

Application by Wandsworth Council for consent to carry out restricted works on Tooting Bec Common: Triangle outdoor artificial grass surfaced sports pitches and associated indoor facilities, SW12

Comments by Friends of Tooting Common

These are comments by Friends of Tooting Common (FOTC) on Wandsworth Council's application of 12 November 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. There are a range of views among FOTC members, since this is an important and contentious subject. The following comments reflect the balance of members' views, following consultation.

3. Friends of Tooting Common neither supports nor objects to the proposed development overall. We see a number of points to welcome, but also a considerable number of points of significant concern, which we urge the Planning Inspectorate to consider.

Points to welcome in 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 (open 08:00 to 21:30 Mon-Fri; 9:00 to 20:00 weekends).
- A café. It is also welcome that the developer has given an assurance that no single use plastic items will be sold.
- Improved drainage, in an area which is often waterlogged.
- That the developer appears to be a credible operator, with a 30-year history of running sports facilities in South London.
- No substantive encroachment onto the rest of the Common (although any encroachment would of course have been a matter of serious concern)

Points of significant concern are:

- The lease of the Triangle site and buildings to a private developer, for a long period (25 years). This therefore means a loss of access by the public to this common land, which is a serious issue of principle. There are concerns that this could be seen as setting a precedent for further loss of land on the Common to commercial ventures, and it would be very important that it is not seen in that light.
- While 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 that there will be "constant and continuing monitoring" of performance, it would certainly be important that active and continuous monitoring

by the Council does indeed take place, and is 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.

- Since the development is to be run by a private leaseholder, it necessarily involves charging for use of the site, which again is an issue of principle as discussed in the first point above.

- The enclosure of the redgra pitch would mean that this would no longer be available for impromptu public use and play. Currently the pitch, though in poor condition, is used considerably. Further, it is often the only dry area available when the rest of the Triangle field is water-logged. It is welcome that it has now been agreed that there would be free access by schools to the redgra pitch during weekdays in term time, and that the developer is also talking to local clubs about letting them also use the site free, as well. That would not however fully make up for the loss to public use of the redgra pitch.

- 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 considerably longer, every day, than at present. 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), it would be important that the Council and Enable also review regularly the effect of the floodlighting on the area around the development, particularly when the site is first used, so that light spillage can be mitigated.

- New wire mesh fencing (re-instatement of fencing that was there previously, though a considerable time ago), causing visual/aesthetic impact as well as loss of public access to the redgra pitch as above. The fencing should be as unobtrusive as possible, given the surrounding green space, and should not have "rebound boards" (see next point below on noise).

- Noise from games may impact other Common users on what is currently a quiet part of the Common, particularly in the evening. It appears that the developer would make arrangements to manage behaviour and attendance at the site, and ensure attendees leave promptly, particularly after evening events. It would be important that this is indeed done, and that attendance at the site is properly supervised at all times. We understand that the developer would be establishing regular engagement meetings with local resident groups to discuss any issues relating to operation of the site, and that the Council agree that FOTC could be represented at these. It would be important that these meetings are indeed established, on a regular and continuing basis, and that the Council ensures that the developer acts on any issues of concern, should they arise. Given that the usual design of these football pitches is to either have mesh fences or mesh fences plus rebound boards, we consider that "rebound boards" should not be used around the edge of the pitches, so that there is less noise (i.e. there should be mesh fencing only around the pitches).

- There may 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. It would be important that these steps are indeed taken, and that any damage to the Common is repaired and reinstated by the developer.

- Traffic and parking. Concerns have 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. No parking would be permitted on the Common. However, we think that the Council would need to keep the position on traffic to the facility under active review, to avoid the possibility of any large-scale build-up of traffic or parking in streets around this corner of the Common. The Council should also liaise with Lambeth Borough on this, since a number of the neighbouring streets are in Lambeth.

- It is clear, both from comments from members of FOTC and from members of the public, that the current redgra pitch, while in very poor condition and in need of replacement, is much valued as the only substantial dry area of Triangle Field that is available to use and play on when the rest of the field is waterlogged. Therefore we consider that as a separate matter the Council should explore possible actions to address the waterlogging of the Triangle field for the longer term, as possible compensation for the loss to public use of the redgra pitch.

4. If it is decided to approve the application, it will be particularly important that the Council and the developer do indeed take action to mitigate the effect of these negative factors. We therefore consider that, if it is decided to approve the application, approval should be subject to the following conditions:

- 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 and 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 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 explore the feasibility of free access by other, appropriately supervised, groups.
- That the Council (or Enable Leisure and Culture 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 liaises with Lambeth Borough on any possible implication for traffic or parking on neighbouring streets; and keeps the position on traffic to the facility when in use under active review, to avoid the possibility of any large-scale build-up of traffic around this corner of the Common.
- That the Council reviews the condition of the grassed part of Triangle Field, and implements a plan to improve drainage and reduce waterlogging in the area, as possible compensation for the loss to public use of the redgra pitch.

Friends of Tooting Common
14 December 2020