

Public Document Pack



OVERVIEW & SCRUTINY COMMITTEE

Thursday, 27 July 2023 at 7.00 pm
Conference Room, Civic Centre, Silver
Street, Enfield, EN1 3XA

Contact: Democracy

Direct: 020-8132 1383

E-mail: democracy@enfield.gov.uk
Council website: www.enfield.gov.uk

Councillors: Margaret Greer (Chair), Mahmut Aksanoglu (Vice-Chair),
Maria Alexandrou, Nawshad Ali, Kate Anolue, Hivran Dalkaya, James Hockney and
Michael Rye OBE

Education Statutory Co-optees: 1 vacancy (Church of England diocese
representative), vacancy (other faiths/denominations representative), vacancy
(Catholic diocese representative), Alicia Meniru & 1 vacancy (Parent Governor
Representative).

Enfield Youth Parliament Co-optees (2)
Support Officer – Stacey Gilmour (Governance & Scrutiny Officer)

AGENDA – PART 1

1. **WELCOME & APOLOGIES**
2. **DECLARATIONS OF INTEREST**

Members of the Council are invited to identify any disclosable pecuniary,
other pecuniary or non-pecuniary interests relevant to the items on the
agenda.

3. **DECISION CALLED-IN-KD5607- DECISION TO LEASE LAND AT
WHITEWEBBS PARK GOLF COURSE (Pages 1 - 4)**

To review the decision of the Leader of the Council taken on 7 July 2023 as a
result of the matter having been called-in.

- 3.1 **REASONS FOR AND OFFICER RESPONSE TO CALL-IN-KD5607-
DECISION TO LEASE LAND AT WHITEWEBBS PARK GOLF COURSE
(Pages 5 - 12)**

The reasons for call-in received from eight Members of the Council, together
with officer responses to the reasons for call-in.

3.2 ORIGINAL DECISION OF CALL-IN-KD5607-DECISION TO LEASE LAND AT WHITEWEBBS PARK GOLF COURSE (Pages 13 - 164)

The original decision documents

(This item contains exempt information as defined in Paragraph 3 (information relating to the financial or business affairs of any particular person – including the authority holding that information) of Schedule 12A to the Local Government Act 1972, as amended).

4. DATES OF FUTURE MEETINGS

To note that the next scheduled date of the Overview & Scrutiny Business meeting is 14 September 2023 at 7:00pm in the Conference Room at the Civic Centre.

5. EXCLUSION OF THE PRESS AND PUBLIC

To consider passing a resolution under Section 100(A) of the Local Government Act 1972 excluding the press and public from the meeting for the items of business listed on part 2 of the agenda on the grounds that they involve the likely disclosure of exempt information as defined in those paragraphs of Part 1 of Schedule 12A to the Act (as amended by the Local Government (Access to Information) (Variation) Order 2006). (Members are asked to refer to the part 2 agenda.)

AGENDA PART 2

6. ORIGINAL DECISION OF CALL-IN-KD5607 - DECISION TO LEASE LAND AT WHITEWEBBS PARK

Item 3 above refers.

London Borough of Enfield**Overview & Scrutiny Committee****Meeting Date: 27 July 2023**

Subject: Call in – Decision to Lease Land at Whitewebbs Park Golf Course**Decision of: The Leader of the Council (Cllr Nesil Caliskan)****Key Decision: KD5607 - List 07 23/24**

Purpose of Report

1. This report details a call-in submitted in relation to the following decision:

The Leader of the Council, Cllr Nesil Caliskan (taken on 7 July 2023). This has been “Called In” by 8 members of the Council: Councillors Hannah Dyson (Lead) Reece Fox, David Skelton, Lee Chamberlain, Alessandro Georgiou, Chris Joannides, Ruby Fox and Andrew Thorpe

Details of this decision were included on Publication of Decision List No. 07/23-24 issued on 7 July 2023.

In accordance with the Council’s Constitution, Overview and Scrutiny Committee is asked to consider the decision that has been called-in for review.

Proposal(s)

2. That Overview and Scrutiny Committee considers the called-in decision and either:
 - (a) Refers the decision back to the decision-making person or body for reconsideration setting out in writing the nature of its concerns. The decision-making person or body then has 14 working days in which to reconsider the decision; or
 - (b) Refer the matter to full Council; or
 - (c) Confirm the original decision.
3. Once the Committee has considered the called-in decision and makes one of the recommendations listed at (a), (b) or (c) above, the call-in process is completed. A decision cannot be called in more than once.
4. If a decision is referred back to the decision-making person or body; the implementation of that decision shall be suspended until such time as the decision-making person or body reconsiders and either amends or confirms the decision, but the outcome on the decision should be reached within 14 working

days of the reference back. The Committee will subsequently be informed of the outcome of any such decision

Relevance to the Council's Plan

5. The council's values are upheld through open and transparent decision making and holding decision makers to account.

Background

6. The request received on 05 June 2023 to "call-in" the decision of the Cabinet Member for Public Spaces, Culture & Local Economy on 26 May 2023 was submitted under rule 18 of the Scrutiny Procedure Rules. It was considered by the Monitoring Officer.
7. The Call-in request fulfilled the required criteria, and the decision is referred to the Overview & Scrutiny Committee in order to consider the actions stated under 2 in the report.
8. Implementation of the Portfolio decision related to this report will be suspended whilst the "Call-in" is considered.

Reasons and alternative course of action proposed for the "Call in"

9. Please see the reasons for call in and officers responses under item 3.1

Proposed course of action is for referral back to the Deputy Leader.

10. Having met the "Call-in" request criteria, the matter is referred to the Overview and Scrutiny Committee in order to determine the "Call-in" and decide which action listed under section 2 that they will take.

The following procedure is to be followed for consideration of the "Call-in":

- i. The Chair explains the purpose of the meeting and the decisions which the Committee is able to take.
- ii. The Call-in lead presents their case, outlining the reasons for call in.
- iii. The Cabinet Member/ Decision maker and officers respond to the points made.
- iv. General debate during which Committee members may ask questions of both parties with a view to helping them make up their mind.
- v. The Call in Lead sums up their case.
- vi. The Chair identifies the key issues arising out of the debate and calls for a vote after which the call in is concluded. If there are equal numbers of votes for and against, the Chair will have a second or casting vote.
- vii. It is open to the Committee to either;
 - a. take no further action and therefore confirm the original decision
 - b. to refer the matter back to Cabinet -with issues (to be detailed in the minute) for Cabinet to consider before taking its final decision.

- c. to refer the matter to full Council for a wider debate (NB: full Council may decide either to take no further action or to refer the matter back to Cabinet with specific recommendations for them to consider prior to decision taking).

Main Considerations for the Council

11. To comply with the requirements of the Council's Constitution, scrutiny is essential to good governance, and enables the voice and concerns of residents and communities to be heard and provides positive challenge and accountability.

Safeguarding Implications

12. There are no safeguarding implications.

Public Health Implications

13. There are no public health implications.

Equalities Impact of the Proposal

14. There are no equality implications.

Environmental and Climate Change Considerations

15. There are no environmental and climate change considerations.

Risks that may arise if the proposed decision and related work is not taken

16. There are no key risks associated with this report.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

17. There are no key risks associated with this report.

Financial Implications

18. There are no financial implications.

Legal Implications

19. S 21, S 21A-21C Local Government Act 2000, s.19 Police and Justice Act 2006 and regulations made under s.21E Local Government Act 2000 define the functions of the Overview and Scrutiny committee. The functions of the committee include the ability to consider, under the call-in process, decisions of Cabinet, Cabinet Sub-Committees, individual Cabinet Members or of officers under delegated authority.
20. Part 4, Section 18 of the Council's Constitution sets out the procedure for call-in. Overview and Scrutiny Committee, having considered the decision may:

refer it back to the decision-making person or body for reconsideration; refer to full Council or confirm the original decision.

21. The Constitution also sets out at section 18.2, decisions that are exceptions to the call-in process.

Workforce Implications

22. There are no workforce implications.

Property Implications

23. There are no property implications.

Other Implications

24. There are no other implications.

Options Considered

25. Under the terms of the call-in procedure within the Council's Constitution, Overview & Scrutiny Committee is required to consider any eligible decision called-in for review. The alternative options available to Overview & Scrutiny Committee under the Council's Constitution, when considering any call-in, have been detailed in section 2 above.

Conclusions

26. The Committee following debate at the meeting will resolve to take one of the actions listed under section 2 and the item will then be concluded.

Report Author: Stacey Gilmour
Governance & Scrutiny Officer
Email: Stacey.gilmour@enfield.gov.uk
Tel No. 020 8132 1383

Date of report: 19 July 2023

Appendices

Found elsewhere in the agenda pack.

Background Papers

No documents have been relied on in the preparation of this report.

Overview and Scrutiny Committee – 27th July 2023

Officer Response: Key Decision number KD5607: Decision to lease land at Whitewebbs Park

Reasons for the “Call in” are detailed below:

1. Reason for call-in
The Council should not go ahead with the proposed lease to Tottenham Hotspur, which has no local support and doesn't provide full public access to the park.
Officer response
<p>This decision follows a number of previous decisions: in March 2019 (KD 4849) to market the golf course to prospective new tenants; in March 2021 to permanently close the golf course, which was loss-making (KD5177); and in September 2021 (KD5177) in principle approval to enter into an agreement for lease with Tottenham Hotspur (“TH”).</p> <p>The September 2021 decision followed stakeholder and resident engagement that informed setting the Council’s objectives for the park. The Council’s objectives were: enhancement of public access, community engagement, maintenance of woodland and open areas, range of activities (outdoor leisure or sport led) and provision of refreshments and welfare facilities. These objectives formed part of the scoring matrix used in a competitive bidding process, under which TH’s bid was assessed as scoring highest. Therefore, TH’s proposal represents the best available opportunity for delivering these objectives for the benefit of local residents.</p> <p>The current decision is whether to proceed with the above decision in principle made in September 2021, following compliance with the statutory procedure for inviting and considering public objections to the proposal. As per paragraph 30 of the Report (KD5607) it was confirmed that the objections were duly considered and, in the view of officers, none gave rise to sufficient reason for the Council not to proceed with the proposal, which offers significant benefits as set out in the report for KD5177 and the current Report (KD5607).</p> <p>When the golf course was operating, there was not “full public access to the park”. Under TH’s proposal, Whitewebbs Wood will be preserved and remain publicly accessible and managed by the Council. TH will fund new enhancements including signage and repairing trails and parts of the perimeter bridleway around the edge of the site. Around half of the former golf club will be rewilded and transformed into new parkland and wildflower meadows. In addition, improvements will be made to the Southern Clubhouse and car park to incorporate a public café and WCs and public car parking.</p> <p>The area of the park which TH will control and to which public access will be limited is approximately 18% of the park. This area will be dedicated to growing the Women’s and Girl’s game with a new state of the art Football Academy and the new Turf Academy,</p>

and access will be managed by the Club. The remaining 82% of Whitewebbs Park will remain fully open to the public.

2. Reason for call-in

The park is enjoyed by people from across the Borough. The Council holds the Park in trust and as part of this trust is expected to maintain open access to the parkland.

Officer response

The park will continue to be enjoyed by people from across the Borough and TH's proposal offers significant enhancements of the park, for the benefit of the public: see the response to reason 1, above. Further, TH's proposal will provide a sustainable economic basis for the park, into the future.

Section 123(2B) of the Local Government Act 1972 provides a procedure whereby that part of the park to be leased to TH is released from the statutory open space trust and the Council has followed that procedure.

3. Reason for call-in

Whitewebbs Park is one of the most important public spaces in the borough. It represents a crucial hub for biodiversity, with 78 species of birds, ancient woodland and a wide variety of flora and fauna. The proposals detailed in the report by Tottenham Hotspur will destroy the land and its biodiversity forever.

Officer response

There is no evidence whatsoever that TH's proposal will destroy the land or its biodiversity. See the response to reason 1, above. That part of the park which it is proposed TH will control and to which public access will be limited was formerly used as a golf club and this will be limited to approximately 18% of the park.

The Council are developing a Management Plan, which will seek to maximise ecological outcomes and benefits, both for park users and wildlife.

Further, the merits of any proposed scheme and its effect on the natural environment together with any proposed mitigation will be a material consideration to be assessed as part of the statutory planning application process having regard to the requirements of adopted and emerging planning policy and any statutory requirements. This will be for the Council in its role as Local Planning Authority to consider as part of the planning process on which there will be public consultation, which was explained in the recent letter that went out to residents.

4. Reason for call-in

The proposal for reinstatement of parkland on the southern part of the golf course is unnecessary as the parkland has re-established itself unaided. The rewilding is already under way due to natural processes.

Officer response

TH's proposal will deliver a range of public benefits, as set out in the response to reason 1, above.

One of these benefits is rewilding around half of the former golf club and transforming it into new parkland and wildflower meadows. The process of rewilding involves land management techniques to maximise ecological outcomes and benefits. This will not be secured by simply leaving the parkland alone.

As stated above, the Council are developing a Management Plan, which will seek to maximise ecological outcomes and benefits, both for park users and wildlife.

5. Reason for call-in

Whitewebbs Park should be allowed natural regeneration alongside tree planting and the creation of wildflower-rich glades.

Officer response

See the response to reason 4, above.

6. Reason for call-in

There has been a lack of information, transparency and consultation regarding the plans and inconsistencies throughout.

Officer response

TH's proposals for the leased areas were publicised at the time of the winning bid, as an appendix to both KD5177 and more recently in Decision Report KD5607 as Appendix D. Information about the proposals has consistently been available on the Council's website.

A notice under Section 123(2A) of the Local Government Act 1972 was published in the Enfield Independent on 14 December 2022 and again on 21 December 2022. The notice provided a link to the Council's website, where details of the proposal were set out, and invited objections, which have been duly considered.

Public and stakeholder engagement will also form part of the planning application process.

7. Reason for call-in

There has been a 90% error in calculations as to the loss that the golf club was making. The previous report KD5177, March 2021 (to permanently close the golf

course following closure during Covid19 pandemic) included the revenue financial costs of Whitewebbs Park Golf Course for the six years (2014-15 to 2019-20) on a full cost accounting approach, totalling £1.2m loss. When calculated on the basis of cashable savings as a result of closing the golf course (i.e. excluding overheads and capital charges), the figure is £115,000 loss over the same period.

Officer response

The report in March 2021 reflected the full cost approach, not just the cash able savings, excluding overheads and capitals charges. This has been set out in the current Report.

The figures have no effect on the current decision. The calculations show the golf course operating at a loss. The golf course closed permanently in 2021. This decision concerns the future of the park given the current circumstances.

8. Reason for call-in

There remains lack of detail and clarity to the proposal that THL will carry out improvements to the park's infrastructure (including to bridleways and footpaths).

Officer response

TH's proposals are available on the Council's website and include information about the improvements to the park infrastructure. See further the response to reason 1, above.

These proposed works will be finalised after planning and informed by the associated public consultation and implemented ahead of the lease being entered into.

9. Reason for call-in

The Council informed the public of the intention to enter an Agreement for Lease with THL by posting a notice on a toilet wall on 14th December. The Notice was published as residents were preparing for Christmas and going on holiday. Lease terms were not made public even in draft form.

Officer response

Formal notice of the proposal to enter into an Agreement for Lease was advertised in accordance with Section 123(2A) of the Local Government Act 1972, and published in a local newspaper, the Enfield Independent, for two consecutive weeks beginning 14th December 2022.

In addition, the Notice in A3 print was displayed at the Civic Centre, Silver Street and the four hub libraries (Library Green, Ordnance Road, Edmonton Green and Broomfield Lane).

A further copy was displayed on the LBE-owned WCs at the southern end of

Whitewebbs Park adjacent to the public carpark.

A full calendar month was allowed for submitting objections, namely 11.59pm on Sunday 15th January 2023 (allowing a longer period because of the holiday period).

During the negotiation stage, which is continuing, the lease terms remain commercially sensitive and confidential and/or subject to legal and professional privilege.

10. Reason for call-in

The proposed lease would benefit only a select group of elite players and not an increasing opportunity for Enfield women and girls to play sport.

Officer response

TH's proposal will deliver a range of public benefits, as set out in the response to reason 1, above.

In relation to the specific issue of increasing opportunity for participation in sport, Tottenham propose to develop a women's football academy to sustain the growth in women's football, with a regionally significant facility that is dedicated to the development of women's and girls' football from grassroots level – the two components feeding off one another.

The proposed Women's Football Academy would create a positive impact on women, by developing female football talent from U10 level, through U16 and U18 levels up to development squad (reserve team) level.

In addition to the development of academy talent, the facility would also enable the development of female grassroots football .

11. Reason for call-in

The entire process for the marketing and accessing of bids cannot be trusted. The report asserts that this represents the best consideration that was obtainable on the terms of the tender. There should have been an open process with independent observers.

Officer response

The independent property consultancy, Knight Frank, ran the process on behalf of the Council. The previous report KD5177 confirmed that following an extensive two stage marketing process, that TH's submission achieved the highest evaluation score.

The bidding process was operated in accordance with commercial procurement legislation and was designed to encourage competitive bids.

12. Reason for call-in

A Deed of Easement should be formalised between Edmonton Running Club and Enfield Council as soon as possible in order to safeguard their current rights into perpetuity.

Officer response

Legal advice has been obtained that confirms the club has not acquired the rights that it claims. The use that club members have enjoyed in the past was as members of the public exercising their rights to use the park for public recreation. Further, this use will continue in the future in respect of the vast majority of the park.

Proposal: Councillor Dyson has asked that the decision is referred back to the decision maker.

CALL-IN OF DECISION

TITLE OF DECISION: Decision to Lease Land at Whitewebbs Park Golf Course

DECISION OF: Leader of the Council – Councillor Nesil Caliskan

DATE OF DECISION LIST PUBLICATION: 7 July 2023

LIST NO: 07/23-24

COUNCILLORS CALLING-IN

(The Council's constitution requires signatures of seven or more Councillors to call a decision in).

Call in Lead

- | | |
|----------------------------|--|
| (1) Signature:..... | Print Name: Hannah Dyson (Lead) |
| (2) Signature:..... | Print Name: Reece Fox |
| (3) Signature:..... | Print Name: David Skelton, |
| (4) Signature:..... | Print Name: Lee Chamberlain |
| (5) Signature:..... | Print Name: Ruby Sampson |
| (6) Signature:..... | Print Name: Alessandro Georgiou |
| (7) Signature:..... | Print Name: Andrew Thorpe |
| (8) Signature:..... | Print Name: Chris Joannides |

This page is intentionally left blank



PUBLICATION OF DECISION LIST NUMBER 07/23-24

MUNICIPAL YEAR 2023/24

Date Published: 7 July 2023

This document lists the Decisions that have been taken by the Council, which require publication in accordance with the Local Government Act 2000. The list covers Key, Non-Key, Council and Urgent Decisions. The list specifies those decisions, which are eligible for call-in and the date by which they must be called-in.

A valid request for call-in is one which is submitted (on the form provided) to the Governance and Scrutiny Team in writing within 5 working days of the date of publication of the decision by at least 7 Members of the Council.

Additional copies of the call-in request form are available from the Governance and Scrutiny Team.

If you have any queries or wish to obtain further report information or information on a decision, please contact democracy@enfield.gov.uk

INDEX OF PUBLISHED DECISIONS – 7 July 2023

	Date Decision came/ comes into effect	Part 1 or 2	Subject/Title of Report	Category of Decision	Affected Wards	Eligible for Call-In & Date Decision must be called in by (If Applicable)
Decisions Made by Executive Directors / Portfolio Holders						
Leader of the Council (Cllr Nesil Caliskan)	Monday 17 July 23	Part 1 & 2 (Para 3)	<p>Decision to Lease Land at Whitewebbs Park Golf Course</p> <p>I. Approve proceeding with the disposal (lease conditional on agreement for lease) of the former Whitewebbs Park Golf Course to Tottenham Hotspur Limited.</p> <p>II. Delegate to the Director of Property, in consultation with the Director of Legal, finalising the terms of the agreement for lease and, following satisfactory completion of the planning process, granting the lease.</p> <p>III. Note the updated financial implications in relation to Key Decision KD5177 (paragraphs 39 &</p>	KD 5607	Whitewebbs	Yes Friday 14 July 23

		40). The report sets out the options considered, if any, and the reasons for the recommendation and the decision.			
--	--	--	--	--	--

This page is intentionally left blank



London Borough of Enfield

Report Title	Decision to Lease Land at Whitewebbs Park Golf Course
Report to:	The Leader
Date of Report:	26 th June 2023
Directors:	James Wheeler – Acting Director of Development (Property) Sarah Cary – Executive Director Place
Report Author:	Jennifer Lee Jennifer.lee@enfield.gov.uk
Ward(s) affected:	Whitewebbs
Key Decision Number	KD 5607
Implementation date, if not called in:	12 th July 2023
Classification:	Part 1 Public
Reason for exemption	The Part II report contains information that is commercially sensitive and could be prejudicial to the interests of both the Council and the proposed lessee.

Purpose of Report

1. To approve proceeding with the disposal (agreement for lease) of the former Whitewebbs Park Golf Course (WPGC) for a 25 year lease to Tottenham Hotspur Limited (THL), following consideration of public objections in response to the notices published under Section 123(2A) of the Local Government Act 1972.

Recommendations

- I. Approve proceeding with the disposal (lease conditional on agreement for lease) of the former Whitewebbs Park Golf Course to Tottenham Hotspur Limited.
- II. Delegate to the Director of Property, in consultation with the Director of Legal, finalising the terms of the agreement for lease and, following satisfactory completion of the planning process, granting the lease.
- III. Note the updated financial implications in relation to Key Decision KD5177 (paragraphs 39 & 40).

Background and Options

2. The former Whitewebbs Park Golf Course is currently unoccupied, and as a temporary measure the public have enjoyed the benefit of access over the full grounds.
3. In March 2019, Key Decision KD4849 approved proposals to market the golf course. Following the closure of the golf course during the Covid19 pandemic, in March 2021, KD5177 approved a proposal permanently to keep closed golf course with immediate effect.
4. In September 2021, KD 5177 gave in principle approval to enter into an agreement for lease with the preferred bidder, Tottenham Hotspur Limited (THL), and subject to planning, for the grant of the lease.
5. The Director of Property & Economy was given delegated authority in consultation with the Director of Legal and Governance to make minor amendments to the heads of terms and to finalise the agreement for lease, the lease and associated documents.
6. Appendix A provides a map of Whitewebbs Park. Under the proposed lease, approximately 18% of the overall park would be enclosed for THL's use, as a women's and girls' football academy and turf academy.
7. Heads of Terms setting out the proposed terms of the agreement for lease are attached in the Confidential Appendix.

8. The key terms of the proposed lease are as follows and have not changed since KD5177:
 - 25 years from the date of completion of the lease
 - A total consideration of £2,000,000
 - Lease to be excluded from the security of tenure and compensation provisions of the Landlord & Tenant Act 1954 (Part II, as amended)
 - Improvements to the site (see below para.8)
9. Proposals by THL for the site include the following.
 - Creation of an academy for women's and girls' football;
 - Refurbishment and extension of the Northern Clubhouse to create an education centre for women's and girls' football;
 - Expansion of a THFC Turf Academy, training the next generation of ground staff and greenkeepers in conjunction with other leading sports venues;
 - Reinstatement of parkland on the southern part of the golf course;
 - Tree surveys, habitat survey, hydrological survey and woodland management survey;
 - Improvements to the Southern Clubhouse and car park to incorporate a café and WCs and public car parking;
 - Improvements to the park's infrastructure including to bridleways and footpaths.
10. The agreement for lease is currently being drafted. The agreement will oblige THL to obtain planning permission for their proposals and to complete a series of improvement works, before the lease will be granted.
11. Section 123(2A) of the Local Government Act 1972 states that *"A principal council may not dispose under subsection (1) above of any land consisting or forming part of an open space unless before disposing of the land they cause notice of their intention to do so, specifying the land in question, to be advertised in two consecutive weeks in a newspaper circulating in the area in which the land is situated, and consider any objections to the proposed disposal which may be made to them."*
12. The Council published the Section 123(2A) Notice in the Enfield Independent on 14th December 2022 and again on 21st December 2022. See Appendix B. The Notice was also displayed at the four Enfield Hub libraries (Enfield Town, Ordnance Unity Centre, Edmonton Green and Palmers Green Libraries) in the Civic Centre and at the proposed site.
13. The Notice invited objections to the THL proposals and stated that any objections would be considered.
14. An analysis of the objections and officers' responses to them is attached as Appendix C. A total of 788 submissions were received. Some of these were duplications where the responder chose to submit via both the website and email address, while many had submitted what appeared to be a stock response prepared for them by others.
15. The common themes identified in the objections are summarised below.

16. Officers have carefully considered these objections with reference to the THL proposals.
17. Lack of consultation / engagement / information about the proposals - The common theme here related to how the plans had been communicated with some responders expressing their concern over the lack of information provided. Many comments were a request for more information or highlighted that they felt there had been limited engagement. A common theme was a misconception that the planning process was not going to be implemented. This is not the case, since the grant of planning permission would be a pre-condition of the grant of the lease. Further, THL's planning application would be subject to statutory consultation at a minimum, with non-statutory consultation expected as part of the pre-planning process. The Council would also update the landing page on its own website with information about the proposals as they progress.
18. Community Impact - Objections received relating to the theme of community impact raised concerns over the potential loss of space for use by various groups including walkers, dog walkers and running clubs. We believe many of these views do not fully consider the proposed lease terms. The proposals would provide free public access to approximately 67% of the leased area and would be designed to enable an enhanced community experience as compared with when the golf course was operational, with an enhancement on the quality of the open space and therefore enhanced accessibility.
19. The area of the park which THL would have exclusive use of was previously used as a golf course and it would be limited to approximately 18% of the overall park. This area would be dedicated to growing women's and girls' football with a new state of the art Football Academy as well as a new Turf Academy, and access would be managed by the Club. The proposed Football Academy aligns with the Council's ambition of increasing opportunity for women and girls to play sport in Enfield.
20. Environmental Impact - Concerns that green space may be lost. The proposals seek to enhance and celebrate the open space through the creation of a joint estate management agreement between the Council and THL in relation to the area that would remain freely open to the public.
21. Under THL's bid, Whitewebbs Wood would be preserved in its entirety and remain fully publicly accessible and managed by the Council. THL would fund enhancements including signage and repaired trails.
22. Around half of the former golf course would be rewilded and transformed into new parkland and wildflower meadows. The northern boundary would also be rewilded to form a natural connection between Whitewebbs Wood and the new nature reserve, which THL is delivering at Dickenson's Meadow.
23. Financial – Many objections concerned the financial consideration for the proposed disposal. THL's detailed proposal was evaluated as the winning

bid in 2021, following a competitive tender process. See attached bid at Appendix D. The Council is prima facie obliged to obtain the best consideration that can reasonably be obtained, under Section 123(2A) of the Local Government Act 1972. A valuation report on best consideration has been prepared by Knight Frank and is contained within the Confidential Appendix.

24. Physical and Mental Health – Concerns were raised over the loss of access to the parkland in terms of its benefits both for taking exercise contributing to physical health and as an immersive natural environment contributing to mental health. We refer to the responses above in relation to community impact and environmental impact.
25. Process and Decision Making – The responses highlighted an apparent misconception as to what was being notified through the Section 123 process. The proposal detailed in the Public Notice related to an ‘Agreement for Lease’.
26. An agreement for lease is not a lease per se but an industry-standard contractual mechanism which gives both sides a degree of certainty that a lease will be completed at some point in the future but only when specific conditions have been met.
27. In this instance, the agreement for lease would incorporate the conditions of THL obtaining planning permission, along with the completion of various works including improvements to footpaths and public facilities.
28. Miscellaneous - A number of responders made broader statements which were not interpreted as an objection, so we have placed limited weight on these in determining our recommendations.

Preferred Option and Reasons for Preferred Option

29. Following consideration of the objections received in response to the Section 123(2A) Notice, this report recommends proceeding with the agreement for lease.
30. The objections were duly considered, but in the view of officers none gave rise to sufficient reason for the Council not to proceed with the proposals or the agreement for lease, which offer significant benefits as described above.
31. The alternative option is not to proceed with THL’s proposals. If the Council does not enter into the agreement for lease, funds would need to be sourced from elsewhere to redevelop the dilapidated former clubhouses and maintain the parkland, woodland and infrastructure.

Relevance to Council Plans and Strategies

32. The proposed disposal of WPGC would support the Council Plan goals in the following areas.

33. Clean and green places - The proposed rewilding of part of the former golf course and joint estate management plan would support the Council's goals to enhance biodiversity and protect our parks, open spaces, woodlands, watercourses, trees and shrubs.
34. Strong, healthy and safe communities – The creation of a dedicated girls' and women's football training facility would support plans to improve leisure and sports opportunities to enable more active lifestyles.

Financial Implications

Summary

35. The report seeks approval to dispose of the former Whitewebbs Park Golf Course to Tottenham Hotspur Limited by way of an agreement for a 25-year lease for a total consideration of £2m.
36. A more financially favourable approach for the Council would be an advanced payment of the £1.5m consideration by way of a premium.
37. There will be an upfront investment into the former golf course equivalent to £500k by THL, therefore giving a total financial benefit of £2m to the Council over the term of the lease.
38. At the end of the lease term the Council would be able to choose whether to take the site back or to renew the lease.
39. The previous report KD5177, March 2021 (to permanently close the golf course following closure during Covid19 pandemic) included the revenue financial costs of Whitewebbs Park Golf Course for the six years (2014-15 to 2019-20) on a full cost accounting approach, totalling £1.2m loss. When calculated on the basis of cashable savings as a result of closing the golf course (i.e. excluding overheads and capital charges), the figure is £115k loss over the same period.
40. Although the calculated loss is significantly reduced, the golf club was nevertheless being run at a loss. The current proposal, if approved, would bring a financial benefit to the Council of £2m (as set out above) and an increase in business rates.

Revenue Budget Impact

41. The Lease would result in additional income to the Council's revenue budget equating to £1.5m over the term of the lease.
42. Disposing the former Whitewebbs Park Golf Course to THL would lead to an increase in the business rates payable to the Council.
43. Should the Council come to an agreement with THL for an advanced payment of £1.5m, this would be treated as a capital receipt. The £1.5m receipt would reduce the Council's borrowing and annual financing costs by

approx. £100k per year (25 year term at 4.7%). Overall, this would result in a £140k annual saving to the revenue budget.

44. The current cost incurred for the Whitewebbs Park Golf Course site is £40k per annum, this covers the rates, security and insurance costs.

Capital Budget Impact

45. There would be no capital expenditure involved in this proposal. No impact on the capital budget.

Taxation

46. There would be no other known tax implications.

Accounting Treatment

47. The length of the lease (25 years) would make this proposal a disposal of land. The accountancy concept of substance over form would apply where the effective ownership of the site is transferred to the lessee.

48. Should the Council come to an agreement with THL for an advance payment of £1.5m this would be treated as a capital receipt. The receipt would offset any outstanding debt on the site and any gains or losses would be charged through the revaluation reserve and not impact the Council's revenue budget.

49. In the Council's accounts the total value of the lease would be accounted for in accordance with the accounting standard IFRS 16 Leases.

Risks

50. The main risks and mitigations are shown in the table below:

Risks	Mitigations
Not compliant with Section 123 of the Local Government Act 1972, which requires local authorities to dispose of public assets at the best consideration reasonably obtainable.	Expert advice has been sought to demonstrate this proposal is the best consideration that is reasonably obtainable by the Council. A report on best consideration is provided in the confidential appendix.

Legal Implications

51. In entering into property transactions, the Council must comply with the provisions of its Constitution, including but not limited to its Property Procedure Rules, which set out mandatory procedures regarding (amongst other things) the acquisition, management and disposal of property assets.

52. In addition, Section 123(2) of the Local Government Act 1972 requires a local authority to secure the best consideration reasonably obtainable when

it disposes of land (except on a short tenancy, defined as a lease of not more than 7 years), unless it has the benefit of a specific or general consent of the Secretary of State.

53. It is noted that a marketing exercise was undertaken and that THL's bid achieved the highest evaluation score and was selected as the preferred bidder, representing the best consideration that was obtainable on the terms of the tender.
54. A valuation report prepared recently by Knight Frank contained within the Confidential Appendix supports the conclusion that THL's bid is at least equivalent to the best consideration reasonably obtainable on the basis of an unrestricted use of the site.
55. The Council is required as a best value authority under Section 3 of the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. It is considered that the proposals described in this report comply with this duty.
56. The WPGC site includes open space land. In accordance with Section 123(2A) of the Local Government Act 1972 the Council may not dispose of any land consisting or forming part of an open space unless before disposing of the land they cause notice of their intention to do so, specifying the land in question, to be advertised in two consecutive weeks in a newspaper circulating in the area in which the land is situated, and consider any objections to the proposed disposal which may be made to them.
57. Correspondence from CPRE suggesting that the Council's proposal to lease the premises to THL is unlawful is discussed in the Legal Implications section of the Confidential Appendix.
58. The Council must, when carrying out its functions, have due regard to the needs set out in Section 149 of the Equality Act 2010 (the Public Sector Equality Duty, PSED). This duty includes having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic (including people with a disability) and persons who do not share it. The Council must consider the duty, which is personal to decision makers.
59. In order to assist the Council to comply with Section 149, an Equality Impact Assessment (EQIA) is attached as Appendix E to this report. The relevant decision-maker must carefully consider the EQIA as applicable to the scheme they are asked to approve.
60. In summary, the PSED requires the Council, when exercising its functions, to have 'due regard' to the need to:
 - a) Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act (which includes conduct prohibited under Section 29);

- b) Advance equality of opportunity between people who share a relevant protected characteristic and those who do not share it;
- c) Foster good relations between people who share a relevant protected characteristic and those who do not (which involves having due regard, in particular, to the need to tackle prejudice and promote understanding).

61. Under the duty the relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion, sex, and sexual orientation. In respect of the first aim only i.e. reducing discrimination, etc the protected characteristic of marriage and civil partnership is also relevant.

62. In exercising its power to dispose of land, the Council is exercising a “public function”: Under Section 29 of the Equality Act 2010, it must not, when exercising a public function, “do anything that constitutes discrimination, harassment or victimisation” (Section 29(6)) and it must make reasonable adjustments (Section 29(7)). The duty to make reasonable adjustments arises in relation to disabled persons and under Section 20 of, and Schedule 2 to, the Equality Act 2010.

63. The Council should also bear in mind relevant parts of the United Nations Convention on the Rights of Persons with Disabilities and the United Nations Convention on the Rights of the Child. Some of those parts relate to (as regards persons with disabilities) the physical environment, transportation, personal mobility and sporting and leisure activities (UNCRPD), and (as regards children) self-reliance and active participation in the community of disabled children, standards of health, dangers and risks of environmental pollution, and recreational and leisure activities (UNCRC).

Equality Implications

64. Please see the EQIA at Appendix E.

Environmental and Climate Change Implications

65. The proposed investment in biodiversity on the proposed site and environs, along with returning a significant part of the park to parkland, would assist in improving air quality and significantly support the Council’s efforts to combat climate change.

66. An estate management plan is being prepared jointly by the Council and THL, to form an appendix to the agreement for lease. The document would set out the respective parties’ obligations relating to the horticultural and woodland areas on both the leased and non-leased areas in the park. On completion of the lease, the estate management plan would run in parallel for the duration of the term and would be binding on THL’s successors in title or anyone deriving in title from them.

67. In order for the proposed football academy to obtain planning permission, under current adopted planning policies an application would be expected

to demonstrate that the proposal has a minimal environmental impact, in both construction and operational stages.

Public Health Implications

68. The proposal includes increasing the amount of freely publicly accessible open space, which was previously a golf course, the provision of community facilities and an investment in biodiversity and park infrastructure. The proposals are designed to provide an improved space for all park users, which would help narrow the gap between the best and poorest physical and mental health among Enfield residents.
69. It is proposed that the existing café and former clubhouse adjacent to this would be improved, therefore providing all park users a space to meet and connect, supporting mental health and wellbeing.
70. Proposed improvements to the park's infrastructure including to bridleways and footpaths would create an enhanced destination for exercise and active travel.

Property Implications

71. The property implications of the proposed disposal are set out in the main body of this report with more detail in the accompanying Confidential Appendix.

Procurement Implications

72. As this is the disposal of property /land this is covered by the Property Procedure Rules.
Any expenditure relating to the facilitation of the disposal of land, must follow the contract procedure rules.

Report Author: Jennifer Lee
Principal Asset Manager
jennifer.lee@enfield.gov.uk
020 8132 0893

Appendices

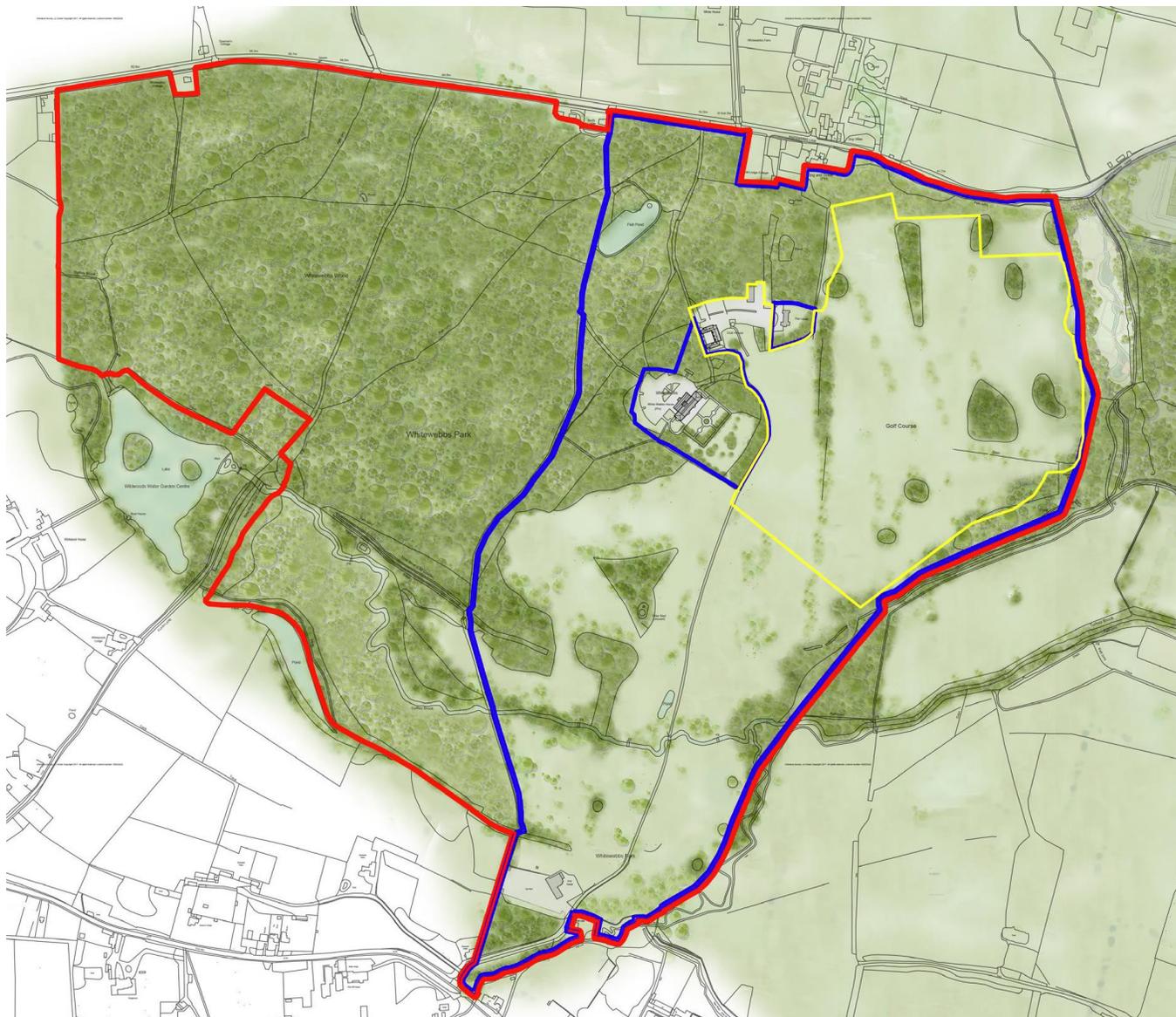
- Confidential Part II Report
Appendix A Map of Whitewebbs Park
Appendix B Section 123(2A) Notice
Appendix C Analysis of Objections
Appendix D Tottenham Hotspur bid
Appendix E Equality Impact Assessment

Background Papers

Departmental reference number, if relevant: HRD2324_016

This page is intentionally left blank

Plan of THFC bid



Red line =
Whitewebbs park
boundary

Blue line = area to
be leased
(54% of park)

Yellow line = area
THFC will occupy
(33% of leased area;
18% of park)

This page is intentionally left blank

**LONDON BOROUGH OF ENFIELD
SECTION 123(2A) LOCAL GOVERNMENT ACT 1972
NOTICE OF PROPOSED DISPOSAL OF OPEN SPACE LAND**

Land to the south of Whitewebbs Lane, Enfield EN2 9HH, including the former Whitewebbs Park Golf Course, shown edged and shaded red on the plan (“the Property”).

NOTICE IS HEREBY GIVEN under Section 123(2A) Local Government Act 1972 that the London Borough of Enfield intends to enter into an agreement to grant a lease of the Property for a term of 25 years to Tottenham Hotspur Limited (or a wholly owned subsidiary of the said company), which is or may include open space.

The Property is shown for the purpose of identification edged and shaded red on a plan which is available online at: <https://www.enfield.gov.uk/publicnotices> and is also available for inspection at the public noticeboard by the main entrance to the London Borough of Enfield, Civic Centre, Silver Street, Enfield, London EN1 3XA, as well as the Council’s four main public libraries at Enfield Green, Ordnance Road, Edmonton Green Shopping Centre, and Broomfield Lane, during their normal opening hours.

Further details about the proposal, including the proposed use of the Property, are available online here: <https://www.enfield.gov.uk/publicnotices> or a hardcopy of these details may be obtained by sending a request by email to Whitewebbs@enfield.gov.uk

Any person who objects to the proposed lease should set out their objection in writing by either using the online response form at the web address above, or by email to Whitewebbs@enfield.gov.uk, or by writing to Strategic Property Services, London Borough of Enfield, Civic Centre, Silver Street, Enfield, London EN1 3XA, and ensure that it is submitted by no later than 11.59pm on Sunday 15th January 2023.

Dated: 14th December 2022

Terry Osborne
Director of Law and Governance
London Borough of Enfield
Civic Centre
Silver Street
Enfield EN1 3XA

This page is intentionally left blank

Proposed Leasing of Whitewebbs Park and Golf Course (WPGC)

Summary of Section 123 Process

The London Borough of Enfield (LBE) propose to lease part of the land at Whitewebbs Park, which was formerly used as a golf course, to Tottenham Hotspur Limited. Following a competitive tender process, approval for the proposed lease was granted by the Leader (KD5177) in September 2021.

Formal notice to enter into an agreement for lease was advertised in accordance with Section 123(2A) of the Local Government Act 1972, and published in a local newspaper, the Enfield Independent, for two consecutive weeks beginning 14th December 2022. In addition, officers displayed the Notice in A3 print at the Civic Centre, Silver Street and the four hub libraries (Library Green, Ordnance Road, Edmonton Green and Broomfield Lane). A further copy was displayed on the LBE-owned WCs at the southern end of Whitewebbs Park adjacent to the public carpark.

The Notice directed any person objecting to the proposal to do so via an online response form detailed in the Notice, email a dedicated address or write to the Council's Strategic Property Services. The deadline for receipt was given as a full calendar month, namely 11.59pm on Sunday 15th January 2023.

Following the deadline, all responses were merged into a single document and considered accordingly. A total of 788 responses were received. Where respondents submitted their objections more than once, any duplications were considered and only counted once.

The process called for respondents to submit their objection only with no further information requested, save for web responses giving the option of supplying a postcode.

Following careful consideration of the topics raised, objections were placed into the categories set out below. Where a response detailed multiple reasons, these were separated to allow for each point to be considered.

The Section 123 Notice called for objections and there were a number of responses in support of the proposed lease or that they would be on receipt of further information. It is not possible to assess the level of public support for the proposals since the Section 123(2A) process does not seek to gather evidence in this regard.

Key Themes
1. Lack of consultation / engagement / information about the proposals
2. Community impact
3. Environmental impact
4. Financial
5. Physical and mental health
6. Process and decision making
7. Miscellaneous

Objections Raised

1. Lack of consultation / engagement / information about the proposals

The common theme in this area related to how the plans had been communicated, with some respondents expressing their concern over the lack of information provided. Many comments were a request for more information or highlighted that it was felt that there had been limited engagement.

	Theme of objection	LBE Response
1.1	The plans and commitment to the process have been vague.	The process is in the early stages. More detailed plans will be shared once the public engagement begins. Full public engagement will begin shortly after the agreement for lease is signed as part of the planning process.
1.2	There has been no consultation with the people of Enfield.	
1.3	We would like further consultation with local residents before any decision is made.	
1.4	There does not appear to have been any / adequate consultation with the local community who it will impact significantly	Prior to the marketing of Whitewebbs Park, the Council engaged directly with stakeholders of the park, to inform

		them of the Council's plans to market the site and provide updates throughout the marketing process.
1.5	We should have been able to see the agreement to lease, planning application & draft lease	<p>The negotiations for the Agreement for Lease (AfL) are commercially sensitive and confidential and in some respects subject to legal professional privilege and accordingly the draft AfL cannot be shared with the public.</p> <p>The planning application has not yet been submitted, but when submitted will be available on the Council's planning portal in the usual way.</p> <p>The terms of the Lease will be negotiated and finalised in due course, but as with the draft AfL these negotiations and the draft Lease will be commercially sensitive, confidential and/or protected by legal professional privilege.</p>
1.6	There are NO ACTUAL details published and/or agreed as to how Spurs will use the 'taken over' land. How can Enfield Council therefore agree to Spurs' proposal since they don't know their ACTUAL proposals. 2. As seen very recently, Whitewebbs was FULLY used by local residents during the Pandemic. The residents of Enfield MUST be able to use (and therefore retain) this vital access to open countryside - at all times. There should not be ANY restriction and/or curtailment of its access and/or use.	Full details of THL's proposals will be revealed publicly through the planning process.
1.7	Why is it that this is not generally known about? Why have the club not engaged as required? Why have the council been pushing this through on the quiet?	THL are preparing a communications and engagement strategy which will begin if and when THL have a contractual arrangement through the Agreement for

		Lease. The Council has not been pushing this through on the quiet: there is a publicly available trail of relevant Council decisions; and the present Section 123 consultation-style process is a public process, as the planning process will be in the usual way
1.8	I object as there has been legally insufficient consultation with the public as to what we want.	Stakeholders were consulted prior to the former golf course being marketed ahead of the tender process and will be invited for more detailed engagement as part of the planning process.
1.9	THL has made no effort to engage meaningfully with the Enfield community - even though to do so was a stipulation for the successful bidder - therefore I object to the proposal.	There is no legal obligation for the Council to undertake a more extensive consultation process than the one that has taken place.
1.10	What will the land be used for? Will the public still have access? Is there any intention of building on the land?	It is proposed that approximately 18% of Whitewebbs Park would be used (subject to planning) as a dedicated women and girls' football training academy and turf academy. The remaining accessible areas would be open to the public. Further detail will be given in THL's planning application and as part of its communications and engagement exercise referred to above.

2. **Community Impact**

Objections received under the principal theme of community impact raised concerns over the potential loss of a community asset, i.e., green space to the public, and lack of any public benefit from the proposals. The Council believes that the community experience would be more enhanced than when the golf course was operational, creating a more accessible open space. Under the proposals, the area of the park which THL would control and to which public access would be limited

is approximately 18% of the original bid boundary. This area would be dedicated to developing the Women's and Girls' game with a new state of the art Football Academy and Turf Academy, and access would be managed by the Club. The remaining approximately 82% of the Park would remain open and accessible to the public.

	Theme of objection	LBE Response
2.1	<p>The proposals are not in the interests of the community today or the future.</p> <p>Whitewebbs is for the people of Enfield we love the freedom of Whitewebbs please don't take it away from us it should be for now and for future generations to enjoy</p> <p>1.I remain unconvinced that the Agreement to lease and the proposed lease are of any benefit to anyone but THFC/ENIC. 2.I urge Enfield Council to reconsider its position and find a solution which genuinely serves the interests of the people of Enfield.</p>	<p>The THFC bid also would see the improvements to the wider park, for example carrying out repairs and renovations to paths, bridleways and fences, as well as improving the existing café and toilet facilities to serve public users of Whitewebbs.</p> <p>The bid also includes proposals for a new Women and Girls' Football Academy and a Sports Turf Academy. These would provide top-class facilities and sporting opportunities for the next generation, helping to meet the Council's ambition of increasing opportunity for women and girls to play sport in Enfield.</p> <p>The bid proposals would also enable the Council to invest in grassroots sport for young people, which has been enthusiastically received by residents across the borough.</p>
2.3	<p>This space should be kept free for the public and not football</p>	<p>The majority of the land would remain accessible to the public.</p>
2.4	<p>It has a strong community of walkers, families gathering and golfers.</p> <p>The land belongs to the people of Enfield.</p>	<p>We acknowledge the community benefits of the parkland and anticipate that these benefits would be enhanced through a revised estates management programme.</p>

2.6	This will no longer be able to be used by the public for recreational walking and riding. Affect local business due to unable to use bridle paths, Jillan's Riding School, Kings Oak Equestrian Centre and Guy Lodge livery stables	The majority of the land would remain accessible to the public. It is proposed that associated bridleways would be upgraded as part of the agreement.
2.7	I object to the lease as it does not appear to enhance the public space itself, support public use of or access to the space	It is expected that the THL proposals would enable the enhancement of the public space, for example, the proposed improvement works forming part of the lease agreement would include refurbishment of the former southern clubhouse to provide a new café.
2.8	Whitewebbs is for the people of Enfield we love the freedom of Whitewebbs please don't take it away from us it should be for now and for future generations to enjoy	Please see comments above.
2.9	1.I remain unconvinced that the Agreement to lease and the proposed lease are of any benefit to anyone but THFC/ENIC. 2.I urge Enfield Council to reconsider its position and find a solution which genuinely serves the interests of the people of Enfield	Please see comments above.
2.10	I object to this land being used in this way. It should not become private	The area which is proposed to be used as a Women's Football Academy would be only approximately 1/3 rd of the area intended to be leased. The remainder of the park would be accessible to the public.

3. Environmental Impact

This principal theme includes objections relating to loss of habitat and to carbon sink during a biodiversity and climate crisis, as well as concerns relating to increased noise, traffic movements, drainage and flooding.

Around half of the former golf club would be rewilded and transformed into new parkland and wildflower meadows. The northern boundary would also be rewilded to form a natural connection between Whitewebbs Wood and the new nature reserve the Club is delivering at Dickenson’s Meadow.

Also nearby, the Club is creating a new environmental centre and nature reserve at Dickensons Meadow. The intention here is to provide the borough with a high quality education experience for both primary and secondary school level pupils and a hands-on experience with nature. Works to deliver the Meadow are due to start this year.

	Theme of objection	LBE Response
3.1	The plans destroy a beautiful area.	The Council understand the concerns that green space may lost be once the park is leased. The proposals seek to enhance and celebrate the open space through the creation of an estate management plan.
3.2	This is a beautiful green space that is used and enjoyed by many including wildlife. It is good for the soul and environment. It should not be made elite by leasing it THFC. Outrageous.	The green space would continue to be enjoyed by the public, save for approximately 18% of the Park being enclosed as a football academy.
3.3	I object to the lease of whitewebbs park to Spurs due to the diverse nature of the animals that live in this park. The space should remain a sanctuary for animals and an outdoor space for residents.	<p>The Council and THL are alive to this and any development would be sensitive to any issues in this regard.</p> <p>The proposed rewilding the majority of the site would lead to an overall increase in habitat for wildlife as well as creating a more diverse place for residents to visit for leisure purposes.</p>

3.4	By allowing this to go ahead this will not only be damaging to the local residents, but the wildlife population too. This area is home to a variety of Flora and fauna which will all be destroyed when the development goes ahead. Hundreds, if not thousands of beautiful trees will need to be torn down, some of which have been growing for hundreds of years and are a vital part of the eco system in the area. Even if every tree was replanted, there will still be considerable damage to the environment, something that the government was meant to be fixing with its money making ulez expansion, not increasing by tearing down acres of forest. The countless animals that call this area home will have no where to go when the demolition starts and a large number of the smaller woodland creatures may even be killed in the process.	Please see the responses above in this section.
3.5	I am objecting the lease of Whitewebbs to Tottenham! The environmental damage is not appropriate in our time. We need to keep our green spaces.	Any environmental damage would be minimal but where it occurred it would be more than compensated for by enhancements to habitat elsewhere.
3.6	This site is important for biodiversity including providing vital nesting habitat for ivy bees.	These comments are noted. The Council and THL would work closely together to ensure that any damage is minimal. As above, the proposed rewilding would enhance the habitat for wildlife.
3.7	Whitewebbs park and woods offer a valuable and important facility to the local community both human and wildlife. Bats, owls and a multitude of other animals are present. This is ancient woodland and must be left alone.	Under the proposals, bat habitats would be protected accordingly.
3.8	This is a hugely valuable space for people and wildlife alike. It has become a nature reserve, since the golf course was abandoned. It has an array of wild bee species; woodpeckers;	The proposals seek to enhance the Park through rewilding and increasing the current natural habitats.

	kestrels; stag beetles; frogs. It's an incredible piece of greenspace and we cannot afford to lose it - especially with the climate and biodiversity crises, in addition to the lack of London wild spaces. Astro turf is an environmental disaster and more pitches for Spurs is simply not acceptable	
3.9	There is a climate crisis & you are destroying a beautiful rewilded park.	
3.10	As a Garden Designer I strongly object to this proposal. Astro turf pitches and plastic reinforced hybrid pitches provide zero value to Enfield's green belt, in fact they'll have a negative impact.	The designs would be considered through the planning process.

4. Financial

The objections received under this principal theme related to insufficient financial benefit from the proposed lease and that the lease would not be at the best consideration reasonably obtainable.

	Theme of objection	LBE Response
4.1	Rent falls below market level / I feel that this land is massively undervalued in today's market / Fails to secure the best price for the land / I object to the lease to THL for a very small sum of money	A confidential up-to-date valuation report on best consideration has been prepared by the Council's valuers, Knight Frank.
4.2	I feel that this land is massively undervalued in today's market.	Please see the response to 4.1 above.
4.3	The land is going to Tottenham Hotspur for a minuscule amount of money. They are a wealthy company who want this land so they should be charged much more money that can then be invested in Enfield services.	Please see the answer in response to 4.1 above.

4.4	The proposed rental income (averaged out at £80,000 a year) will not be sufficient to support the stated intention “to reinvest an extra £100,000 a year into grassroots sport for young people across the borough”. The Council could have made the existing use of the land more viable by adopting a more business-like approach to the existing facilities.	Please see the Financial Implications section in the main Report.
4.5	The monies talked about for the lease is pitiful and a slap in the face to the local community	Please see the response to 4.1 above.
4.6	I realise that all councils are experiencing financial hardships but, selling off/leasing green space, especially at such an insultingly low amount, does not benefit the people of Enfield. A council should always act with the best interests of it's constituents at heart and this does not do that in any way	The Council are not proposing the sell off the land. The proposal is to lease the land for a 25 year term with an estate management programme appended to the lease.
4.7	I am also very concerned that the local authority seem to be charging too little for the leased land and this cannot be in the best interests of the community. If money is to be raised from leasing Whitewebbs surely the local authority would want to maximise the profit made for the benefit of all Enfield residents?	Please see the response to 4.1 above.
4.8	I also feel that if our public park is to be privately leased, this should be done at the market rate or even a premium to that, to justify the loss of access and benefit the local community in other ways. I feel particularly strongly that a business as well financed as THL should be paying significantly more than the current terms of the lease.	Please see the response to 4.1 above.
4.9	I do not believe that this represents good value for local residents	Please see the response to 4.1 above.

--	--	--

5. Physical & Mental Health

The objections reported under this principal theme concern the importance of green spaces for mental health and well-being, in particular (but not only) for retired people and dog walkers.

	Theme of objection	LBE Response
5.1	As a recovering cancer patient daily access has been essential to recovery.	The land would not be lost to the public. There would continue to be public access over the majority of the park.
5.2	Our parks are essential for our wellbeing. Once Spurs start building, it will be completely lost to the public.	Please see the response to 5.1 above.
5.3	The pandemic has shown how important green spaces are and the accessibility of these spaces, for physical and mental well-being.	The Council agrees with this statement and fully appreciates the popularity of the park in this regard.
5.4	This space should be left for general public as its vital for people's mental health.	The land would not be lost to the public. There would continue to be public access over the majority of the park.
5.5	I walk and play golf on this land. Who decided it was your right to deny me and the rest of the public this escape from urban living.	Please see the response to 5.5 above.
5.6	The need to have access to open spaces for recreation for resident's mental health and well-being is key	The Council fully agrees, and hopes residents would choose to continue using the park in this way.

5.7	Green space is of vital importance to people in all walks of life in particular those needing to enjoy the outdoor space which is good for mental health.	Please see the response to 5.6 above.
5.8	I object to the proposal on the basis that will create an obstruction to the absolute freedom to walk/run through the area. We are a mixed group, some living in west Enfield...(west of Ridgeway) and others east of Great Cambridge Road but walks and runs take us east to west taking routes that are varied and often off the beaten track but pass through the proposed area. Any proposal that would prevent us continuing these decades old healthy life improving activities should be stopped or only permitted to all absolute free movement of people irrespective of times or dates.	Part of the park would not be accessible but the proposals would not on the whole prevent these walks and runs. The Council believes that members of the public would benefit from a more enhanced experience.
5.9	Whitewebbs is a much loved and much used open space easily accessed for the residents of Enfield. At a time when we need to encourage greater use of such a great facility to improve physical and mental health	The land would not be lost to the public. There would continue to be public access over the majority of the park.
5.10	I am a member of a walking group for retired people and we are recommended to take regular exercise for our health.	Please see the response to 5.9 above.

6. **Process & Decision Making**

The objections themes set out and responded to below relate to non-legal aspects of the Council's decision-making and process.

	Theme of objection	LBE Response
6.1	Whitewebbs Park is public trust land. It was acquired by Middlesex County Council under section 169 of the Public	Please see the Legal Implications section of the main Report.

	Health Act 1875. The land is subject to a public trust and Enfield Council is a trustee, as opposed to a beneficial owner. Enfield Council thus have no rights at all to sell or lease any part of the park to a private corporation for an exclusive training academy, inaccessible by the general public. The land is also "open space" as defined in Article 6 of the Greater London Parks and Open Spaces order 19672. Various articles within that order prevent Enfield Council from leasing any part of the park for exclusive use by a private corporation, whilst excluding the general public.	The Council has responded directly to CPRE on these matters.
6.2	The timing is close to Christmas when people are distracted and is totally undemocratic as residents have consistently made their objections known.	There has been no deliberate attempt to minimise public awareness or restrict the public's ability to respond to the section 123 Notices. In light of the December timing, the response period was extended to account for public holidays allowing objections to be received up until midnight on 15 th January 2023, thereby allowing a full month for responses to be made to the Notices.
6.3	The Council have gone back on commitment to not agree leases until the planning process has concluded.	The Council proposes to enter into an Agreement for Lease. The Lease would not be granted until planning permission had been obtained.
6.5	Change of publicised tact i.e. planning before lease. As Spurs are agreeing to the terms of the lease now, have they have been in touch with Planning to verbally agree their plans without proper planning consultation? Property Director/department agreed at the public Green Belt Forum meeting to not award this lease to an organisation that had not fulfilled previous Section 106's. Spurs have still not complied with some Section	Please see the response to 6.3 above.

	106s and have foregone at least two planning applications Buildings and Floodlights and completed constructions. The people of Enfield depend on Enfield Council to comply with their own policies to protect residents' rights and hopefully wishes. LBE is mainly funded by Enfield residents after all.	
6.6	Whitewebbs Park is public trust land. Legislation states that the land is to be used as open space and for public recreational activities.	Please see the Legal Implications section of the main Report.
6.7	The leasing of Whitewebbs Park to Tottenham Hotspur FC appears to be unlawful. As stated in the letter from CPRE sent to Helen Berry Senior Property Lawyer. To which I understand there has been no response.	All letters from CPRE to the Council have been replied to.
6.9	The Council has not demonstrated that it is lawful for this land to be leased to THL for the purposes indicated. In the absence of this information, we object to the Council's proposal. We have not seen a copy of the draft lease so we are being deprived of the opportunity to make an informed judgment.	Please see the response to 1.5 above.
6.10	The lease of the park to a commercial organisation is unlawful. It is for the use of the people of Enfield not a private company. Spurs have proven not to be trustworthy in respect of commitments made in respect of footpaths and nature reserves around their main training ground and are not a suitable tenant. It is unnecessary to lease the whole of the park to Spurs in any event when their plans are only for a limited area.	The proposals are to lease only a proportion of the park.



WHITEWEBBS PARK GOLF COURSE

SUMMARY OF
TOTTENHAM HOTSPUR PROPOSALS

A scenic view of a river with ducks and trees. The river is in the foreground, with several ducks swimming. The banks are lined with lush green trees, and a path with benches is visible on the right side. The sky is blue with some light clouds.

“As with our existing Training Centre, close attention to detail will be paid to ensuring the site’s natural environmental habitat is maintained and enhanced and that all design is to the very highest standards.

Our proposals will enhance public access, improve opportunities for recreational and community use and build on the fantastic work that has been delivered by our Foundation in Enfield over the past decade. The new Women and Girls’ Football Academy will enable us to continue developing the game at grass roots level and to improve participation in the sport.

It would be the first of its kind in the UK and it would be in Enfield – an inspirational setting.”

“”

—

DANIEL LEVY
CHAIRMAN, TOTTENHAM HOTSPUR





INTRODUCTION

Tottenham Hotspur Football Club is proud to have been selected by Enfield Council as the highest scoring bidder to regenerate Whitewebbs Park Golf Course.

Our proposals meet the Council's objectives in providing a sustainable future for this important site and also respond to local community aspirations by providing enhanced public access and improve facilities.

The site presents a once in a generation opportunity to create a regionally significant asset for Enfield and we very much welcome the opportunity to respond to this challenge. As a leading professional sports club and adjoining landowner, we offer a unique combination of a passion for sport, leisure, education and inclusivity; an understanding of the local area; and the resources to deliver a scheme to the highest standards.

OUR PROPOSAL IS BASED UPON:

- The enhancement of public access through improvements to footpaths and bridleways
- The restoration of part of the former Whitewebbs Park Golf Course back to parkland
- The redevelopment of the Southern Clubhouse to provide enhanced food and beverage facilities for visitors to the park
- The creation of a new Women and Girls' Football Academy with a focus on the development of grassroots football and widening female participation in the sport
- The restoration and conversion of the Northern Clubhouse as the centrepiece of this new Academy
- The opportunity to work with Enfield Council and stakeholders to establish one of the Country's first Habitat Banks to provide for the long term stewardship of Whitewebbs Wood
- The provision of education and training opportunities through the launch of our new Sports Turf Academy



LOCATION

The Club is proposing to take a lease on part of the site (edged blue), with Whitewebbs Wood being retained in Council control and unchanged (edged red). Subject to further consultation and planning, the proposals include:

1. Ecological and recreational value of Whitewebbs Wood enhanced through public access and landscape improvements
2. Restoration of areas of historic parkland on site of former golf course.
3. Ecological and landscape improvements around Cuffley Brook
4. New Women & Girls' Football Academy centred on Northern Clubhouse and with playing pitches set out amongst ecological and landscape improvements
5. Ecological and landscape improvements to the northern boundary to provide a link into Dickenson's Meadow and the existing Training Centre beyond
6. Redevelopment of Southern Clubhouse to provide new food & beverage/visitor facilities amongst ecological and landscape improvements





IMPROVEMENTS AND UPGRADES

Alongside the extensive ecological and landscape enhancements that will be made across the whole site, the proposal also includes upgrades to and investment in the statutory footpaths and bridleways for use by walkers, cyclists and horse riders. For example, damaged timber fencing will be repaired, wayfinding and information signage will be improved and the Club will seek to convert the permissive paths within its leased land to statutory bridleways.

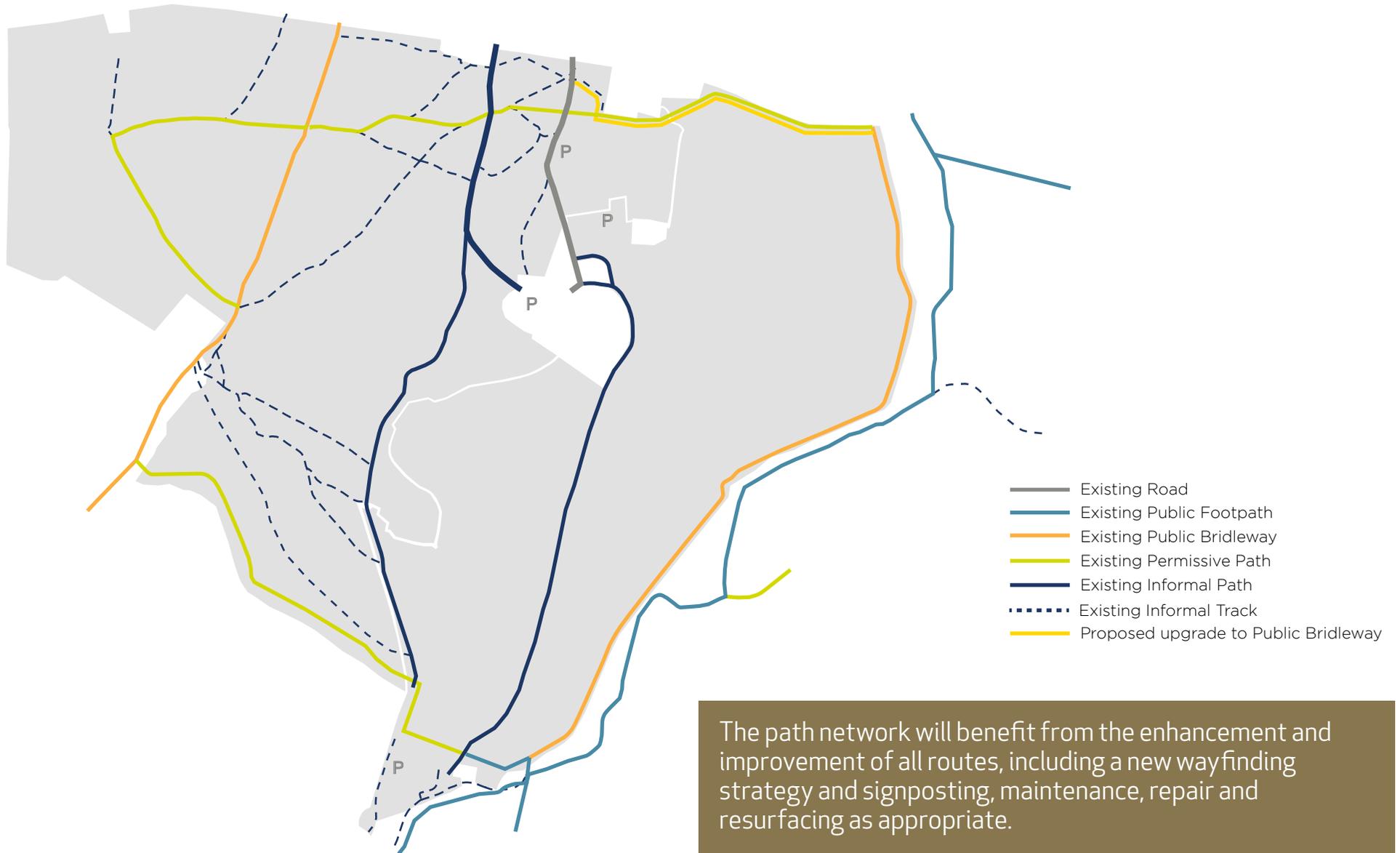
Subject to surveys and planning, the Club proposes to retain and convert the existing Northern Clubhouse to provide the principal built facility for the Women & Girls' Football Academy. New playing pitches will be laid out in consultation with eminent landscape architects and ecologists to ensure their assimilation into the countryside.

Subject to planning, the Club proposes to redevelop the Southern Clubhouse and café to provide significantly improved food, beverage and toilet facilities for visitors to the park. Both the café and toilet facilities will be open to all members of the public.

These enhancements will be secured either through direct works by the Club or from the Club's financial consideration for its lease on the site. The Club and the Council will focus on delivering early improvements.



PUBLIC ACCESS





ECOLOGICAL ENHANCEMENTS

The proposals will see ecological and landscape enhancements across the whole site, with the Council retaining control of Whitewebbs Wood which will remain unchanged and open to the public.

In addition to the restoration of the southern part of the former golf course, the proposals include ecological and landscape improvements to the northern boundary and around Cuffley Brook to the south.

The Club will seek ecological enhancements around the new playing pitches, for example through the introduction of wild flower meadow habitat.

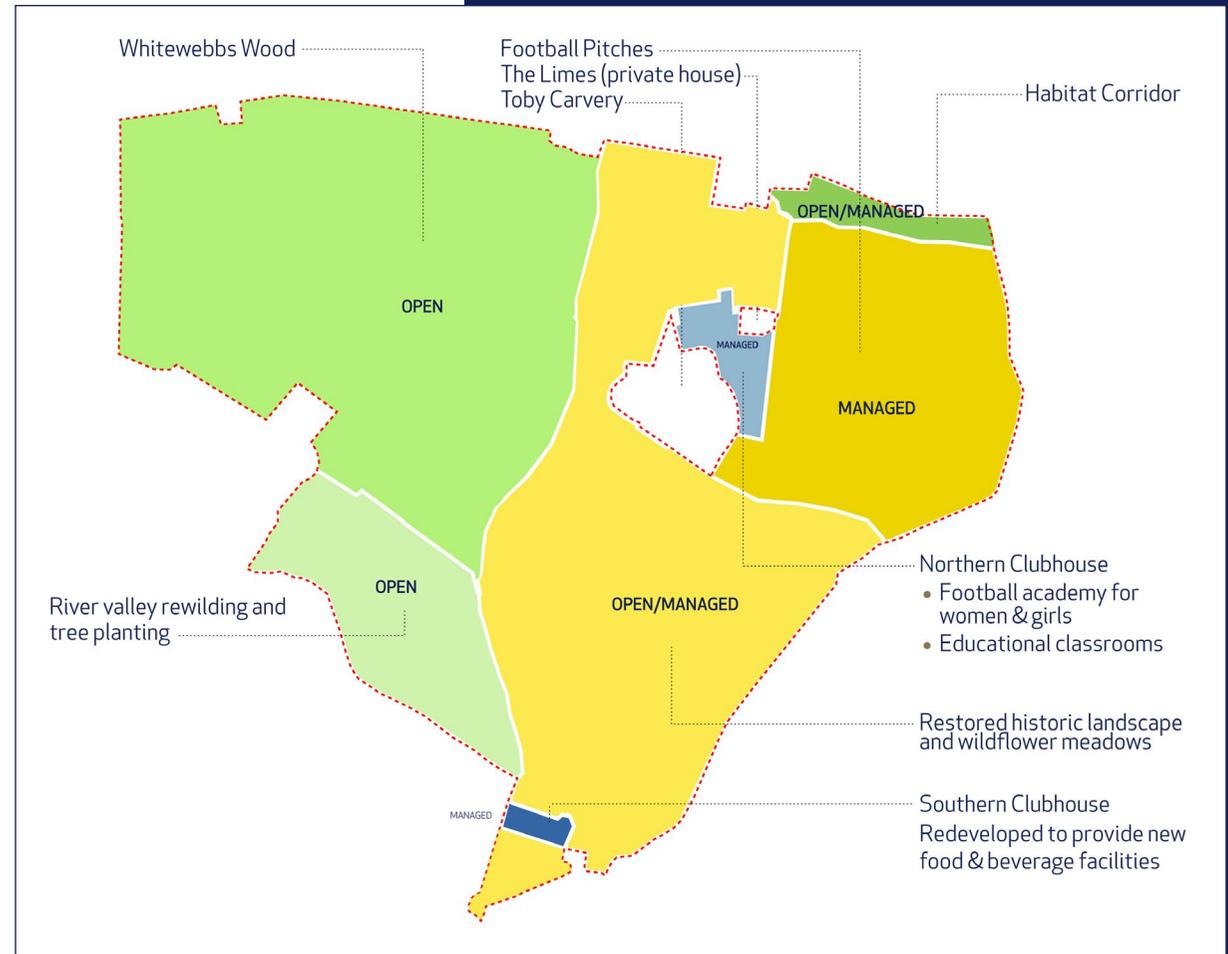


The Club also welcomes the opportunity to work with Enfield Council and stakeholders to establish one of the Country's first Habitat Banks to provide for the long term stewardship of Whitewebbs Wood.

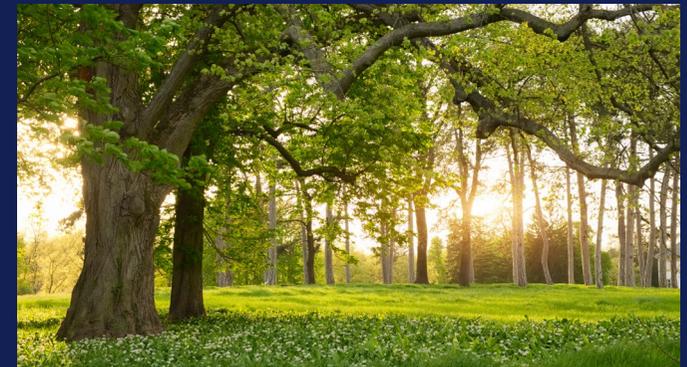


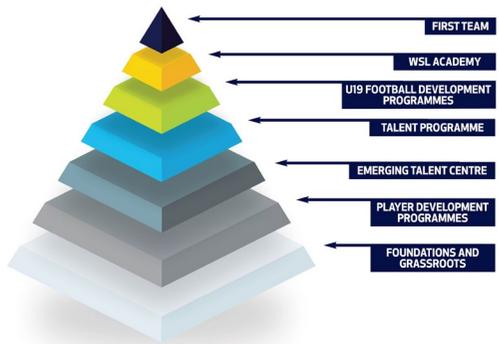
RESTORED LANDSCAPE

Subject to surveys and planning, parts of the former golf course are proposed to be returned to historic landscape and wildflower meadows, informed by the layout of the original 19th Century parkland landscape, reinstating lost parkland trees and historic vistas.



These enhancements would provide opportunities for community and educational events and activities such as sporting competitions, guided trails, seasonal wildlife events and children's events linked to local schools.





AN INSPIRATIONAL FACILITY

With 2.5 million participants in England football is now the biggest women's team sport in the Country.

The Club is proposing the creation of a Women and Girls' Football Academy, taking inspiration from the World-class facilities on offer to the Men's First Team and Academy teams at its existing Training Centre. It will focus on the development of female football at grassroots level in the Borough and beyond.

The new Academy will work in conjunction with the Tottenham Hotspur Women's First Team, which gained professional status following promotion to the Barclays FA Women's Super League in 2019. It will be supported by the Club's Global Coaching Team and charitable Foundation, to create clear progression pathways from entry to elite level through player development programmes, to help Enfield Council grow participation levels in sport and leisure among women and girls.

The Club is also committed to the organic development and holistic support of our Coaching Excellence programme to continue the promise of creating the next generation of World-class female coaches, developing a hub-site that will create career opportunities and sustainable outcomes for female students from our local Borough - working as part of a wider club strategy to grow participation in girls and women's football

With over 2.5 million active participants, football is now the biggest women's team sport in the UK.





EMPLOYMENT AND TRAINING OPPORTUNITIES

The proposals will also facilitate the launch of a Sports Turf Academy, administering and delivering a wide range of courses on site, via our external teaching partners.

Tottenham Hotspur aims to produce a new generation of exceptional sports turf, greenkeeping, horticultural and mechanical staff by giving the sports turf industry a world-class facility to educate students.



“THE SPORTS TURF ACADEMY REPRESENTS A CHANCE TO DEVELOP AN INDUSTRY IN WHICH WE HAVE A WEALTH OF EXPERIENCE AND EXPERTISE, TO THE BENEFIT OF YOUNG PEOPLE SEEKING EMPLOYMENT AND TRAINING OPPORTUNITIES.”

Daniel Levy, Chairman, Tottenham Hotspur



SPURS IN THE COMMUNITY

Spurs has a long history of working with and in the local community in Enfield. In addition to fulfilling its legal obligations as part of Training Centre development, which included the delivery of over 70,000 coaching hours, the Club is involved in the following programmes:

Premier League Kicks – The programme has a long history of using the power of football and the value of sports participation to help young people at risk of becoming not in education, employment, or training in some of the most disadvantaged areas of the community to turn their lives around. This programme is currently being delivered at Oasis Academy; Craig Park; and Broomfield School.

Project Search – A programme that provides students with access to real working environments, taking part in 30 weeks of work placement within North Middlesex University Hospital; with a classroom-based support teaching employability skills with the aim of moving students into employment.

Premier League Inspires – An education programme, newly introduced in 2019, developed by the Premier League and professional football clubs with partnership support from The Professional Footballers Association and the Prince's Trust. The programme is aimed at young people between 11-25 who are at risk of not reaching their full potential; supporting them as they move through the education system and early adulthood.

This programme is currently being delivered at Enfield Grammar School and Enfield County School for Girls.

Premier League Primary Stars – Uses the appeal of the Premier League and professional football clubs to inspire children to learn, be active and develop important life skills. The overall aim of the project is to improve the quality and impact of sport in school by improving confidence in delivering PE in teaching staff and improving confidence in PE participation for the students. The programme brings Premier League coaches into primary schools to work with children and includes mentoring teachers to deliver extra-curricular clubs and classroom support.

This programme is currently being delivered at Wilbury Primary; St John and St James CofE Primary; Forty Hill Primary School (from next term); Hadley Wood Primary (next term); Firs Farm primary school (from next term); Meridian Angel primary school (from next term).

Move4You – Guided physical activity programme to anyone over 18 who has had a cancer diagnoses in the last 5 years. The programme caters to all abilities and helps people to get and stay active. We are currently delivering Move4You virtually in Southbury.





WHAT'S NEW

—
This document is available to view on
our website at
tottenhamhotspur.com/whitewebbs

Richard Serra
Head of Planning
richard.serra@tottenhamhotspur.com
07793 246252



Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Decision to Lease Land at Whitewebbs Park Golf Course following Section 123 Notice
Team/ Department	Strategic Property Services – Housing, Regeneration and Development
Executive Director	Sarah Cary
Cabinet Member	Cllr Leaver
Author(s) name(s) and contact details	Jennifer Lee Jennifer.lee@enfield.gov.uk
Date of decision	4th July 2023
Date of EqlA completion	31st May 2023

Date the EqlA was reviewed by the Corporate Strategy Service	31st May 2023
Name of Head of Service responsible for implementing the EqlA actions (if any)	Adrian Smallwood
Name of Director who has approved the EqlA	James Wheeler

The completed EqlA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqlA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?
 What are the reasons for the decision or change?
 What outcomes are you hoping to achieve from this change?
 Who will be impacted by the project or change - staff, service users, or the wider community?

Proposed Decision

It is proposed the Council enter into an Agreement for Lease with Tottenham Hotspur Ltd (THL), in respect of the land formerly occupied by Whitewebbs Park Golf Course (WPGC).

The attached plan details the areas proposed to be leased, subject to planning permission for the proposed use.

Reasons for Proposed Decision

On 30th September 2021, the Portfolio decision KD 5177 approved the leasing of WPGC to THL for a 25-year term, firstly through the granting of the agreement for lease, and subject to planning, the Lease.

Prior to the marketing of Whitewebbs Park, the Council engaged directly with stakeholders of the park, to inform them of the Council's plans to market the site and provide updates throughout the marketing process. The stakeholders engaged by the Authority were:

- Ward Councillors
- The Friends of Whitewebbs Park
- The Friends of Hilly Fields
- The Greenbelt Forum
- Whitewebbs Golf Club
- Whitewebbs Golf Course Users

This proposal was advertised by, among other means, the publication of a Notice under Section 123(2A) of the Local Government Act 1962 in a local newspaper over two consecutive weeks from 14th December 2022, inviting members of the public to submit objections to the proposal by 15th January 2023. Please see the summary of the Section 123 Process in Appendix C, the Analysis of Objections, for further details. The objections received have been considered by the Council and it is recommended that the Council proceeds with the agreement for lease and, subject to planning, the lease.

Anticipated Outcomes and Affected Users

Proceeding with the proposal would mean that the Council and THL would enter into a conditional Agreement for Lease for the former Whitewebbs Golf Course to be leased to THL if the conditions in the AfL are fulfilled. It is anticipated that approximately 18% of Whitewebbs Park as a whole would be dedicated to a women's and girls' football training academy and a turf academy with limited public access.

The remainder of the park would remain accessible to the public and would be managed through a joint estate management agreement between the Council and THL. Prior to the grant of the lease, THL would be obligated to obtain planning permission for the proposed development and complete a series of works to benefit the wider community, including the following.

- Recreation of parkland and landscaping to include tree planting and meadow creation.
- Improved footpaths.
- Improvements to the Southern Clubhouse and car park to include a public café, visitor centre and WCs with visitors' car parking.

As part of the planning process, there would be the usual statutory consultation period during which the local community would have the opportunity to engage with the proposed development and comment.

The golf course is no longer operational with both the northern and southern clubhouses already vacant; therefore, no staff would be affected.

Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Detailed information and guidance on how to carry out an Equality Impact Assessment is available [here](#). (link to guidance document once approved)

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

According to the 2021 Census, Enfield's population in March 2021 was estimated to be 330,000 (rounded to the nearest hundred).¹

Age breakdown of Enfield's population

Age group	Enfield population
0-4	21,300
5-9	22,800
10-14	24,100
15-19	21,300
20-24	19,100
25-29	21,200
30-34	23,100
35-39	24,000
40-44	24,600
45-49	22,700
50-54	22,700
55-59	21,100
60-64	17,100
65-69	12,800
70-74	11,200
75-79	8,200
80-84	6,500
85+	6,400

Enfield has higher proportions of residents aged under 20 than regional and national averages. The proportion of over 65s in Enfield has grown by 16% in the last ten years.

During the consultation, representations were received stating that the proposal involved the loss of green space for use by various community groups and the public generally. Whilst there is no data specifically indicating this, it might be expected that children, retired people and also possibly disabled people benefit disproportionately in terms of the benefits from access to green space on their physical and mental health and well-being.

¹ ONS, [Population and household estimates, England and Wales: Census 2021](#)

The lease terms would preserve free public access to approximately 67% of the leased area and would be designed to enable an enhanced community experience as compared with when the golf course was operational. It is expected that this would benefit park users of all ages.

The proposed changes also seek to enhance and celebrate the open space through the creation of a joint estate management agreement between the Council and THL in relation to the approximately 67% of the leased area that would remain freely open to the public.

Under THL's bid, Whitewebbs Wood would be preserved in its entirety and remain fully publicly accessible and managed by the Council. THL would fund enhancements including signage and repaired trails. The proposal would also include improvements to the Southern Clubhouse and car park to incorporate a café and WCs and public car parking; as well as improvements to the park's infrastructure including to bridleways and footpaths.

If the proposal is approved, approximately 18% of the park would be exclusively used by THL, dedicated to growing Women's and Girls' football, with a new state of the art Football Academy as well as a new Turf Academy. This would have a positive impact on women and girls from the age of 5 upwards. Although this area will have limited public access, it occupies an area which formed part of the previous Golf Course.

Although the proposals, if approved, would result in a change of use for a portion of the green space previously occupied by the golf course, this would not negatively impact residents and visitors of different ages. Instead, enhancements to the green space and infrastructure would benefit park users of all ages, and the creation of a new football academy would support the participation of women and girls aged 5 upwards in sport.

Mitigating actions to be taken

No mitigating actions have been identified. Accessibility considerations are considered under disability below.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

According to the 2021 Census, 44,876 people (13.6%) in Enfield reported a disability.²

The proposal creates the opportunity to make the former golf course accessible to more user groups through the provision of improved facilities e.g., the southern car park, café and WCs.

The use of the parkland for exercise to aid mental health was a common theme amongst the objections. The proposals to improve the café facilities would provide all park users with an improved space to meet and connect, supporting mental health and wellbeing.

Mitigating actions to be taken

- Accessibility to be considered to ensure footpaths include wheelchair access where feasible.
- The implementation of a suitable ratio of blue badge car parking spaces in the proposed improvement works to the car park.
- Provision of accessible WCs.

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

There is no anticipated impact on this protected characteristic.

² ONS, Disability, England and Wales: Census 2021

Mitigating actions to be taken
n/a

<p>Marriage and Civil Partnership</p> <p>Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.</p>
<p>Will this change to service/policy/budget have a differential impact [positive or negative] on people in a marriage or civil partnership?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>There is no anticipated impact on this protected characteristic.</p>
Mitigating actions to be taken
n/a

<p>Pregnancy and maternity</p> <p>Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>
<p>Will this change to service/policy/budget have a differential impact [positive or negative] on pregnancy and maternity?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>There is no anticipated impact on this protected characteristic.</p>

Mitigating actions to be taken

n/a

Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.
--

Will this change to service/policy/budget have a differential impact [positive or negative] on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

There is no anticipated impact on this protected characteristic.
--

Mitigating actions to be taken

n/a

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a differential impact [positive or negative] on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

There is no anticipated impact on this protected characteristic.
--

Mitigating actions to be taken

n/a

Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

THL propose to develop a women's football academy to sustain the growth in women's football, with a regionally significant facility that is dedicated to the development of women's and girls' football from grassroots level – the two components feeding off one another. The facility would be the first of its kind in the UK and would be an inspirational facility for female participation in sport.

The proposed Women's Football Academy would create a positive impact on women, by developing female football talent from U10 level, through U16 and U18 levels up to development squad (reserve team) level.

In addition to the development of academy talent, the facility would also enable the development of female grassroots football through a variety of THL and FA programmes, such as SSE Wildcats (age 5-11); Mini Soccer Teams (7-10); Youth Teams (11-16); FA Mars Just Play (16+); Soccercise (16+); 5s (16+); and Women's Walking Football (16+).

Mitigating actions to be taken

n/a

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

There is no anticipated impact on this protected characteristic.

Mitigating actions to be taken

n/a

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.
--

Will this change to service/policy/budget have a differential impact [positive or negative] on people who are socio-economically disadvantaged?
--

Please provide evidence to explain why this group may be particularly affected.

There is no anticipated impact on this protected characteristic.
--

Mitigating actions to be taken

n/a

Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The agreement for lease and steps required through to completing the lease would be managed by Strategic Property Services, so any requirements would be managed through the usual leasing procedures. If and once the agreement for lease is entered into between the Council and THL, THL is expected to apply for planning permission for the proposed development. It is anticipated that equalities considerations would be taken into account as part of the planning decision process

Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
Limited accessibility for disabled persons	Accessibility to be considered to ensure footpaths include wheelchair access where feasible.	Jennifer Lee	During the planning process which would begin following completion of the agreement for lease.	n/a	
Limited accessibility for disabled persons	The implementation of a suitable ratio of blue badge car parking spaces in the proposed improvement works to the car park.	Jennifer Lee	During the planning process which would begin following completion of the agreement for lease.	n/a	
Limited accessibility for disabled persons	Provision of accessible WCs.	Jennifer Lee	During the planning process which would begin following completion of the agreement for lease.	n/a	

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank