

Friends of Tooting Common submission to the Planning Inspectorate public inquiry into the proposed Triangle development on Tooting Common (COM/3263104)

These are comments by Friends of Tooting Common (FOTC) for the public inquiry into Wandsworth Council's application to the Secretary of State for consent under article 12 of the Greater London Parks and Open Spaces Order 1967 to carry out these restricted works on Tooting Bec Common.

2. FOTC are a group of local residents who care about Tooting Common. We aim to promote the public use and enjoyment of what is an excellent greenspace. We run a range of events and activities on the Common, including an annual Fun Dog Show; a regular programme of bat walks; litter picks; and walks exploring the trees and plants on the Common.

3. The proposed Triangle development is an important and contentious subject, and there are a range of views among FOTC members on it. The following comments reflect the balance of members' views, following consultation.

4. We see a number of benefits to the proposed development, but also a substantial number of points of significant concern.

(a) Benefits to the proposed development are:

- Renovation of what is, and has been for a number of years, a somewhat run-down site. The redgra pitch itself is in poor condition.
- Improved sporting facilities, including for local football teams, and for the Balham Boxing Club, who provide a facility for some hard-to-reach young people.
- Better security at the site and reduction of anti-social behaviour.
- Publicly accessible toilets - an important consideration since the Common is currently very short of toilet provision. However we understand that the Council are taking some other action to address this shortage and it is not clear that this development is required for that purpose
- A café.
- The prospect of improved drainage, in an area which is often seriously waterlogged. However given the current serious problems of waterlogging in this area of the Common, it is not at all clear that the developer would be able to tackle them fully. It would also be important that the work by the developer would be required to dovetail with the more general work to address waterlogging in that area of the Common now being considered by Enable Leisure and Culture and the Council.
- That the developer appears to be a credible operator, with a 30-year history of running sports facilities in South London.

(b) Points of significant concern are:

A particular point of concern is the loss of access by the public to common land through the lease of the Triangle site and buildings to a private developer, for a long period (25 years). This loss of access, particularly to the redgra pitch (see below), is a major and very serious issue of principle. While the Council have argued that their action is consistent with MHLG Act 1967, this does not answer the issue of principle. Common land should be available to all. Among other things, this loss of access by the public does not appear compatible with the objectives and values of Common land as set out in primary legislation and in DEFRA's Common Land Consents Policy Document, primarily to safeguard its open and unenclosed nature for future generations to use and enjoy.

There are concerns that this proposed lease could be seen as setting a precedent for further loss of access to land on the Common to commercial ventures.

Other points of significant concern - some related to the above - are:

- Since the development is to be run by a private leaseholder, it necessarily involves charging for use of the site, which again is an important issue of principle. Earlier responses by the Council have not addressed this issue.
- The enclosure of the redgra pitch would mean that it would no longer be available for impromptu public use and play. Currently the pitch, though in poor condition and in need of replacement, is used considerably, and on occasions is the only substantial relatively drier area of the Triangle Field that is available to use and play on when the rest of the field is waterlogged. It is welcome that the developer has agreed that there would be free access by schools to the redgra pitch during weekdays in term time, and that free use of the site by some local clubs may also be considered. However that would clearly not make up for the loss to public use of the redgra pitch.
- We therefore consider that - in the event of the development going ahead - the Council should be required to take forward action to address the waterlogging of the Triangle field for the longer term, in order to provide a drier area.. A more general project on waterlogging is already underway by Enable and the Council (as above), but work on the western end of the Triangle field would need to be given high priority
- It is also of concern that astroturf would be used for the construction of the pitch. While this may be considered necessary for the purpose of providing a good quality pitch, there are strong environmental arguments against use of astroturf.
- Floodlighting is likely to be on till 9pm (Mon-Fri) and 8pm (Sat and Sundays, and BHs) for most of the year when the site is in use, so could affect the site for much longer, every day, than at present. (We understand that in recent years the floodlights have only been in operation on one evening a week.) Although it is understood that the floodlights will be modern LED lighting which should considerably reduce 'spillage' outside the area, and also that Enable's Biodiversity Manager is satisfied that there are unlikely to be adverse effects of the development on biodiversity (including on bats), the increased level of lighting is of potential concern. In the event of the development going ahead, it would be important that the

Council and Enable also reviewed regularly the effect of the floodlighting on the area around the development, particularly when the site is first used, so that any light spillage could be mitigated. As yet, the Council have not indicated that this reviewing would be done.

- New wire mesh fencing (re-instatement of fencing that was there previously, though a considerable time ago – we understand the previous fencing was removed in the 1980s), causing visual/aesthetic impact as well as loss of public access to the redgra pitch as above. In the event of the development going ahead, the fencing should be as unobtrusive as possible, given the surrounding green space, and should not have “rebound boards” (which might otherwise be part of the usual design of football pitches), in order to reduce noise (i.e. there should be mesh fencing only around the pitches).

- Noise from games could impact other Common users on what is currently a quiet part of the Common, particularly in the evening. It appears that the developer would (appropriately) make arrangements to manage behaviour and attendance at the site, and ensure attendees leave promptly, particularly after evening events. It would though be important that this is indeed done, and that attendance at the site is properly supervised at all times. However there would inevitably be some increase in noise from football matches, including from spectators.

- In this connection, we understand that the developer would intend to establish regular engagement meetings with local resident groups to discuss any issues relating to operation of the site. It would be important that these meetings were indeed established, on a regular and continuing basis, and also that the Council would be involved with these meetings and ensure that the developer acted on any issues of concern, should they arise.

- There would be likely to be some impact from building work (likely to be about 6 months) on adjacent areas of the Common. The developer and the Council have said they intend to take reasonable steps to minimise this, and that, among other things, the plans are that the adjacent children's playground would remain open, for safe usage, throughout the building work. This is welcome (and appropriate) but it would be important that these steps were indeed taken, and also that any damage to the Common was repaired and reinstated by the developer.

- Traffic and parking. Strong concerns have - rightly - been expressed that the facility would result in additional traffic and parking in neighbouring streets in the area. While strictly beyond FOTC's remit, this would clearly be of concern. The Council and developer argue that most traffic would be local and that steps would be taken to "actively encourage visitors to walk, cycle or use public transport", including by the developer's green transport plan for the site. However it is not clear that there has been a transport impact assessment of the development, including the likely additional parking stress around the Common, or that the Council have liaised with the London Borough of Lambeth on this (a number of the neighbouring streets are in Lambeth).

- We understand that the Council are including break clauses in the contract which would provide for immediate termination of the contract and lease in the event of any substantial failure, and also that there will be "constant and continuing monitoring" of

performance. It would certainly be important that active and continuous monitoring by the Council did indeed take place, and was acted on if necessary. We also consider that, in addition to this regular monitoring and the breach clauses, there should in any case be a regular review by the Council of the facility and performance, preferably annually, and at least every five years: the Council have not responded to our suggestion on this latter point.

5. In the event of the development going ahead, it would be particularly important that the Council and the developer took action to mitigate the effect of these points of significant concern, to the extent that that is possible.. We therefore consider that, in this event, approval by the Planning Inspectorate (PI) should be subject to, or on the strict understanding of, the following conditions:

- That the Triangle development is not seen as setting a precedent for any further loss of land on the Common to commercial leases.
- That Enable and the Council give high priority, within their general plans for addressing waterlogging on the Common, to work on western end of the Triangle field in order to provide a drier area.
- That the developer ensures that their work on improved drainage for the development site dovetails with the more general work to address waterlogging in that area of the Common now being considered by Enable and the Council.
- That the Council does actively and continuously monitor performance of the developer, including taking account of any concerns raised by local residents and the community; and, should the need arise, take action under the breach clause in the contract. Also, in addition to this regular monitoring and the breach clause, there should in any case be a regular review by the Council of the facility and performance, preferably annually but at least every five years.
- That the developer and the Council take all appropriate action to minimise the impact of building work on adjacent areas of the Common; and that they ensure that the children's playground remains open, for safe usage, throughout the building work; and that any damage to the Common during building work is repaired and reinstated by the developer.
- That the developer does indeed make active arrangements to manage and supervise behaviour and attendance at the site, and ensure attendees leave promptly, particularly after evening events; and that the Council actively monitors this, including noise levels.
- That the developer be required to take reasonable steps to reduce noise from football played on the pitches, in particular to not use "rebound boards".
- That the developer does indeed establish regular engagement meetings with local resident groups to discuss any issues relating to operation of the site, on a continuing basis; and that the Council are involved with these and ensures that the developer acts on any issues of reasonable concern, should they arise.

- That in addition to the plans to allow schools free access to the redgra pitch during term time, the Council and the developer arrange for free access by other, appropriately supervised, groups.
- That the Council (or Enable on its behalf) review regularly the effect of the floodlighting, including on wildlife, on the surrounding green space.
- That the Council defines clearly that under no circumstances would any parking of vehicles associated with the site or its events when in operation be permitted on any part of the Common.
- That the Council actively monitor and review the position on traffic to the facility, to avoid the possibility of any large-scale build-up of traffic or parking in streets around this corner of the Common, and takes appropriate action to deal effectively with any build-up. Among other things, the Council should liaise with the London Borough of Lambeth on any possible implication for traffic or parking on neighbouring streets.

However while such conditions would mitigate some of the points of significant concern, the **loss of public access to Common land (as above) could not be mitigated and would remain a serious issue of concern from the development.**

Friends of Tooting Common
3 May 2022