



Friends of Clapham Common

Registered Charity Number 1189142

re. Putt in the Park Ltd (PITP) at SW4 9AN

(REF: COM/3268390)

Dear Sir/Madam,

We are the Committee members of the Friends of Clapham Common (FCC), a registered charity (Reg No 1189142) with around 600 members.¹

Clapham Common is a Site of Interest for Nature Conservation (SINC) and we are an active group of volunteers committed to preserving the integrity of this much-valued, green space in south London.

In keeping with our mission statement, we are involved with conservation projects to enhance the biodiversity of the Common and to restore its buildings and facilities.

We plant trees, shrubs and bulbs and have been helping to develop the wetland areas. We have a seat on the Clapham Common Management and Advisory Committee (CCMAC) and take an active role in advising Lambeth Council on improving management policies.

This letter sets out why the proposed changes to the Pavilion and Bowling Greens at SW4 9AN are, in the view of FCC, neither in the interests of the local neighbourhood, nor in those of the public.

¹ <https://claphamcommon.net/>

As such, the applicant should not be granted permission to continue by the Secretary of State, according to criteria set out in the Commons Act 2006, section 39. ("2006 Act")²

This representation demonstrates that public rights of access on the Common would be lost, that the proposal would have permanent and deleterious consequences for the environment, and that the materials used in the project are wholly unsustainable.

Furthermore, the applicant fails to provide scale-drawn ground plans, relying entirely on artists' impressions and 3D modelling images. The applicant has omitted to include the necessary details of the construction process, quantities of materials, and relevant design details required to assess the project accurately regarding the environment and local neighbourhood. We thus think the Inspectorate should refuse the application for permission, as the applicant has details of their works that are incomplete and inconsistent, as we will further demonstrate below. (see 2.2, "Sustainability")³

The analysis and discussion below demonstrate that biodiversity claims are without foundation and that the illustrated ground map ("Clapham Common Final Plan") is one example of a wider trend of greenwashing by developers.

Furthermore, we have endeavoured to show, at key points, that the proposal is in contradiction of Lambeth's Borough Plan, especially as it pertains to environmental and biodiversity concerns. Given that this plan is the implementation of national guidelines at a local level, it is a yardstick for good development appropriate to the neighbourhood.

A borough-wide campaign, run by FCC, is underway to protest the proposal, in conjunction with a petition which has already garnered more than 4500 signatures.⁴

We thank you for carefully considering our representation. We urge you to refuse permission.

2 <https://www.legislation.gov.uk/ukpga/2006/26/contents>

3 We attach a copy of PITP's "Method Statement", sent to Clapham Common Management and Advisory Committee (CCMAC), which reveals some but not all the relevant details, and shows contradictions, explained below.

4 <https://you.38degrees.org.uk/petitions/protect-clapham-common>

1. Interests of the Neighbourhood

1.1) Physical enclosure

The bowling greens are currently open to the public and are extremely popular with parents and young children. They offer quiet respite from the heavy foot-traffic on the main pathways of the Common and provide direct access to an ornamental, fruiting orchard, located to the north of the site.

The site is currently fully accessible. In their history, the greens have not been enclosed (see "Access Statement"). Under this current proposal, the new putting greens will be completely enclosed by new fencing 1.2 m high and subject to opening hours. All public rights of access will be lost.

We attach photographs ("Access Photos") which demonstrate that the greens are fully open to, and enjoyed by, the public.

1.2) Operational exclusion

Use of the privately run mini-golf course will be subject to exclusive entrance fees for boroughs with economic disparities. This creates an issue of unequal access between those from differing backgrounds.⁵ It is another leisure amenity on a Common with plenty of sporting venues for young adults. For both these reasons, the development goes against one of Lambeth's three Borough Plan priorities ("Creating inclusive growth [so that] all of Lambeth [may] benefit from the investment in and regeneration of the borough").⁶

There are, meanwhile, already two other Putt in the Park sites in Wandsworth just a short bus ride away, at Battersea Park and Wandsworth Park.

1.3) Character of the neighbourhood

All four Putt in the Park sites are homogenised and formulaic in layout and appearance.⁷ The company has not adjusted to show sensitivity to the surrounding area, nor to reflect its culture and history. The aesthetics, signage and paths are styled as if for a theme park ("PITP Advertisement"),

5 Wandsworth is quite wealthy but four in ten children are in food poverty in Lambeth.
<https://love.lambeth.gov.uk/how-lambeth-council-is-tackling-child-food-poverty-and-how-you-can-help/>
Fees for the courses at Battersea are : Adults - £10.00; Children (under 15 years) - £8.00; Family of Four - £30.00

6 "Lambeth Biodiversity Action Plan" p. 16

7 <https://www.puttinthepark.com/courses/>

out of keeping with the early-20th century pavilion and greens. Covering two bowling greens, the site is twice the size of others operated by PITP.

Unlike their previous sites, the Clapham putting greens would be constructed within just a few metres of a residential street on Clapham Common West Side, which is a quiet road with rows of mid- to late- Victorian town houses. The design shows no deference to the historic pavilion itself or the character of these houses, and thus represents a loss of amenity to the neighbourhood.

Other Putt in the Park sites host corporate events. Their advertising emphasises alcohol and a party atmosphere, which is out of keeping with the tranquil area.⁸ Their branding appears to offer little to elderly residents, including those of the two nearby retirement homes.⁹

Given its heritage, the pavilion is currently being considered for registration as an Asset of Community Value. In Gunnersbury, a Planning Committee of the Council has agreed that Putt in the Park does not represent community interests in an analogous situation.¹⁰

If permission is granted, the new applicant's business will mean the termination of trading terms for the small cafe operator currently leasing the smaller spot on the same site. The existence of a cafe appears to be overlooked by the applicant.¹¹

1.4) Public consultation

A lack of engagement with the local neighbourhood demonstrates PITP's lack of interest in local needs and concerns.

During the early stages of the development, the applicant appeared twice before the Clapham Common Management and Advisory Committee (CCMAC) to give initial presentations.¹² These did not include details of construction or material quantities, relying exclusively on an artist's impression of the site. ("Clapham Common Final Plan"). Since this time, the applicant has made no attempt to establish a forum to consult with the wider public, with the exception of notice boards showing advertisements set up prior to this application ("Notice of Our Proposals" & "PITP Advertisement", which are currently affixed to the pavilion).

The proposal has thus far failed to align itself with neighbourhood interests, as evidenced by the 4500+ signatories to the petition protesting the project. There were 150+ written objections made to

8 "Social Media Ads"

9 Audley, 3 Nightingale Ln, London SW4 9AH; and Nightingale House, 105 Nightingale Ln, London SW12 8NB

10 <https://gunnersburyfriends.org/bowls-vs-pitch-and-putt-decision-deferred/>

11 See "S38 Application", p.6, where they say they will create a "much needed cafe".

The existing business is here: <https://www.google.com/maps/place/Common+Ground/@51.4548097,-0.1520227,18z/data=!4m5!3m4!1s0x48760590b980d8bf:0xbb91c5f1d7bae3d8!8m2!3d51.4542798!4d-0.151756>

12 Details in CCMAC Minutes <https://claphamcommon.info/ccmac/meetings/>

the planning application for a change of use from pavilion to cafe (Wandsworth Planning ref. 2020/2536).¹³ This was rejected by Wandsworth, but will be appealed later this year.

2. "Public interest": Nature Conservation

(Environment, Sustainability, Pollution, and Biodiversity)

Lambeth's action plan, in line with their national obligations¹⁴, states that they are committed to building "sustainable neighbourhoods" in which "nature" is "integral".¹⁵ This is therefore a reasonable measure of public interest, which is inextricably linked to what is best for the neighbourhood. This section shows that the plans, such as they are, are not reasonably sustainable, and nor is nature an integral part of them.

2.1) Environment

The proposed resurfacing of the bowling greens would be extensive, covering approximately two thirds of the site (2530sq.m) with a hardcore aggregate, plastic grass and hard standing.

Although the applicant has not disclosed the exact proportions of plastic grass to hard standing, on page 11 of the "Method Statement" the applicant states the 'Area Size' as '2000sq.m of synthetic turf'.

This being the case, the quantities of aggregate required to create the base to the stated depth of would be around 400 tonnes.¹⁶ This calculation is further supported by the "Method Statement" we have supplied, which lists 60 lorry loads of 'stone base material' being delivered to the site.¹⁷ Such quantities of hardcore aggregate will permanently change the landscape and will run contrary to the imperative of 'conservation of the environment'.

The environmental damage will be further compounded by the preparation process itself, which uses machinery to heavily compact the aggregate to form a solid layer for laying the artificial turf. This compaction will permanently destroy soil structure across the site. The resurfacing will block

13 Searchable here: <https://planning.wandsworth.gov.uk/Northgate/PlanningExplorer/GeneralSearch.aspx>

14 One of the most significant legal requirements for delivering biodiversity in Lambeth is the 'Biodiversity Duty', which has been set out in the Natural Environment and Rural Communities Act 2006 (NERC) in Section 40. This requires that 'every public body must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'.

15 "Lambeth Biodiversity Action Plan" p. 16

16 Assuming that it goes all the way down the stated 100mm. This assumption is moderate as, even if this depth were not filled, there are also landscaping elements like hummocks to be made of the aggregate. Our calculation assumes use of 10mm aggregate over a 2000 sqm area to a depth of 100mm. This is the software we used: <https://www.robinsonquarry.co.uk/tonnage-calculator.php>

17 p. 5

all future possibility of carbon storage from trees, shrubs and grassland, and will create dead zones for wildlife both above and below ground.

2.2) Sustainability

It is hard to see what the applicant means by "sustainable design".¹⁸

All plastic lawns are extruded from petrochemical products and support the fossil fuels industry. Many of these products are manufactured abroad and they all carry a significant carbon footprint. These plastics are not biodegradable.

Many suppliers will offer 10-year guarantees for the product and installation but none will step over this limit. Artificial turf products usually need replacing within 10-15 years - a short life span for an exterior surface material.

The applicant states:

“Many observations regarding synthetic grass are valid and are mainly regarding future waste and perceived wear issues. However, the turf we use is from Real Turf, Spain, is of the highest quality, very durable and is 100% recyclable...”¹⁹

The applicant does not mention that there are two different grades of plastic grass on the site. Real Turf is only one of their suppliers. In the “Method Statement”, they list Verde Sports as their supplier for the Verdelux artificial grass, which is a longer grade polypropylene grass used extensively throughout the site.²⁰ We have contacted Verde Sports who have confirmed this grass is manufactured with a latex backing and is not recyclable. They have confirmed it will eventually have to go into landfill.

In addition to the plastic mass from the turf, there is also a separate cushioning underlay, made of polypropylene and polyester, sandwiched between the aggregate and the artificial turf. If this runs under all the grass throughout the site then it adds an extra 1.20kg per sq.m We spoke to the applicant’s listed supplier, Leigh Spinners, who confirmed the mix of polymers, meaning this material is also not recyclable. These are, again, details the applicant has not supplied in the proposal.

With regards the claim, of key concern to the public in a climate emergency, that the grass is "100% recyclable", there are currently no recycling facilities in the UK that can reprocess plastic grass. The British Plastics Federation has recorded zero recycled plastics in the UK over the last decade from plastic grass. It is not recycled and in practice not recyclable.²¹

18 p. 7, question 13, "S38 Application"

19 p. 3, "PITP Advertisement". This claim of recyclability is also in their application, p. 6, question 11.

20 p. 18, "Method Statement"

21 According to our correspondence with the Federation, there may be one plant in Denmark that has the potential to recycle it.

Meanwhile, none of the plastic grass products used are made from recycled products. This is a particularly pressing issue as the weight of plastic grass plus underlay used on the site is about 5900kg, equivalent to more than half a million plastic carrier bags.²²

2.3) Pollution

At the point of laying, the cutting required to fit the lawn to the space - like a carpet - means innumerable plastic blades get shredded, releasing micro plastics into the environment. For the Clapham site, the volume of micro plastics produced will be exacerbated by the rounded shapes apparent throughout the lawns of the course. The grass comes in large rectangular rolls, meaning there will be considerable waste produced by cutting these shapes. Over time, many blades come loose from their footings and contaminate the surroundings.

2.4) Biodiversity

Lambeth's "Biodiversity Duty" is enshrined in national law and recognised by their own plan.²³

The application therefore does much to extol the project's biodiverse credentials. The reality is that two thirds of the site will be covered in petrochemical surfaces and hard standing (its current surface is entirely living turf). This is self-evidently an inappropriate material for creating a biodiverse landscape. Below we have shown that few of these claims stand up to scrutiny.

2.4.1) Biodiversity: Flora

The planting scheme shows the applicant's understanding of biodiversity is restricted to nectar production from flowers. Although valuable, nectar only caters for a short part of the life cycle for many invertebrates. There is no inclusion of specific foliage plants, which would provide an essential vegetation food source for the larval stage of the life cycle for many insects--butterflies, moths and other pupating insects.

22 Avg. weight of materials used per square metre, calculated proportionally by their apparent use, times the area in square metres.

23 "One of the most significant legal requirements for delivering biodiversity in Lambeth is the 'Biodiversity Duty', which has been set out in the Natural Environment and Rural Communities Act 2006 (NERC) in Section 40. This requires that 'every public body must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'." "Lambeth Biodiversity Action Plan", p. 14

Almost all the plants listed are ornamental, non-indigenous species, many of which are not recommended for use on Common land by Lambeth Parks. They are all commonplace garden plants found in garden centres. They do not have extended or repeated flowering seasons and they exhibit no special characteristics for enhancing biodiversity.

Many of the listed plants require conflicting growing conditions in terms of soil pH, soil types and light levels. For example *Pieris japonica* requires acidic soil and a sheltered position in partial shade, whereas *Lavandula angustifolia* thrives in fast draining, alkaline soil in full sun. Plants have been put together from countries with contrasting climate zones - *Choisya ternata* 'Sundance' is from Mexico and *Skimmia japonica* is from Japan. These are incompatible planting partners when creating cohesive landscape designs.

Horticultural competence in making plant selections and recognising the particular needs of plants will be essential to the nature conservation and success of the site.

The listed tree, Golden False Acacia (*Robinia pseudoacacia* 'Frisia'), has become prone to a die-back disease over the last decade, resulting in death for many younger specimens. This tree is no longer recommended for landscape use by many horticulturalists.

The *Robinia pseudoacacia* species is a North American native, particularly prone to suckering from the base. Our British tree species in Battersea Woods on the Common are currently under threat from an uncontrollable spread of *Robinia* suckers.

Despite the emphasis on biodiversity, the generic term 'wildflower' is used throughout the design to denote planting in certain areas. There is no indication as to the specific flower mix or biodiverse purpose given to the intended planting scheme.

2.4.2) Biodiversity: Amphibians

Claims that the water feature will attract newts and frogs are unsubstantiated and improbable. This area is surrounded by roads on three sides, within several meters of the site and there are no other linking ponds on this part of the common. In addition, the water feature will be surrounded by stretches of coarse plastic grass blades, prone to overheating in sunshine, which would deter or be harmful to amphibious life.

The primary purpose of the water feature is to be a trap for golf balls as part of an obstacle course and players are issued with nets to fish them out. This repeated activity is not conducive to the creation of a wildlife pond or the wellbeing of its inhabitants.

Authentic wildlife ponds are recommended to have areas with a 60cm depth to protect amphibians from freezing in winter - the pond in the design only has a consistent 20cm depth.²⁴

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The final line in the illustrated section of the appeal states 'The courses will add a vast amount to the Bio Diversity on the Common'. We have shown these claims to be overstated and to constitute greenwashing.

Conclusion: After Putt in the Park?

The current lease for 15 years itself presents sustainability issues. Should Lambeth elect not to renew the lease, or should the company fail, the site will need to be dismantled, removed and restored to its former state.

What will happen to the trees and shrubs that will have matured and established extensive root systems? These plants would be laid out in a conservation area according to the plans of a mini-golf course. The resulting planting plan once the site has been cleared will make no sense.

The sheer volume of materials imported during the construction of the site, as detailed above, will be near impossible to remove and the landscape may be lost forever.

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Lambeth was the first London borough to declare a climate emergency in 2019.²⁵ Clapham Common is designated by Lambeth as a Site of Importance for Nature Conservation (SINC).²⁶ Permitting use of these materials where unnecessary, and for an unacceptably short lease undermines sustainability and decarbonisation policies and is not in the public interest.

We believe we have demonstrated that the proposals from the applicant are neither in the 'interests of the neighbourhood', nor in the 'public interest' according to the 2006 Act, Sections 38-39 and we therefore urge the Inspectorate to reject the proposal.

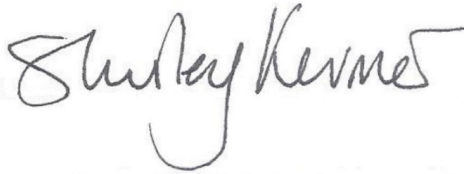
24 We have had confirmation from a colleague at Friends of Wandsworth Common that after newts and toads were identified in the pond on their site, they were unable to survive.

25 <https://www.lambeth.gov.uk/better-fairer-lambeth/climate-change-and-sustainability>

26 p. 25, 10.2, "Lambeth Biodiversity Action Plan". They say that "[d]evelopments that negatively impact upon any Lambeth SINC will only be permitted in exceptional circumstances and only where suitable mitigation or compensation can be secured from the beginning to offset or compensate for potential harm to the site or its wildlife value."

All the information in this letter is true to the best of our knowledge at time of writing. We would be very happy to provide any further information to the Inspectorate and include contact information below.

Yours faithfully,

A handwritten signature in black ink that reads "Shirley Kermer". The signature is written in a cursive style with a large, looped 'S' at the beginning.

Shirley Kermer, Chair of FCC

A handwritten signature in black ink that reads "Gareth James". The signature is written in a cursive style with a large, looped 'G' at the beginning.

Gareth James, Committee Member, FCC

A handwritten signature in black ink that reads "E Allnutt". The signature is written in a cursive style with a large, looped 'E' at the beginning.

Ed Allnutt, Member, FCC

For any additional information, please feel free to contact us at friends@claphamcommon.net