

Official initial objection from the Friends of Chestnuts Park as of 31st August 2023

Further responses to the details in the planning application will be submitted prior to the deadline, which we have requested be extended 2 weeks beyond 6th September in order to give parents returning from school holidays time to analyse the proposals.

Summary

- The proposed retention basin in the main playing field is too big for the very small Chestnuts Park. The proposal is too risky. It is being rushed through in a chase to retain funding, without enough resource in place to manage the many risks both immediate and in the longer-term.
- The proposed large size of the two basins in relation to the green field would be oppressive and entirely change the open aspect and nature of our park.
- It risks removing public amenity green space if the basin is fenced off for safety
- The surface water drains feeding into the retention basin have for a long while been emitting noxious odours via the drain covers and are probably contaminated by misconnections of grey water from domestic drains in the catchment. At the point of writing, 31st August, the latest water quality results are still not available, but are suspected to show problematic levels of contamination.
- LBH has, we believe, only a single member of staff responsible for flooding, and no longer employs the single misconnections officer. If there are future public health problems with polluted water surfacing in the park, there is not capacity to deal with it in a timely fashion
- There is already an almost total lack of gardening input to our park. Adding new features will make a bad situation worse.
- Basins like this elsewhere fill with rubbish very quickly, and the council's existing cleansing teams lack the resources to deal with this
- The whole project is a massive experiment. There are NO precedents for a project like this in a small and heavily used park like ours. And yet there is no framework for managing such an experiment, no connection with any university or research team to monitor its effectiveness including the water quality, nor resources in place to fill in the basin and return the park to its former use if the project fails.
- There is no wider risk management strategy in relation to this project
- Local schools which use the park and other key stakeholders have not been consulted. The list of actual consultees only includes the immediate neighbours in parts of La Rose Lane, Cranleigh Rd and Falmer Rd, and not even the main stakeholders such as the café, community centre, the NHS Trust, the five local schools which use the park, and the Friends Group
- There is proof neither any significant flood risk nor that if it exists it will be mitigated by this experimental basin. Extreme drought is a serious problem, and is likely to affect this project.
- For the Council to ruin our park with this rash and rushed project just to be seen to have completed another flood project, is not right.
- We oppose this current proposal and urge councillors to reject this application. It will cause untold damage to our small and popular park.

1 Formal objections as per the criteria listed on the planning portal.

Criteria: “Principle - If you feel that the very nature of the proposal is inappropriate for example that the use of land/property should not change”
“Out-of-character - If the design of the development, its scale and use, is such that it appears to be out-of character with its surroundings”
“Overbearing - The scale of the works means that the property/premises has an oppressive impact on surrounding areas/houses”

The proposed retention basin in the main playing field in the area nearest the Cranleigh Rd gate is inappropriate, out of character and overbearing. It is too big for the very small Chestnuts Park. In addition, this proposal is too risky, and is being rushed through, without enough resource in place to manage the many risks both immediate and in the longer-term. The justification given for the rush is the need to complete the project by the funders’ deadline of March ’24, but this is not justification for a bad project.

The proposals risks removing public amenity green space. Chestnuts Park is situated in the area of the highest green space deprivation in the borough. In addition, we’re about to have over 900 new homes, with no open play or sports spaces suitable for older children, built across the road on the old St Ann’s hospital site. We need more useable green space, not less.

Equally important, there is an almost total lack of gardeners recruited to the parks service, serious problems with Thames Water’s performance as a company, only one LBH staff member looking after flood prevention, and no plans in place for dealing with any domestic misconnections in this catchment area. This means that the council is not currently in a position to mitigate the many risks.

The proposed large size of the two basins in relation to the green field would be oppressive and entirely change the aspect and nature of our park. When we started the idea of having a SUDS in the park, it was envisaged that it would not take up major amenity space but would run along the side of the park. This could possibly have created a water feature and wildlife area in the NE corner of the park, currently the site of two derelict basketball courts. The courts would be re-located anew elsewhere in the park.

However, engineering investigations revealed that the geography of the park means that the only possible location for the project would be on the main field, and would have to be a single basin, rather than a swale or ditch running along the side of the park. This change of location and scale of the single option being offered is simply unacceptable. It was suddenly introduced via a presentation on screen during a project team zoom meeting in the Spring, with no prior warning. Since then the project team has ploughed on regardless of the repeated concerns expressed by the Friends about the size and location.

Criterion: “Disturbance - There would be unacceptable intrusion in the form of noise nuisance, general disturbance, odour, etc.”

Health and safety concerns and unacceptable disturbance due to odour

Originally it was hoped that the Stonebridge Brook, which used to run through the park and was culverted in the last century, would be found in pipes running under the park. Sadly, it has not been possible to find it. Some remnants of the brook probably exist in the surface water drains, and certainly further East where those drains link up with the Hermitage Brook, near the junction with Culvert Rd and North Grove: there is a flow which then exits into the Lea near Markfield Park café.

In the absence of the missing brook, the rainwater/road run-off drains will be diverted into the park and brought to the surface briefly in a retention basin. However, at present these surface water drains are consistently emitting noxious odours via the drain covers, and are clearly contaminated by misconnections of grey water from domestic drains in the catchment. Thames Water, itself a company in trouble, has not listed this catchment area as an area for concern for misconnections. LBH has, as far as we understand, only a single member of staff responsible for flooding, and no longer employs a single misconnections officer. When there are future public health problems with polluted water surfacing in the park after the project is finished in March 2024, there is not capacity to deal with them in a timely fashion.

It has been argued that by surfacing polluted water into a park the public will be educated about the dangers of misconnections whereby grey water from local homes is wrongly connected to the surface rainwater drains, and that they will then campaign for the authorities to correct the problems that have occurred. To us this is a hopeless, unrealistic and cynical approach. Our park is too precious to local families to be sacrificed in this way, allowing an expected problem to arise in the park and then relying on local people to complain about it in order to get something done. There are all sorts of other spaces where water can be surfaced for cleansing, not least for example in the complex of inaccessible railway land to the East where the Stonebridge runs under various local rail lines near where they intersect with Seven Sisters Rd, and also Tottenham High Rd and Ermine Rd near the Stonebridge Estate.

And if the water introduced into the park is polluted, two or three metres of reeds are not going to make any significant impact on cleansing it. The specialist water consultant stated very clearly that the project is primarily designed for containing flooding in the park, and *not* for water cleansing and that any water cleansing would only be incidental and not significant. The latest water results show a level of pollution comparable to that in Firs Farm in Enfield. But unlike Firs Farm, which has long stretches of open flowing water, reedbeds and reservoirs, and lots of space to get away from any areas of smelly water, this project will be placed in a very small park which is heavily used in every area. The water will not be cleansed, and where the water is smelly, there will be no space to get away from the smell.

Increase in littering

From observation of all similar basins elsewhere, the basin is likely to be filled with rubbish very quickly, and on current evidence the council's existing cleansing teams lack the resources to deal with this. We have two volunteers who litterpick every morning 365 days a year before the parks team arrives. They are retiring soon and so the existing problems will escalate even without the addition of a rubbish magnet which the basin would provide. We cannot rely on unpaid volunteers to address these future issues.

Reduction of open space

Parents are also concerned about the danger of the water in the basin and of children falling in. The response from the council has been that if this is the case, the basin will be fenced off. This would be in contradiction of the council's policies which are not to reduce the overall size of public amenity land in parks. We would oppose fencing off any area of the field very strongly indeed.

Additional concerns

Volunteers are presumed to have a role in managing the new project, and yet the Friends of Chestnuts are already overwhelmed with the existing gardening tasks in the park, in the absence of almost any horticultural input by the Council. A temporary private contract is proposed for the maintenance of the area, but we contend that the parks service, on current evidence, is not competent to manage such a contract nor to take it over in due course. There is currently almost no gardening service. The grass cutting is still unpredictable and doesn't follow agreed guidelines. Hedges in the play areas are overgrown and the beech hedges are being allowed to degenerate with brambles and other species taking over. It is inconceivable that even with a new cohort of parks gardeners, they would be able to manage the new reedbed environment. In Lordship Rec it's the volunteers who deal with the slopes of the Moselle.

There are apparently enough gardening staff allowed for in the parks service budget, but the Council has not been able to recruit them over the past few years. (We suggest that they need to revise salary levels to rectify this, but this will not be done in time to save this project.) Indeed, the lead parks manager for this project had not yet, as of July, managed even to meet with an operations manager due to "the short staffing in that team", even though such a meeting was clearly needed way back in early Spring. If there is no time even to meet to discuss how to address the risks, there is no hope of there being time for staff and their managers to manage them.

Lack of professional framework for managing an experimental project

The whole project is a massive experiment. There are *no* precedents for a project like this in a small and heavily used park. And yet there is no framework for managing such an experiment and no connection with any university or research team such as the special team at UCL which Haringey Rivers Forum have worked with. Indeed there seems to be no one in place in the Council even to engage with developing such a relationship with a university. Haringey volunteer water squad has stated it has no capacity to help with this project.

The levels of pollution and heavy metals in road run-off are not yet known, which also makes this project experimental.

This plan is completely inappropriate in a very small public park. Families using the park don't have a choice of moving away from the offensive area as they can at Firs Farm, Broomfield or Albany Park. There are simply no other examples of a large project like this taking up vital public green amenity space in a small park.

Lack of adequate risk management strategies and failure of understanding of co-production with local stakeholder organisation

We have asked to see the wider risk management strategy of the council in relation

to this project. We have been told that no such strategy or register has been created, only a risk register for the actual project, in terms of contractors etc. This project has gone wrong due to silo working and not enough input from the parks service, which has not always been represented at the monthly meetings, leaving the Friends as the only voice defending the interests of the park.

Possible solution

It is clear that if the project is to go ahead in any form, it needs at least another year to explore other less risky options and to consult properly on them.

We oppose this current proposal and urge councillors to reject this application. It will cause untold damage to our small and popular park.

2 Flaws and errors in the documents posted on this planning site

Design and Access statement

The odd layout of this statement, in shallow 3 pane panels, make it extremely difficult for lay people to read at all. When it's printed out on A4 the text is illegible. When looking at it on screen it's very difficult to follow the panels as each page jumps about. One has to scroll sideways across the 3 panels, and the document becomes unstable on most devices.

Our comments are based on a first reading. We will have more to make before the deadline.

The other projects listed in Figures 23, 24 and 25 on pp. 31 and 32 of the Design and Access statement are not relevant or comparable to what is proposed for Chestnuts.

The various photos and diagrams, for example in Figure 11 and Figure 15, show a very different environment from that to be found in Chestnuts. It is likely that the hole in the ground will be almost empty of water for most of the year. Similar projects elsewhere, including in Albany Park, are now mainly just dry holes in the ground, with cracked clay and dead trees supporting very little plant growth.

The illustrative montages, for example in View 3 and 4, though we understand they use the conventions of design, are so dark and indistinct that they give a misleading impression of the size of the project. Anyone who looks at the map eg in figure 5 showing how project which will occupy the bulk of triangle of the main field between the raised line of the main concrete culvert and the Western perimeter path, will realise that these shadowy projections, which indicate just some darker green areas at the edge of the park, do not convey the significant reduction in size of the main field and the impact of it.

We invite anyone to come and stand in the park and look at the proposed size of the project in relation to the main field. The lovely photos of the area as it is now, taken from the entrance by Chestnuts School gate (which the Friends fundraised for, designed and installed), which open and close the Design and Access statement, are a record of what will be lost if the project goes ahead.

Statement of Community Involvement

It is claimed that a formal meeting has taken place with Chestnuts School and it has also been claimed that the school is in favour of the scheme. We believe this to be incorrect.

There was a single meeting with the green lead teacher from Chestnuts school, at a point when the issues in terms of the risks and danger were not apparent. She was mostly interested in how the children could be involved in design of any new feature, but that was not of interest to the consultation.

The list of consultees does not include the main local stakeholders like the café, the community centre, the Friends group nor the five local schools which use the park.

At no point has the local resident population, nor the many schools which use the park, been properly informed of the size and risks of this project.

We would also like it noted that during the public Commonplace consultation about the project in July, we requested our name be removed as a partner, so worried were we about the risks and dangers of the project. (We are of course happy to be named as a partner in the Commonplace consultation on the masterplan for the park, which contains interesting ideas for the park as a whole).

3 Further information and objections in the context of the history of our involvement in this project

When years ago we first suggested investigating the possibility of surfacing of the Stonebridge Brook which used to run through and then under the park, this fitted into our long-term rolling park masterplan in the following four ways:

1. The drainage work levelling the playing field carried out in 2000 appears to have failed and now needs addressing. There is also puddling across the park, including in key areas of the field. We hoped that a rain garden or SUDs project would contribute to this drainage challenge.
2. The now derelict basketball courts in the NE corner of the park are one of the very few problem areas of the park which we haven't yet tackled in the 23 years since we formed as a group. They also need to be relocated away from the adjacent blocks of flats due to the noise from late night tournaments and the unlicensed parties following the tournaments. We proposed a rain garden in that location, and the creation of new courts elsewhere in the park, further away from residential housing.
3. In spite of our addition to the park of many ecological features, including the willow garden with its sustainable beds and orchard, the wildflower meadow strips at the Chestnuts Gate, and the perimeter hedge we have laid over the past 10 years with TCV, the park still lacks many ecological features and wildlife and as far as we are aware there is no current LBH Conservation Plan for our park. We have never met the Conservation Officer. The few beds which we do not garden ourselves as volunteers, eg the round bed by the Community Centre, are entirely neglected, and only gardened once a year the week before the Green Flag judging visit. Prior to the extreme drought of the past two years, we thought that some wetland type features would add to the ecological variety in the park.

4. We are committed to flood alleviation programmes, and to surfacing water where feasible, in order for sunlight and appropriate planting to help purify water before it enters the rivers and the sea. Although there is not much evidence of flood risk immediately around the park, there was enough to justify a bid to the GLA, EA, Thames Water and Thames 21 to investigate the feasibility of surfacing the brook.

None of the problems and issues raised in the four paragraphs above are addressed by the flood alleviation project in its current form, as we demonstrate below:

1. The retention basin will *not* take water from the main field or deal with any of the existing drainage problems within the park, and its size and location in the main field will remove public amenity. Additional works are proposed to level the current ruts in the field, but these need to take place anyway.
2. We had hoped that the water feature in the park would be placed in the NE corner. However, engineers' investigations of the geography of the park have revealed that this is not possible, and the single option presented to us was the large retention basin in the NW corner of the field.
3. Since we started to think about water features 10 years ago, the extreme drought of, for example, 2022 has started to manifest in the park in terms of challenges to the mature plane trees. Similar flood projects we have visited in Albany Park in Enfield are suffering from drought, with the trees and reedbeds dying. We now believe that more savannah type planting needs to be introduced, and natural solutions found to the challenges of drought. We were also shocked to hear that a significant length of the mature native hedge we have worked with TCV to plant around the perimeter of the park over the past 12 years will be dug up to allow heavy vehicles to come into the park. We fear that the hedge plants are too big to survive being moved, and they have taken years to grow to their current height. The infill trees in that section were planted by local families during lockdown.
4. This proposed project is taking a sledgehammer to crack a nut. Because of the way the land falls, we understand why a basin in the main field is now considered the only option for creating a flood alleviation project. But other than a one-off flood at the junction of La Rose Lane and Clarence, which cleared in a day, and some wetness in gardens at the south-eastern end of Falmer Rd, there is not a serious flood problem in this small area. Other areas of the borough need prioritising for flood mitigation much more. Choosing to make our small park suffer so that the council can tick a box to show that it is doing one flood project is not fair on the park. There is also no sense that the Chestnuts Project is part of a wider strategy for flood mitigation in the area. For example, many of the Homes for Haringey houses in the catchment area ie the North end of La Rose Lane have paved front gardens, and there are opportunities for rain gardens in the wide pavement extensions outside and opposite the corner shop. Unlike in Enfield, there are simply not enough resources in the borough's own flood team staffing to make a joined-up strategy of the kind that is needed. Nor are there enough resources in LBH/Thames water to reverse the Chestnuts Project and make good the damage to the park if this project fails to divert flood waters and if the water brought into the park is too noxious for residents to tolerate.

As stated above, there was enough evidence to merit a funding application to GLA, the Environment and others to investigate the feasibility of a drainage feature in our park. But the results of that research have apparently now shown that the only feasible option is a basin dug in the main field. This would damage one of the key features of the park, which is the great sense of open space across the field. You only have to stand at the side of that field to see how small children break into a run as soon as they get onto it.

There is no real proof that any flood risk will be successfully mitigated by this experimental basin. There is no proof that this is an area of extreme flood risk compared to other areas in the borough which merits such an intrusive proposal. For the Council to ruin our park with this rash and rushed project is not right.

We urge the planning committee to reject this application.