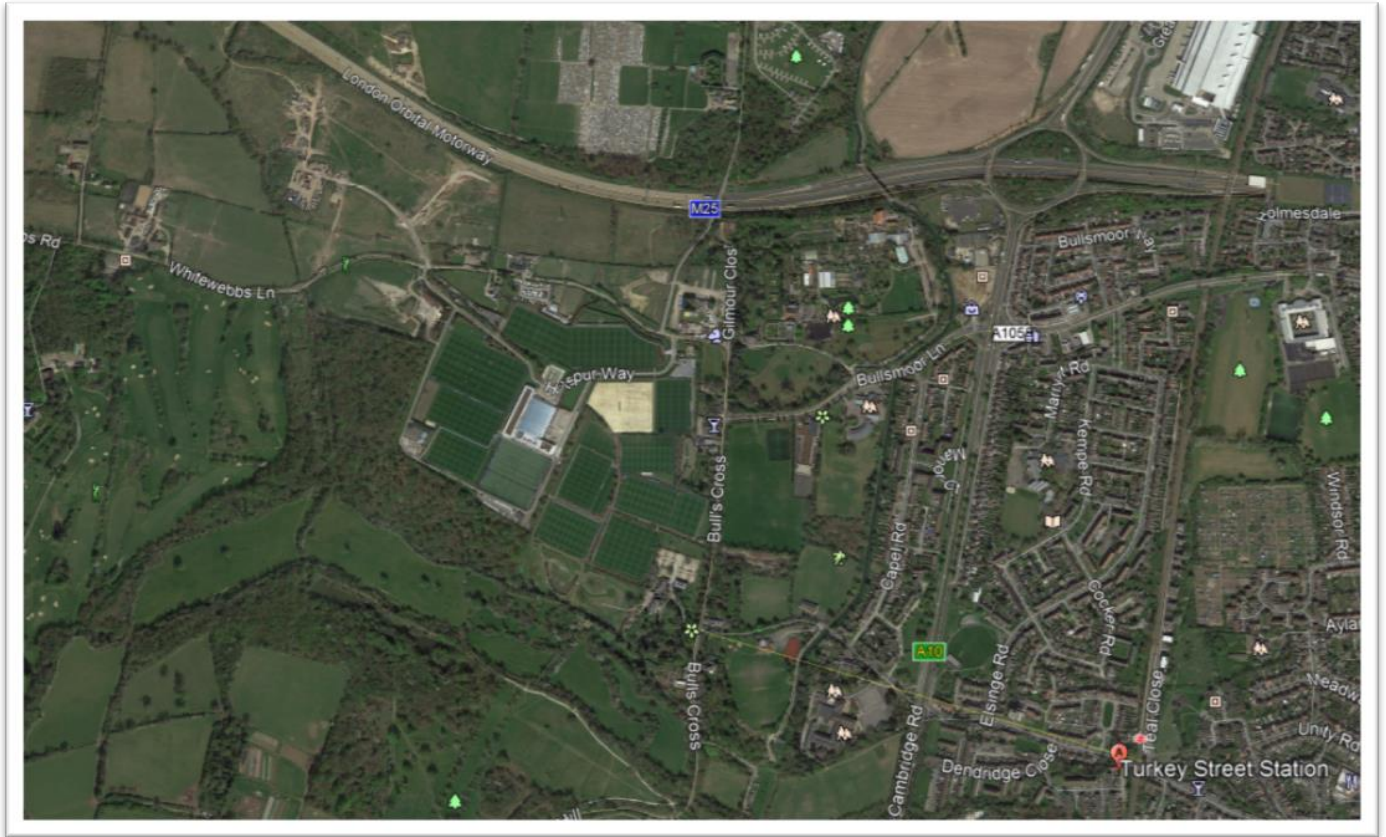
- The Club is signatory of the UN Sports for Climate Action Framework (announced 25th January 2021)
 - The Club is a founding partner of Count Us In – a global movement aimed at mobilising 1 billion people to act on climate change. A large-scale campaign is planned for what is hoped will be a return of fans in greater numbers in Spring 2021. It will urge fans not to slip back to bad habits following the pandemic and encourage them to take simple steps advocated by Count Us In, aimed at reducing their carbon footprint
 - To Care is To Do [page](#) on the website showing environmental sustainability initiatives
- All announcements related to sustainability and environmental measures are communicated via Club channels, including the official website, social media platforms and match day programmes.

Tottenham Hotspur was awarded bonus points for actively engaging fans in a move towards positive behavioural change that reduces environmental impacts in their own lives and, additionally, by way of the Club tracking and reporting on the percentage of fans taking various modes of transportation to games and events.

Baseline Transport Information

An evidence base has been assembled to assist the consideration of the proposed designation. Recent travel patterns are an important context within which to consider future transport-related outcomes. Desktop research has identified valuable sources of time-series transport information that pre-dates the Covid-19 pandemic. The Hotspur Way Training Centre was completed and opened in 2012.

The transport information has been considered for the latest available 10-year period. The first consideration is the key routes in the neighbouring area, as shown in the following aerial photograph.



Traffic Flows

Desktop research has identified valuable sources of time-series transport information that pre-dates the Covid-19 pandemic. The Hotspur Way Training Centre was completed and opened in 2012.

The transport information has been considered for the latest available 10-year period.

There is a Traffic Count Point (DfT) on Bullsmoor Lane to the west of the Great Cambridge Road for which there is information from 2000 to 2016. In the early part of the Millennium traffic flows increased by 10% up to 2006. Since that time traffic flows have fallen for 14,649 to 12,358 in terms of Annual Average Daily Flows (AADF) – a net reduction of 16% during which time the Hotspur Way Training Centre was occupied. There was no significant short term increases in traffic flows on what is the primary vehicle access route to the Training Centre.

year	pedal_cycles	two_wheeled_cars_and_taxis	buses/coaches	all_hgvs	all_vehicles	%age Ch.	
2000	33	143	11409	49	247	13308	100%
2001	37	155	11420	53	235	13327	100%
2002	39	149	11420	58	221	13341	100%
2003	27	114	11594	32	192	13263	100%
2004	23	109	11733	36	213	13351	100%
2005	66	91	12829	48	222	14416	108%
2006	83	100	13065	51	217	14649	110%
2007	42	84	11128	54	199	13226	99%
2008	49	81	10872	55	195	12927	97%
2009	53	77	10785	58	181	12781	96%
2010	51	73	10493	61	178	12466	94%
2011	51	73	10462	63	184	12435	93%
2012	44	79	10262	62	199	12217	92%
2013	36	78	10352	57	209	12350	93%
2014	41	80	10382	55	196	12423	93%
2015	47	76	10347	53	196	12451	94%
2016	87	90	10107	35	284	12358	93%

Bullsmoor Lane to the east of the A10 is a busier street. Between 2009 and 2019 the traffic flows reduced by 18% (AADFs fell from 24,985 to 20,447).

The A10 Great Cambridge Road is part of the national Primary Route Network. There are 2 Count Point sites in the local area. The first is just south of the M25 junction and the second is near the Turkey Street underpass of the A10. The traffic flows have increased by between 3% and 5% in the most recently available 10 year period. Between 2009 and 2019 the traffic flows south of the M25 junction increased slightly from 53,535 to 56,114 measured as AADF.

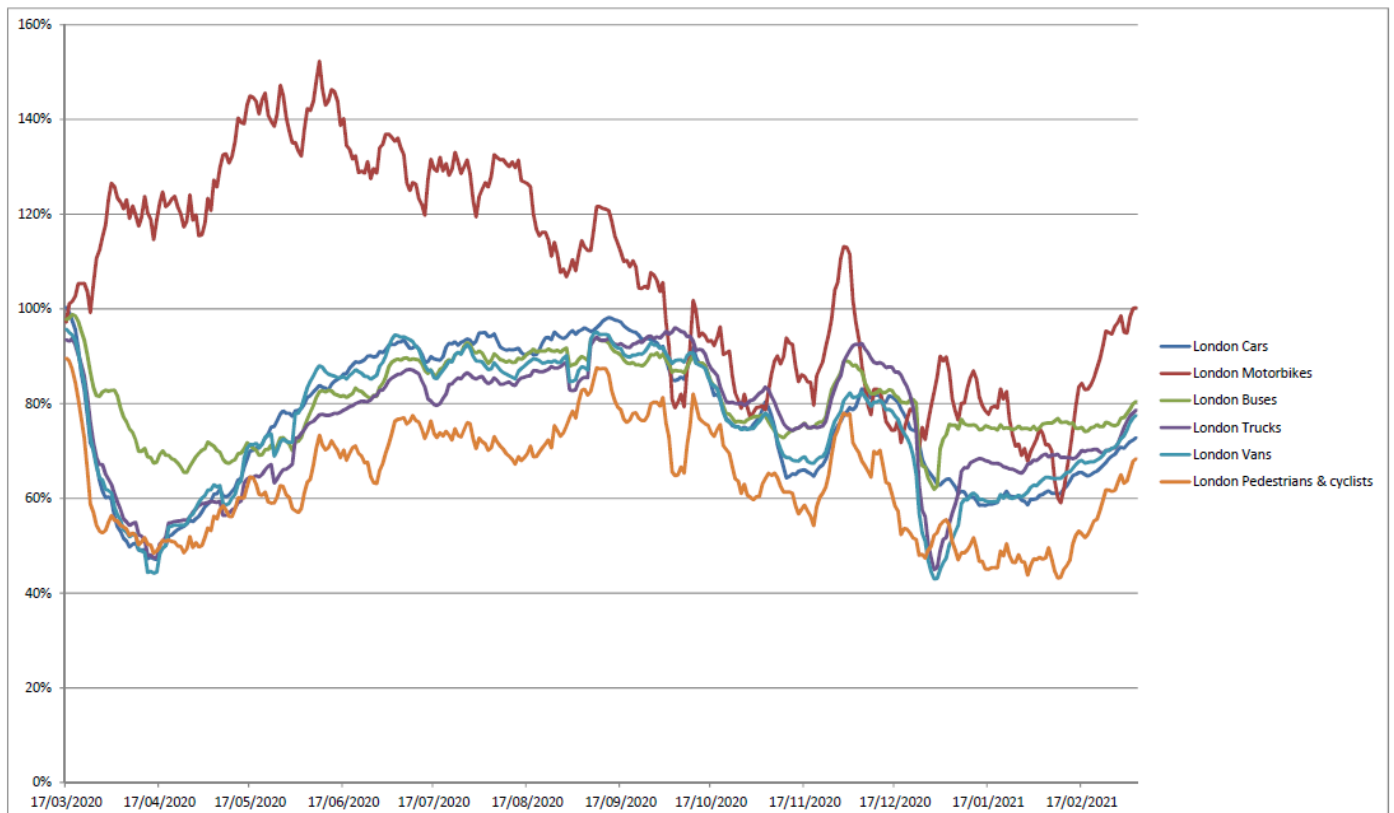
The Covid-19 pandemic has resulted in considerable changes to the level of use of all local transport networks. The Office for National Statistics produces a range of relevant information which is updated on a weekly basis. The graph below is based on observed traffic camera activity based on several thousand locations in Greater London. This shows a considerable increase in the use of motorbikes and significant reductions to all forms of road-based transport in the first wave of the pandemic with the introduction of the first lockdown measures which commenced on 23rd March 2020.

LB Enfield has been particularly badly affected by the Covid-19 pandemic. In the first wave, in the spring of 2020, LB Enfield (alongside LB Brent) had the highest weekly excess mortality rate in the UK at 361.4% of the annual average for the same week in the previous 5 years. This occurred in the 7 days leading up to 24/04/20 (source ONS).

In the second main wave in the winter of 2020/21 the peak infection rate was 1,360 cases per 100,000 of the resident population. That is equivalent to 4,500 cases in the week up to 09/01/21. At the time of writing the infection rate is only 2% of the worst week (source PHE).

Throughout the Covid-19 pandemic, to date, there have been some 30,000 identified cases in LB Enfield, and many more, unidentified, given the low community test rates in the first 6 months, and over 1,000 deaths (source PHE).

An important point to appreciate is that traffic volumes returned to pre-pandemic levels during September 2020 i.e. car traffic was at 98% and buses, vans and trucks were at least 90% compared to early March observations (source ONS). See graph below. It can, therefore, be expected that the removal of the second wave lockdown measures will have a similar and quite short term consequence before activity levels rebuild. However, it is quite likely that the journey purpose distribution and hence the detail of traffic and public transport use, will be quite different. This will be the case with residential areas.



LB Enfield 2011 Car Ownership Information

It is inevitable that the 2021 census will show a significant reduction to average car ownership per household and the overall level of private vehicles. Similarly, there will be a large increase in the number of No Car households. These changes will relate to Greater London as a whole, the London Borough of Enfield and other adjoining local authority areas.

In 2011 the level of car ownership in Enfield was higher than the Greater London average and very much higher than the Haringey figures. Enfield is likely to show a level in 2021 similar to the Greater London average in 2011. This is predictable because local roads in North London have shown reduced traffic levels in the last 10 years, including Bullsmoor Lane. In LB Haringey in 2011 there was a 10.6% increase in occupied households since 2001 and an 11.7% reduction in cars per household thus showing a net reduction in the number of private vehicles in the borough. Similar results can be expected for Enfield in 2021. The corollary is large increases in rail use for all trip purposes.

LB Enfield Census Statistics Comparison								
Year	Households	No Car	1 Car	2 Car	3 Car	4+ Car	All Cars	Car/hh
2001	110,268	0.286	0.455	0.207	0.041	0.012	114,955	
2011	119,916	0.325	0.433	0.183	0.044	0.015	119,653	
2001	110,268	31,482	50,161	22,770	4,565	1,290	114,955	1.04
2011	119,916	38,973	51,924	21,945	5,276	1,799	119,653	1.00
Change	9,648	7,491	1,763	- 826	711	509	4,698	-4.3%
%age ch.	8.7%						%age ch. 4.1%	car/hh

B Haringey Census Statistics Comparison								
Year	Households	No Car	1 Car	2 Car	3 Car	4+ Car	All Cars	Car/hh
2001	92,170	0.465	0.412	0.104	0.015	0.004	62,949	
2011	101,955	0.518	0.382	0.083	0.013	0.002	61,515	
2001	92,170	42,822	38,002	9,623	1,373	350	62,949	0.68
2011	101,955	52,813	38,947	8,462	1,325	204	61,515	0.60
Change	9,785	9,991	945	- 1,160	- 48	- 146	- 1,434	-11.7%
%age ch.	10.6%						%age ch. -2.3%	car/hh

Greater London Census Statistics Comparison								
Year	Households	No Car	1 Car	2 Car	3 Car	4+ Car	All Cars	Car/hh
1991	2,782,996						1,639,446	
2001	3,015,997	0.375	0.431	0.158	0.029	0.008	2,616,328	
2011	3,266,173	0.416	0.405	0.140	0.029	0.009	2,664,414	
1991	2,782,996						1,639,446	0.59
2001	3,015,997	1,130,649	1,298,481	476,185	86,470	24,211	2,616,328	0.87
2011	3,266,173	1,358,728	1,322,800	457,264	94,719	29,396	2,664,414	0.82
Change	250,176	228,079	24,319	- 18,921	8,249	5,185	48,086	-6.0%
%age ch.	8.3%						%age ch. 1.8%	car/hh

Local Railway Stations

There were slight reductions to the annualized passenger flows in the last month of the year 2019-2020 due to the Covid-19 pandemic so we have compared the year 2018-2019 with 2008-2009.

Turkey Street station – passenger numbers have increased by 113.7% in the 10 year period. The station use in 2018-2019 was 980,294 passenger entries and exits per annum. The service is operated by Arriva on behalf of TfL London Overground. All the trains were replaced in 2020 with much higher capacity rolling stock. The service is within the Southbury loop from London Liverpool Street and terminates at Cheshunt station.

Turkey Street runs east to west between the A1010 Hertford Road and Bull’s Cross by way of an underpass of the A10 Great Cambridge Road and a pedestrian/cycle only road closure on a narrow bridge near the Old Ignations Football Club to the west of the A10. The station is in easy walking distance of the eastern side of the Hotspur Way Training Centre. The walking distance from Turkey Street station to Bull’s Cross, the eastern boundary of the designated area, is around 1 kilometre – a 12 minute walk.

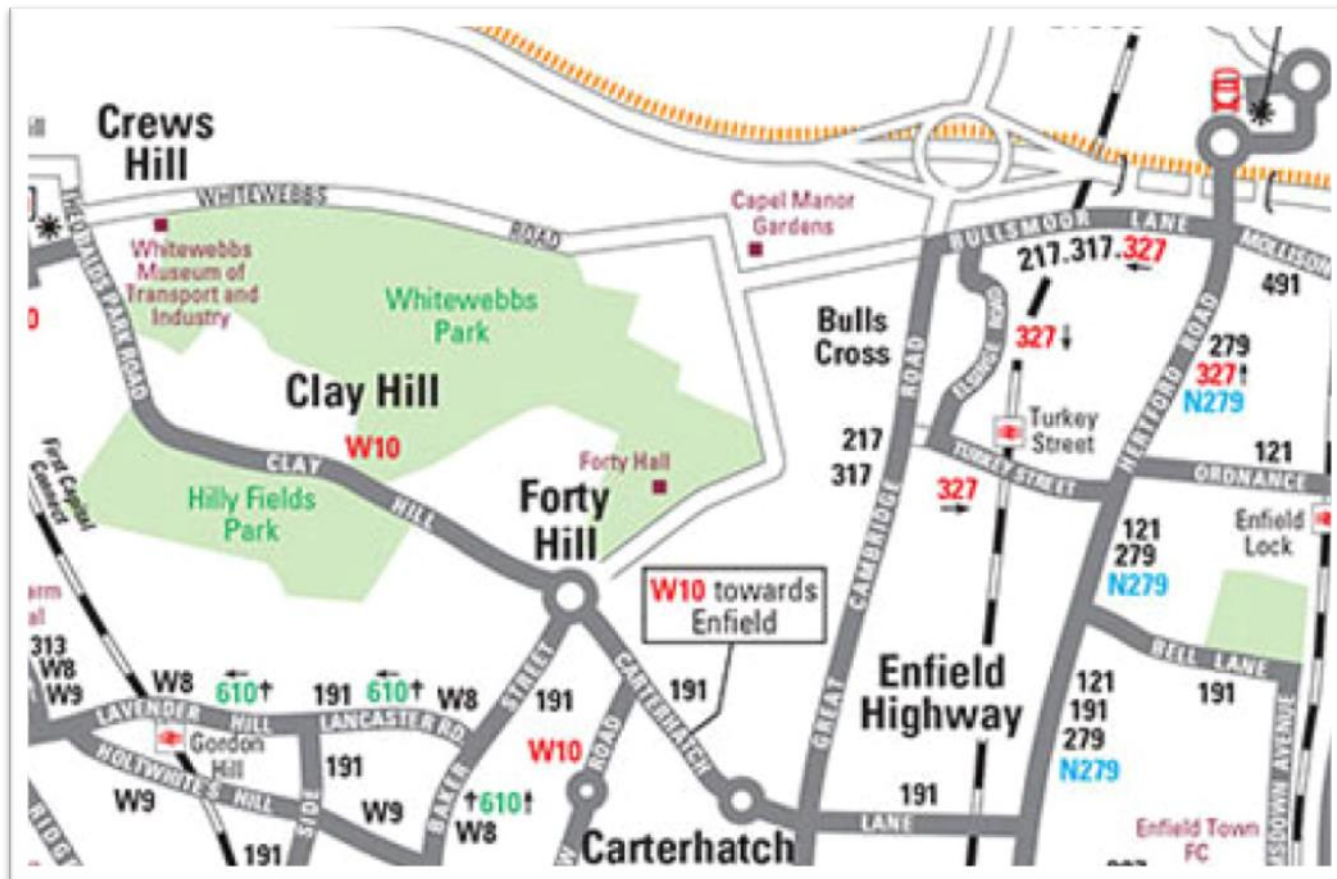
Crews Hill station – passenger numbers have increased by 66.6% in the 10 year period. The station use in 2018-2019 was 139,344 passenger entries and exits per annum. The rapid growth in passenger numbers until 2013 has been reversed in recent years – probably as a result of reduced employment in the station locality. The station is operated by Great Northern which is part of the Govia Thameslink Railway family of rail services. The rolling stock was fully replaced from March 2019. The service operates from London Moorgate on the Hertford (North) loop line.

Waltham Cross station – passenger numbers have increased by 79.4% in the 10 year period. The station use in 2018-2019 was 1,115,822 passenger entries and exits per annum. The service has been operated by Abellio Greater Anglia (AGA) since 2012. The rolling stock is in the process of being replaced before the end of 2021.

Cheshunt station - passenger numbers have increased by 47.5% in the 10 year period. The station use in 2018-2019 was 2,369,724 passenger entries and exits per annum. The station is an important interchange between the London Overground and AGA services.

Local Bus Services

There is no readily available open source for patronage data on the TfL London Bus Network. This information would be fully available at a later stage.



There are a number of TfL services in the local area. The highest frequency service is the route 217 in the A10 Great Cambridge Road which has an average waiting time of 8.2 minutes. The 317 and 327 services run at a lower frequency.

M25 Junction 25 improvement scheme

The Highways England project definition is as follows;

In December 2014 the Department for Transport (DfT) published the Road Investment Strategy (RIS) for 2015-2020. The work confirmed the case for the need for an improvement at M25 Junction 25, and considered the options available to take forward to the options identification stage.

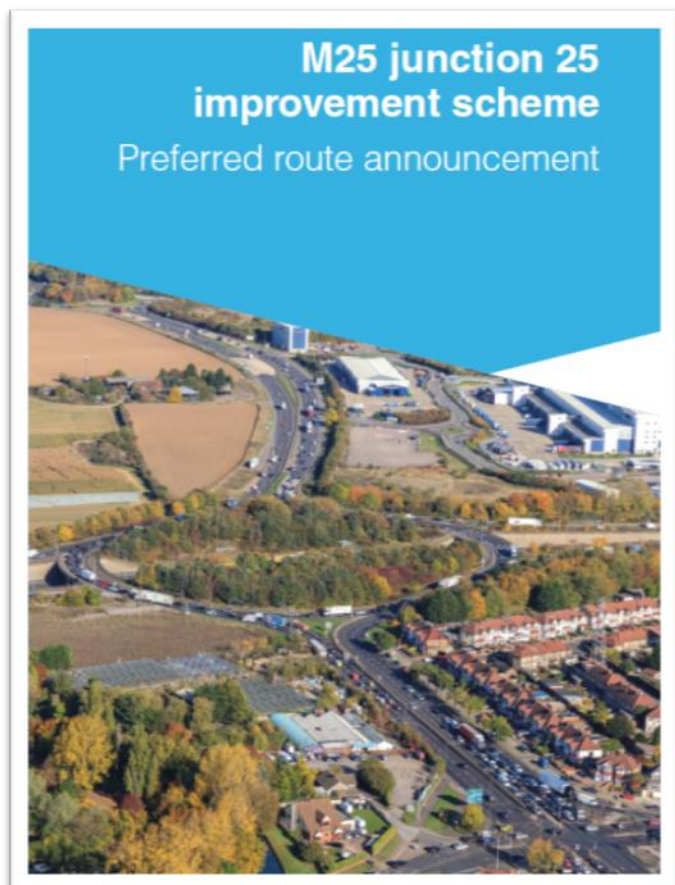
Based on the RIS statement, the scheme is described in the Client Scheme Requirements for Junction 25 as an “upgrade of the junction between the M25 and the A10 at Cheshunt, providing greater capacity for traffic”.

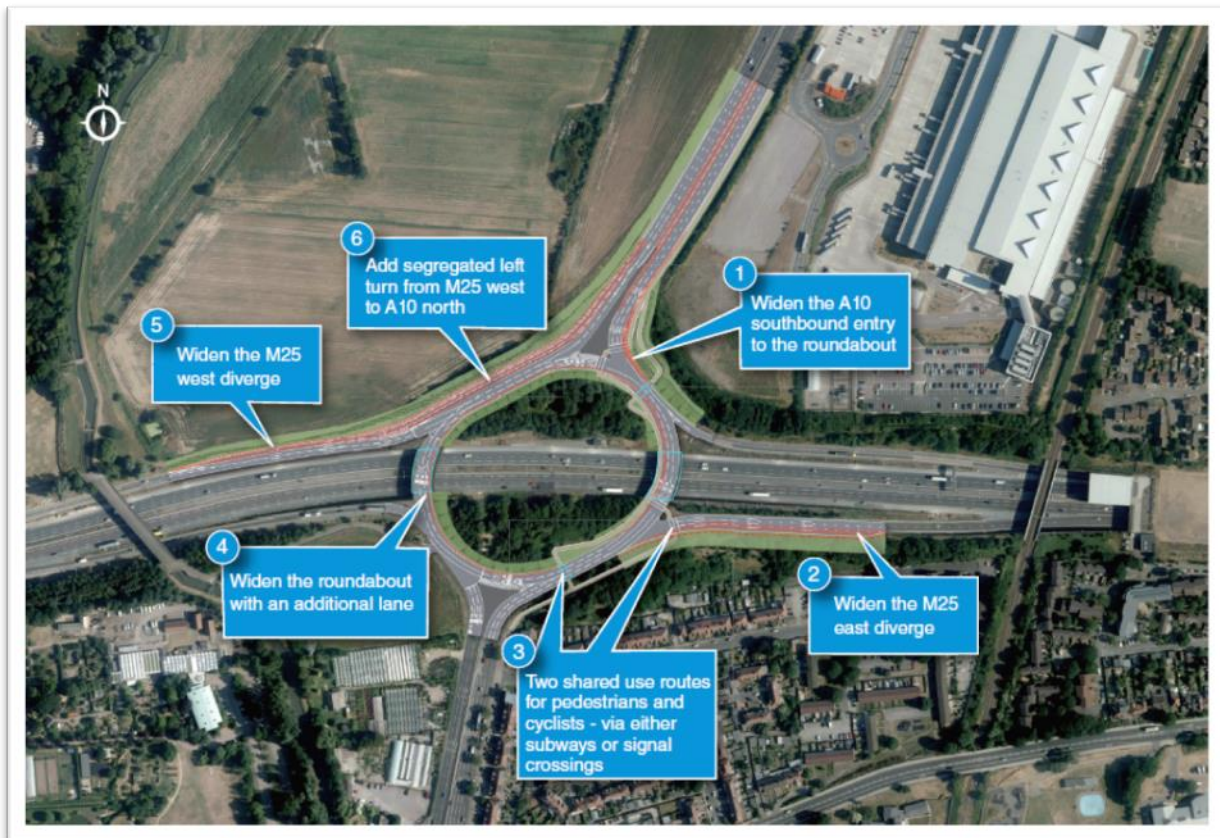
The contract for the main highway improvement works commenced in the Spring of 2021. These works will be substantially complete in 2 years. The primary objective is that the queues and delays at the junction in 2037 should not be significantly worse than as observed in 2015.

It is anticipated that traffic growth between 2012 and 2037 (the design year) will be of the order of 20% additional traffic. Without the improvements this would result in considerable increases in the queues and delay at Junction 25.

The highway works on the boundary of the borough will address traffic congestion and facilitate traffic growth related to development activity. The key time periods are the weekday AM and PM peak periods. The designation for professional and community sports, recreation and leisure facilities will, however, tend to attract trips outside of the conventional peak hours.

During the construction works there will be traffic management measures to facilitate the necessary contractor access to the various work sites which will result in some congestion during the 2 year period of the main works.





Strategic case

Based on the evidence review undertaken during PCF Stage 0, seven key problems were identified for Junction 25:

- Queueing back from junction onto mainline/Holmesdale Tunnel inhibits strategic M25 function
- High number of complaints (HAILs) raised mostly related to signal reliability and performance
- Poor junction performance (delays, reliability and queues)
- Comparatively high collision frequency identified at Junction 25
- Poor quality pedestrian/cycle facilities through Junction 25 inhibit potential usage
- Lack of spare junction capacity to support projected population and employment, inhibiting opportunities for all
- Sensitive environmental receptors identified in the vicinity of the Junction 25 associated with high traffic volumes, delay and a high proportion of HGV noise

Scheme objectives

- Reduce congestion and delays at junction 25 between the M25 and the A10
- Increase capacity by widening both the roundabout, and the A10 southbound approach
- Improve safety and traffic flow on the roundabout by redesigning the layout
- Support future traffic demands to enable development and economic growth
- Maintain access for non-motorised users (pedestrians and cyclists) and improve conditions wherever possible
- Minimise the environmental effects of this scheme on local air quality and noise

Travel Planning

The future Travel Plans to support the further development of the Hotspur Way Training Centre vicinity will have the following objectives:

- To protect the local and wider environment by encouraging and reinforcing sustainable personal transport choices and minimise car-based travel (by reference to the agreed modal split targets and the integral car driver mode share) in relation to all activities held at or taking place at the Hotspur Way Training Centre to satisfy the prevailing planning and transport policy requirements at a national, London and local level including the Mayor's Transport Strategy and Enfield Council UDP/LDF;
- In promoting sustainable travel, to seek in particular to maximise the extent to which journeys are made by physically active modes in order to confer the resultant health benefits;
- To minimise the detrimental effect of activities at the Hotspur Way Training Centre upon the functioning of the local transport network;
- To concentrate effort to achieve the greatest benefit, reflecting the concentration of journeys in respect of certain event types and activities and the realistic scope for journeys to be shifted towards sustainable means;
- To minimise the negative impacts arising from servicing and delivery activities at the Hotspur Way Training Facility;
- To mitigate as far as reasonably practicable the negative transport, public safety, environmental and amenity impacts (including cumulative impacts) in relation to travel and parking activities caused by activities at the extended Hotspur Way Training Centre to local communities, the Green Belt, nearby activities, the surrounding urban areas and on the environment generally (including local amenity);
- To manage the coach parking, car parking, motorcycle parking and cycle parking at all times in the most efficient manner so as to minimise negative impacts on the transport network, the Green Belt and the environment (including local amenity) and to maximise the use of more sustainable means of travel;
- To identify, evolve and adapt the targets and/or measures in a timely and effective manner (including proactively) in response to relevant events, experiences and circumstances in relation to the enhanced Hotspur Way Training Centre facilities on the local transport networks in the surrounding areas;
- Through active and positive co-ordination with the other parties based in the Hotspur Way Training Centre and the locality, to provide support and encouragement to them to foster sustainable transport patterns in relation to their activities and, in particular, to work effectively to ensure that the probability

of major/intermediate conflicting events coinciding with activity elsewhere in the Centre is minimised;
and

- To improve access to Hotspur Way Training Centre irrespective of personal mobility, any form of disability or special educational needs.

It is likely the Travel Plan will be supported by highway improvements, car parking and associated management measures, servicing and delivery plans and various initiatives to dovetail the developments with the local transport networks such as bespoke shuttle bus services.

The Local Area Management Plan (LAMP) for the Tottenham Hotspur Stadium includes a wide range of measures to encourage walking and cycling and to offer bespoke shuttle bus and minibus services for travel to the Stadium. Similar measures would be considered to support the proposed designation, particularly related to the connections to Turkey Street station and other nearby railway stations.



QUOD

CAPITAL BOND COURT
LEEDS
LS1 5SP

E: TIM.WARING@QUOD.COM