TOOTING COMMONS MANAGEMENT ADVISORY COMMITTEE (TMAC) SUBMISSION TO PLANNING INSPECTORATE INQUIRY ON THE PROPOSED WORKS ON TRIANGLE DEVELOPMENT, TOOTING COMMONS COM/3263104

STATEMENT OF CASE BY TMAC AS INTERESTED PARTY

APRIL 27th 2022

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1. THE ROLE OF TOOTING MAC

- 1.1 The Tooting Commons Management Advisory Committee (MAC) is an elected body constituted by the London Borough of Wandsworth and comprises twenty-four annually elected members, these are usually local residents and users of the Commons. We work predominantly to advise Wandsworth Borough Council and its contractors on Commons users' perspectives on Commons-related issues. We also work to monitor, in conjunction with the Chief Parks Officer, the effective implementation of the Management Plan for Tooting Commons. We regularly survey users of the Common about their views on the priorities for the Common.
- 1.2 We aim to help to achieve a balance between facilities for formal and informal open-air recreation on the Commons, and the protection and development of plant and animal life to retain and enhance their natural character.

2. THE MANAGEMENT PLAN FOR THE COMMON

- 2.1 The agreed overall strategy for the Common through its management plan (see Appendix 1) is to:
 - Retain, enhance and de-urbanise the Common to conserve the essential character of the Common.
 - Restore the historic and natural heritage of the Common whilst integrating recreation and landscape conservation.
 - Restore biodiversity and habitats, heritage features, improving access and the visitor experience.
 - Increase the levels of awareness, learning and engagement reconnecting people with the heritage of the Common so they understand its special qualities and character as a Common as opposed to a park.

3. EXECUTIVE SUMMARY

Whilst we appreciate the benefits that may accrue from the proposed facilities for some potential users and particularly the provision of much-needed toilets and upgrading the Redgra pitch, we are very concerned that these modest improvements are far outweighed by the loss of public amenity – specifically that access to the football pitches will now be denied to almost all Commons users; that the proposed fencing and floodlighting will significantly change the nature of that part of the Commons; and the associated noise and disturbance of many additional visitors to the area will have a negative impact on the enjoyment of Commons users in direct opposition to the Management Plan and strategy above.

4. THE REDGRA PITCH AREA: HISTORY AND CURRENT USAGE

- 4.1 The hard weather pitch was built in the 1960s and the current floodlights were installed we believe in the 1960s. The pitch was originally fenced but the fencing fell into disrepair and was removed in the late 1980s. Throughout this period the area of the football pitch has been freely available for Commons users together with grass football pitches elsewhere on the common. In recent years the floodlights have been used about a once a week making this probably the darkest area of the Commons which has prompted the MAC to undertake work to investigate controlling the light sources more in order to achieve 'Dark Skies' certification as the UK's first Urban Night Sky Place.
- 4.2 All age groups use the Redgra pitch, and it acts as an informal recreational area for exercise, football kick arounds, informal cricket, jogging, box exercise and Tai Chi. (see Appendix 2) The pitch is used throughout the year and especially in times of wet weather when it is an island of relative dryness in the often-waterlogged Commons. It is also used as a short cut from the path by the railway line to the path on the west side of the Commons parallel with Culverden Road, for those wishing to avoid the sometimes calf-deep puddling on the path between the railway bridges by the playground.

5. THE PLANNED DEVELOPMENT: OUR INTERPRETATION OF THE REASONS AND THE SCOPE OF THE DEVELOPMENT

- 5.1 Core to the council's permission is that Wandsworth is "a borough of playing pitch deficit" and under considerable pressure to provide more facilities to meet the evergrowing demand for both matches and training. It states that "space and public funding is limited so any move towards meeting that aspiration is only likely through redevelopment of existing sites and private sector funding". There are already football pitches on the common which are not enclosed centred around a changing room which serve needs and could be adapted for five or seven a side. Our assessment is that this puts the interests of the small minority of the local population and from surrounding Boroughs who wish to play fee paying organised football on pitches against the wider wishes and needs of the larger proportion of the population who wish to exercise in other ways outdoors and to enjoy the quiet and local nature as evidenced by the recent survey of users conducted by the MAC (see Appendix 3)
- 5.2 The council states the proposed facility is intended for use by all sectors of the community and will provide positive improvement opportunities, "for a sizable proportion of the local community currently disadvantaged" in ability to participate in sport and physical activity. The claim has been made it will "provide a 21st century sports facility on a modern Common ". Our view is the proposal is purely designed to increase football pitch provision in the Borough for a fee-paying minority and that a 'modern

Common' does not have to be one with fenced off areas, floodlights and the associated noise and nuisance.

6. POTENTIAL BENEFITS OF THE PROPOSAL

6.1 Toilet provision

The Commons are currently poorly provided with public toilets, and those that do exist are unknown to many Commons users. This has been alleviated to some extent by temporary toilets on the other side of the Common and there are plans by the council to develop further permanent toilet provision and improve signage. There are no toilet facilities at all available on the Commons to the north side of Bedford Hill, although there is a part-time facility available at the Woodfield Pavilion. The addition of a publicly accessible — and especially wheelchair accessible — toilet within the current building footprints would be a welcome addition but this is required now and not necessarily part of a scheme.

6.2 Improvements to the Redgra pitch

The pitch is in a state of neglect now and work to improve it for existing Commons users would again be helpful. But clearly changes to the pitches which are then not available for accessible recreation to Commons users are of no benefit to the local community and act so as to diminish the enjoyment of the Commons.

6.3 Reductions in antisocial behaviour

The area around the current boxing club has been associated with some drug use and this may be reduced if the area becomes busier but clearly only if there is better monitoring. It may of course substitute one form of antisocial behaviour with another.

6.4 However, we feel all these benefits could be achieved without fencing off and floodlight this dry area of the Common. And should be, without need for this scheme.

7. OUR CONCERNS

7.1 The scale and impact of the development

For the site to be commercially successful it will require a relatively high level of usage, and this usage will be much greater than at present. The impact of this busy site needs to be fully acknowledged in what is a quiet area of the Common. Whilst the current Redgra pitch is used intermittently for knockabouts with perhaps an average of five or six people using it half the time (so an average of three people), it seems likely that the new usage of the proposed three 5x5 and one 7x7 pitches (i.e., 44 players at maximum occupancy per hour) will be many times greater. This amounts to a potential usage of over 3000 users per week and that excludes visitors, friends and families watching. Even allowing for 50% usage of the new capacity (i.e., 22 users at a time) this would still represent about seven times as much noise disturbance and traffic in the area and from 9 am until 9pm at night

7.2 Loss of common land

We firmly believe in the principle that common land should not be enclosed, and that open space should be protected at all cost.

7.3 The development is at odds with the views of current users of the Common

The evidence is that most users of the Common enjoy the value of the open space where the green space is valued for social interaction as well as offering benefits relating to physical and mental health and wellbeing. Surveys of the Common usage *pre pandemic* shows informal uses rated far higher than organised activities. As many as 64 per cent went to the Commons simply 'to walk'; 60 per cent went to exercise'; 42 per cent went 'to relax'; 32 per cent went 'to meet friends; 25 per cent went to cycle; and 18 per cent went to walk their dogs. Informal sports and games attracted 13 per cent of those who visited— 3 per cent more than those who visited to play organised sport. The MAC's own survey undertaken after lockdown in October 2021 showed the overwhelming benefits for users were 'a green and natural environment' (88 per cent), a feeling of 'open space' (87 per cent) and 'peace and quiet' (51 per cent). Only 11 per cent of users saw 'sports facilities' as important.(see Appendix 3)

8. THE SPECIFIC PROBLEMS WITH THE PROPOSAL AS IT AFFECTS COMMON LAND

8.1 It affects the interests of those occupying or having rights over the land

The MAC works to increase the enjoyment of the Commons in line with the agreed Management Plan. The Plan's overall aims to 'de-urbanise' and 'improve the visitor experience' of the area for all visitors is directly at odds with an intensive development of floodlit football pitches that will deny Commons users free access to an area of the Commons and introduce considerable noise and disturbance.

8.2 It has an adverse impact on the neighbourhood and how the Common is used by local people

The neighbours and users of the Commons are likely to be negatively affected by a combination of problems :

- Traffic nuisance and pollution. The proposal is likely to bring new users from a wide
 area including neighbouring boroughs. The local station and underground are over a
 ten-minute walk away and with no car park in the area extra car usage will lead to
 congestion, noise and pollution around neighbouring roads. There is no evidence
 that the green transport plan as part of the application would have a significant
 impact on car usage.
- The visual effect of a large facility in the field which detracts from the wooded feel of that end of the Common (see Appendix 4 for a visual representation)

- The noise of those using the pitches and those waiting to play or waiting for players: as noted above this nuisance may increase seven-fold and will be able to be heard by those walking on the path by the Woodfield pavilion field. The mitigations in place won't work and very little account has been taken of noise pollution (See Appendix 5)
- The floodlights which will disturb the tranquillity of this part of the Commons each evening during the darker months when they are used. In addition, it will significantly impact the nocturnal habit of animals and birds that benefit from the tranquillity and darkness of this area. Animals and birds need dark corridors to travel. and floodlight across the majority of the passageway between the two railway lines will seal this route off for them
- Increased litter and possibly antisocial behaviour arising from much greater usage of that area of the Common.
- Loss of access to an area that they have habitually used so interfering with how that part of the Common is currently used.
- The 'urbanisation' of a previously quiet area, which would be contradictory to demands for re-wilding and getting areas back to nature.
- Effects on parents and children using the adjacent playground given the greatly increased numbers of people using the football pitches

8.3 It restricts the rights of access to the Common for users

The council claims that the public will be able to access the facilities. But enclosing the current pitch with a fence and charging for the use of the facility will be a clear loss of public access to that part of the Common. It will mean that the multiple current users of the Redgra pitch won't have anywhere to exercise, particularly in wet weather when the rest of the Common is wet and muddy. Charging for the pitches will mean that many current users will not wish to pay for an hour's booking for informal exercise. Similarly, some potential users clearly won't be able to afford the proposed charges, a negative impact which will only be exacerbated by the current economic situation.

8.4 It has a negative impact on nature conservation on the Common

The aim of the Commons management plan is to provide net gains in biodiversity, and it is unclear how the proposed benefits of the site outweigh the negative effects on biodiversity. The Commons have recently been the subject of the Heritage Project in which Lottery funds have been used to re-establish threatened habitats, notably the acid grasslands. The Council has also installed LED lighting which has helped the Commons to

become a more peaceful and gently lit area at night. This is all in line with the Management Plan objective to 'Restore biodiversity and habitats, heritage features, improving access and the visitor experience'. This development by contrast urbanises and brightly lights an area of the Commons in direct contravention of the strategy. Evidence of the negative effects of floodlighting on flora and fauna is accumulating and widely acknowledged for example by the Royal Horticultural Society with particular impact on nocturnal species of insects and on bats — which are quite Common in the area due presumably to the naturally wet conditions and the relative quiet and lack of human disturbance. There has not been a regular survey of bats in this area in recent years and certainly no survey since covid. More widely the lack of a comprehensive audit of species in that part of the Common and a detailed assessment of the impact of the development means there is no significant evidence that there would be the minimum impact on biodiversity that the proposal claims.

8.5 Flooding of the area is not being addressed

Flooding is a major challenge for the Commons as for many other public open spaces in the Borough and climate change is making this more common and more severe. As the Meteorological Office noted in its State of the UK Climate 2020 report 'Six of the 10 wettest years for the UK in a series from 1862 have occurred since 1998'. The Triangle area is particularly severely affected with run off down the gentle slope from West to East leading to a stream forming next to the railway line to the south of the site and major puddling on the path to the west that makes it impassable to pedestrians, leading some to loop around over the Redgra pitch. If this wider issue is not addressed as part of this proposal — which it seems it is not — then this problem is likely to be exacerbated by increased run-off from the new pitches and by people clustering on the few remaining dry areas at times of heavy rain. The recent report on flooding on the Common by Enable highlights the extensive measures that would be needed to mitigate the chronic flooding problem in this area of the Common — it is not clear to us that the proposed development takes this into account. (See Appendix 6)

8.6 Fencing and floodlighting affect access and reduce the quality of the experience of Commons users

Both fencing and floodlighting are clearly key to the success of the financial model that underpins this development – the first by denying access to existing Commons users and the second by extending the hours during which paid-for activity can take place. The impression has been given that both are continuations of existing policy and installations. In our view this is not the case:

- The fences were removed in the late 1980s, over thirty years ago, and have never been reinstated.
- The floodlights have been only rarely used for perhaps an hour or two a week in recent years – this is totally different from having them on each evening during the darker months which – just as the usage of the pitches would increase perhaps seven-fold the usage of the lighting would be perhaps twenty-fold. These should be viewed as new installations not as continuations of existing practice.

8.7 Risk of precedents – taking other parts of the Common out of free public access and changing the balance of the Common

The Commons have already been diminished by removing land from free access, for example the Tooting Lido development, the athletics track and the tennis courts. None of these are now free to use by the local community. This has been recognised as a loss of amenity by Wandsworth Council through land compensation – in the case of the athletic track for example with an equivalent piece of land by Church Lane. This case is very similar in the loss of amenity – extensive use by schools and by clubs in the evening, bright floodlighting of the area – but without any compensation. We are concerned that gradually the Commons are being turned into a recreation ground and the users of the Commons excluded from its amenities, and their enjoyment of its spaces reduced by new facilities which provide them with little or no benefit.

9.1 **SOLUTIONS AND MITIGATIONS**

- 9.1 In our view the perceived needs of football clubs in other parts of the borough should not be met by this development which will severely and negatively impact the Commons and the experience of its users. We are not against the principle of an improved facility in the Triangle area but would propose that this is arranged in such a way that some access to Commons users is continued, and the negative impacts are reduced.
- 9.2 We would prefer a development which delivered the following benefits:
 - The Redgra pitch is upgraded but remains free to use by all, as now.
 - An accessible public toilet is created.
 - There is no fencing to restrict access.
 - No floodlighting is used, in order to protect the local flora and fauna.
- 9.3 If, however, the decision is taken to proceed with a development broadly as proposed, we would support the following mitigations to reduce its negative impact:
 - An accessible public toilet is created.
 - Hours of use are reduced, compared to those being proposed
 - The use of floodlighting is either ruled out or its hours limited to no more than the previous usage i.e., no more than one evening per week
 - A limitation is put on the brightness of the floodlighting
 - Additional trees are planted to shield the visual effect of the development from the rest of the common.
 - Pitches should be free for public use for defined periods to allow true greater access to users who can't afford the charges, so reducing the usage restriction of a public amenity.
 - Investment of revenue from the development is ring fenced to support improvements in amenities and biodiversity on the Common.

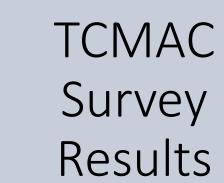
APPENDICES

1 Commons Management Plan see Tooting Common Management and Maintenance Plan (wandsworth.gov.uk)

2 Example of the current Redgra pitch usage



Appendix 3 Tooting Mac Survey of users of the common



November 2021

Four question SurveyMonkey poll sent out principally via social media in October 2021

1005 responses received by the closing date 16 November 2021

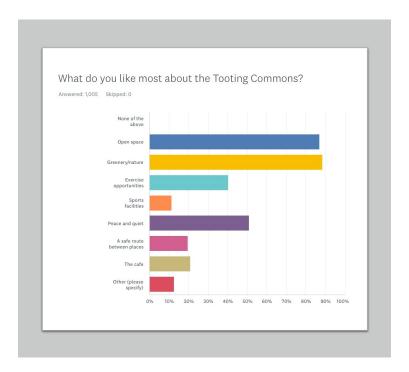
Respondents were self-selected and no socio-demographic data collected

Questions also allowed write-ins

Methodology

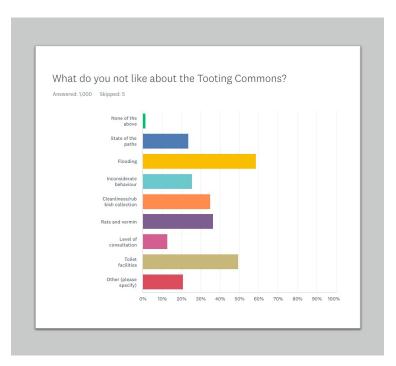
1 Positives about the Commons

- Desire for a green/natural (88%) open space (87%) that has peace and quiet (51%)
- Functional benefits are much less important
 - Exercise opportunities (40%)
 - The café (21%)
 - A safe route (20%)
 - Sports facilities just 11%
 - 24 people wrote in 'play'



2 Negatives about the Commons

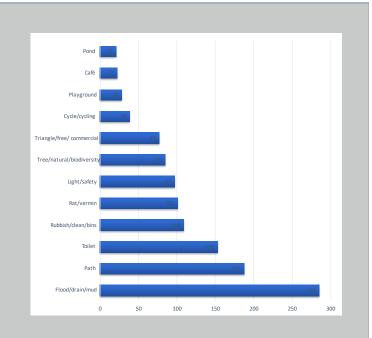
- Flooding (59%) and the lack of toilets (49%) are the greatest areas of complaint
- Rats/vermin (37%) and cleanliness/ rubbish collection (35%) are also important
- Inconsiderate behaviour (26%) and the state of the paths are also important (24%)



3 What should be the top priority?

(free text entry mentions, n=831)

- Waterlogging of the Commons is the clear #1 priority, this also relates to #2 paths
- Toilets, cleanliness and vermin are also major issues
- Lights/safety, biodiversity and the triangle development all require attention





Appendix 4 Floodlit football pitches elsewhere in London



Appendix 5 Noise pollution from artificial sports pitches see agp-acoustics-planning-implications.pdf (sportengland-production-files.s3.eu-west-2.amazonaws.com)

<u>Appendix 6</u> Tooting Common Flood and Water management Proposals July 2021 Enable

<u>Tooting Common Flood and Water Management Proposals - July 2021 Triangle</u>
<u>Play Area, Bedford Hill, Woodfield Woodland.</u>

Introduction

- 1.0 The purpose of this report is to set out the key factors and issues for consideration in the management of water and in particular flood situation in the northern section of Tooting Common. This is in a context of increasingly changeable and extreme weather patterns. Tooting Common and open space in general have also seen increased use and footfall over recent years and in particular during periods of lockdown. Land use change and development in the surrounding urban environment also puts pressure on often old infrastructure which was not designed to handle the volumes and usage requirements of current conditions and inputs. One of the end results has been an increase in the amount of the common land being affected by flood water and an increase in the amount of time these spaces remain unusable.
- 1.1 The increase in frequency and duration of these events not only cause disruption to access and connectivity but may well cause damage to path networks, rail, infrastructure and private property as well as causing damage to habitat, leading to loss of species or changes in habitat type. Flooding can also lead to pollution and contamination of the common through road run off from local roads or the mixing of sewage with surface water. To a certain extent, periods of flooding are a natural and seasonal aspect of the Common which is part of the local catchment which forms part of the wider Thames flood plain. The geology of this part of the Common largely consists of London clay and therefore actively retains water and slows its dissipation to ground water.
- 1.2 This report will identify appropriate opportunities to work with the natural and built environments and key local stakeholders to optimize the potential of Tooting Common to adapt to flood events. Importantly, a balance must be struck to not only look at initiatives that can help reduce flooding impact but also take into consideration the many different habitats, community facilities and surrounding infrastructure, as well as the connectivity of Tooting Common to the surrounding locality. The application of these proposals will reduce the impact of flooding and ensuring that accessibility and connectivity remain uninterrupted for as long as possible throughout the year.
- 1.3 The Commons can play a role in managing flood events through some of the open spaces being used as flood alleviation/storage therefore reducing the impact of flooding on private property and surrounding built infrastructure. However, it is important that flood alleviation is managed wherever possible and takes into account the use of the site by local residents and visitors to avoid negative impacts and loss of provision of facilities or habitats.
- 1.4 It is also important to note that there will be certain extreme weather conditions and periods of year when flooding will occur regardless of the management strategies that are implemented. The purpose of the report is to advise on how both hard and soft infrastructure improvements or changes to maintenance regimes can *reduce* the impact of these events on the common. If flooding does occur, intervention strategies should allow spaces to recover as quickly as possible from a flood situation. Key outcomes being to create a more resilient physical environment as well as increasing the understanding and local knowledge for maintenance teams to either carry out preventive works or have good policies and procedures in place to respond to flood events.
- 1.5 In this document we will identify the areas in the common that are regularly affected by flooding. Here we will set out the context, solutions, priorities and responsibilities and the potential for maintenance and capital investment solutions.
- 1.6 This report should also be read in conjunction with the Tooting Common Management Plan which covers hydrological analysis and recommendations for dealing with flooding as well great

detail on the wider and complete context of the environmental management proposal for the common.

Key Flood Areas.

Triangle Play Area.

Triangle Play Area: Site Infrastructure

- 2.0 This section of the common is prone to regular flood events and causes disruption to access and connectivity through the Culverden footpath. The Triangle play area is located in the north-western section of North Tooting Bec Common. It is made up of footpaths, rail tracks and rail bridge. A play area consisting of wooden play items, sand pit and banked mounds is adjacent to an artificial football pitch. This is located on the Tooting Triangle field.
- 2.1 Flooding in this area also affects the play area and during significant flooding events the buildings (currently known as Tooting Boxing Club) adjacent to the play area have been flooded. There is a low point below and to the north of the rail bridge which collects water from all surrounding fields. Footpaths and downcomers from the rail bridge speed up the influx of water into the area. The existing drains seem insufficient to cater for the volume of water during extreme weather, and often get blocked as a result of silt and derbies entering the drainage system with the water movements over time. The levels and surrounding spaces are referred to in the management plan as 'creating a bowl'. The culvert to the south of the rail bridge is insufficient to take surface water and is completely blocked, meaning water flows under the bridge and collects in the low point to the north of the bridge.

Triangle Play Area: Ownership Responsibility

2.2 The overall responsibility of Tooting Bec Common is Wandsworth Borough Council as well as under the further responsibility of the planning secretariat. Culverden footpath is under the responsibility of The Highways team under the adopted footpath number 10. The play area, pitch and the footpath that leads to Triangle field is under the maintenance responsibility of Enable LC. The boxing club building is a Wandsworth Borough asset, under the responsibility of Property Services. Network Rail are responsible for the rail tracks, rail bridge, space under the bridge and sections of land in the common immediately adjacent to the tracks. The drainage network is the responsibility of Highways and Thames Water. There is also third-party interest in investment and development of the existing boxing facilities through redevelopment.

Triangle Play Area: Priority Solutions

2.3 Maintenance Solutions

a) Priority 1: Ensure that the mentioned drains are cleared and flowing as intended. This would require the drains to be unblocked through jetting. Further CCTV inspection is also advisable to ascertain if the pipes are broken or being affected by tree route ingress. We recommend

an increased maintenance regime from the Highways Department to inspect and unblock (where necessary) the drains along Culverden footpath, in particular in the approach to autumn and periods of high expected rainfall. Access must be in place in order for Highways teams to carry out maintenance work at the locations. Ultimately, we recommend Highways review the capacity of the drainage network and how suitable the gradient is to remove

water from this location as the network may no longer be fit for purpose for the increase in rainfall and extreme weather events. Investment into specialist equipment (vehicle) or subcontractors should be made to ensure maintenance work can be carried out at the location with the restrictive nature of the footpaths and access points. The rail bridge currently causes a major obstacle for vehicle access. Possible use of smaller gully sucking vehicles could be considered.

- b) Priority 2: Enable LC to provide regular cleansing and removal of debris, vegetation and silt from the footpath that leads from Triangle Field through the incumbent grounds maintenance contractors. This will reduce the amount of silt and debris entering and blocking the drainage network. A separate maintenance regime/schedule should be developed to Inspect and clear existing ditches on the southern approach to the rail bridge as well as any new or redefined ditches or ponds added through capital investment.
- c) Priority 3: Network Rail to regularly clear and remove overgrowth and debris blocking their drainage infrastructure under the bridge and under the tracks.
- d) Priority 4: Third Party Thames Water to take responsibility for their infrastructure and to ensure they have no barriers for maintenance teams to access their network. Also, they must ensure their work, once complete, does not damage the common through methods and materials used to make good.

2.4 <u>Capital Investment Solutions</u>

- a) Priority 1: carry out a refit/redesign of the single gully located on Culverden footpath on the southern approach to the rail bridge. Appropriate silt traps and debris guard will be required to reduce the amount of material entering the network. We suggest that Highways install an overflow mechanism/route to channel water and reduce the erosion of the footpath using French drains and grills. This would require specialist input from a hydrologist or engineers to determine the best designs and solution for the culvert.
- b) Priority 2: raise Culverden footpath and reprofile levels to break the bowl effect created by the current ground levels and topography.

 Priority 1 and 2 are also covered in the management plan see Appendix 1.
- c) Priority 3. Increase drainage network capacity and potentially increase the number of drains serving the area. As part of any capital investment or project to renovate the footpath, buildings or facilities, the drainage network serving the area should be increased to handle increased volume. The number of drains should be increased, and French drains installed across paths to capture surface runoff. This may require initially surveying (likely by Thames water) data to define specific requirements.
- d) Priority 4. Identify appropriate locations to install new ditch lines and attenuation ponds on the sides of the triangle field paths and the southern approach to the rail bridge; this would capture surface water. Further leaky dam approaches could be used in the ditch lines to slow the flow towards drains allowing them to take water off site without getting overwhelmed too quickly. A hydrologist would have to be commissioned to ascertain appropriate locations and sizes of the proposed drain ponds and other works along and beside the path leading from the Triangle Field. This would provide opportunities to improve green infrastructure

and natural water management strategies such as the installation of reed beds, leaky dam systems and SUDs. Careful consideration towards exiting habitats and Biodiversity would be required in considering locations, size and potential new planting for any new natural water management strategies.

- e) Priority 5: investigating the potential of using the space around and under the artificial pitch to install either attenuation tanks or surrounding attenuation ponds. This would require approval by the planning secretariate.
- f) Priority 6: Addressing the play area with engineered solutions such as level changes and reprofiling of the play space would reduce the speed at which water enters the drainage network. This will prevent water from pooling and flooding the play area.

Bedford Hill Road.

Bedford Hill Road: Site Infrastructure

- 3.0 Bedford Hill Road is an A road that defines the boundary between the north and south of Tooting Bec Common. To the north, it has a line of large mature plane trees, immediately adjacent to the pavement and a ditch which may be historical. A field formally used for Gaelic football is further north of the tree line and to the east of the field, the tree line gives way to scrub land and the bottom end of Woodfield Woodland. This area has been prone to regular flooding, in particular the winter of 2020-2021 with large sections of standing water in the field and the very real possibility of the road becoming flooded.
- 3.1 The road has a damning effect on water trying to move through to Tooting Common south and ultimately to lower points in the local catchment area and main lake. North of the road the field drains down towards the road from the tracks and Woodfield Woodland.

Bedford Hill Road: Ownership Responsibility

3.2 As above the majority of the Common is under the responsibility of WBC and planning secretariate, Bedford Road and the pavement is under the responsibility of WBC Highways team. Similarly, the Culverden footpath to the west falls under the responsibility of the Highways team. To the east, the road is transacted by the network rail tracks which curve towards the triangle play area to the north. The drainage network is a shared responsibility between Highways and Thames water.

Bedford Hill Road: Priority Solutions

3.3 Maintenance Solutions

- a) Priority 1. Is to increase the maintenance regime for the road drains located along Bedford Hill Road. This will ensure that blocked drains are identified and cleared allowing the drainage network to take water away from site. As with the Triangle play area, the drain network at this location should be inspected using CCTV and any repairs made to damaged pipes as required.
- b) Priority 2. Increase street cleansing and clearing of pavements and road, to remove leaves and silt thus reducing the potential of the drain system getting blocked particularly during autumn/winter.
- c) Priority 3. Enable LC to inspect and clear excess debris and build-up of green waste in the ditch and field by the pavement, in particular after storm events.
- d) Priority 4. Highways to have gully sucking vehicles or subcontractors on standby ahead of storm events so resource can quickly be called upon to unblock drains during rain events.

3.4 Capital Investment Solutions

- a) Priority 1. Increase capacity and size of drainage network serving along Bedford Hill Road.
- Highways to look to add more drains and increase size of pipes taking water away from site.
- b) Priority 2. Changes to layout and material make up of pavement along northern side of Bedford Hill Road. Highways investigation by a specialist hydrologist or engineer would be required to look at what potential alteration to the pavement height, layout, marital and drainage connections could be made. Alterations such as the additions of silt traps would be required to implement management plan strategies for flood management in this part of the common. Here silt traps (or other means of preventing silt entering the drainage network) are required before land drains are connected to the drainage network as neither Thames Water nor the Highways Dept would wish to see potentially disruptive volumes of silt entering the drainage system.
- c) Priority 3. Reprofile and increase size of ditch running along Bedford Hill Road Pavement. This would act to hold some of the floodwater reducing surface water flooding along the road and slowing the input into the drains. Due to the proximity of the plane trees this would have to be done so as not to cause damage to root systems. Leaky dam systems could be introduced to further slow the flow of water. Similarly, the introduction reed beds and marginal planting into the ditch, where appropriate, would slow flow and act as a silt trap.
- d) Priority 4. Creating attenuation ponds and scrapes (Scrapes are shallow depressions with gently sloping edges, which seasonally hold water) where appropriate in the field above the ditch and tree line. These would hold surface water and allow sections of the field to flood in a more controlled manner. Both ecological and hydrological expertise would be required to ensure the existing habitat and species are preserved and the size of attenuation ponds and scrapes are sufficient to deal with the volumes of water coming off the field.
- e) Priority 5. Identify appropriate locations to increase tree planting. Investigate the use of cricket willow which could have an added outcome of being harvested. This likely to be towards the Woodfield woodland section of Bedford Hill.

Woodfield Woodland: Context

Woodfield Woodland: Site Infrastructure

4.0 The area consists mainly of deciduous woodland and scrub located just to the northeast of Bedford Hill Road. The road forms the southern boundary and the tracks similarly creating a physical barrier running north toward the Triangle play area.

Woodfield Woodland: Ownership Responsibility

4.1 The section of the common is owned by WBC and managed by Enable LC. The woodland has a boundary with highways to the south and network rail to the east. The trees and woodland would specifically be the responsibility of the tree team.

Woodfield Woodland: Priority Solutions

4.2 Maintenance Solutions

a) Priority 1. Inspect health of trees and take appropriate action to keep trees in good health. Maintaining the tree numbers will help increase tree canopy cover slowing rainfall,

roots will both slow surface water runoff and a soak water mainly during the growing season.

b) Priority 2. Ensure excess build-up of fallen leaf matter and twigs are removed from pavements and drains.

4.3 Capital Investment Solutions

- a) Priority 1. Dig attenuation pools and ditches (ditches are deeper depressions with gently sloping edges, which seasonally hold water) where appropriate in and around the woodland, in particular towards Bedford Hill Road. Using a leaky dam approach this will slow water towards the road, reducing flood risk on Bedford Hill Road. A Hydrologist and ecologist would be needed alongside expertise from the tree section to ensure existing habitat and species are conserved. The tree section would need to be involved with location of pond to ensure the health of trees are conserved and not damaged.
- b) Priority 2. Planting additional wet-woodland species as well as replacing dead or failing trees with species that will tolerate wet conditions.

General Recommendations

Maintenance

- 5.0 Increase inspection and maintenance regimens of existing drainage infrastructure. This will maintain a free-flowing network which will allow water to move away off site. Increased inspection levels will mean defects or maintenance requirements with drains and pipe networks are identified and can be acted upon. Ideally this would be carried out over the summer months before autumn and winter, and would involve all interested stakeholders.
- 5.1 Increased inspection and maintenance of existing ditch lines found by Culverden footpath (southern approach to rail bridge) and Bedford Hill Road. Removal of debris and blockages will increase the capacity of the ditches to hold flood water leading to less of the common being affected by surface water pooling.
- 5.2 Thames Water to increase inspection and maintenance of network running through the common. This should reduce the input of water from slow leaks and reduce the likelihood of burst pipes causing large flooding events.
- 5.3 Network Rail to inspect and clear vegetation and debris on sections of their infrastructure that could lead to blockages in the surrounding drainage network. All stakeholders to review their current regimes and recommend an annual programme of regular clearance and planned maintenance in line with the MMP action to "ensure all structures are maintained to a high standard" and "Develop a 20 year plan for maintaining the commons buildings and infrastructure.". In addition, cross organisational and departmental flood-group to be identified or formed to meet regularly to review the effectiveness of maintenance regimes and tackling flooding.
- 5.4 Any new infrastructure added through capital investment should be added to maintenance regimes.
- 5.5 Review current flood response policy and ensure all relevant bodies have a clear understanding of how act and allocate resource to react quickly in flood situations.
- 5.6 Ensure all stakeholders attend and input to local catchment groups so a joined up approach to water management is maintained or increased.

Capital Investment

- 6.0 Redesign existing ditches so they have increased capacity. Use of leaky dam concepts or increased planting should be considered to slow the flow towards the low point and the drainage networks. this particularly important on the southern approach to the rail bridge.
- 6.1 Commission a hydrologist to identify location and size of new ditch lines, ponds and scrapes. Focus of these interventions being the southern approach to the rail bridge alongside the Culverden footpath and similarly on paths leading from the triangle field by the artificial pitch.
- 6.2 Increase capacity of drainage network so that it can cope with more water and increased frequency of rain events. This should reduce the need for call out to deal with flood events in the area.
- 6.3 Identify appropriate locations to plant or replace trees to maintain or increase canopy cover and reduce flow at ground level.
- 6.4 Include SUDs, silt traps and debris guards as part of any changes to the built environment, and work with stakeholders (principally Council Highways department) to look for potential suitable flood alleviation projects.

Community Engagement

7.0 Review where existing volunteering and community projects can be included into flood management through practical delivery of some aspects of green infrastructure improvements or remotely through analysing existing data and online research into weather patterns as well as new innovations in flood management. this would follow a citizen science approach, like the ZSL backed Outfall Safari (https://www.zsl.org/conservation/regions/uk-europe/londons-rivers).

Report findings and recommendations.

- 8.0 Tooting Commons is the largest greenspace in the borough of Wandsworth and has a history of localised flooding due to the geology and topography of the site. In recent years the level of flooding has increased in line with changing climatic conditions and increased rainfall which has become more frequent due to the outcomes of climate change.
- 8.1 Grounds maintenance programmes have remained largely unchanged in this period.
- 8.2 While use of the Commons has increased, particularly during the 2020 pandemic period, increased use itself will have had a limited impact on the increased level of flooding in 'known flooding areas'.
- 8.3 It is clear that infrastructure, currently existing on site, has a vital role to play in ensuring the capacity of the Commons to deal with heavy flood events, is as great as possible. Ensuring all infrastructure is fit for purpose it fundamental and the assessment of this is the priority action.
- 8.4 A variety of stakeholders, namely; Wandsworth Council Highways department, greenspace management contractor Enable Leisure and Culture, grounds maintenance contractor Continental Landscapes, Network Rail and Thames Water all have a role to play in ensuring the longer term resilience to flooding of the Commons.