

## Proposed Works on Tooting Bec Common COM/3263104

### Statement of Case: Dan Boyde      Objection

#### Introduction

1. My name is Dan Boyde and I have been resident at 69 Scholars Road since 2004. I **object** to Wandsworth Council's application to fence off part of Tooting Common as part of the proposed "Tooting Triangle" development, and ask the Secretary of State to reject the application.
2. I live at the south end of Scholars Road, very, very close to the Tooting Triangle area. Over the years my family have made use of the children's playground areas, and have made frequent use of the 'Redgra' football pitch area for a range of activities.
3. I appreciate the opportunity to have my say on this proposal at this Public Inquiry, particularly in light of how poorly the public consultation has been handled by Wandsworth Council throughout the history of this project. Despite our very close proximity to the development, Wandsworth Council have not deemed it appropriate to contact us or any other local residents at any stage in the application.
4. The objections expressed here are my own – but I would not have submitted this objection if I was not aware that there is very substantial local opposition to the scheme.
5. This statement is largely a reiteration of my previous objections to the application. However, I have taken the opportunity to carefully review the Statements of Case from the Council submitted recently, to see whether any of the issues have been addressed. This has merely confirmed that elements of the Council's position are based on severely flawed reasoning and/or a failure to assess the impact of the scheme in a meaningful way.

#### Summary of objection

6. My objections relate to the "interests of the neighbourhood" and are therefore relevant to your consideration. In summary my objections to the proposal relate to:
  1. the loss of a valuable area of the Common that is currently free for all to access, to be fenced off for commercial use;
  2. the adverse impact of parking and traffic that the proposal would generate in the roads near the junction of Cavendish Road and Emmanuel Road;
  3. the noise impact of the massive intensification of use of the area, around the main access area on Cavendish Road as well as around the pitch;
  4. the adverse impact of the massive intensification of use of floodlighting from the current one hour a week to c38 hours a week;
  5. the inadequacy of the Council's consultation process throughout the history of the project.

### **Fencing off common land for commercial operation**

7. My principal objection is to the permanent enclosure of land that is currently free for anyone to use at any time, converting its use to a commercial operation. I do not agree that this is “in the interests of the neighbourhood” or that “no harm will arise”. While it may only be a small part of total area of common, it is the only accessible hard surface. Many correspondents have highlighted the varied nature of current use, and the value many residents place on access to the area, particularly during a very wet winter when so much of the grass area has been unusable.
8. As I pointed out in previous objections, to the planning application and this latest application, the Council appear to have little or no understanding of the current use and to have made decisions based on inadequate information. I attended (virtually) the whole of the Wandsworth Council Planning meeting, and it was a notable feature of the debate that the Councillors, and the officials who wrote the planning report, had no understanding of the extent to which the pitch area is used. Only one member had actually bothered to visit the site, and she observed that she had seen a number of different small group activities in progress. This insight was swiftly glossed over by her colleagues.
9. The plan involves this area of the Common being fenced off and no longer available for public use – with no alternative facility provided. In their statements, Mr Warren states that the scheme would be “without the loss of any existing facilities”, Mr Cooper-Grundy says there would be “minimal impact on those wishing to use the pitch”, and Mr Lowndes says the scheme would “allow for increased use in inclement weather”. All these statements are nonsense – we all lose the opportunity to use the area, whatever the weather, unless we pay for organised group access.
10. The application (15) is misleading in claiming that the purpose of the fencing is to protect the area, ensure the right footwear and prevent injury to passers-by. The principal purpose of the fencing is to restrict access to paying customers only, to enable a commercial operation on common land.
11. While the area was fenced off in the past, the Council papers confirm that the fencing was removed more than 30 years ago. After such a long period, I think it is unreasonable to talk about “reinstating” the fencing, as the area is firmly established as an open area of the Common.
12. At times, the developers and the Council have portrayed the area as derelict and unused, posting pictures taken when it is empty and misrepresenting current usage. The developer’s website falsely claimed that the space “has been only used by a few people for many years”, and the current boards have large pictures of the area when it has been partially flooded. At other times, they claim that the area is heavily used and that there would therefore be no noise, parking or traffic impacts. Neither case is true – there is significant casual use, but not on anything like the scale of the proposal which would have large numbers of people on site 12 hours day all year round.

13. The pitch area is widely used on a casual – and FREE - basis by many people for many activities. There are often multiple games in progress with small groups, as well as occasional larger games. It is used for all manner of ball games, fitness workouts, and for toddlers learning to ride their bikes in a safe space. While the surface is not the best, it is a valuable all weather option that is open to all – the proposal to fence it off and remove free access for all is a significant loss of the overall amenity of the Common. I know that other respondents have supplied photos and video to demonstrate the real usage of the area, and encourage you to take note of these.

### **Parking and Traffic Impact**

14. I am very concerned about the impact of parking and traffic in the area around the junction of Emmanuel Road and Cavendish Road, the principal access point to the site. We live at the Emmanuel Road end of Scholars Road and would be among the first to be affected by additional parking. There is no spare parking capacity in the area.
15. The developers and the Council have failed to undertake any meaningful analysis of the likely usage, where people would come from and what mode of transport they would use, and what the resulting traffic and parking impacts would be, relying instead on irrelevant statistics and casual assertions. They refer to the “Green Transport Plan”, which consists of little more than asking people not to drive. A review of the post-codes on the many football club members who were encouraged to support the planning application suggests that this is highly unlikely, and that people would come from a broad area of South London. The developers have already been promoting evening football competitions. I would also suggest, based on my own experience of the sporting clubs and events my children have been involved over the last decade, that many of the people who are within a 15-minute walk would be driven to the site. I would expect that many users would be children, whose parents would, understandably, choose to drop them off by car, particularly on dark nights.
16. Mr Cooper-Grundy cites statistics about the access modes of existing visitors to the Common. This is irrelevant to the assessing the impact of the scheme which will bring a different group of people to a specific area of the Common for a specific purpose. Mr Lowndes claims that “the sports facilities already exist and in this context methods of travel are unlikely to change”. But the proposal is for a fundamental change in sporting facilities from a free casual use area to a round-the-clock commercial operation with dozens of people on site the whole time.
17. Mr Cooper-Grundy’s statement asserts that there have been no objections from traffic authorities. Wandsworth Council are hardly likely to challenge their own scheme, and Lambeth did in fact lodge concerns at the time of the Planning Application. I appreciate that it is unlikely to be a very high priority for them at this time, but is a serious concern for those of us who will be directly affected.
18. Mr Lowndes states that “*I understand that there is no parking stress*” outside the controlled parking periods. It is not clear what this assertion is based on, but residents of Scholars Road would certainly not agree. It is frequently difficult to find a parking space. Occasional events at the Boxing Club or on the Common have generated significant parking difficulties, and this would become the norm if the project proceeded.

## Noise impact

19. The Council acknowledge that there will be noise associated both with people involved in sporting activities on the site, and with the flows of people coming and going from the site, but reach the quite extraordinary conclusion that *“the Council believes such noise will not be significantly different to, nor worse than, current levels of noise”*.
20. They attempt to justify this by stating that the current Redgra surfaced area is *“extremely popular and well used by many people for a variety of sport and recreation activities”*. As noted earlier, this is in contrast to their previous claims that the area is hardly used at all.
21. The proposed scheme will involve round the clock, year-round use with dozens of people on the site at any time. Three 5-a-side pitches and one 7-a-side pitch implies a minimum of 44 people in sporting action at any time, though there will often be a lot more with squads, referees, coaches, parents, and hangers-on. Overlaps at the beginning and end of each session mean there will probably be 100 people on site at any time.
22. Current usage of the redgra pitch is entirely casual, generally in small groups playing independently, and is negligible after dark. This generates very little noise. Objectors have rightly pointed out that the area is used and useful to many people for a range of activities, but this use is on a totally different scale to that of the proposed scheme. It is simply not credible to claim that the noise level will not be materially different. One must question the judgement of people who can make this claim.
23. The children’s playground is well-used, though again the numbers and noise level are far below those of the proposed facility and, obviously, children’s playgrounds are not widely used after dark and after dinner-time. The more relevant issue relating to the playground is the impact of the noise, and the inevitable bad language that goes with competitive sport, on the young children using the playground.
24. Mr Cooper-Grundy’s statement rightly noted that many objectors regard the areas as a “quiet and peaceful haven”, but goes on to state that the *“Council notes that the proposed facilities do not change this element in anyway”*. Yes, they would! I think most people would agree that switching on floodlights and having dozens of people playing sport would be a bit of a change from an area that is largely quiet after dark.

## Impact of Floodlighting

25. There would be a major impact from the vast intensification of use of floodlights. The Council have previously claimed that *“the proposed changes to lamps and in particular the use of LED lights to replace the existing floodlights will bring about a reduction in light levels and light spill in this part of the Triangle field”*, and they now note that there are no controls on when the existing lights can be used, claiming these as benefits of the plan.
26. While the proposed lights might be better on a like-for-like basis, this misses the fundamental point that the existing lights are hardly used. Current usage is stated to be an hour per week – which would increase to several hours a day, seven days a week, for 9 months of the year. The net increase in lighting impact would be enormous, fundamentally changing this area of the Common.

27. The justification for supporting this scheme with this level of increase, despite their sustained opposition to allowing floodlighting of the sports pitches at Streatham and Clapham High School, where there is a far more compelling case for making better use of established sport facilities, is wholly unconvincing.

### **Inadequate Consultation**

28. Throughout the history of this scheme, the Council's efforts to engage with the public and make them aware of the scheme have been poor, leaving many with the suspicion that this has been deliberate because opposition was anticipated. This was manifested when the Planning Application was submitted, with many local people only being made aware of the plans at a very late stage because they were alerted by objectors via posters and social media. A very large number of objections were submitted "late" along with a petition with thousands of signatures.
29. In response the Council have claimed that *"all of the objections, together with the on-line petition were **considered** by officers and reported, as "Late Items of Correspondence", to the Council's Planning Committee on 19th May 2020 and that the "Late Items of Correspondence" document was included with the Council's application to the Planning Inspectorate."*
30. The key word here is "considered". I observed the planning committee meeting and while I would agree that the scope of the opposition was fleetingly acknowledged, it was certainly not "considered" in any meaningful sense. A number of my comments related to aspects of the officials' report that were inaccurate or misleading. That report was not updated in any way to reflect the "late" flood of comments and the discussion did not address many of the specific points raised. It was clear that the minds of the Chair and most colleagues were already made up, and that there was no interest in considering any further arguments.
31. In response to the widespread criticism of the lack of transparency in the consultation process the Council's only response has been to say that they have done the statutory minimum and *"placed public notices in editions of the South London Press"*. With all due respect to those who produce this paper, I do not think it has a very large readership and doubt that public notices in its pages reach much of an audience. There has been no visible attempt to improve on communication since then. Given how close we live to the site, I am surprised that at no point have the Council written to us.
32. In the 21<sup>st</sup> Century, with so many communication channels open to them, it is simply unbelievable that the Council believe that it is sufficient to rely on notices in the South London Press. I would encourage the Council to stop being so defensive in response to public criticism, and devote some time to considering how they might improve on the process of consulting meaningfully with the people they serve.
33. For the current application, the application form clearly states that "you must advertise your proposal in one main local newspaper and at the **main points of entry to the common**". One of the main entry points, and by far the closest to the Triangle area, is the junction of Cavendish Road and Emmanuel Road, where there are ample opportunities for notices to be displayed both at the corner and under the railway bridge, where other Council notices have been displayed in the recent past. There is also a Council / Enable notice board right next to the pitch area, which is the single most obvious place to display a notice. No notice was displayed at either of these locations at any stage.

34. When a proper notice was finally installed, it was placed inside the children's playground, facing into the playground, rendering it invisible to everyone passing by on the footpath. Again, it is hard to resist the feeling that this was deliberate. A more visible board about the scheme was eventually installed, but only some considerable time after the consultation period started.
35. I am therefore relieved to have the opportunity of this Public Inquiry to consider the many objections to the proposal from local residents.

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29 April 2022