

Future Merton
London Borough of Merton
12th Floor Civic Centre
London Road
Morden
SM4 5DX

9 May 2012

Dear Sirs

Submission of representations to the Site & Policies Development Plan Document – Wimbledon Stadium

Following an initial meeting at London Borough of Merton Civic Centre on 25 April 2012, we submit representations to the London Borough of Merton Site & Policies Development Plan Document (DPD) consultation, on behalf of our client, Hume Consulting Limited. Our client has a specific interest in Wimbledon Greyhound stadium (Site 37).

The submission is supplementary to the letter from Richard Herbert of Strutt & Parker that was submitted prior to the initial deadline for responses.

It was agreed with officers that further supplementary information would be welcomed, and given due consideration.

Existing & Emerging Policy Position

The Wimbledon stadium site extends to 5.29 Hectares. It is not allocated for any specific use in the existing 'up-to-date development plan' for the area - The Merton Unitary Development Plan, which was adopted in October 2003. The site is highlighted as an area at Risk of Flooding every 100 years, and also forms part of the Controlled Parking Zone (Policy PK1). There is no specific reference to the site in the Council's Core Strategy, which was adopted in 2011.

The Existing use is a Greyhound stadium that is also used for Stock Car Racing. It falls within Use Class D2 (Assembly & Leisure) of the Town & Country Planning 1990 as amended by the Use Classes (Amendment) Order 2005. The site also has extensive car parking, which is defined as sui generis use.

The stadium is identified as Site Proposal 37 in the Site & Policies DPD. The document confirms that the site has a number of strategic physical constraints, namely:

- It is within the functional flood plain (Flood Zone 3b) of the River Wandle;

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- It is surrounded on all sides by Strategic Industrial Locations;
- The site has limited Public Transport Accessibility (PTAL Level 2), with the existing highway network, railway lines, river and utilities infrastructure (including a major substation adjacent to the site), limiting opportunities for improving access; and
- The site is within an Archaeological Priority Area.

The Council's preferred use for the site is 'Intensification of sporting activity (D2 Use Class) or Industrial (B1[c], B2 Use Class) and warehousing (B8 Use Class) on cessation of a sporting use'. The site has been promoted by Savills L&P Ltd for a residential-led mixed use scheme.

The Council state in the draft DPD that, in the event the existing sporting use would cease, an industrial designation would be compatible with the scale, function and nature of the development surrounding the site, but would need to take account of the adjacent electricity substation, and the need to minimise any potential impact upon archaeological heritage, and flooding.

Wimbledon Stadium & Greyhound Racing in the United Kingdom

Greyhound racing remains a popular sport in the UK and Ireland. The sport attracts approximately 3 million spectators per year in the UK, making it the 3rd highest spectator sport after Football, and Horse racing. There are 25 licensed stadia in Britain, with a total turnover of £75,100,000 (*this is just on course tote betting – off course tote betting is £2.6bn plus on course bookmaker*). Furthermore, the industry directly employs circa. 10,000 people. Licensed racing in Great Britain is regulated by the Greyhound Board of Great Britain (GBGB). In 2007 the GBGB regulated sector approximately consisted of 26 racecourses (Walthamstow has since closed), 1,520 trainers, 4,135 kennel staff, 867 racecourse officials, and in excess of 15,000 greyhound owners with approximately 10,000 greyhounds registered annually for licensed racing.

Wimbledon Stadium is the most famous Greyhound stadium in the United Kingdom, following the closure of Walthamstow, and has been used for that purpose since May 1928. It is a historic site which has been the home of the World's most prestigious Greyhound race, the English Greyhound Derby since 1984, following the demise of the White City stadium. This race must have minimum prize money of £50,000. The competition has six-rounds and attracts around 180 entries each year. Wimbledon and the significantly smaller Romford stadium are the only remaining Greyhound venues within Greater London.

Wimbledon stadium is also iconic to speedway and stock-car racing. The stadium hosts stock-car racing annually every weekend for 12 weeks during the months of November, December and January. The stadium was formerly home of the SuperStox World Championship, hosting the event between 1962 and 1974, regularly attracting a capacity attendance. It was also home to the Unlimited engine capacity Banger racing World Championship, until the event moved to Ipswich Stadium in 2008.

The stadium is currently in a very poor state of repair. It is an eyesore to the local environment, and provides little, to no benefit to local businesses. Whilst the stadium was originally designed to accommodate up to 8,000 spectators, the majority of the main grandstands have been closed due to general dereliction and safety concerns. The facility is currently used only 2 evenings a week, Friday and Saturday, with occasional race events on Tuesdays. Attendances average between 1,000 on 1,500 per

evening, partly as a result of the reduced capacity to circa 3,500 spectators, and partly due to the poor condition of the building. As such operating profits have declined 90% between 2008 and 2010. Due to the lack of investment in facilities and prize money, two of the larger trainers have left Wimbledon over the last two years, which has a direct impact on the number of greyhounds available to fulfill races/meetings..

The stadium is beyond repair or refurbishment, and it is likely to be forced to close entirely on grounds of health and safety in the not too distant future without significant investment. Closure of Wimbledon stadium would result in the loss of a substantial number of jobs and an iconic arena of national significance. Approximately 10 trainers would directly lose their jobs immediately. Furthermore, it would severely impact the Greyhound industry as a whole by reducing potential owners and sponsors through no longer having an iconic London presence.

Representations & the Opportunity Proposed

Through the Local Development Framework, and public consultation relating to the Site Allocations DPD, it is evident that the Council's default preferred position is to seek to retain the stadium and the site within the currently permitted D2 use class. This is strongly supported by our client, who has a strong track record in the management, operation and redevelopment of Greyhound stadiums.

Our client wishes to invite the London Borough of Merton to not only test the options for retaining Greyhound racing at Wimbledon Stadium, but also dramatically enhance the profile of the stadium as a world class leisure destination of national significance; safeguard the long-term retention of Greyhound racing in London; and raise its profile as a sport, reaching out to a wider and more cosmopolitan population.

Our client has a proven track record in the sport of greyhound racing. They have sustained an eleven year tenure as the Government appointed chair of the semi-state run Irish Greyhound Board, responsible for the management and operation of 17 tracks across the Republic of Ireland. Our client has successfully repositioned the Greyhound industry in Ireland from one of relative obscurity, to one of the most popular night time activities in the country. They have overseen the redevelopment of a number of existing stadia, as well as the development of new stadia, which has led to annual attendances across the tracks rising from 586,000 to 1.4million persons per annum. Furthermore, our client's input has had a direct correlation with achieving the following successes:

- Tote betting increasing from 6.7million Euros to 51.3million Euros;
- Increase in bookmaker betting from 22.2million Euros to 93million Euros;
- Increase in prize money from 2.4million Euros to 11.35million Euros;
- Trebling of sponsorship from 610,000 euros to 1.94million Euros

The regeneration of the sport in Ireland, has attracted a far wider audience, from standard track-side tickets to corporate suites, which in the larger arenas, are regularly be booked out three months in advance by large corporate clients. The stadiums are a recommended tourist attraction within each city in their own right, and provide a wide range of jobs to a broad spectrum of society.

Our client proposes to demolish the existing stadium, which is beyond repair, and to re-orientate it within the site. They propose to subsequently construct a new world class track, with a grandstand capable of accommodating up to 6,000 people. The stadium would be designed to the highest standards as set out in the images below and it is our client's objective to deliver the best Greyhound racing facility in the world to Wimbledon. It is proposed to provide a four-tiered grandstand, that will facilitate over 1,500 trackside spectators with bars and restaurants at ground level; with a two-tier restaurant above capable of seating over 700 people, with tables of between four and eight seats tiered evenly to provide uninterrupted views of the track below for all guests.

It is proposed that each table would have its own TV from which to watch the action and to benefit from replays. Each table would have their own dedicated sales person, who would facilitate any betting, and the area would be complimented with dedicated betting and bar areas. The restaurants would serve a range of cuisines, from traditional favourites to high end haut cuisine. The top tier level would provide up to eight corporate boxes, each capable of accommodating up to 60 people, with a further two private suites, each capable of accommodating 80 guests. Each corporate box and suite would have a private bar and a balcony with the best possible views of the track below. The suites and boxes could be joined to accommodate larger parties.

Providing such a range of facilities within such a high quality leisure destination will attract a far wider range of clientele than that which currently frequents the stadium, with a particular target to attract a number of corporate companies serving the financial centre of London.

It is proposed that racing would be held between three and four times per week, 51 weeks of the year, whilst the existing 12 week calendar of stock car racing would be retained, through the provision of a significantly upgraded track inside the 480m Greyhound oval. This would provide significant economic benefits to the local population, the Borough, and London as a whole. The facility itself would employ approximately 250 part time staff on each night racing was held, offering flexible job opportunities within the tote, catering and office sectors to the local population. The jobs would be directly targeted to the unskilled sector, with the majority being ideal for those between 18 and 26 years of age, providing much-needed employment opportunities to the population within which there is the most acute need. The development would also create approximately 25 additional full time posts relating to the management, maintenance and catering services of the stadium, as well as a large number of construction jobs during the demolition and redevelopment stages.

The proposal would also act as a catalyst to physically regenerate the wider area. The experience in Ireland has shown that the regeneration of the stadia has also led to a positive impact upon local businesses, as a result of a significant increase of disposable income entering the area. In particular public houses – of which there are three currently closed within close proximity of the site, would benefit from the substantial rise in footfall. Similarly the proposals would likely attract hotel/restaurant investment, and benefit local transport and taxi companies.

It is proposed that the stadium would have up to 120 car parking spaces dedicated to trainers and kennels for up to 90 greyhounds designed foremost to protect the welfare of the dogs. This would also attract a far wider number of trainers and owners to invest in, and compete at Wimbledon, safeguarding the welfare of existing dogs, and the trainers that currently use the stadium.

There is an opportunity to incorporate conferencing facilities and community space into the stadium that can be used during the day, and on non-race evenings by a range of local community groups, making it not just a leisure destination, but also a place of community focus for which local residents groups can be proud. The Greyhound industry also has a strong track record in running dedicated fundraising evenings for local sports/youth clubs and charities, which could benefit a number of local charities, as well as football, rugby, hockey and sports groups.

The Need for complimentary/enabling forms of investment

The estimated cost of the stadium itself is in the region of £30 million. This does not take account of any costs associated with remediation of the site, removal of asbestos, archaeological examination, improvements to highway access arrangements, or engineering works to ensure that the development would not have a detrimental affect on the River Wandle floodplain.

The greyhound stadium would become a viable business in its own right. The model proposed by our client is to attract a range of patrons of varying financial disposition, by making Wimbledon stadium the UK's premier Greyhound stadium that can draw on the 8 million residents of Greater London, attract tourists, and tap into the world's largest financial sector. However, the stadium alone could not support the capital costs associated with redevelopment and remediation of the site. Therefore, a high value use must be identified to contribute to the costs of the development that is not only acceptable in planning terms, but would secure a long-term sustainable solution that can contribute to the wider regeneration of the area.

As set out earlier in these representations, our client strongly supports the Council's identified commitment to maintaining the leisure, and stadium use of the site. As identified by the Council in this process of consultation, the first priority must be the retention of an iconic stadium. However, during initial feasibility studies for the proposed development, we have considered the following options as potential uses that could assist in funding the proposals.

- **Offices (Use Class B1)** – The site is not part of, or close to an established office location. The immediately surrounding uses are characterized by industry and warehousing, with large swathes of residential development beyond. Wimbledon Town Centre is the closest established office location, and benefits from excellent public transport accessibility. It is considered that there is no market to attract a large-scale single employer to this location, which would be required as a pre-let, to act as a catalyst for attracting further tenants, and to facilitate any form of speculative office development. As such office use is not considered to be a viable or suitable option for the site.
- **Light Industry & Warehousing (Uses Classes B2 & B8)** – The site is surrounded by a large established strategic employment location, and as recognised by the Council in the draft DPD, industrial and warehousing units would be appropriate to this location given the nature of surrounding land uses. However, the rental income/site value that can be achieved for B2/B8 industrial units is considered too low in this location, particularly in comparison to sites such as Park Royal which benefit from connections to the strategic highway network, and major transport hubs such as Heathrow Airport, to provide the level of funding required to facilitate redevelopment of the Greyhound stadium.

- Leisure (Use Class D2) – The site currently has a leisure use, and it is not considered that a swimming pool or fitness centre would provide sufficient capital to fund the redevelopment of the stadium. Alternatively a Bingo Hall, or Bowling Alley, or Cinema Complex are considered to require a larger residential population in the immediate vicinity, whilst struggling to compete with existing facilities in Wimbledon and Wandsworth.
- Residential (Use Class C3) – The site is located within the flood plain of the River Wandle. Residential is a 'sensitive' use defined in the National Planning Policy Framework, and therefore would require a complex, and costly engineering solution to ensure 'safe means of escape' from all properties, whilst any application would need to demonstrate that there were no sequentially preferable sites available or suitable within Flood Zones 1 or 2 that could accommodate the residential use. The need to remediate the site from contamination, and provide appropriate acoustic and landscape screening from the adjacent industrial developments, and electrical substation would be costly in order to achieve a satisfactory environment and level of amenity. The lack of open space in the immediate vicinity of the site would require extensive levels of on-site open space to support a new residential population. The residential values of property in the immediate area are also lower than many of the surrounding areas of Wandsworth Common; Earlsfield; Wimbledon Park; Wimbledon; Wandsworth; Putney and Southfields. This, coupled with the environmental and physical constraints of the site would likely require a very dense residential development to deliver funding for a new stadium, which is not considered appropriate for this site given its suburban context and PTAL rating of 2. Indeed the London Plan would indicate that a maximum residential density of 50 – 95 dwellings per hectare. It is not considered that a residential development that was sustainable and in accordance with the Mayor of London and Merton planning standards could therefore provide sufficient value to support the redevelopment of the stadium.
- Non-food (comparison) Retail (Use Class A1) – The nearby town centres of Wandsworth and Wimbledon are defined as 'major' centres in the Mayor's London Plan, and provide the principle comparison retail destinations for the area. The town centres of Colliers Wood and Tooting also provide a wide range of comparison retail floorspace. Whilst the retail needs assessments for both Wandsworth and Merton Borough's identify capacity for additional floorspace to 2016; 2021 and 2026, the vast majority of this is already allocated to existing 'regeneration sites' within the defined centres. Furthermore, unlike large supermarkets, comparison retail shopping is traditionally located in smaller format units that compliment each other through a critical mass that attracts linked trips between various retail units in one visit. Locating a cluster of comparison goods retail units in this location is considered to likely have a negative impact upon the existing centres.

Our client considers that food (convenience) retail (Use Class A1) is perhaps the most appropriate use to achieve a sustainable development, and assist in funding the redevelopment of the stadium. The site is located at the boundary of the London Boroughs of Wandsworth and Merton. Any food retail units/supermarket in this location would likely draw on a catchment within 10 minute drive (off-peak) of the site. As such any supermarket would draw on expenditure from both Wandsworth and Merton Boroughs. The 2008 Wandsworth Retail Assessment highlighted capacity of 10,200 sq m to 2016, rising to 13,200 sq m by 2020. Even after commitments/allocations this would leave a requirement for 8,800 sq

m of additional convenience floorspace by 2020. Similarly the Merton Retail & Town Centre Needs Assessment (August 2011) highlights capacity for up to 7,100 sq m of gross convenience floorspace.

We have visited the surrounding centres, which are considered to be healthy, and it is evident that there is a strategic qualitative gap in supermarket provision between Wimbledon and Wandsworth. As such our client would like to work with the Council to test the suitability of a supermarket/foodstore at the site against the sequential and impact tests defined in the National Planning Policy Framework, in particular the need to provide consumer choice to the local community, and the impact any proposal may have upon the surrounding defined centres of Wimbledon, Colliers Wood, Wandsworth and Tooting.

Summary

Our client wholeheartedly supports the retention of Wimbledon Stadium as a Greyhound racing venue. It is the most famous and iconic greyhound racing venue in the United Kingdom, and must be retained. Our client, has a strong proven track record in the management and operation of greyhound stadiums, to great success, and has a keen interest in acquiring the stadium to facilitate its redevelopment into the world's leading venue for greyhound racing. Our client has a vision to provide a world-class destination leisure facility to the benefit of Merton and London as a whole, whilst widening the reach of greyhound racing to a broader range of residents, tourists, employers and employees. The redevelopment of the stadium would remove an architectural eyesore that offers little economic benefit to the surrounding businesses and communities, replacing it with a cutting edge stadium of exemplary design standards that would act as a catalyst to regeneration of the wider area, and set a new benchmark for greyhound racing in the UK.

The redevelopment would also bring substantial economic benefits in the form of circa 250 new jobs as well as construction jobs that would be directly targeted at low-skilled local unemployed people. It would also have a positive effect on nearby public houses and private transport companies, and attract further investment from hotel operators.

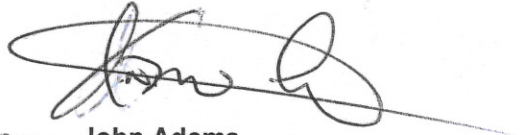
It is considered that the development of a supermarket/foodstore alongside the new stadium would provide the most viable and sustainable form of development that can not only safeguard the existing use, but meet a qualitative gap in retail provision, deliver substantial economic benefits to the local community, through the provision of up to 600 new jobs, and deliver a facility of international status to the London Borough of Merton.

We would like to work with the Council to test the issues arising from the option of food retail development and a new Stadium on the site.

We trust our client's representations will be taken into due consideration, and request that we be made aware of any further consultation of this Development Plan Document.

Yours sincerely

Drivers Jonas Deloitte.



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- cc. Tara Butler - London Borough of Merton
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