

Merton Sites and Policies and Policies Plan (the plan) Public Examination

Main matter 7: Site selection process

7. ***Site Selection Process. The Council's Call for Sites Consultation (SP4.20) yielded a number of sites which, together with additional sites that emerged, were assessed by the Council. Most of these sites were ultimately allocated in the Plan suitable for various uses but a number of them were excluded.***

This prompts two questions.

(1) Are the sites in the Plan suitable for their allocated uses? This applies particularly to the following sites:

Site 37. Wimbledon Greyhound Stadium.

(a) Is this site a suitable location for an intensification of sporting activity with supporting enabling development?

- 7.1.1 The inspector's questions have been responded to in part. Each respective part of the question is identified in bold and italics with the council's response following.

(1) Are the sites in the Plan suitable for their allocated uses?

- 7.1.2 All of the sites in the Plan have been assessed individually as part of the evidence base to support the deliverability of the Sites and Policies Plan. The following documents have collectively considered the suitability and deliverability of the sites in the Plan, and the Plan as a whole:

- Site Allocations Deliverability Assessments July 2013 (**SP4.23**);
- Development Plan Viability Evidence (**SP4.22**);
- Sustainability Appraisal (**SP4.2**);
- Statement of Consultation (**SP4.6**); and
- The Sites and Policies Plan (**SP4.1**).

- 7.1.3 The information in these documents, which summarises the evidence, consultation results and other assessments, demonstrates that the sites in the Plan are suitable, available and achievable for delivery within the lifetime of the Plan.

- 7.1.4 In particular, the Site Allocations Deliverability Assessments (**SP4.23**) contains an individual assessment for each site in the Plan with regard to its suitability for the allocated use(s). The document summarises an objective assessment of the suitability of each site taking the following evidence into account:

- council officer site visits;
- owner consultation;
- all representations received during each consultation stage;
- the relative merits of the allocated uses;
- national and regional policy where applicable; and
- various studies such as Merton's Employment and Economic Land Study 2010 (**SP5.20**).

- 7.1.5 While the council is satisfied that each site allocation is justified for the uses listed, some sites will require further information to ensure that a particular development proposal will be suitable. To ensure that the allocations are clear, effective and to assist delivery, outstanding issues have been identified as part of the site description, planning factors or issues headings.
- 7.1.6 For example, Site 21 Birches Close, the '**Strategic planning factors**' heading indicates that parts of the site are within a critical drainage area, and the **Issues** heading states that "*Development proposals will need to incorporate suitable mitigation measures associated with the critical drainage area*". Such matters are more appropriately addressed and mitigated as part of the planning application process as the exact impact, and the most appropriate solution, will only be fully known then.
- 7.1.7 One unique scenario is Site 75 Former Mitcham Gasworks which is presently not suitable for the allocated residential use and requires the existing gasholder infrastructure to be decommissioned prior to residential use being established on the site. This is referenced accordingly in the allocation and the landowner has stated their intention to undertake this work as part of their viability studies.

(1) Are the sites in the Plan suitable for their allocated uses? This applies particularly to the following sites:

Site 37. Wimbledon Greyhound Stadium.

(a) Is this site a suitable location for an intensification of sporting activity with supporting enabling development?

- 7.1.8 Yes, the Wimbledon Greyhound Stadium site is suitable for an intensification of sporting activity (D2 Use Class) with supporting enabling development for the following reasons:
- The site has operated with an existing sporting/leisure since the 1920's which helps to demonstrate the suitability of the location for such use;
 - A sequential site search demonstrated that this is the most deliverable site for a sports stadium (refer to Appendix 1). Although the search was carried out specifically for a football stadium, the size and characteristics of the sites reviewed demonstrates that this site is appropriate for a stadium;
 - The general character of the area is industrial in nature and the site is not, however additional industrial land should not be provided due to the potential impact on existing industrial areas (refer to paragraphs 7.1.39 to 7.1.41 below);
 - The site is an out-of-centre location therefore large scale office, retail or other town centre type uses are not suitable; and
 - There is a large amount of support for sporting intensification on the site from the owner, an interested developer and a large number of the general public who supported one or both schemes for sporting intensification.
- 7.1.9 The two main constraints to development of the site and thus potentially affecting site suitability are flood risk and transportation. These constraints impact all proposals for redevelopment of the site. The site is wholly located within the functional flood plain (flood zone 3b) and an area with poor/moderate access to public transport (PTAL 2/3). Any development on the site will be required to address these issues which are considered the

most prominent issues affecting the sites suitability for enabling development. These matters are discussed further below.

- 7.1.10 In the council's view, there are no other more suitable sites for a sports stadium in the borough, which is supported by an exhaustive site search prepared by Colliers International on behalf of AFC Wimbledon (refer Appendix 1). Although this site search was specifically for a football stadium, it is the council's view that the characteristics of football stadia (size, transport implications etc) can apply equally to other sports stadia.

Suitability constraint: managing flood risk

- 7.1.11 The Environment Agency has stated (**SP4.13**, letters of 27 August 2013 and 18 September 2013) that it is in the Agency's and the council's interest "*for sites such as Wimbledon Greyhound Stadium to be redeveloped if redevelopment can provide an overall reduction in flood risk*" and that they support the redevelopment of the existing greyhound stadium into that of a stadium on a like for like footprint as it does not result in an increase in vulnerability (Stage 3 representation 27 February 2013).
- 7.1.12 Preliminary information provided by the parties who have submitted schemes suggest the flood risk can be appropriately mitigated (**SP4.5** and Stage 3 consultation received from Hume Consulting Ltd info and Stage 4 for GRAA/AFC Wimbledon schemes).
- 7.1.13 Whichever party delivers the site will have to submit a site-specific Flood Risk Assessment, specific to their development proposals, stating how the development will reduce flood risk and be safe for users and occupiers of the site.
- 7.1.14 In their representation at Stage 2a consultation in May 2012 (publicly available on Merton Council's website since 2012 at http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/sites_policies_plan/sites_policies_stage2a.htm), Hume Consulting Limited considered a range of alternative uses which could be considered as complimentary or enabling development to support a proposal for sporting intensification. Their current scheme proposes sporting intensification with enabling retail and residential use as the enabling development following further suitability and viability investigations.
- 7.1.15 Similarly, the proposals received from the GRAA Ltd (and AFC Wimbledon more recently as part of Stage 4) since the Stage 2a consultation also propose sporting intensification with enabling retail and residential development. This illustrates that both parties believe the site is suitable for such uses and the flood risk can be appropriately managed.
- 7.1.16 Based on the information available, the council therefore considers that the site is suitable for sporting intensification with supporting enabling development primarily based on the nature of the existing use of the site, the nature of the surrounding environment, the developer interest in providing such use and the lack of a suitable alternative use(s) for the site.

Suitability constraint: transport to and from the site

- 7.1.17 The site is in an area with poor/moderate access to public transport (PTAL 2/3). It is within 20 minutes walk to Haydon's Road and Earlsfield train stations and a 20 minute walk to Tooting Broadway underground station. The site currently contains a greyhound stadium, a large car park and other smaller sporting facilities. The existing traffic movements from the site will act as a benchmark.

- 7.1.18 Transport impacts will depend on exactly what sports facilities would be proposed (i.e. whether greyhounds, football or other) and the quantum of enabling development that would meet policy requirements and enable the scheme.
- 7.1.19 Many people and organisations, including local residents, Wandsworth and Merton councils want to ensure that traffic and parking are appropriately managed. All parties wishing to redevelop the stadium have been advised to hold early meetings with Transport for London, the Metropolitan Police, Wandsworth Council and Merton Council in the interests of scoping out and finding solutions to transport matters (Appendix 8). Both the GRAA Ltd (landowner's representatives) and Hume Consulting Ltd have submitted scoping reports on initial transport issues.
- 7.1.20 Any application will have to be accompanied by an extensive transport assessment, produced as the scheme is developed, which identifies the potential impact of the development on the transport network, what measures will be taken to minimise transport impacts of the scheme towards improving accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport.

Potential alternative uses

- 7.1.21 The council has considered a range of alternative uses that could be considered suitable on the site which are discussed below:
- Continuation of current uses without any redevelopment – while it is suitable for the continuation of the current use, the site has long been identified as having potential for redevelopment. The owners have submitted it for redevelopment and other interested parties are also interested in delivering a new scheme. In accordance with the NPPF, councils should prepare positive plans that support sustainable development of brownfield land;
 - Office use – Merton's Employment and Economic Land Study 2010 (**SP5.20**) and the London Office Policy Review 2012 (**SP2.20**) demonstrate that there is no demand for out-of-centre office space in Merton and that the only additional demand for high quality office space would be in Wimbledon town centre. **SP5.20** informed policies in Merton's Core Planning Strategy 2011 (**SP3.2**). The site is therefore not considered suitable or viable for significant office development;
 - Light industrial and warehouse use – such uses would be suitable on the site given the nature of the surrounding areas in both Merton and Wandsworth are designated as a Strategic Industrial Location and Locally Significant Industrial Site in the respective Local Plans. However, the GLA publication Industrial Land Demand and Release Benchmarks in London (**SP2.22**) and Merton's Employment and Economic Land Study 2010 (**SP5.20**) as well as development trends in Merton over the last 10 years demonstrate that there is likely to be no demand for additional land for industry in London. **SP2.22** also supports the view that existing employment space should be enhanced prior to any additional employment land being considered for designation (this is outlined further below in relation to part (d) of the question);
 - Leisure use – the site currently has a leisure type use. Some leisure uses (e.g. sporting activities) are suitable for the site. The council would not consider town centre leisure uses (e.g. cinemas) as suitable for this out-of-centre location;
 - Retail use – the site is near to the town centres of Wimbledon, Wandsworth and Tooting which provide the principle retail

destinations for the area. This site an out-of-centre location and is not suitable for large scale retail use which would draw trade away from existing centres and require frequent travel. In accordance with Merton's Core Planning Strategy (**SP3.2**) proposals for retail stores larger than 280 m² would have to meet the retail sequential test and impact assessment;

- **Residential use** – residential is considered to be a suitable enabling use based on current market conditions, however further evidence is required to ensure that the physical constraints of the site (e.g. flood risk, access) are appropriately managed depending on the quantum and design of residential development. In the council's view, the first part of the flood risk 'exceptions test' (whether or not the redevelopment would provide wider sustainability benefits to the community) is demonstrated if a sports stadium were to be provided (**SP4.23**) but specific development proposals would have to be accompanied by a site-specific Flood Risk Assessment to demonstrate that the development will be safe and will reduce flood risk to the site and to the area (or at least not increase it).

7.1.22 The council will require more detailed information to be submitted as part of the planning application process. If the type of enabling development proposed does not meet the required planning policy (for example in terms of layout, design etc), this may affect the scale of sporting intensification that can be achieved on the site.

(b) Support has variously been expressed for providing an enhanced greyhound stadium or a football stadium on the site. On the face of it the allocation in the Plan would allow for either option. It would not be appropriate at this stage to go into the relative merits of these schemes but it has been suggested that the Plan should include a more explicitly reference to seeking to retain a greyhound stadium. Is there any merit in this suggestion?

7.1.23 The council is of the opinion that that allocation is worded in such a way which provides flexibility to support the principles of either of the schemes submitted for sporting intensification (i.e. greyhound racing or football). This is in accordance with paragraph 157 of the NPPF (**SP1.1**) which states that sites should be allocated to "promote development and flexible use of land", as well as the presumption in favour of sustainable development. This is achieved by having a flexible allocation for an underutilised brownfield site.

7.1.24 The council does not consider there to be any merit in allocating the site explicitly for a greyhound stadium when comparing it to the allocation as it is currently drafted. Doing so would unduly reduce the flexibility of the development potential of the site which could contradict the NPPF with regard to providing flexibility and the presumption in favour of sustainable development (paragraphs 14 and 151). It is also considered that allocating the site for a greyhound stadium would not require a strategic policy allocation as it relates to a redevelopment of the existing use operating on the site only. It would not introduce any flexibility compared to the existing situation.

7.1.25 In addition, the party who submitted the scheme for a greyhound stadium does not currently own the site, therefore it is not presently available and thus not deliverable. Sites allocated in Local Plans must be deliverable in accordance with the NPPF (paragraph 173).

- 7.1.26 It should also be noted that undertaking such amendment would result in an outright discount of the sporting intensification scheme submitted by the landowner, who has the obvious control over the site. To disregard the scheme submitted by the owner and favour an alternative, particularly when it is not currently available and thus not deliverable, is not considered to be in accordance with good planning practice and is contrary to the deliverability requirements in the NPPF (paragraph 173).
- 7.1.27 The council considers that the sporting intensification element of both schemes submitted would be in general accordance with the allocation for sporting intensification.
- 7.1.28 The suggestion it should be explicitly for greyhound racing has been made primarily by Hume Consulting Ltd and the GLA. Similarly, there are several parties who advocate that the site should be explicitly for a football stadium. Most individual representations received by the council have also supported one scheme or the other based on personal preference, but ultimately they all support the principle of sporting intensification in doing so. The council considers it has derived an appropriate allocation which can deliver either scheme for the sporting intensification component. The council considers that to allocate or favour one particular scheme would unduly restrict the future use of the site. Providing flexibility in the allocation accords with the NPPF in seeking to obtain the most sustainable and appropriate form of regeneration on the site, which is considered to be dilapidated and underutilised by the council.
- 7.1.29 It is considered that there are sufficient planning policy elements in place through national guidance, the London Plan (**SP2.1**), LBM's Core Planning Strategy (**SP3.2**) and the emerging Sites and Policies Plan (**SP4.1**) to determine the appropriateness of any enabling uses on the site at the time a planning application is submitted. In addition, neither Hume Consulting Ltd nor the GLA can deliver the site for greyhound racing use as the site is not currently available to them.

(c) Is the site suitable for the sort of enabling development (residential/leisure/retail) that has been suggested?

Residential use as enabling development

- 7.1.30 Both schemes submitted include residential use as part of enabling development. Based on the information available to the council, it is considered that residential use is suitable on the site, subject to mitigation of flood risk, transport, design and other policy matters.
- 7.1.31 The size of the site generates a huge range of potential options for quantum, location, design and scale of residential development, which would need to be explored in relation to each particular scheme. Currently, the council considers that residential use as enabling development is suitable and viable on the site, subject to the mitigation of potential adverse effects and the scale, design, location within the site, layout and other urban design and planning policy issues being acceptable to the council. However, this will be subject to further evidence and investigation in order to appropriately remedy or mitigate the potential effects of development.

Leisure use as enabling development

- 7.1.32 Leisure uses not suitable for town centres are generally considered appropriate as it is congruent with the existing leisure activity on the site in the form of the greyhound stadium and St Christopher's Squash and Fitness Club. Representatives of the club have stated their desire to remain on the

site and enhance the existing facilities that are currently on offer. Both schemes submitted to the council acknowledge this provision and provide for a new, enhanced squash and fitness facility.

- 7.1.33 Merton's Open Space Study 2010/2011 (**SP5.23**) states that total sports hall demand in Merton is at 85.7%. "*Sports hall full*" level is considered 80%. The study concludes that, taking into account cross boundary use and accessibility issues, capacity of hall sites are considered to be at 100%. There is an overlap between the types of services offered at the existing squash and fitness club, therefore it is apparent that capacity exists for additional facilities of this type in this part of the borough. The allocation requires an equivalent or enhanced squash and fitness club.
- 7.1.34 The council supports an enhanced leisure facility in principle on the site and considers it suitable for such use. However, the council also considers that, with current development values, leisure use is unlikely to be enabling development and that it is more appropriate to be considered part of sporting intensification. The council has not received any objection to the provision of an equivalent or enhanced squash and fitness club on the site (or similar leisure activity).

Retail use as enabling development

- 7.1.35 In the current development market in England, supermarket retailing is often proposed within mixed use schemes to improve the financial viability of the scheme. However national, regional and local planning policy is to provide retailing activity in town centres first. Neither the GLA nor Merton nor Wandsworth councils are supportive of substantial out of centre retail uses on the Wimbledon Greyhound Stadium site due to its out-of-centre location. This is confirmed within correspondence received from the GLA (**SP4.12**) as part of Stage 4 consultation, dated 28 August 2013 which states "*...the provision of a substantial out of centre retail store as an enabling development at this site, would not be in conformity with London Plan policy*".
- 7.1.36 Any retail uses would have to undertake a sequential test and impact assessment to ensure that they comply with the "town centre first" planning policy. Small supermarkets serving the local residential community will have a less an impact on drawing trade from nearby town centres and will not significantly increase traffic so will be more likely to be able to demonstrate policy compliance. Large superstores (food and non-food retailing) are more likely to have an impact on increasing congestion and drawing trade from established town centres so are less likely to be compliant with local and national policy.
- 7.1.37 As stated in the allocation, any enabling use other than sporting intensification will be subject to meeting planning policy, evidence and consultation. It should be noted that the enabling development specified in the two schemes submitted has been purely from a commercial viability perspective and are not explicitly supported by the council in the allocation. The council does not have evidence to allocate the site for such uses. The scale of enabling development will also be related to the scale of sporting intensification proposed. Accordingly, the policy restrictions on any enabling development could potentially govern the scale of sporting intensification that can be proposed on the site.
- 7.1.38 At the time a planning application is submitted, a number of relevant planning policy matters that will need to be addressed to determine the sites suitability to accommodate retail use would include (but are not limited to):
- Flood risk;

- Transportation;
- Design;
- Sequential and impact assessments;
- Impact on neighbouring uses and potential reverse sensitivity effects; and
- London Plan policy, Merton's Core Planning Strategy, the Sites and Policies Plan and the NPPF.

7.1.39 The council therefore considers that, based on available evidence, sporting intensification with enabling development is suitable on the site. This position is supported by parties interested in delivering the site (GRAA Ltd and Hume Consulting Ltd). However, further evidence is required to appropriately consider the scale and impact of enabling development on the viability of any scheme submitted.

(d) It has been suggested that the site is more suitable for industrial and warehouse development together with leisure facilities and school use. What are the advantages and disadvantages of this approach?

7.1.40 The council is not familiar with any particular representation or correspondence which suggests the site is suitable for the mix of uses referred to. As a result, the council has objectively assessed the suitability of the site for each use as well as commenting on the potential of accommodating all three uses together on the site.

Suitability for industrial and warehouse development

7.1.41 The council acknowledges that primarily based on the nature of the site and surrounding area, that industrial and warehouse development would be suitable on the site. However, demand for large industrial sites has been declining in London over the last 5 – 10 years primarily due to the cost of establishment in the capital compared with nearby or outer London industrial estates with arguably better and less congested road and freight transportation links (**SP5.20**). Merton's Employment and Economic Land Study 2010 (**SP5.20**) provides an appropriate evidence base to determine whether the site would be suitable for industrial and warehouse use. Many of the conclusions in **SP5.20** are echoed in the GLA's Industrial Land Demand and Release Benchmarks 2011 report (**SP2.22**).

7.1.42 The following are excerpts from **SP5.20** and are considered relevant whilst any officer comments are included as additional text in italics:

- Demand for industrial premises has been fairly low in recent years, primarily as a result of a lack of modern premises, with much of the stock on the main industrial estates approaching the end of its useful life. This is particularly the case for many of Merton's small scattered sites. There is reasonable demand for small, modern units with good parking and high eaves heights but larger industrial units are often difficult to let. However, industrial vacancy is fairly low and many agents/firms report a lack of availability of suitable premises within the borough. Most demand is for smaller industrial units and is almost exclusively from local firms. *Evidence of lack of demand for larger industrial units. The size of the site would generate a significant number of small industrial units which would only be viable if there was high demand for such uses;*
- There has been very limited interest historically for large-scale distribution activities within Merton and other locations with better strategic road access and availability of larger sites are likely to

continue to be more obvious locations for distribution activities. *There is no evidence to suggest a change in this trend;*

- Merton is seen as unlikely to be able to retain its industrial base unless it can deliver a significant improvement in the quality of its stock. *This demonstrates that improvements should be made to existing land before allocating new industrial land. It is reiterated that whilst there may be justification for better space, this doesn't mean Merton needs additional industrial land;*
- Under most of the estimates, significantly less industrial space would be required, as future losses of general industrial (B2) space outweigh likely demand for more warehousing and storage (B8) space. Overall, this implies a requirement for somewhere between 2.2 ha more and 8.1 ha less employment land. *Additional land is therefore not needed;*
- More effective use of existing supply is suggested and developing incentives to achieve this;
- The study refers to the site as a “large sports facility”;
- Plough Lane industrial area (which adjoins the site to the south and west) scored average quality in a qualitative appraisal of existing industrial areas in Merton. *This suggests that an enhancement of the existing area, as opposed to an expansion, would better suit any industrial growth need in this part of the borough;*
- Merton generally has low quality employment sites, road congestion, and is a substantial distance to motorways. This is common with other south London boroughs. *Further evidence that additional employment land would not be suitable and therefore not deliverable on the site;*
- Merton has below average representation in what have been growth sectors in the past, with relatively high reliance on public sector and manufacturing jobs, which have declined more than average. *The decline of these sectors has resulted in a reduced demand for industrial land;* and
- An average of 12,500 m² of gross new B class space has been developed annually in Merton in recent years, with just over half of this office-type space. However, significant losses, particularly of industrial space, have reduced the net completion rate to a loss of -4,700 m² employment space per annum. There is over 83,000 m² of potential new employment space in the development pipeline, equivalent to over six years supply at recent completion rates. However, because of losses which will occur on redevelopment, if these schemes are built it would result in a net loss of employment space overall. *Further evidence against providing additional employment land in Merton.*

7.1.43 The site is therefore considered suitable for industrial and warehouse use, however evidence suggests that no additional land should be allocated for such uses.

Suitability for school use

7.1.44 With respect to the suggestion for school use, a report undertaken by Capita Symonds in 2012 regarding primary school places (**SP5.8**) and a report undertaken in by Capita Symonds in 2013 regarding secondary school places in the borough (refer **SP5.67**), came to the same conclusions regarding the site:

- that the Wimbledon Greyhound Stadium site was not suitable due to its size, the nature of surrounding uses being light industrial, the adjoining electricity substation, and flood risk;
- the site was not suitable due to costs associated with site acquisition, and removal of existing buildings;

- the site was therefore not considered on the “shortlist” as having the potential to provide additional primary school places;
- the greatest need for schools is towards the west of Wimbledon town centre (for primary schools) and towards the centre of the borough (for secondary schools). This site’s location would not serve these areas.

7.1.45 It is therefore considered that the site is not suitable for school use.

Suitability for leisure use

7.1.46 Leisure uses exist on the site presently and are included in the site allocation.

7.1.47 Merton’s Open Space Study 2010/11 (**SP5.23**) illustrated that there is demand for additional sports hall space in this part of the borough as identified in paragraphs 7.1.30 to 7.1.32. The proposed allocation acknowledges this, requiring the provision of an equivalent or enhanced squash and fitness club as part of redevelopment. This is considered part of sporting intensification and not enabling development.

7.1.48 Both the existing club operators and the parties who have submitted schemes to develop the site have indicated they will provide an enhanced facility. Leisure use is therefore considered suitable for the site as part of a mix of uses (subject to mitigation of potential adverse effects such as flood risk, transport issues etc).

7.1.49 Redevelopment of the site to provide solely leisure uses is unlikely to create a viable development on its own without significant investment from an altruistic source.

7.1.50 It is therefore concluded that there are clear disadvantages to providing the mix of uses suggested on the site, or similarly if any of the uses referred to were provided on their own.

Site 35. Mitcham Fire Station.

(a) Is this site a suitable location for the mix of community, residential restaurant/café, drinking establishment and non-food retail uses for which it is allocated in the Plan?

7.1.51 The Mitcham Fire Station is soon to become surplus to requirements following completion in 2014 of a new fire station approximately 700 m from the site. The existing Mitcham fire station building is locally listed, as is the adjacent Vestry Hall, and is situated opposite the Grade II listed Mitcham parish rooms.

7.1.52 The upper level of the fire station comprises ancillary fire station facilities such as rest areas, office space, kitchen and communal space. The ground floor consists of a single engine bay, storage rooms for equipment and office and communications area.

7.1.53 The uses identified in the site allocation were derived in consultation with the landowner and published guidance on the use of historic fire stations (London’s Historic Fire Stations, March 2010 Appendix 4), with the exception of assembly and leisure uses (Use Class D2) which the owner did not support. The council considers the site to be suitable for D2 uses as well as the other uses as this approach provides additional flexibility to the development potential of the site, which accords with the NPPF. D2 uses have also been suggested by local community representatives.

- 7.1.54 The range of uses allocated reflects the unique nature of the site and building and its wider setting in a conservation area, situated opposite listed buildings, the fire station itself being a listed building, and in relatively close proximity to both Mitcham town centre to the north and the parade of A and B uses along London Road to the south.
- 7.1.55 The council does not anticipate that all or even several of the allocated uses could be provided and it is likely that only one or two will prevail as part of delivery of the site. Converting historic fire stations is a relatively rare occurrence and the council used guidance from both the owner (the London Fire and Emergency Planning Authority) and the English Heritage and London Fire Brigade guidance London's Historic Fire Stations, March 2010 (Appendix 4). This range of uses should ensure that a viable development of the site can be achieved. Unjust restrictions on the potential use of the site would only inhibit viability of redevelopment.
- 7.1.56 Based on this information the council considers the site to be suitable for the range of uses allocated in the Plan.

(b) It has been suggested that the site [Mitcham Fire Station] would be suitable for a residential led mixed use development. What are the advantages and disadvantages of this suggestion?

- 7.1.57 The owner has suggested that the allocation should be amended to state a “residential led mixed use development ...” as opposed to the existing allocation which states a “mix of uses ...”. The council does not consider there to be any distinct advantage in amending the wording as suggested for the following reasons:
- Firstly, the council believes an appropriate mixed use development including residential use can be achieved on the site without the need to change the wording as suggested;
 - The council does not oppose the principle of such development on this site and believes the allocation as it stands is enabling as opposed to restricting;
 - Allocating the site for a residential led development could, in the council's opinion, potentially provide an unrealistic presumption that a majority of the site is suitable for residential use. In reality, the part of the building that can be most easily converted to residential use is the upper floors (currently used for ancillary residential for the Fire Service, which already has a separate entrance). In accordance with the guidance in London's Historic Fire Stations, March 2010 (see appendix 4) the council considers that the ground floor level could be retained in some capacity where it can be visited/viewed by members of the general public and retained in its current state as much as possible;
 - The guidance in London's Historic Fire Stations, March 2010 (Appendix 4) also states the following which is considered relevant and supports the council's allocation:
 - the relationship of the appliance bay, watch room, entrances and stores is of historic importance
 - creative uses for upper floors must be considered
 - can a suitable new use be found that will keep the appliance bay and yard as open spaces?
 - Upper floors were usually designed as residential flats, and the best use for an historic building will often be that for which it was historically designed. Can upper floors be put back into residential use?

- 7.1.58 It is therefore apparent that the upper level could be converted into residential use. The upper floor of the Mitcham fire station has historically operated as ancillary residential (dormitory type accommodation), including a kitchen and office space for staff as opposed to permanent residential accommodation.
- 7.1.59 Allocating the site for a “*residential led mixed use development*” is not considered appropriate without further evidence to justify whether any alternative use could be provided on the site which could potentially better protect the historic nature of the building. It would be considered appropriate if the building was greater than two storeys or residential use was the most appropriate use on a majority of the site. However this does not reflect the existing building and site therefore it is not considered to be a suitable approach.

(c) Should this site be considered as part of a wider site?

- 7.1.60 The site is not suitable to be considered as part of a wider site redevelopment for the following reasons:
- Mitcham Fire Station is locally listed and sits in a conservation area within Metropolitan Open Land, close to Grade II listed buildings. It is considered that the
 - The adjacent council-owned Vestry Hall building to the north is currently used for a combination of community and office uses which the council is retaining. The hall is locally listed and there are no plans to change the building or how it is used;
 - The adjoining Cricketers public house to the east has been subject to a number of planning applications and appeals throughout the last five years. There is a live planning application which has been submitted for a change of use from a public house (A4) to residential (C3) use (LBM reference 13/P1077). As outlined in the evidence based document **SP5.63**, the council did not consider sites with live planning applications for inclusion in the Plan; and
 - The adjoining land to the west is open space and not suitable for development. It is therefore considered that the wider area is not suitable to be incorporated into the Plan for potential new uses.
- 7.1.61 It should be noted that some aspects of proposals for Mitcham Fire Station have been considered in the context of the wider site and surrounding area and will continued to be considered at any planning application, such as:
- External design considerations;
 - Designations which affect the site and wider area, particularly
 - Adjoining open space, metropolitan open land, and green corridor
 - Wandle Valley Regional Park
 - Mitcham Cricket Green conservation area
 - Cricket Green borough character study

Site 70 Haslemere Industrial Estate.

(a) Is this site a suitable location for business/light industrial or other suitable employment led development?

- 7.1.62 The site is considered a suitable location for business/light industrial or other suitable employment led development based on the following information:
- The site is an existing and established industrial estate which is contiguous with adjoining employment uses to the north incorporating 12 and 12a Ravensbury Terrace, the Wandsworth Locally Significant

Industrial Area beyond the River Wandle, and the Rufus Business Centre to the south;

- The site is defined as a scattered employment site in Merton's UDP (**SP3.5**), Core Planning Strategy (**SP3.2**), and the Sites and Policies Plan (**SP4.1**). This policy position will be maintained in the Sites and Policies Plan in conjunction with the site allocation;
- Based on the history and nature of existing uses on the site it is considered suitable for retaining business/light industrial or other suitable employment led development. The council understands that the site has been in continuous employment use since the 1920's. The current owner has occupied the site since the 1970's and although the site is now too small for the existing business, this does not mean it is not suitable for any form of business use;
- The owner supports the allocation and acknowledges the council's policies to retain employment led uses on the site as outlined in their Stage 3 and 4 consultation responses which state "*The Council's assessment of the Estate states that the Council will support a suitable employment led redevelopment and this is supported by Astranta Asset Management and the landowners of Haslemere Industrial Estate*";
- Existing and emerging council policy restricts the loss of scattered employment sites (subject to certain criteria). There is insufficient evidence to suggest the site is no longer suitable as an employment site in accordance with the criteria;
- Retention and enhancement of the existing employment land adheres to existing and emerging policy and the Employment and Economic Land Study 2010 (**SP5.20**);
- A large portion of the site is located in the functional flood plain which may affect the ability of more vulnerable uses to be established on the site (subject to policy); and
- A planning application for the adjoining property, (Site 64 12a Ravensbury Terrace, has been submitted which includes expansion of the existing employment (office) use on the site which suggests there is demand for employment use in the vicinity.

7.1.63 The council has deliberately left the site allocation broad ranging to provide flexibility for the owners to develop a new, high quality mixed use development which will achieve the necessary employment led development, but has the ability to accommodate alternative uses. Based on the information above the site is considered suitable for business/light industrial or employment led development.

(b) It has been suggested that the site should be allocated for a mix of employment and residential uses. What would be the advantages and disadvantages of this approach?

7.1.64 The owner submitted that the site should be allocated for a mix of employment and residential uses. Merton's Core Planning Strategy (**SP3.2**), the Sites and Policies Plan (**SP4.1**), the Employment and Economic Land Study 2010 (**SP5.20**) all support the retention of scattered employment sites unless there is appropriate evidence to suggest that the site is no longer suitable for employment use. In accordance with these documents, the council will continue to seek the needs for employment land in the borough on existing employment sites. There is no evidence available to suggest the site cannot continue to provide employment use.

- 7.1.65 The council does not need to allocate the site for residential use in order to meet its housing targets set by the Mayor of London as its targets are met from other sites in the Plan. It is important to retain some dedicated employment floorspace in the borough, as council's evidence base suggests (**SP3.2, SP4.1, and SP5.20**). The council is willing to consider community type employment uses to serve the surrounding residential population if B uses lack demand on the site. The allocation provides this flexibility.
- 7.1.66 The primary disadvantage is a lack of evidence to support residential use on the site. The primary advantage would be to the landowner only in terms of increasing the value and certainty over future development in the short term.
- 7.1.67 The main issue from the landowners' perspective is that the existing buildings are no longer suitable. This however does not mean that the use is no longer suitable or viable on the site. The marketing evidence provided was in relation to one of the five units on the site which had only been vacant for approximately 12 months (which is not sufficient in terms of meeting policy).
- 7.1.68 Provided an equivalent or acceptable amount of employment uses are retained on the site, then subject to policy, the council is not opposed to other uses being considered and established on the site as part of an "*employment led development*". Accordingly, the council has not stipulated what uses are considered not suitable on the site.

Site 48. Land at Bushey Road.

(a) Is there a realistic prospect of the site being developed for the employment led mix of uses, including bulky goods retail, for which it is allocated in the Plan?

- 7.1.69 The council believes there is a realistic prospect of the site being developed for an employment led mix of uses including bulky goods retail. This is based on various pieces of evidence as well as representations received from current and previous owners of the site. The justification is outlined in the paragraphs below.
- 7.1.70 To summarise, the area identified as Site 48a has a live planning application (council reference 13/P1802) to redevelop a portion of it for bulky goods and fashion retail; the bulky goods element of which accords with the proposed allocation. This is evidence that this portion of the site has a realistic prospect of the site being delivered bulky goods retail and providing jobs on this employment site. The existing employment use to the rear of the site is to be retained.
- 7.1.71 The area identified as Site 48b has recently changed ownership in July 2013. The new owners have advised that they have not yet derived a strategy to deliver the site in accordance with the allocation, but have previously stated that their development aspirations are centred on an enhancement and expansion of the existing retail asset (they also own the adjoining land to the east at 80 Bushey Road).
- 7.1.72 The following information represents a timeline of the key events which resulted in the site being allocated for an employment led mixed use development:
- **January 2012** – the site is included in Stage 2 consultation for an employment led mixed use development following its submission for inclusion by the owner of both portions of the site as part of the call for sites consultation (Stage 1);

- **December 2012** – information submitted from the owner of site 48b following 18 months of marketing, stated that there is interest from several different parties regarding different uses on the site (refer paragraph 7.1.71 of this report), all of which are accommodated by the allocation;
- **January 2013** – the site is maintained in the Stage 3 consultation document with the same allocation following continued support from both owners;
- **June 2013** – a planning application is submitted for a Next Home proposal on Site 48a by the owners of Site 48a;
- **August 2013** - the council is advised that Site 48b has been sold;
- **August 2013** - correspondence is received from the representative of the new owner of Site 48b that they believe the site is not viable for the existing uses or strict B class employment use;
- **02 October 2013** –the *Sites and Policies Plan* is submitted to the Secretary of State; and
- **30 October 2013** – correspondence received from the representative of Site 48b that they have no strategy to deliver the site in accordance with the allocation or otherwise.

- 7.1.73 The council refers to the following evidence which support the realistic prospect of the site being developed in accordance with the allocation:
- Merton’s Core Planning Strategy 2011 (**SP3.2**);
 - Employment and Economic Land Study 2010 (**SP5.20**);
 - Merton’s Unitary Development Plan 2003 (**SP3.5**); and
 - Marketing evidence submitted by the previous owners of Site 48b.
- 7.1.74 The Core Planning Strategy (**SP3.2**) and Merton’s UDP 2003 (**SP3.5**) identify the site as a Locally Significant Industrial Site. Policies regarding the protection of employment sites in **SP3.2** were most recently derived and supported with evidence from the Employment and Economic Land Study 2010 (**SP5.20**). Both of these documents support the promotion of employment generating uses on the site.
- 7.1.75 The then owners of the site challenged Merton’s Core Planning Strategy at its public hearing in February 2011, stating that the site should be redeveloped for a wider range of uses than the Locally Significant Industrial Area would allow for. The inspector rejected this approach; she considered that the site was still viable for a range of employment uses, particularly with regard to its location near the A3.
- 7.1.76 Marketing evidence provided by the former owners of Site 48b for the period from late 2010 to late 2012 stated the following:
- No interest was received to retain the existing office use;
 - Interest from occupiers included education use (one school and one college), two B8 uses (one distribution centre and one warehouse use), a television studio and two builders merchants; and
 - Interest from purchasers included an entertainment/place of assembly venue, a low cost supermarket, a car showroom, a bulky goods retailer and an education provider.
- 7.1.77 All of the uses referred to in the marketing evidence provided are included in the allocation and are thus supported on the site in principle, with regard to the employment generating aspects, with the exception of the supermarket and entertainment/place of assembly venue as they are not suitable in out-of-centre locations. The council therefore considers that there is appropriate and recent evidence to suggest there is local demand for employment uses on this site.

- 7.1.78 The council has used this evidence base to provide an allocation which will create jobs on the site which accords with the established policy position, but also responds to market signals. This accords with paragraphs 22 and 158 of the NPPF by not providing blanket protection of the existing employment site and introducing flexibility in response to market signals.
- 7.1.79 The allocation provides a broad range of job creating uses which would be supported on the site and expands on the traditional employment uses which are protected on a Locally Significant Industrial Site. The council believes this will ensure a viable and deliverable employment generating redevelopment, including bulky goods retail, on the site can be achieved.
- 7.1.80 The allocation also enables the council to provide strategic policy guidance on future development of the site.
- 7.1.81 Particular issues that need to be addressed across the whole site include transportation and the potential proliferation of out-of-centre retail uses. While the site is well located for the A3 road, access to the site is constrained and increasing traffic from the status quo (bearing in mind 48a and 48b are both currently vacant) could have a negative impact on the constrained access. Ad hoc proposals and a piecemeal approach to development of the site, and accessing the sites, are unlikely to provide the most effective solution. The proposed allocation sets out opportunities for development and clear policies on what will and will not be permitted on the site as required by paragraph 154 of the NPPF.
- 7.1.82 The allocation enables a range of flexibility on a presently underutilised site which can provide an impetus for investment and regeneration, and thus viability. The council believes the allocation provides better opportunities to develop the site compared with the existing designations which ensures the site will be viable and deliverable in accordance with paragraph 173 of the NPPF.
- 7.1.83 A total of three sites in the Plan include allocations for employment generating uses. The other two are existing scattered employment sites (Sites 64 and 70) and the subject site is a Locally Significant Industrial Site. The allocation of these sites to provide enhanced employment space conforms with paragraph 156 of the NPPF, but also provides key policy to enhance existing employment areas, which was a common conclusion within the Employment and Economic Land Study 2010 (**SP5.20**). This study emphasised that existing employment sites should be enhanced prior to additional land being provided, and that overall the retention of this site for employment generating use was appropriate.
- 7.1.84 The council therefore believes that sufficient evidence exists to support the site allocation and that there is a realistic prospect that the site will be developed for an employment led mix of uses, including bulky goods retail, for which it is allocated in the Plan.

Site 41. Kingston Road opposite Lower Downs.

(a) Is the site suitable for the residential use for which it has been allocated in the Plan?

- 7.1.85 Yes, the site is suitable for residential uses for which it has been allocated in the plan. The council considers the site suitable for residential use for the following reasons:
- The nature of the area and surrounding environment is almost entirely residential;

- The site has not had a lawfully established land use with the exception of providing advertising hoardings for at least the last 40 years and has been vacant of development the entire time;
- It was suggested by the now previous owner, and moved by the current owner (and originally a nearby civic society), that the site is suitable for residential use and could be delivered for this use in a relatively short time frame;
- It was suggested by various parties that the site could be used for alternative uses such as open space, education, and transport improvements (a roundabout). The site has been deemed to not be suitable for such use(s) as outlined in the deliverability assessment (**SP4.23**). Further information in this regard is provided in response to part (b) below; and
- The site will contribute toward Merton meeting its housing targets allocated by the Mayor of London.

7.1.86 The council considers that residential use is therefore the most appropriate use for the site.

(b) *It has been suggested that the suite should variously be used as a school, as open space or as a roundabout. What are the merits or otherwise of these proposals.*

- 7.1.87 Regarding the reference to use as a school, the primary school site search report undertaken by Capita Symonds (**SP5.8** page 25 Appendix 1) stated that the site was discounted before planning review as “*unlikely to meet education requirements*”. This was based on size, internal and external space requirements, traffic and noise impacts, even when considered with adjoining sites. The same conclusions were reached as part of the secondary school site search (**SP5.67**).
- 7.1.88 With regard to the suggested use as open space, the site was qualitatively assessed by council officers against the criteria for open space which include its functionality as open space, size, accessibility, potential use and visual amenity, and was not considered to be suitable for open space as a result.
- 7.1.89 Regarding the suggestion the site should be used as a roundabout, where there is a perceived risk to road safety the council would normally ask the applicant to provide a safety audit to accompany the application. This has been requested as part of pre-application discussions held with the landowner and will be enforced as part of any planning application that will be assessed for development on the site.
- 7.1.90 The junction is served by a pedestrian and cycle crossing on Kingston Road, facilitating access to important routes to local schools, Raynes Park Station cycle routes and to The Chase pedestrian and cycle greenway. This junction has been investigated in the past and casualty statistics for the last three years do not support the need for significant intervention. These have been checked more recently and one slight personal injury accident was recorded in 2012 ranking it in 44th place of the 100 worst junctions in the borough (in terms of collisions with 1 being the worst). The provision of a roundabout could also be detrimental to road safety, in particular for vulnerable road users, who often see them as a real and perceived barrier.
- 7.1.91 The council has an annual safety programme where by all collisions in the borough are considered and prioritised based on numbers, severity and vulnerability. It is not possible to address all accidents but nonetheless

where possible engineering solutions are derived to address severity and reduce the risk of similar collisions from taking place. The council does take safety seriously but regrettably it is not possible to address all personal injury collisions that take place on borough roads. The council will monitor this junction along with all other roads in the borough and take the appropriate action subject to available funding. There is no evidence to suggest a roundabout would result in junction improvements or improve traffic safety.

W007. Land at Rookwood Avenue.

(a) The existing green corridor designation on this site is proposed to be retained and an open space designation would be added. Would this open up the possibility of the land being developed for, for example, car parking?

Exclusion from the Plan as site with an allocated alternative use

- 7.1.92 No, the retention of the existing green corridor designation and the proposal to add an open space designation to the land at Rookwood Avenue would not open up the possibility of the land being developed for, for example, a car park.

Site history

- 7.1.93 **1983:** A Section 52 agreement (relating to an adjoining planning application) specifies that this site should be used for open space and recreational uses. It is evident from the Section 52 agreement relating to this site (dated 01 August 1983) in Appendix 6 that this site has been used as publicly accessible open space for more than 30 years.
- 7.1.94 **2003 October:** the site was allocated as part of Merton's green corridor in Merton's UDP, adopted in October 2003.
- 7.1.95 **2012, January – June:** The site is published on the draft Stage 2 Policies Map (**SP4.18**) as proposed to retain its green corridor designation. A local civic society, The Wimbledon Society, make representations to the council suggesting that the site could be suitable for allocation as a Site of Importance for Nature Conservation (SINC).
- 7.1.96 **2012 December:** Following the representation recommending that the site be allocated as a SINC, a qualified ecologist assessed the site was for its biodiversity value. It is evident from the ecologist's site inspection report in Appendix 7 that he found that the site had potential to become a Site of Importance for Nature Conservation (SINC) in the future, though not in this version of the Local Plan.
- 7.1.97 **2013 January:** the draft Sites and Policies Plan and Policies Map proposes that this site retain the green corridor allocation and be allocated for open space because this circa 1500sqm open site is adjacent to a SINC (the Beverley Brook), is part of a green corridor, conforms to both the NPPF (**SP1.1**, p.54) and London Plan (**SP2.1**, P.305) definitions for open space and does not meet any of the council's 'exclusions' criteria for the designation of land as open space as published in the 'Stage 3' public consultation document (**SP4.14**, p.507-508).
- 7.1.98 **2013, 10 July:** councillors resolved to submit the Sites and Policies Plan and Policies Map, which proposes the site be designated for green corridor and open space, to the Secretary of State.

7.1.99 **2013, 31 July:** the landowners, RB Kingston, sell the site at auction.



Figure 1: Google Streetview image of the site taken in May 2012.

7.1.100 **2013, September:** the new owners submitted a planning application (LBM Ref. 13/P3152) for vehicle storage associated with a nearby a car sales business and another planning application (LBM Ref. 13/P3652) on 31 October 2013 for six four-bed houses, but the latter is still considered to be invalid. To date, the new owners of the site have made no submissions to the council with regards to the formulation of the Sites and Policies Plan.

7.1.101 In conclusion, from the condition of the site, the legal constraints, the representations received on it, the site's assessment against Merton's open space criteria (as set out in the Stage 3 consultation document **SP4.14**) the ecologist's report and consideration of the need for other suitable land uses in that location, the council did not consider the site as suitable or deliverable for development alternative to the green corridor and open space value. Neither the landowners at the time (RB Kingston) nor other parties proposed that this site be allocated for redevelopment to an alternative use.

Open space designation opening up possibility of development

7.1.102 The existing green corridor designation on this site, which has been in place for more than 10 years, is proposed to be retained as this circa 1,500sqm site makes a valuable contribution to this green corridor which, in accordance with the definition in the glossary of the Sites and Policies Plan (**SP4.1**, p.199), "...may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join."

7.1.103 It is clear from the nine representations received at pre-submission stage (Stage 4 – Statement of Consultation **SP4.5**) that this open land, which provides a physical and visual link to the Beverly Brook, is greatly valued by the local residents whose houses are in the proximity of large scale buildings and a fly-over highway.

7.1.104 Although the council's proposed policy DM O1 allows for some forms of development on open space, in accordance with the NPPF (**SP1.1**) paragraph 74, the criteria are relatively onerous in the context of Merton. In the unlikely scenario where some development might be justified in accordance with draft policy DM O1 (**SP4.1**), the proposals would still need to meet the criteria in draft DM O2 (**SP4.1**). Therefore it is the council's view that the proposed open space designation will not open up the possibilities of the land being redeveloped.

The car park example

7.1.105 The only type of parking that might be compatible with land designated as green corridor and open space would be where it met one of the criteria in part c) and all of the criteria in part d) of draft Policy DM O1 Open Space (**SP4.1**), and where appropriate enhancement measures are included in accordance with part a) of draft Policy DM O2 Nature conservation, trees, hedges and landscape features (**SP4.1**).

Conclusion

7.1.106 It is the council's view that this site should be protected for its potential nature conservation and recreation value, and there is insufficient evidence to demonstrate that there are deliverable alternative uses for this site, for which the need is greater than the site's obvious nature conservation and recreation value.

7. Site Selection Process. The Council's Call for Sites Consultation (SP4.20) yielded a number of sites which, together with additional sites that emerged, were assessed by the Council. Most of these sites were ultimately allocated in the Plan suitable for various uses but a number of them were excluded.

This prompts two questions.

(2) *Why have certain sites been excluded from the Plan? This applies in particular to:*

Site 38. Byegrove Road, Colliers Wood.

(a) *Why was this Sewage Pumping Station excluded from the Plan rather than identified as a Major Developed Site?*

7.2.1 Examination library document **SP5.63** provides details of all sites excluded from the Plan with supporting evidence since the first stage of consultation on the Sites and Policies Plan. Site 38 Byegrove Road was initially excluded from further consideration in the Sites and Policies Plan prior to the Stage 3 consultation.

7.2.2 The site was excluded because Thames Water (the owner) advised the council that they were unlikely to deliver the site within the lifetime of the Plan (refer Appendix 6) for their preferred use, housing, as required by the NPPF (paragraph 173). Thames Water also could not address the site constraints such as flood risk (3b), high voltage transmission lines, metropolitan open land and green corridor designations with respect to the potential impact on their suggested use. Thames Water also advised the council that the sewer pumping station was operational and that they had no intention to decommission it within the lifetime of the plan.

- 7.2.3 With regard to Thames Water's suggestion that the site should be designated as a Major Development Site in the Plan, referring to correspondence in September 2013 between LBM officers and Thames Water regarding the matter (Appendix 7), the following justification was provided to Thames Water as to why the site would not be identified as a Major Developed Site:

"With regards to your proposed designation of the site as a Major Developed Site (MDS) in the MOL, I can inform you that officers have investigated this matter but found no reference to MDS in relevant current planning policies. The last bullet point of paragraph 89 in the National Planning Policy Framework (NPPF) would be a material consideration with any planning application on the this site but in Annex 3 of the NPPF it is clarified that PPG2 has been replaced by the NPPF and it is evident that the NPPF does not incorporate the concept of 'Major Developed Sites' as set out in the former PPG2. Neither the NPPF nor the London Plan requires the council to identify MDS's in MOL and Merton has no policies identifying or referring to MDS. The council will therefore not be showing any MDS's on its Policies Map."

- 7.2.4 The above is considered sufficient justification for excluding the site from the Plan with respect to its allocation as a potential housing site and not identifying the site as a Major Developed Site.

Site 16. Wimbledon Library

(a) This site is allocated in the submitted version of the Plan but the Council now proposes to exclude it. What are the planning reasons for this decision?

- 7.2.5 The site was proposed for allocation to provide certainty over the future of the library and outline the council's intention to provide an enhanced library facility on the site, whilst enabling additional uses to achieve the most sustainable use of the site. The actual space available for potential additional uses was small when taking into account the desire in the allocation to provide an enhanced library facility.
- 7.2.6 Following receipt of a petition signed by more than 2,400 people, it was evident that the general public were not satisfied that there was certainty over the future of the library facility on the site, as required by paragraph 154 of the NPPF. The petition period ran concurrently with the pre-submission consultation (Stage 4) and was submitted to the council after completion of the pre-submission consultation period, hence the site remained in the Plan, but was later removed from the submission version as a result of the above information. The public perception was that there was a risk to the future of the library facility and the potential for a substantial commercial redevelopment of the site, although this was not the case.
- 7.2.7 It was determined that the social component of sustainable development would not have been delivered if the site had remained in the plan in accordance with paragraphs 15 and 152 of the NPPF. No obvious mitigation of the perceived impact was evident therefore it was concluded the site should be requested to be removed from the plan during the submission process to the Secretary of State.

Appendices

Appendix 1 – Colliers International report on AFC Wimbledon site search

Appendix 2 – London's Historic Fire Stations, 2010

Appendix 3 – Correspondence with the owners of Site 48b

Appendix 4 – Rookwood Avenue Section 52 agreement

Appendix 5 – Rookwood Avenue ecologist report

Appendix 6 – Correspondence with Thames Water regarding Site 38

Appendix 7 – Correspondence with Thames Water regarding major developed sites

Appendix 8 – Letter from Merton Council to greyhound stadium parties 23 July 2013



AFC Wimbledon

Returning Home, Summary Report

ISSUED AUGUST 2011, UPDATED FEBRUARY 2013

COLLIERS INTERNATIONAL

AFC WIMBLEDON

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1 HEADLINES

The conditions for a stadium led mixed use project in AFC Wimbledon's preferred areas of Merton are strong, probably the **best** since Wimbledon FC left the borough in 1991.

This is a challenging and exciting project, if delivered it would have national and international **resonance**.

Recent years has seen London deliver new, creative, innovative and complex projects. A stadium project in Wimbledon will need to **learn** from successes in London and elsewhere.

From a long list of eighteen Merton locations, **three** have been identified where the context is favourable to deliver a stadium and residential led mixed use project.

- Wimbledon Stadium, Morden Underground Depot and Merton Industrial Estate

The **demand and supply** context for property uses that have a track record of co-location, in or alongside stadiums or arenas, as part of mixed use development is positive for each location.

An early order of magnitude **test of financial scale** based on notional projects for each location suggests sufficient value could be generated from commercial development in each location to enable a stadium to be funded for AFC Wimbledon.

The **Wimbledon Stadium** location presents the best option for AFC Wimbledon to return home and for Merton to facilitate a **transformational economic development project** to delivery regeneration outputs in the short to medium term. Strategic net benefits for Merton, AFC Wimbledon and a third party developer investor will include.

- Attractive **commercial** prospects and a relatively fast speed to market
- A football stadium for AFC Wimbledon along with community uses to drive social cohesion and **community building**
- **New homes**, ancillary commercial uses plus community components that enables Merton to deliver quickly on the London housing agenda
- **Improvements** to the physical environment of the wider area, better connections, an improved environment and traffic management.
- A strong **destination** in the east of the borough
- Helping to refresh the wider Merton and Wimbledon **place brand** as a place to live, visit and invest.

2 INTRODUCTION

2.1 ABOUT THIS REPORT

This report is an updated strategic review of stadium location options for AFC Wimbledon in their home borough of Merton. It consolidates the extensive work undertaken by Colliers International between 2008 and 2012. This report considers:

- Research and analysis on **location options**
- Strategic issues associated with how a stadium could be **delivered**
- AFC Wimbledon helping to be a catalyst for a **transformational** economic development project in Merton and the wider south London area

During this period Colliers International undertook a variety of work tasks for AFC Wimbledon, looking at location options, development and planning strategy, destination development, plus stadium operations and business planning issues.

2.1.1 A MULTI-DISCIPLINARY TEAM



Colliers International is a global top three property advisory business with around 500 offices in more than 60 countries with 12,300 employees. Colliers International provided management consulting, town planning and property development expertise for AFC Wimbledon between 2008 and 2012. In early 2010 Colliers International assembled a small professional team. This team agreed to work on a combination of pro bono and reduced fee rates. This full team comprised:

- Colliers International, destination, property development and town planning
- **Sidell Gibson**, master planners & architects
- **Franklin Andrews Sport** (part of Mott McDonald), cost consultants and project managers
- **Steer Davies Gleave**, transport and urban design consultants
- **Derek Wilson Sports + Event Architects and Michael Crook Architecture**, sports and event specialists

During a series of workshop meetings the team combined their collective experience, knowledge and expertise to provide advice to AFC Wimbledon.

2.2 DRIVERS OF A REGENERATION PROJECT

2.2.1 BRINGING AFC WIMBLEDON HOME?

The current situation is the best opportunity for AFC Wimbledon to return home since Wimbledon FC left the borough in 1991. We understand the following:

- Executive officer and **political desire and enthusiasm** to deliver a significant regeneration project in the borough. A major requirement is **housing** to accommodate the current and forecast population growth in the borough and across Greater London
- There is **cross party political** support to bring AFC Wimbledon home
- Merton has developed an understanding of the **net benefits** a stadium led regeneration project can bring to a local authority and community from projects elsewhere in the UK and internationally
- A stadium led project should help **refresh** the Merton destination and its place brand as a place to live, visit, invest and work
- A stadium led project can help tidy up and provide a stronger **gateway** to the borough from neighbouring Wandsworth to the east

2.2.2 COMPETITION BETWEEN PLACES IS INTENSIFYING

Destinations need to be on the front foot to stay competitive. Any city or piece of city now needs to continually refresh and adapt its offer, to make bold interventions to stay competitive and indeed grow its appeal as a destination to live, work and visit.

There are many examples from across the UK and internationally over the last twenty years of urban revitalisation initiatives. Projects in Sheffield, Manchester, Leicester, Liverpool, Glasgow, Cardiff, Birmingham and Portsmouth and elsewhere in London illustrate how places have sought to establish a strong vision, revitalise their portfolio of products and services for the 21st century and at the same time refresh their identity and appeal.

Some of Merton's offer to the local, regional, domestic and international market place is tired. The urban fabric is uninspiring and in need of revitalising. In today's world it is unacceptable for any town, city or piece of city to rest on its laurels. Within the incredibly complex London system Merton needs to position itself so it will attract and retain investment, retailers, customers, culture, visitors, residents etc. Locally there has been increasingly strong acceptance that Merton needs to be on the front foot and make bolder interventions than it has in the past.

COMPETITIVE CONTEXT

Merton faces **challenges** to remain one of London's premier mid-urban boroughs. Challenges include declining public finances, part of the complex London system, the need to fund many services, a growing and diverse London population and the growth and revitalisation of other London districts. Although Merton and especially the northern Wimbledon district are successful and popular, they do have drawbacks and limitations. The south and eastern parts of the borough, which were developed for the most part between the 1920's and 1940's, are much more suburban in character and face a range of other challenges. Merton has identified three core areas of the borough:

- Greater Wimbledon
- Morden
- East Merton and Mitcham

In London **other boroughs** have embarked on significant urban regeneration projects of varying scales, Wembley, Cricklewood, Greenwich, Kings Cross, Stratford, Dalston, Tottenham and Croydon are some.

Merton is now keen to make a step change in the borough and start to deliver an **urban renaissance** in areas where it has identified the potential to do so. A stadium project for AFC Wimbledon is seen as being an ideal catalyst for such an initiative.

2.2.3 POTENTIALLY A GREAT MERTON, LONDON AND INTERNATIONAL PROJECT

This is a very exciting and very challenging initiative. If delivery of a project were to happen, given the history of AFC Wimbledon and the complex Merton area it would have **national and international resonance** for Merton.

The AFC Wimbledon story, achievements and **brand** is strong. The market position and destination brand of Wimbledon, within Merton, also plays out powerfully at local, regional, national and international levels. Combining the two should really help Merton, Wimbledon and AFC Wimbledon position for a successful future.

Appendix 1 provides some background on the Merton context.



3 LOCATION OPTIONS

3.1 REVIEWING OPTIONS

In discussion AFC Wimbledon, and in consultation with Merton, fresh consideration needed to be given to possible locations where a stadium led mixed use project could be delivered to meet the requirements of both Merton and AFC Wimbledon. This included a review of previously considered sites and locations that might not be obvious but could provide a unique opportunity to align with Merton and AFC Wimbledon's objectives. The aim is to understand which locations might have the best economic development, regeneration, financial, sporting, business and community benefits.

3.1.1 CONDITIONS FOR SUCCESSFUL STADIUM LED MIXED USE DEVELOPMENT

Characteristics that a location should ideally offer for a stadium led mixed use project include:

- **Vacant, underused land and buildings**, especially such land and property that is owned or controlled by the public sector and/or state agencies
- Areas where the public sector are strong and **full support** between them and the football club is agreed
- Sites that have a strong economic development, **regeneration** and revitalisation story
- A project that is **sellable** to the investor, developer and occupier sector and can support a strong destination brand
- The public sector provides strong **leadership**

Other issues to consider include:

- Potential linkage with other sites, especially high value sites, in the borough or even out of borough, for off-site enabling development
- Ensuring there is a credible, deliverable and sustainable concept and business plan that supports sustainable destination development
- A location that is likely to be popular with the AFC Wimbledon supporter base. This is understood to be the north, west and south west of the borough.

Figure 1: Conditions for success

Key criteria
<ul style="list-style-type: none"> • Public sector champion - to ensure full support & leadership during the development journey; • Inefficient land & property – often owned or controlled by the public sector, so that a stadium can contribute to destination and value creation from higher value development • Regeneration - an area identified as needing revitalisation where public sector resources can be mobilised to attract private sector investment.
Supporting criteria
<ul style="list-style-type: none"> • Accessibility - Good public transport is available for stadium users and also to support a higher quantum of property development; • Sellable – a project that appeals to the private sector, public sector stakeholders and the local community through the net benefits achieved; • Brand potential - a location that offers AFC Wimbledon and Merton the opportunity to develop and thrive.

Delivery of a stadium led project in an urban context is complex; these have been identified as conditions for success

3.2 LONG LIST OF OPTIONS

A base assumption was that footprint and circulation space for a potential c 20,000 capacity football stadium could be accommodated. In 2008 Colliers International prepared a long list of 18 Merton locations, plus the Kingsmeadow Stadium in Kingston, where this base assumption could be met and outlined their opportunities and challenges.

During the following four years to 2012, and at times with partner consultants (master planners, transport, architects, engineering and cost), this long list was reduced. Colliers International and their partner consultants then interrogated the short listed options in Merton.

Figure 2: Long list of location options considered

<i>Location</i>	<i>Comment</i>
1. Merton Industrial Estate	Centre of the borough, South Wimbledon/Colliers Wood. Light industrial area. Seen as potentially part of an “urban new town”. Lots of existing businesses and jobs. Dominant owner AVIVA a major institution.
2. High Path Estate	Centre of the borough, South Wimbledon/Colliers Wood. Social/Affordable housing estate. Plans for revitalization. Possible rebuild including stadium, intensification and inclusion of adjacent site into a an urban new town
3. Wimbledon Stadium	Greyhound stadium in east of borough on border with Wandsworth. Regeneration area, vacant and under utilised land, needs improvement, rundown gateway to the borough
4. Lombard Industrial Estate	South centre of borough, adjacent to Morden Hall Park, light and heavy industrial area
5. Tesco Extra	South west of borough, adjacent to A3, Raynes Park, border with Kingston. Major super market, potential for intensification and redevelopment
6. Sainsburys, M&S (ex Savacentre)	South Wimbledon-Colliers Wood area, part of a major regeneration initiative for Merton. Major supermarket/shopping centre; Redevelopment potential on own or as part of the wider South Wimbledon-Colliers Wood “urban new town” initiative.
7. Weir Road estate	North east of the borough, light and heavy industrial area
8. Thames Water, Mitcham	South east of the borough part of review in 2009
9. Willow Lane estate	South east of the borough part of the review in 2009
10. Tooting & Mitcham FC	South east of the borough, existing football club, parkland area
11. Gresham Road, Railway depot	North of the borough, potentially not needed operationally, largely residential area
12. Prince Georges Playing Fields	West of borough, large playing field area close to A3 and Raynes Park
13. Wimbledon Park Athletics stadium	Small athletics facility in north of the borough, largely residential area
14. Morden Road Park	Centre of the borough, opposite Merton Industrial Estate
15. Merton College & Swimming Pool	South of the borough, large college campus and 1960’s swimming pool in Morden Park
16. Wandle Valley	East of the borough, former sewage works, light industrial zone now parkland area, identified in 1980’s, significant development since
17. Morden Park, playingfields	South of the borough, former London schools playing fields part of Morden Park
18. Morden Underground Depot	South of borough, large area of London Transport sidings, an unconventional opportunity, raft/suspend over depot, catalyst for new Morden,
19. Kingsmeadow	AFC Wimbledon’s existing stadium. Out of borough by c 1 mile in Kingston. Area now part of Kingston Hogsmill Valley regeneration

3.2.1 TOWARDS A SHORT LIST

A simple qualitative approach using a basic scoring and weighting system to a range of criteria was used to assess the long list of locations.

3 KEY CRITERIA – 75% WEIGHTING

Three core criteria were viewed as the most important so had a higher weighting totalling 75%

- **Champion, 25% weight:** Is the public sector likely to be supportive for promotion and delivery of the project?
- **Inefficient land & property, 25% weight:** Is land and property underused, vacant, low value or in need of improvement and where value can be added?
- **Regeneration, 25% weight:** Is the project likely to contribute to physical and social regeneration?

3 SUPPORTING CRITERIA – 25% WEIGHTING

Three other criteria were seen as important supporting components but had a lower weighting totalling 25%.

- **Access, 10% weight:** is overall accessibility good whether by public transit, walking, cycling and private car?
- **Sellable, 10% weight:** is the location and potential project likely to be sellable to the public, private and the overall community?
- **Brand, 5% weight:** would the site help strengthen and align with the Merton and AFCW development?

The scores given were based on local knowledge of the area, previous research, analysis and discussions from various meetings and workshops of the professional group during 2010 and 2011. A score was given for each criteria of between 0 and 5, with 0 the lowest and 5 the highest. The weighting was then applied to reflect the overall importance of each criterion.

3.3 SHORT LIST OF OPTIONS

Some locations were quickly deleted. These included all the “parkland” type locations due to their Metropolitan Open Land designation and expected sensitivities. Additionally parkland locations would be unlikely to generate any significant regeneration outputs and the majority were outside the areas Merton are most keen to revitalise. Some of the more challenged urban sites were excluded as

they scored poorly in key areas; this included areas seen as being unpopular with the supporter base.

The three locations that scored the highest are:

1. Wimbledon Stadium
2. Morden Underground Depot
3. Merton Industrial Estate

The overall results are illustrated in figure 3 below and the locations in figure 4.

Figure 3: A simple qualitative filter to assess a variety of locations

LOCATION	KEY CRITERIA			SUPPORTING CRITERIA			TOTAL	%score	WEIGHTED %Score
	Champion <i>Supportive Public Sector for planning & delivery</i>	Inefficient property <i>Underused, poor quality &/or vacant land % property</i>	Regeneration <i>Catalyst for sustainable long term value add</i>	Access <i>Transport</i>	Sellable <i>Public, Private, Third & Community Sectors</i>	Brand <i>LB Merton Destination & AFCW</i>			
Maximum score	5	5	5	5	5	5	30		
Weight	25%	25%	25%	10%	10%	5%	100%		
Wimbledon Stadium	5	5	5	3	4	5	27	90%	94%
Morden Underground Depot	4	3	5	5	4	4	25	83%	82%
Merton Industrial Estate	5	2	5	4	3	5	24	80%	79%
Kingsmeadow (wider RBK regeneration area)	4	4	4	3	4	1	20	67%	75%
High Path Estate	2	3	3	5	2	5	20	67%	59%
Wandle Valley	2	4	3	2.5	2	4	17.5	58%	58%
Morden Road Park	2	3	3.5	4	1	5	18.5	62%	58%
Sainsburys - former Savacentre	3	1	3	5	2	5	19	63%	54%
Morden Park Playing Fields	1	4	3	4	1	2.5	15.5	52%	53%
Lombard Industrial Estate	3.5	1	3	3	2	4.5	17	57%	52%
Merton College & Swimming Pool	2	3	2	4	2	2	15	50%	49%
Tooting & Mitcham FC	1	4	2	2	2	2	13	43%	45%
Tesco Xtra	2.5	1	2.5	3	2	3.5	14.5	48%	44%
Weir Road Industrial Estate	2	1.5	2	2	3	3	13.5	45%	41%
Thames Water site Mitcham	2	2	2	2	2	2	12	40%	40%
Willow Lane Industrial Estate	2	2	2	2	2	1.5	11.5	38%	40%
Prince Georges Playing Fields	1	3	1	3	1	4	13	43%	37%
Wimbledon Park Athletics Stadium	1	2	1	2.5	2.5	5	14	47%	35%
Gresham Way Railway Depot	1	2	2	1.5	1	3	10.5	35%	33%

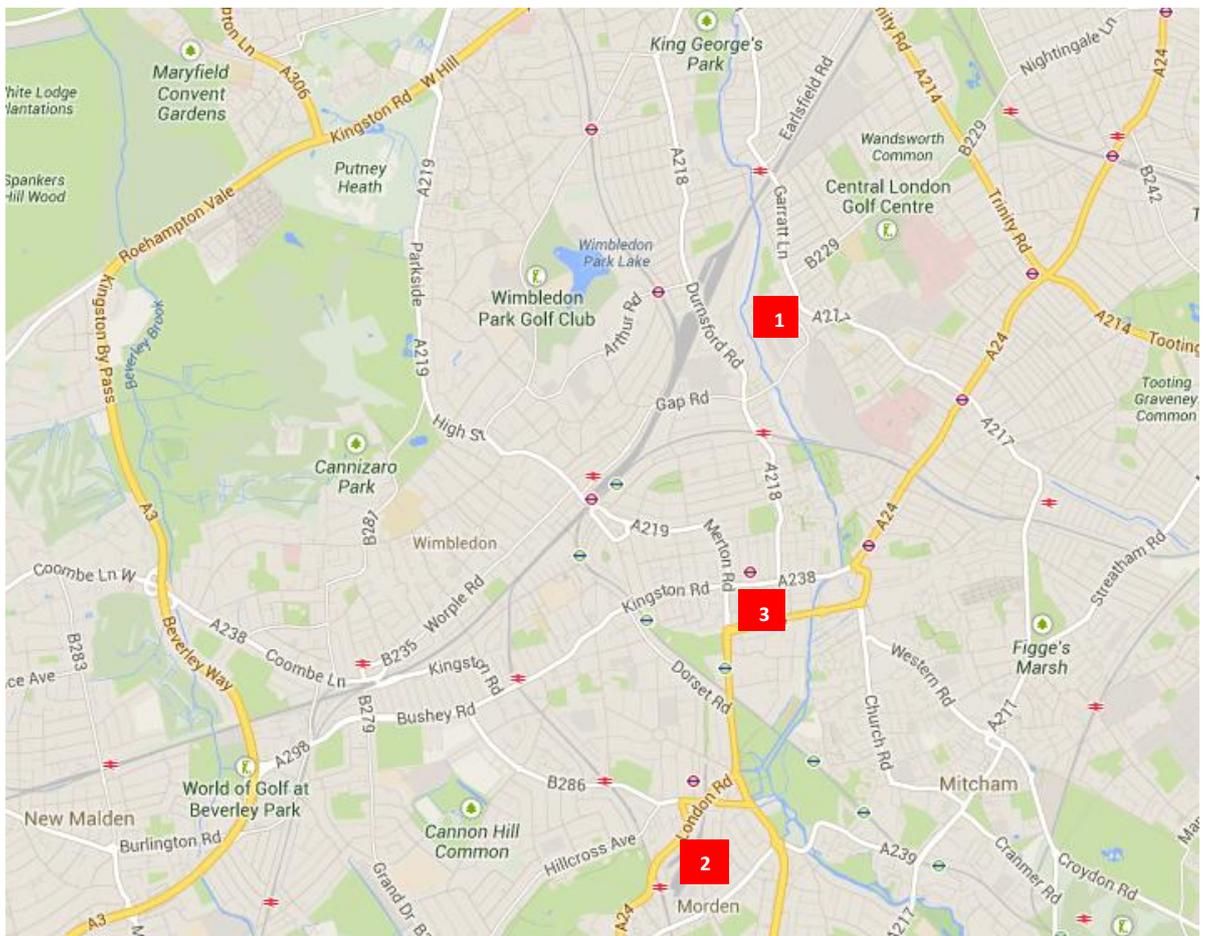
3.3.1 THE THREE LOCATIONS TO ASSESS

There was agreement from the consultant and client group that these three locations represented the best opportunity for achieving both AFC Wimbledon and Merton objectives over the coming years. It was fully acknowledged that each location would present their own range of sensitivities and complexities. However in these three locations we consider Merton is most likely to be able to use their powers to facilitate partnership working between the public, private and third sectors to deliver a stadium led project.

- Both Merton Industrial Estate and Morden Underground Depot are in two of Merton’s core regeneration areas.
- Wimbledon Stadium represents Wimbledon’s largest piece of challenged, vacant and inefficient land at a “gateway” location between Merton and Wandsworth. It is also within the Wandle Valley an important corridor for regeneration and modernisation within the London Plan.

These three locations would need to be the subject of an early development assessment and test of financial scale based around some very early master planning and costs. It was agreed and understood **that this testing of the financial scale should in no way be seen as a valuation or be used for any other purposes except considering the financial order of magnitude of what are only very indicative projects**

Figure 4: Short listed locations



1. Wimbledon Stadium; 2. Morden Underground Depot; 3. Merton Industrial Estate



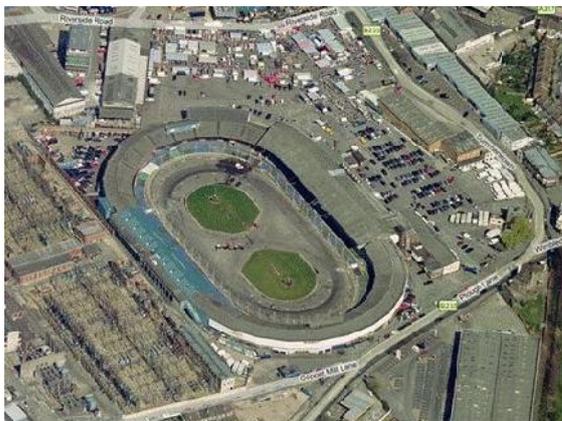
4 DEVELOPMENT ASSESSMENT

4.1 WIMBLEDON STADIUM

4.1.1 OVERVIEW

Situated in the north east of Merton, the stadium is bordered by Plough Lane, Riverside and Summerstown, to the west is an electrical sub-station and light industrial uses. Adjacent to the electrical sub-station is the River Wandle which we understand means part of site is classified as a flood plain. We are not experts on this issue but believe a clever design and engineering response is likely to reduce any risk significantly. Perhaps a stadium through such an innovative design response might also reduce any flood issues elsewhere on the site and so support more commercial development such as residential.

Figure 5: Wimbledon Stadium



For “high value” south west London it certainly represents inefficient and under used land and property in what is a harsh and unattractive part of Merton.

The existing stadium is tired and it is understood the greyhound operation is challenged. This is perhaps the one area in the borough that has significant vacant, underused and inefficient land and property. With an existing stadium use plus being very close to the original home of Wimbledon FC on Plough Lane this is seen as the obvious location for a new football stadium. It is also part of the Wandle Valley corridor.

Wimbledon Stadium dates from the 1920’s and has been refurbished in a piece meal manner over the years. The stadium had a capacity of about 9,000 although

we understand this has been reduced recently. In its heyday used to have c 40,000 people attending. The remaining part of the site is hard standing although there is a building fronting Summerstown with a motor cycle driving school and café as occupiers. The Wimbledon Stadium site covers approximately 12 acres (5 ha), the stadium footprint occupies perhaps 50% to 60% of the site.

4.1.2 LOCATION CHARACTERISTICS

- Two hundred metres to the south west is Reynolds Gate the c 600 unit residential development on the site of the original home of Wimbledon FC.
- Wimbledon Station is about a 20 minute walk, Wimbledon Park Station (underground), Earlsfield and Tooting Broadway (underground) Stations are a 15 minute walk. Haydons Road station is about a 5 minute walk. The area is served by several bus routes.
- Surrounded by the electrical sub-station, the industrial uses to the north and immediate east, big box retail to the west and frequently congested road network, the environment is harsh and unappealing.
- Part of the site is a floodplain which will present design, engineering and development challenges
- Rundown, “in-between” piece of London, harsh edges
- Mix of uses surrounds: light industrial, big box retail, residential, electrical sub station
- Planning - Zoned as D2 – stadium
- Border of Merton and Wandsworth

A SITE NEEDING LATERAL AND CREATIVE THINKING

Merton’s aspiration for regeneration is likely to mean a range of experiences will be required at this location. Importantly high quality place making will be needed. This means an innovative master plan and urban design response allied to a visionary property development approach will be required that ensures the project works effective on its own but is crucially effectively connected to the surrounding area.

The opportunity is to create a strong destination at the gateway between Merton and Wandsworth in the north east of the borough and to provide a strong hub in the Wandle Valley.

4.1.3 USE AND OWNERSHIP

Wimbledon Stadium was one of six UK greyhound tracks purchased by Risk Capital Partners, from Wembley plc. Risk Capital Partners is a private equity group run by Luke Johnson a very successful entrepreneur, businessman and former Chairman of Channel 4. We understand the greyhound tracks were acquired through debt funding from a major Irish bank. This means it is now effectively controlled by the National Asset Management Agency (NAMA). This is the financial institution set up by the Irish Government following the economic, banking and property crisis in Ireland, the Eurozone and wider European Union in 2008/09.

The Greyhound Racing Association (GRA) currently operates the stadium which has a number of events per week for Greyhound racing; Stock car racing; a large Sunday market and health & fitness centre including squash courts. We understand the financial performance of the stadium and its core greyhound business is weak. With an existing use as a stadium AFC Wimbledon has previously written to Merton that the site should retain sporting use and remain a venue for sporting and leisure uses with AFC Wimbledon as the anchor sports team.

We understand Risk Capital Partners/NAMA have an agreement with Galliard Homes to develop a residential scheme.

THE GREYHOUND ISSUE

The market context for greyhound racing is challenged; it has been in long term decline. In the modern era we believe that the interests of the greyhound sector are likely to be best served at an alternate London location. If a new "London Greyhound Stadium" was to be built it is very unlikely Wimbledon would be chosen as a location. A new location that would give the greyhound sector access to a much wider market than Wimbledon Stadium can ever possibly support would be targeted.

For example locations with much better access to the whole of the London market are likely to be targeted. A new "London Greyhound Stadium" might therefore act as a catalyst project in one of the major fringe central London projects at various stages of planning. For example:

- Olympic Park and surrounds, Royal Docks and around Excel Centre, Greenwich Peninsula and Nine Elms Battersea.

We believe this type of location, or indeed an out of town location, would provide the greyhound sector with a much more appropriate location for the modern era.

4.1.4 OPPORTUNITIES AND CHALLENGES

Opportunities	Challenges
<p>Inefficient land & property. This is Wimbledon’s only real significant brown field site where value can be added</p>	<p>Land owner & high cost of entrance. This is reportedly c £20m to £30m+ to acquire the site. Understanding the issues with existing tenants, of which there are a few, and their lease structure will be important. For example to secure vacant possession.</p>
<p>Existing Stadium. This is very positive for development of a new football stadium, as is the historic location of two stadiums in this part of the borough.</p>	<p>Site size. Reasonable size site but requires a creative and innovative design response to help capture value and spread benefits into surrounding area and minimize any perceived negatives</p>
<p>Transport. Public transit is viewed as good for football supporters but limiting for other uses. With a significant retail use there are likely to be concerns on car trip generation and town centre vitality</p>	<p>Greyhound operation. Greyhound racing is a niche and declining market. The greyhound sector is likely to be best served by seeking an alternate London location.</p>
<p>Operations. Strong management required along with effective design to manage event day</p>	<p>Design. The size of development, ability to master plan a strong scheme with a variety uses will require a creative and innovative design response</p>
<p>Place Making. A strong urban design response would improve the built environment and provide an attractive eastern gateway into the borough.</p>	<p>Wandsworth. The border location would mean they are an important stakeholder and influence what happens.</p>
<p>Population. Lots of local residents but none are immediately adjacent. Crowd control methods are now very effective. Early crowd management plan required</p>	<p>Congestion. The area’s roads are frequently very congested. Ability to master plan the wider area including a link across the River Wandle from Riverside to Weir Road should be explored</p>
<p>Exit. The site owner is looking to exit, NAMA issue (“Value for Irish tax payer”). AFC Wimbledon provide a solution that enables development sooner rather than later</p>	<p>Flood plain. This will present engineering, design and development challenge</p>

4.1.5 DEVELOPMENT ASSESSMENT

This is a difficult site, however most are in London. This location is in between places, has a relatively weak public transport context and fragmented and harsh local environment. The flood plan issue presents an engineering design and development challenge but a stadium located in the portion of the site closest to the River Wandle might help alleviate the risks. Clearly this needs expert advice. A creative master plan and innovative design response is required. Such a major project should aim to bring the area together more coherently and provide a positive addition to the built environment and help local area revitalisation.

The location in many ways would be ideal for a new AFC Wimbledon stadium. The development idea here is to deliver a stadium enabled primarily by residential with supporting retail, leisure and community uses.

4.1.6 TEST OF FINANCIAL SCALE

Our very early test of the projects financial scale suggests that a stadium led mixed use development is viable in this location. These are order of magnitude estimates only.

- Project costs: £162 million
- Capital value: £184 million
- Profit: £22 million (13.5% on cost)

4.1.7 BENEFITS OF THIS LOCATION

- This location would probably be seen as an excellent Wimbledon location by its supporters. Return to the area that was Wimbledon FC's home from 1912 to 1991.
- We understand there is currently strong political support for a project on this location and officers would be supportive.
- Potentially significant new residential development that allows the club to grow supporter base through those in the immediate vicinity and create greater vibrancy
- A strong local regeneration project providing a gateway between Merton and Wandsworth
- Potential to tidy up a currently very rundown part of the borough and tackle the long term traffic problems through a master plan approach to the wider area. For example a link across the River Wandle at Riverside and Weir Road
- A stadium project in this location should allow the club to develop a good business from a range of events, activities and uses in the stadium itself
- Providing a hub location in the Wandle Valley to help consolidate and grow employment uses along with a larger residential population

4.2 MORDEN UNDERGROUND DEPOT

4.2.1 OVERVIEW

This was suggested by the Colliers International as a creative option. It potentially gives an opportunity to tackle the challenges Morden faces and that Merton wishes to address. The idea is that using a raft, suspension or sunken cut and cover approach, a stadium could be developed above the depot sidings. Such an approach has been delivered at the Central Line sidings as part of the Westfield White City project.

Figure 6: Morden Underground Depot



View towards the south west from Merton Civic Centre roof top. The area of the depot (Transport for London) and some surrounding land owned by Merton covers approximately 6 ha (15 acres) and is a very short distance from Morden town centre.

Despite its problems, Morden has a number of attributes that need to be nurtured as part of a wider master plan strategy to shift its appeal.

Morden is one of the most accessible places in Merton and South West London with underground, main line rail, tram and an extensive bus network. It is also on a main London arterial road, the A24, from central London to the south coast via Epsom and the M25. This site is situated to the south west of Morden town centre. It is a core piece of London Undergrounds operational infrastructure for Northern Line services.

Morden town centre has lost its way and struggled for some time as a retail and business centre, losing market share to other centres such as Wimbledon, Sutton, Kingston, Croydon and the retail parks at Colliers Wood. The local environment is difficult with the town centre dominated by the main A24 highway and bus services.

4.2.2 USE AND OWNERSHIP

The sidings are part of the Transport for London operational estate. Surrounding land use and characteristics include:

- Excellent public transport accessibility into central London and the wider London region
- Good road links into London, outer London suburbs and southern England
- Morden town centre is home to Merton Civic Offices in the landmark Crown House tower
- There is a large local population to the north and south.
 - The north is primarily private residential development.
 - To the south the St Helier Estate a very large inter war social housing project.
 - Both areas developed as a result of the underground development to Morden in the 1920's.
- Other surrounding uses include one of Europe's largest Mosques (Baiful Futuh Mosque) and the Merton Campus of South Thames College
- A variety of primarily convenience and value retail space
- To the east and west are two significant parkland areas, Morden Hall Park (National Trust) and Morden Park to the west.

4.2.3 OPPORTUNITIES & CHALLENGES

Opportunities	Challenges
<p>Lower cost of entrance. Potentially these could be minimal depending on the development agreement with the GLA/TfL</p>	<p>Cost of engineering solution. This is unknown, although we understand the cost of the raft or sidings box at White City was c £75m. This is very high and likely to be prohibitive; Likely to be complex</p>
<p>New land is being created in a highly accessible location. Something London and especially mid urban/suburban London is short of.</p>	<p>TfL Operation. Very important to TfL at this time; huge challenge</p>
<p>No or limited vacant possession. There are no other major land owners/occupiers, whilst Merton owns the car park.</p>	<p>Connectivity. Ensure the project is effectively connected into the existing Morden town centre so that benefits accrue for the whole of the Morden area</p>
<p>No decanting. With no existing occupiers whether residential or business new space for them is not required</p>	<p>Suburban/Community. The surrounding area is very suburban in character. The project would need a strong design response.</p>
<p>Delivery. This might be a project that is relatively easy to sell and deliver</p>	
<p>Destination. This can help breathe new life into Morden as other urban infill/expansion projects ie) Wembley City, Cricklewood, White City, Stratford etc</p>	
<p>Value. Is being created and not destroyed to only be recreated again</p>	
<p>Sellable. Expectation is that this presents a good story for the majority and can be sold to key stakeholders.</p>	

4.2.4 DEVELOPMENT ASSESSMENT

The development idea here is to deliver a solution not just for an AFC Wimbledon stadium but also to address the decline of Morden over the last twenty five years. With land in short supply the vision is to employ an engineering solution to develop over the existing Northern Line depot. This might be similar to what has been achieved in recent years at the Central Line depot at Shepherds Bush for the Westfield White City retail led project.

This would then create additional “land” for development of the stadium, probably at the south west end adjacent to the main line railway and the Baiful Futuh Mosque. A major master plan response including surrounding land, including the

town centre could then be opened up for further residential led mixed use development. Connections would be created into the existing Morden town centre to help full revitalisation of the Morden town centre destination.

4.2.5 TEST OF FINANCIAL SCALE

Our very early test of the financial scale of a notional project suggests that a stadium led mixed use development is viable in this location. These are order of magnitude estimates only

- Project costs: £337.4 million
- Capital value: £405.6 million
- Profit: £68.2 million (20.2% on cost)

4.2.6 NET BENEFITS

- Probably acceptable to the majority of supporters as an appropriate Wimbledon location
- Excellent accessibility for the majority of the existing supporter base. Accessibility via rail, underground, tram, bus and road provides access to potential supporters in the London, south London and Surrey region;
- Potentially significant new residential development that allows the club to grow supporter base through those in the immediate vicinity and create greater vibrancy;
- AFC Wimbledon might use the adjacent Morden Park playing fields immediately to the south as a training ground and community coaching base
- A stadium project in this location should allow the club to develop a good business from a range of events, activities and uses in the stadium itself
- AFC Wimbledon being seen to be part of a transformational project that helps to revitalise Morden a major target of Merton.

4.3 MERTON INDUSTRIAL ESTATE

4.3.1 OVERVIEW

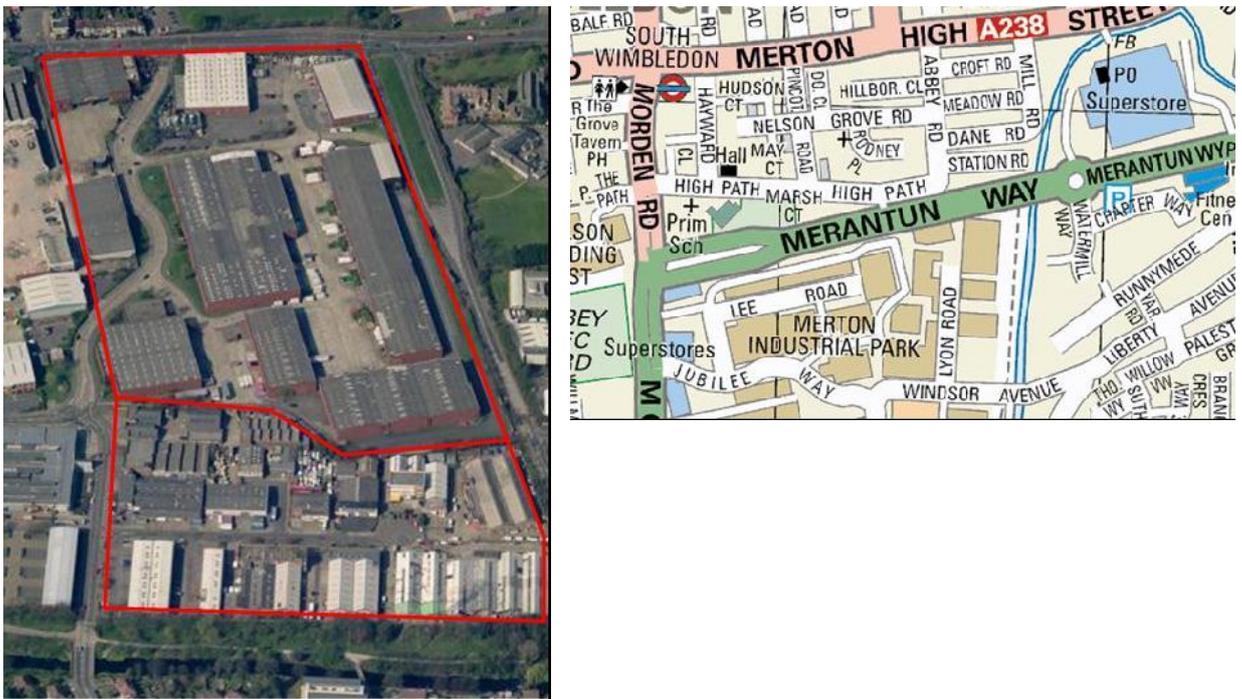
This area is located in the centre of the borough a short distance south of the HighPath Estate and fronts at the western end the A24 Morden Road. This location consists of two main zones:

- Merton Industrial Estate (MIE) AVIVA: 1980's industrial, distribution and DIY retail boxes in the ownership of AVIVA, fronting Merantun Way, A24 Morden Road and Jubilee Way
- MIE-Lyon Road: Mixed ownership, small scale light industrial and business space units between Lyon Road and the River Wandle at the eastern end of the location.

Both zones are within the South Wimbledon-Colliers regeneration area, a major long term target Merton has for transformational regeneration. Both zones have significant business occupation and employment.

The idea here is that the majority of business uses might be relocated to alternate sites in the borough, for example the adjacent Lombard Industrial Estate. This area would then become a large scale residential and mixed use district incorporating a stadium for AFC Wimbledon. Potentially the area would also extend further east and take in the Colliers Wood area. Merton has an early concept of developing an urban new town for the borough.

Figure 7: Merton Industrial Estate



This is currently in productive use with many businesses and jobs. A clear danger that must be avoided is destroying value. The largest site owner is AVIVA who own much of the land and property from Morden Road to Lyon Road. Whilst the eastern end is multi ownership with many smaller occupiers.

4.3.2 LOCATION CHARACTERISTICS

Covering an area of approximately 12 ha (30 acres), this location is within the South Wimbledon-Colliers Wood regeneration zone Merton. The location is at the centre of the borough just south of the High Path Estate. The site is bordered by A24 Morden Road to the west, Merantun Way to the north, Jubilee Way to the south and the River Wandle to the East.

The area marks the transition of mid urban London to suburban London. Other uses close by included the Lombard Industrial Estate to the south that has increasing vacancy levels, common across London. A notable recent development is the construction of a London region fire control centre on the south side of Jubilee Way.

4.3.3 USE AND OWNERSHIP

As outlined earlier there are two zones in this location.

- A 1970's/80's industrial estate plus two DIY retail boxes (Homebase & Wickes) owned by Aviva. We call this area MIE-AVIVA;
- A multi-occupied, multi-owned, higher density industrial/business space zone by Lyon Road. We call this zone MIE-Lyon Road.

We have met with AVIVA. At the time they were interested in the approach, however confirmed they had undertaken some very early thoughts on asset management with many lease due to expire in the latter part of this decade. For the time being AVIVA considered it is an important part of their property portfolio.

4.3.4 OPPORTUNITIES AND CHALLENGES

Opportunities	Challenges
<p>Environmental structure & heritage. This is strong in surrounding areas and indeed there are powerful stories that can help in place making. For example the River Wandle and its industrial heritage</p>	<p>Employment. Significant existing and viable businesses and jobs might be put at risk unless alternative location is available.</p>
<p>Transport. Public transit is excellent and will facilitate greater development. Gateway into the borough and provide southern fulcrum for Wimbledon Broadway to help extend this southwards.</p>	<p>Sensitivities. Amongst the local business community and the political sensitivities as to what business and jobs under threat might mean for a redevelopment project.</p>
<p>Development Quantum & Quality. This could be significant across residential, business space, retail, leisure, public realm and community uses. Office uses potentially provide more jobs on site</p>	<p>Design. The size of development is likely to be c 4 to 8 stories would this fit into the local context well. Costs of required basement parking will be high. Major transformational project so strong masterplan approach required</p>
<p>Place Making. Connectivity into surrounding areas and capture of the value & energy from core Wimbledon area and help spread this further south and east.</p>	<p>High cost of entrance. To start a project this will be high, getting Aviva on side and securing vacant possession is very costly. The same would need to be done for the multi-owned and occupied Lyon Road zone which would be very complex</p>
<p>Gateway & Frontage. Potential to present a significant new approach for the borough and capitalise on the Wimbledon brand and address.</p>	<p>Decanting businesses. If an alternate site is achievable this is likely to be complex, costly and sensitive as the London Olympic Park and Emirates Stadium projects have shown. This will be very complex with a large number of individual property deals to be secured</p>
<p>Partnership. Public, private sector together in some form of development alliance.</p>	<p>Destroying significant value to create value. Significant costs of achieving a cleared site to develop again. This is not good regeneration practice.</p>

4.3.5 DEVELOPMENT ASSESSMENT

The development idea here is to deliver a major transformational project for Merton. The project would seek to develop significant housing, modern business space and additional retail and leisure uses. This would be a very complex project, foremost would be the concerns of existing businesses and their employees. We understand there are around 800 jobs on the estate. In addition with AVIVA, a major financial institution, owning the majority of the location this would present an opportunity through their consolidated ownership, financial strength and property expertise.

The long term vision is for a “new town” for Merton. This envisages a project of a series of strong urban blocks encompassing a mix of uses. The stadium as the catalyst would have a flexible location but early master planning work suggests the eastern end, adjacent to the River Wandle (and high voltage power lines) is most appropriate

The costs of securing vacant possession are likely to be very high for a project to be progressed in the short to medium term. So unless Aviva is willing to undertake a major redevelopment this is likely to be a long term opportunity when leases expire.

4.3.6 TEST OF FINANCIAL SCALE

Our very early test of the projects financial scale based on a notional master plan suggests that a stadium led mixed use development is viable in this location (based on AVIVA land only). These are order of magnitude estimates only.

- Project costs: £511 million
- Capital value: £609 million
- Profit: £97 million (19% profit on cost)

4.3.7 NET BENEFITS

- We understand there is currently strong officer and political support for a transformational regeneration project at this location and extending towards Colliers Wood.
- This would be a truly major project with major residential and economic development potential for the borough.
- Potential significant new residential development that allows the club to grow supporter base through those in the immediate vicinity
- Club might use the Morden Road playing fields a short distance to the west as a training ground and community coaching base
- Stadium project in this location should allow the club to generate strong income flows from a range of events, activities and uses in the stadium itself.

However unless a readily available site is available to accommodate the businesses and jobs, the club, might be seen as responsible for businesses closing and people losing their jobs. In turn this might well see a weakening in political support.

Figure 8 provides a summary of a notional development project in each location.

Figure 8: Notional Project overview

LOCATION	Location Review Criteria	Scale (estimated)	Risk areas	Strategic Concept Vision
Wimbledon Stadium	Strong score across all criteria. Accessibility relatively weak	Quantum: 400,000 ft ² + Capital Value: £184m Project Costs: £162m Profit: £22m (13.5% on cost)	Land owner (RCP/NAMA), Greyhound operation; Traffic congestion; Joint operations; Harsh existing environment; Flood plain issue; Retail ?	Private sector residential led; Improved connections, public spaces; strong urban block(s); Creative and innovative design response; stadium within community; well managed destination
Comment: Priority location for action, understandable, credible, sellable and deliverable project. Would help deliver a strong north/east gateway to Merton and a hub location in the Wandle Valley. Speed to market of residential should be fast and thus delivery of major regeneration project achieved. Would be complex but a creative/innovative design and developer vision should enable delivery.				
Morden Underground Depot	Strong score across all criteria, although weaker on land and property due to unique nature and operational needs	Quantum: 1.3m ft ² Capital Value: £405m Project Cost: £337.6m Profit: £69.2 million (20.2% on cost)	Land owner (single) TFL tube operation; Complex Engineering solution (high cost of raft/suspension); Construction, phasing; local community	A highly accessible, great value and quality London location. Morden urban extension; stadium block; residential, office, retail, leisure; Good value proposition. Like: Wembley City, Stratford City & Cricklewood, Shepherds Bush/White City, St Denis Paris, Telstra Dome Melbourne
Comment: Seeks to revitalise existing town centre, so urban design, highways work and linking into existing underground station required. Refresh Morden destination brand. However TFL operational needs, very high engineering costs and complexity mean this is currently not appropriate for a football stadium.				
Merton Industrial Estate	Strong score however existing ownership & occupation means cost of entry likely to be very high, difficult project to see with existing businesses and jobs so difficult to sell	Quantum: 2.0m ft ² Capital value: £609 m Project costs: £511 m Profit: £97 m (19% on cost)	Aviva and important part of their portfolio; Multiple land owner area very complex; Existing & viable uses; Vacant possession costs businesses & jobs; Decanting; lots of complex property deals	Merton “new town”; South Wimbledon Colliers Wood area; Public private partnership Strong stadium block. Like: Cricklewood, Wembley City, Stratford/Olympic Park
Comment: Potentially an exciting project in target regeneration zone of major scale. Costs and complexity very high at this time, potential for the longer term as vacant possession is secured with major institution in AVIVA helping to deliver.				

5 CONCLUSIONS

All three shortlisted locations present possibilities for both AFC Wimbledon and Merton. After four years of very limited development activity, except for the strongest London locations, the **development cycle** is slowly starting. With negligible development over the last four to five years and population growth continuing to increase in Merton and London the need for development, especially homes to be built is pressing. These need to be well thought out neighbourhoods that connect into existing area, they need to have community building. This is what AFC Wimbledon would help to contribute to by returning home.

5.1 RECOMMENDATION

Investigations and consultations over a number of years by Colliers International, has identified the **Wimbledon Stadium** location as where a project can be delivered. This is where the ambitions of Merton, AFC Wimbledon and a developer investor can be achieved. This is almost certainly in some form of development and management partnership.

5.1.1 SPEED TO MARKET

Wimbledon Stadium is the location in the **short to medium term**, where a well thought out new residential neighbourhood to meet current and forecast population growth can be delivered.

This location is where “speed to market” of housing for Merton and London, plus a football stadium for AFC Wimbledon, along with supporting community, retail and leisure uses can be achieved. AFC Wimbledon has advanced rapidly since 2002. The current Kingsmeadow Stadium offers a difficult match day experience, limited revenue earning potential and limited potential to develop more community outreach programmes in their home borough.

At Wimbledon Stadium we believe

- The barriers to entry are relatively low and development should be able to commence soon
- The neighbourhood football stadium helps unlock the site and provides a community hub with a range of community, social and commercial amenities
- Planning gain and social/affordable housing requirement might be expected to be lower given the football stadium and its community components

- A football stadium through its design response might reduce flood issue, improving commercial potential elsewhere on the site
- With a clever and innovative design response, flood plain issues can be reduced and an attractive urban London neighbourhood can be delivered that will appeal to a large and growing market.
 - Singles, couples, small families and seniors seeking a good value London housing option (to buy or to rent) in a high quality master planned urban district with many transport, services and amenities either on site or close by.

LONGER TERM

Modern Underground Depot and Merton Industrial Estate both have merit for master plan led development for the borough. However we think both are some way off due to their complexity and costs of entry.

5.1.2 AFC WIMBLEDON AT WIMBLEDON STADIUM CAN

Regenerate for what has for a long time been a blighted part of the borough.

- Mobilise public and private investment and support, to introduce higher value land uses, **create value**, in an area in need of regeneration, and to generate a range of economic and social **benefits** for the local community. The latter will be critical.
- Deliver a new neighbourhood football stadium that is **enabled** by the required quantum of residential development. This will probably also include ancillary retail, leisure, some office space, a hotel and serviced accommodation.
- Deliver a **comprehensive master plan** for the Wimbledon Stadium site itself and the **wider area**. This would incorporate high quality and innovative design and attractive new public spaces and connections.
 - For example establishing an “**East Wimbledon**” neighbourhood that helps to **tie together** what is currently a fractured piece of Merton and South London. It should also seek to improve the local area traffic situation that is an important local issue; in particular the Durnsford Road, Gap Road and Plough Lane junction
 - Projects elsewhere in the UK and internationally show the potential contribution of a modern stadium development to **place-making**. For example, the Olympic Stadium was the buzzing heart of the Olympic Park during London 2012 and it will continue to anchor the legacy use of the site. The Emirates Stadium in Islington and smaller stadiums such as Orient’s Brisbane Road are indicative of the urban revitalisation that can be achieved.

- The project will play an important role in **economic development**. Apart from the jobs created at the football stadium itself, the development will generate a large volume of new leisure spending on match or event days, further supporting employment in the local area. On other days the football stadium is likely to act as a conference and meetings venue (generating higher value bed nights), small scale office space, leisure and community uses. These should complement an appealing mix of ancillary commercial uses on the wider site to create an active destination throughout the year.
- The project will require modern **active management** techniques especially on event days. As part of the locations master plan this should be mainstreamed and learn from best practice in the management and operation of similar “event districts” districts within urban locations in London, the UK and overseas. The management of event crowds in an urban context is now well understood, strategies and practical initiatives to minimise disturbance to residents will be required and these should be assembled soon.

5.1.3 COMMUNITY BUILDING

The club and football stadium should help anchor this new neighbourhood district, acting as a hub and alongside Merton initiatives, create and maintain a sense of community to support place making. AFC Wimbledon is a supporter-owned club with strong ties to the local area through their history, fan base and ownership structure. The Football Club’s vision is to redefine a community or neighbourhood stadium for Wimbledon. It will be a an **asset for people** of all ages and backgrounds, an important place in the social life of the community, a source of civic pride and identity, and a catalyst for investment, jobs and training opportunities.

Central to this is the **AFC Wimbledon brand**. This is potentially an important theme to be explored and developed that could help elevate this part of Merton and even drive market demand for the project. Community, collective, working together, enjoyment and being networked are all characteristics AFC Wimbledon has displayed over the last 11 years. These place brand characteristics might also help in refreshing the wider Wimbledon and Merton place brand in the coming years. This project can help to define the future of Wimbledon and Merton.

APPENDICIES

SUPPORTING INFORMATION

1 MERTON OVERVIEW

1.1 CORE STRATEGY

As part of its statutory requirement Merton prepared its *Core Strategy* document. This is a major part of the *Local Development Framework* that frames the longer term town planning and development strategy for the borough. The Core Strategy document and the Local Development framework being approved in early 2011 and adopted in summer 2011. This document also needs to conform to the London Plan (prepared by the Greater London Authority GLA) this was updated in 2011. In both documents Merton and the GLA has created a favourable planning environment that would help accommodate a stadium as part of a transformational project to supports its strategic objectives and economic development aspirations.

1.1.1 MERTON'S STRATEGIC OBJECTIVES

- Environmental leadership
- Social cohesion
- New homes & physical regeneration
- Strong & diverse long term economic growth
- Healthier and better place to live, work and visit
- Better connected borough
- High quality urban and suburban environment.

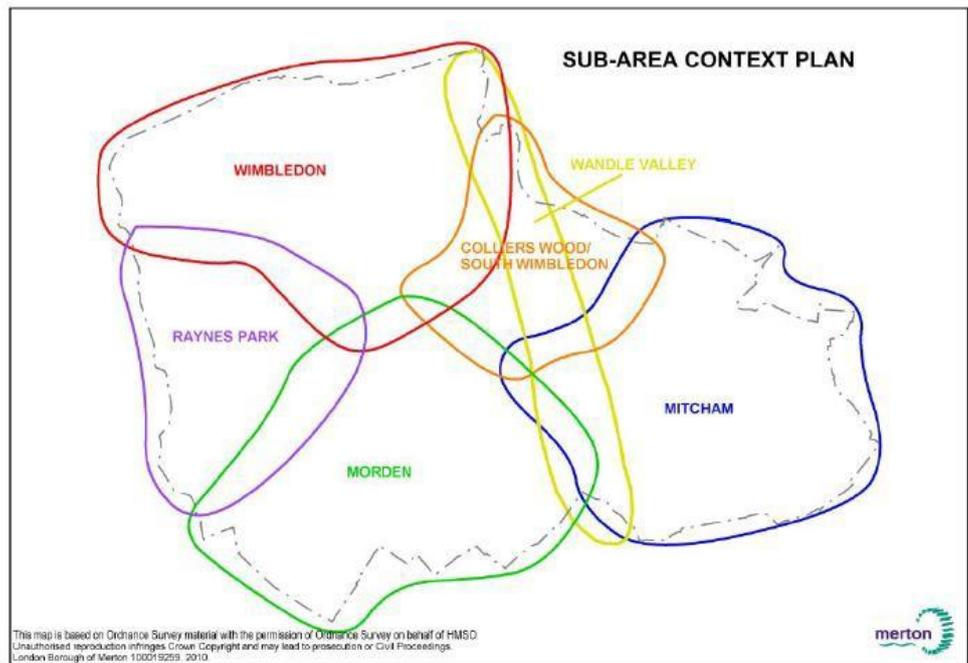
In particular Merton's Core Strategy outlines the South Wimbledon-Colliers Wood area and Morden as the two key areas for significant regeneration and development activity. The Wimbledon Stadium area within the Wandle Valley is also looked on favourably for regeneration. These areas are likely to be viewed positively by AFC Wimbledon and their supporters.

1.1.2 AFC WIMBLEDON SUPPORTERS LOBBY MERTON, FROM THE CORE STRATEGY

The largest response on any single issue throughout all the Local Development Framework consultations came from supporters of AFC Wimbledon wanting a football stadium or a multi-purpose sports complex with new community facilities within the borough. They identified the site of Wimbledon Greyhound Stadium as their choice of location. This is located

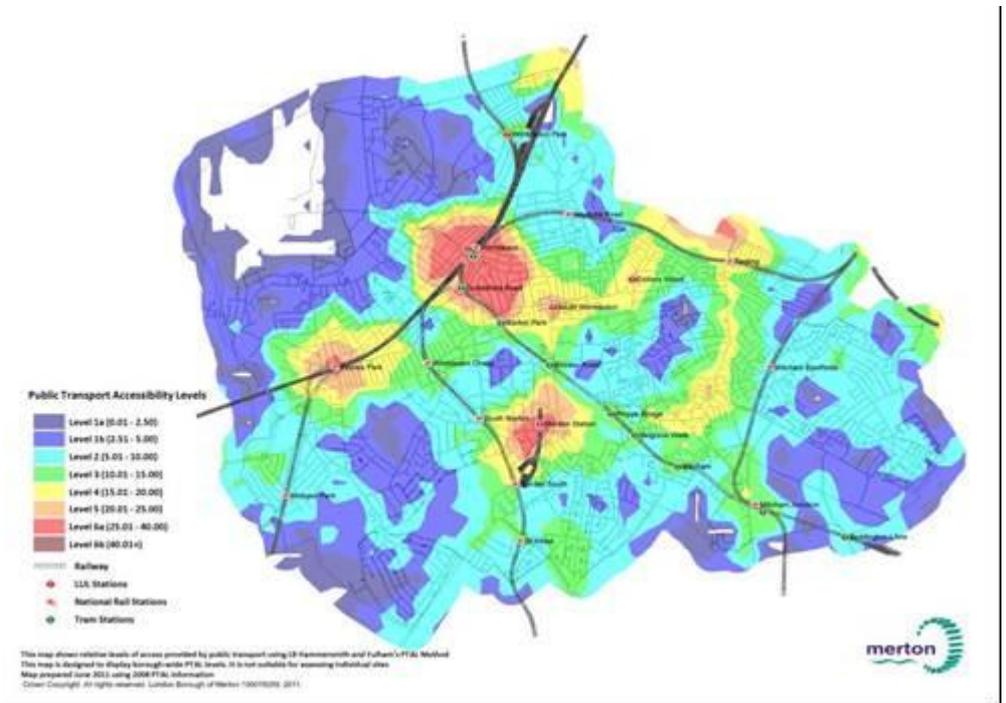
within a functional flood plain therefore the site is restricted in the range of uses it can offer, in accordance with PPS25 and Chapter 24 'Flood Risk Management - Policy 16'. Building on our legacy in sport, we support the provision of a sports stadium within the borough.

Figure 9: Districts within Merton



The Wandle Valley, including Wimbledon Stadium and South Wimbledon-Colliers Wood area is seen as crucial to the revitalisation of the borough and its ability to accommodate the current and forecast population growth of London. Morden has also been identified as a major target for regeneration.

Figure 10: Wimbledon & Morden both have excellent public transport accessibility



Wimbledon Stadium has the weakest public transport, as measured by the PTAL rating. Rail and underground stations are about 10 to 15/20 minutes' walk. This is seen as a positive for sports stadiums as crowds can be dispersed in a more managed approach and spending captured by local businesses.

Figure 11: Wimbledon sub area

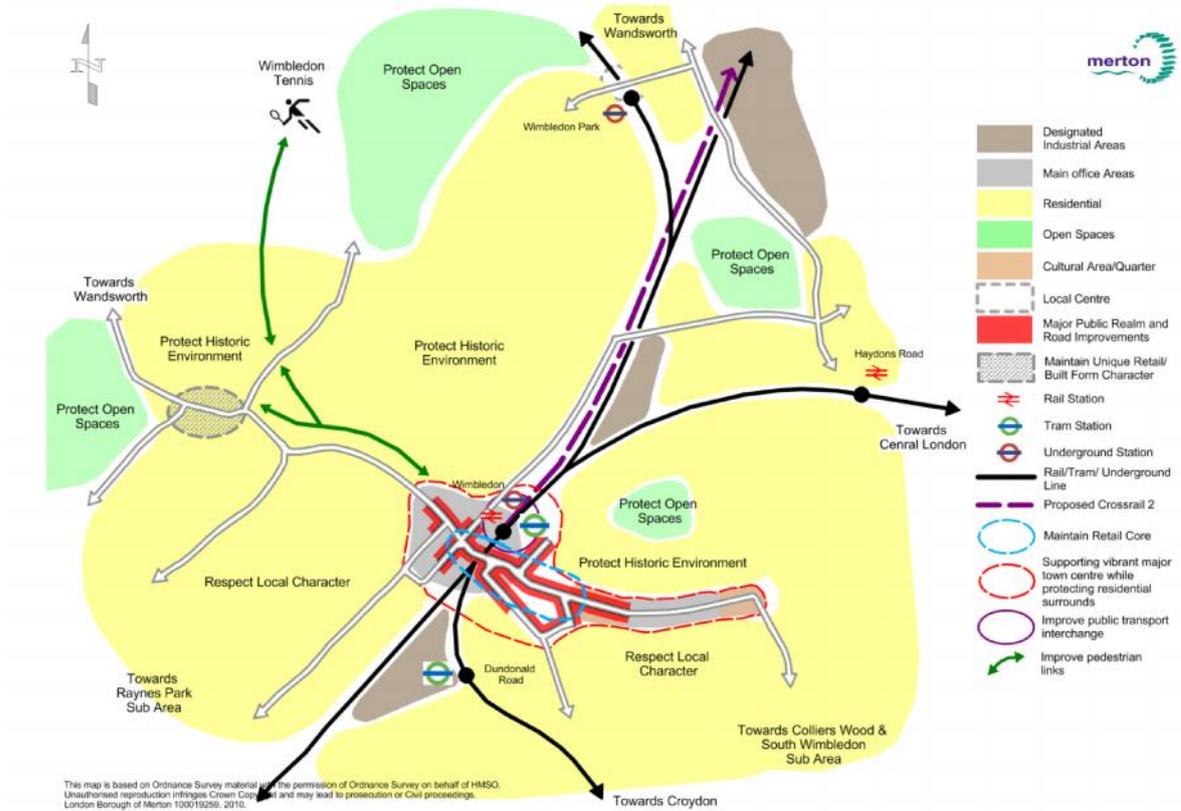


Figure 12: South Wimbledon-Colliers Wood sub area from Merton's Core Strategy

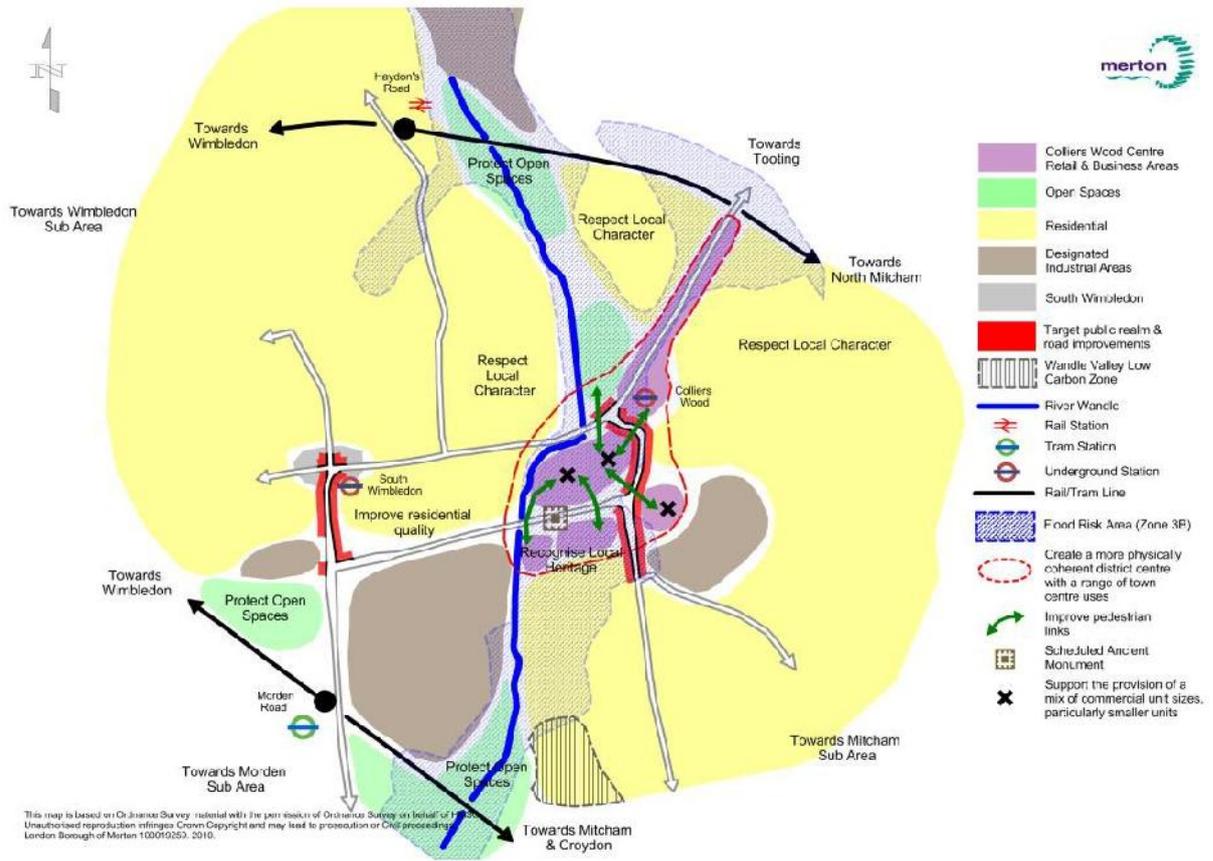
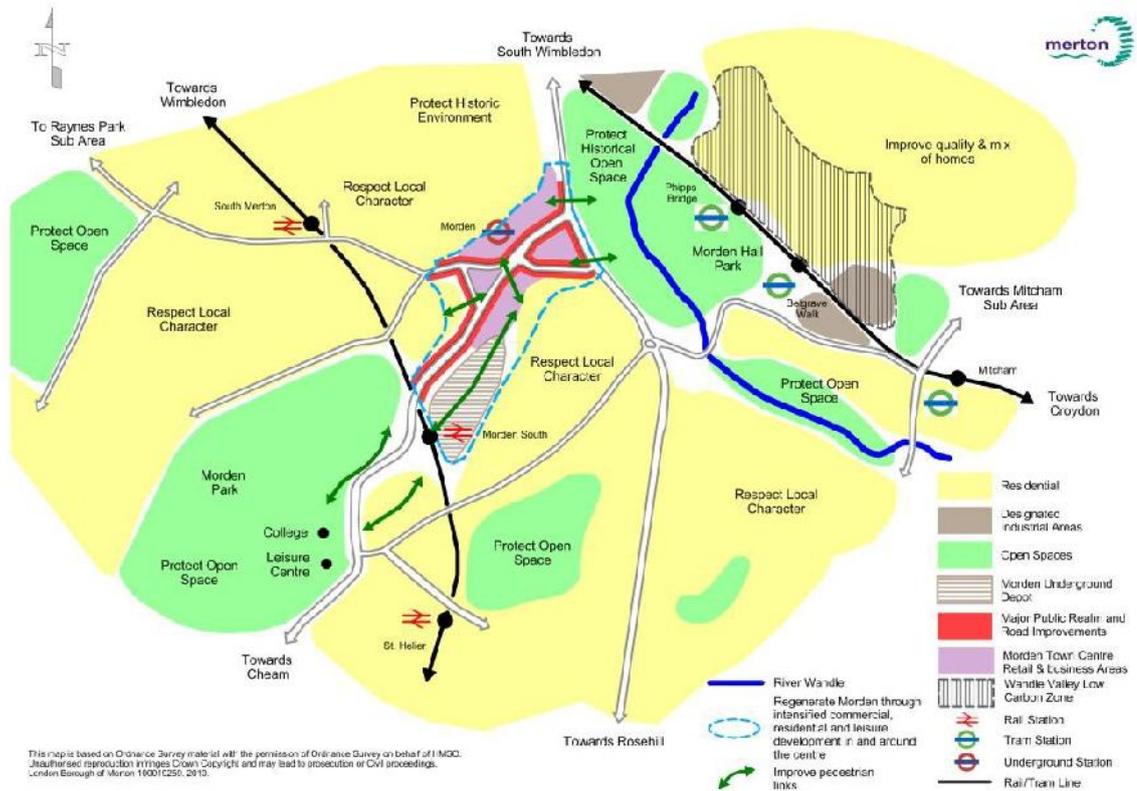


Figure 13: Morden sub area from Merton's Core Strategy



1.2 MERTON PROPERTY OVERVIEW

The following tables provide a summary of the property context within the Merton area in terms of potential property sectors and uses that might form part of a stadium led mixed use district.

Figure 14: Property overview in Merton and potential as part of a stadium led mixed use project

Use	Description	Strength	Weaknesses	Potential
HOTEL	A mid to upper market hotel. Within or adjacent to stadium.	Income from event-day hospitality and non- event day conference and meetings; Track record elsewhere; Merton has a gap	Competition from other SW London hotels and conference venues; Relatively complex property needs	Good
Comment	<i>Probably strongest potential for mid to upper market brand, operators understood to have requirements in Wimbledon.</i>			
OFFICE	Business space for small occupiers, local sole traders; Serviced office centre (i.e. Regus) for surrounding industrial businesses incubation centre. A big local user (council, back office from St Georges/St Helier hospital)	Potential revenue stream; Does not require prime pitch or heavy footfall location; Different use time compared to majority of event days; Space for “one man/lady bands” in professional services sector. Flexible informal base to work and meet	Challenge of configuring office space floor plates within a stadium development; Demand in this location? Some stadium developments have struggled to fill office space e.g. Southampton	Average to medium
Comment	<i>Possible to include in stadium structure, consider possible pre-let to large local user such as health sector to free up space on existing hospital sites. Serviced business centre type facility could be a good fit as would incubator and local small business/ sole trader sectors</i>			
Retail	Small cluster of convenience and comparison retailers to create a local daily shopping destination.	Revenue stream; Drive footfall on non-event days Create activity and strong frontage	Planning consent?; Demand on non-event days would be linked to wider development and regeneration of the area; property and operational needs	Good
Comment	<i>Outside of stadium structure but possible to help create an active frontage. Sainsburys Local, Tesco Metro and other daily shopping uses. Perhaps some form of focused retail offer in a well research niche sector</i>			

Use	Descriptio	Strengths	Weaknesses	Potential
Food & beverage	Cafes, bars and restaurants to create a destination on event days and non-event days.	Revenue stream; Good fit with stadium as major leisure anchor; Drive footfall, extend dwell times	Demand on non-event days would be linked to wider development and regeneration of the area	Good
Comment	<i>Inside and outside stadium structure to help create activity. Mid market positioning, would it be Pizza Express or Pizza Hut? Probably chain F&B</i>			
Private residential	Apartments for sale or rent.	The highest value use; Create a balanced community of people living around the stadium Create activity and public policing	Planning consent?; Negative perceptions of exclusivity do not fit with a community stadium	Good
Social/ affordable residential	Housing for key workers or low income groups.	Planning/ political support; Create a balanced community of people living around the stadium Create activity and public policing	Lower values than private residential;	Average to Good
Serviced apartments	Long stay apartment lets for corporate London market. International workers being based in London on contracts	Creates a new stadium community; Users for other aspects of stadium Managed by hotel operator; Attractive values	Needs strong and efficient management	Good
Student accommodation	High density accommodation for students	A successful emerging use-type in London Create vibrancy and footfall throughout the day		Average to Good
Comment	<i>Outside stadium structure, perhaps in stadium corners or immediate stadium block/precinct, generates users for other facilities in stadium block. Recent projects at Wembley, Emirates, Orient show successful housing projects close to stadiums in the London area work. More planned at Tottenham, Brentford, Stratford & Millwall. Quantum and typology likely to depend on location.</i>			

Use	Description	Strengths	Weaknesses	Potential
Healthcare	Primary Care Trust or other ambulatory care facility or healthy living centre. Possibly a sports medicine centre. Other private healthcare uses/operators	Unlock public funding streams; Embed the stadium within the community Track record of private operators in stadium space Driver of footfall; Link in with St Georges	Opportunity costs of using space potentially below commercial rents; Potential for conflicts with other uses Challenge of configuring a sizeable, attractive education facility within a stadium	Good
Comment	<i>Inside stadium structure, discuss with St Georges, St Helier and others in the public sector. Are there private healthcare providers for certain medical facilities, treatments (elective, MRI, CT scanners etc.)</i>			
Private health and fitness	Branded private gym and health centre (e.g. physiotherapy, rehabilitation, counseling)	Good fit with sports and fitness theme Potential revenue stream; Does not require prime pitch; Drive footfall during the day	Not a strong anchor user Complex property use Lots of M&E; Lots of representation in already in Merton	Average to Good
Comment	<i>High local provision but review if part of a major new residential led project</i>			
Education	Primary school, nursery, crèche or adult education centre. Part of South Thames College Wimbledon College of Arts	Unlock public funding streams Embed the stadium within the community Relatively simple property use/requirements Driver of footfall	Opportunity costs of using space potentially below commercial rents; Potential for conflicts with other uses Challenge of configuring a sizeable, attractive education facility within a stadium	Average to Good
Comment	<i>Inside stadium structure, track record of lifelong learning elsewhere. Investigate potential of including a primary school in stadium structure if part of major new residential led project and identified local need as would help to generate footfall in mornings and afternoons to benefit other commercial components?</i>			

Use	Description	Strengths	Weaknesses	Potential
Multi-purpose community facility	Flexible facility for meetings, events, socialising and hire by local community groups. Could include a performance space for studio and workshop dance, theatre etc.	Embed the stadium within the community. Does not require prime pitch. A relatively small space requirement Simple property use/requirements Driver of footfall	Opportunity costs of using space below commercial rents; Require revenue support?	Good
Comment	<i>Inside stadium structure, track record elsewhere, keep as flexible as possible. Free up site in central Wimbledon</i>			
Commercial Leisure	Bowling, casino, nightclub, cinema and similar Children's play centre, edutainment type concept,	Potential fit into stadium voids for nightclub and bowling Help maintain activity, attract and retain supporters before and after matches	Need to understand business model Cinema offer strong in town centre Clash against core operation	Good
Comment:	<i>Stadium voids might provide space, market test potential commercial operators, track record elsewhere, market test potential operators</i>			
Conference and exhibition	Large flexible space for a range of functions and activities; doubles as match day entertainment venue	Good fit with stadium infrastructure (F&B), access, adds to interest; Is there a sector to focus on? Likely to be demand in this part of London; Link to hotel strong; Relatively simple property use/requirements	Need for strong and focused management as part of stadium operation	Good
Comment:	<i>Inside stadium structure, track record elsewhere, understand what Merton wants and potential hotel operator linkages</i>			



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London's historic fire stations

EH and LFB Joint Guidance
March 2010



ENGLISH HERITAGE



LONDON FIRE BRIGADE

FOREWORD

London Fire Brigade has been serving the capital for more than a century and in this time our city has changed almost beyond recognition. Alongside fighting fires, we now need to prepare for and deal with a wide range of incidents, from the threat posed by terrorism, to transport crashes and other major civil incidents like flooding. Fire stations play a huge role in allowing us to keep Londoners safe.

Our stations now need to allow for a more diverse workforce, as well as more advanced equipment and vehicles. As fire prevention and community safety are now a core part of our business, our stations must also provide space for firefighters to meet local people and pass on important advice.

Whilst our stations must develop at the same pace as our services, we recognise that it is also vital that we protect and preserve some of our older buildings and their heritage. These historical sites form a major part of our past and are something we are immensely proud of. It's a delicate balance to strike but we hope that our buildings reflect our heritage of public service and at the same time remain fit for purpose.

We welcome the publication of this guidance note and hope that by working closely with English Heritage and the conservation officers across London our fire stations are protected so that they can be appreciated by future generations.

Councillor Brian Coleman AM, FRSA
Chairman of London Fire and Emergency Planning Authority

LONDON FIRE BRIGADE

Ron Dobson QFSM, MIFireE
Commissioner, London Fire and Emergency Planning Authority

LONDON FIRE BRIGADE

The character and appearance of London has been shaped by many factors over time. One of the most significant has been the threat of fire and the early building codes established to minimise that threat have resulted in the familiar materials and valued scale that still survives in many parts of the capital. The emergence of an organised fire service in the nineteenth century has resulted in a proud legacy of civic structures that often combine architectural elegance with functional efficiency. These buildings are usually instantly recognisable and highly cherished by the communities they serve and their architectural and historic interest has been nationally recognised by designating many of them as listed buildings.

The history of the service and its buildings has been a story of constant change as the complexities of the city have evolved. New equipment, new ways of working and new responsibilities mean that fire stations are subject to constant pressure for adaptation. Often built to meet the particular requirements of their time, adaptation of fire stations presents challenges, but if they are to continue to be in effective use there has to be recognition that change is necessary. English Heritage believes that successful change in these circumstances can only be achieved through understanding the significance of the legacy.

We are pleased to have had the opportunity to work with the Fire Service on this guidance. It is intended to help in formulating and deciding upon proposals for adaptation or change. There is no single solution that is appropriate for the range of different buildings across London, but there is a consistent approach that can be applied; one which relies on informed understanding. This joint guidance is provided by the Fire Service and English Heritage to help that process and ensure that these important and familiar features of London can continue to contribute positively to their communities by successfully accommodating a vital public service but also by continuing to contribute to the diverse character of the city.

Dr Nigel Barker
Head of Regional Partnerships, London Region

ENGLISH HERITAGE

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Top image: The firemen of High Barnet, in an image taken in 1922, with a 'new-fangled' motorised appliance.

Other images: Firefighters of the London Fire Brigade undertaking training exercises at Barking and Forest Hill.

I INTRODUCTION

This management guidance is intended to aid local authorities in the assessment of applications for alterations to historic fire stations whether they are listed, or unlisted and within conservation areas. By understanding what is important about these buildings, and understanding the unique requirements of the London Fire Brigade (LFB), it should be possible to successfully plan future changes that manage the delicate balance between conservation and service provision.

Whilst providing an effective fire and rescue service is an essential part of LFB's work, Listed Building Consent should be adhered to but should not cause significant restrictions to any building.

As the pressures and obligations of the service evolve, so the Brigade's buildings need to evolve with them. The purpose of this document is to enable the LFB and Local Planning Authorities to understand better the opportunities and constraints of these historic buildings, thereby enabling the process of building adaptation.

2 THE SIGNIFICANCE OF HISTORIC FIRE STATIONS

To understand significance one must understand the buildings and their history. This section considers the historical development of the London Fire Brigade, focusing on architecture and service provision in order to understand what is special about these buildings.

2.1 HISTORICAL DEVELOPMENT

The construction of fire stations has historically followed a 'boom and bust' pattern, which is intrinsically tied into politics, economics and technological advancement.

Fire protection was originally organised by private insurance companies, with the first publicly funded fire service coming into existence in 1866 following an act of parliament. This was the Metropolitan Fire Brigade (MFB) and was led by Captain Eyre Massey Shaw. His political will resulted in a building boom which got into full swing by the late 1870s and continued into the 1880s. The MFB's buildings came under the Metropolitan Board of Works (MBW) and their architects, most notably Robert Pearsall, were responsible for the rich Gothic style that identified Victorian municipal buildings. None of these fire stations remains in active use by today's Brigade. After the London County Council (LCC) replaced the MBW in 1889, a decade followed where few new fire stations were built, although some large projects were completed, and a number of enlargements and adaptations were undertaken.

Another boom began at the turn of the century, with the appointment of a number of fine architects to the fire brigade branch of the LCC architects department, which designed some of the most unique and creative buildings, including Euston Road, West Hampstead and East Greenwich (all built 1901).

This boom was still underway when the concept of mechanised appliances was introduced. The first station to provide only mechanised appliances was the former Wapping station at Red Lion Street in 1905. After this, a new wave of rebuild and alteration began to bring stations up to standard.

This continued for a decade, although later stations from this time tend to follow more standardised patterns. The last horse drawn escape turned-out in November 1921, after which the use of horsed escapes and pumps ended and mechanisation was fully adopted.

The outbreak of the First World War stopped the building programme. The first inter war station was Peckham in 1925 – a very sober and functional structure. A mere six stations (including the very grand Lambeth HQ) were built in the 1920s and 1930s, and a further six in the 1960s.

In 1965 the LCC was replaced with the Greater London Council (GLC), and the Greater London area expanded. This meant former county stations now came under the LFB's remit, and a heritage of new stations was bequeathed. Many of these are Edwardian stations, although a large number were 1930s, with more from the 1950s and 1960s.

7 The Albert Embankment HQ, 1937, by E.P. Wheeler for the LCC, with the Lambeth River Station in the foreground. (This has since been replaced with a new river station.) The building is Grade II listed, but is no longer used as the administrative headquarters. An active fire station remains on the ground floor. The practice tower seen on the left is separately listed.

8 An undated image showing the stables at Knightsbridge fire station,

1907 by LCC architects. The doors on the left led directly through to the appliance bay to keep 'turn-out' time to a minimum. This fire station remains in active use although the horses and stabling are long since departed.

9 The interior of the engine room at Westminster fire station, 1901 by LCC architects, with an appliance facing the doors ready for action. This station remains in active use. 8 and 9 both show characteristic white glazed brick tiles.

A slower pace of growth continued through the 1970s, replacing outdated stations. Responsibility for this work was taken over by the London Fire and Civil Defence Authority (LFCDA) in 1986, an authority that was again replaced by the London Fire and Emergency Planning Authority (LFEPA) under the Greater London Authority (GLA) post 2000.

2.2 PLAN FORM, LAYOUT AND FUNCTION

The design, style and plan-form of stations varies hugely, with unique station designs such as those at Belsize or Kensington. Some stations, such as Tooting or Waterloo (de-commissioned) follow a more standardised plan, but even these can still vary greatly from one another:

Some spatial relationships are however standardised, and form part of the intrinsic character of the fire station. The best example of this is the large open space of the 'appliance bays' (the main room on the ground floor where the fire engines, known as 'appliances' are kept). This space is usually adjoined by the watch room (the room where the communications equipment is kept and the nerve centre of any fire station). Separate entrances to the upper floors often adjoin the watch room, so one staffed room can control security for the separate parts of the building.

The appliance bays historically were organised with 'returns' so that appliances could be driven out of the main doors and brought in from a separate entrance, back through the yard and into the bays (the reason for this was that horses could not be reversed).

However, post-mechanisation, 'returns' were often either infilled, amended or the land was sold off. Physical evidence of this historic adaptation can often be seen, and the subsequent reordering of the station understood. Most stations retained access from the appliance bay to the rear yard.

The ground floor would have accommodated stables for horses, sometimes within a section of the appliance bay (such as at Euston or Knightsbridge,) and sometimes as separate buildings within the yard (such as at Fulham).

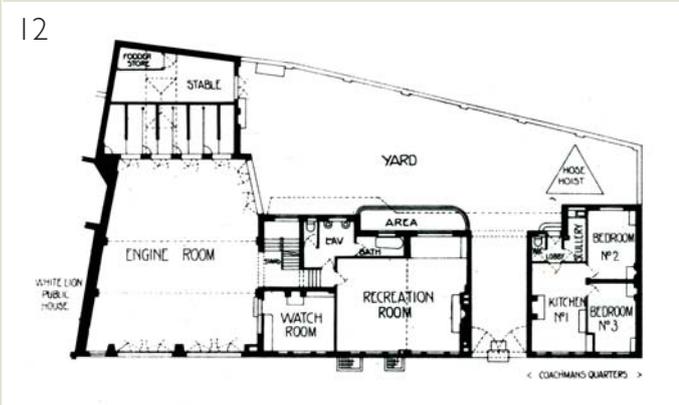


The yard would always have contained a range of outbuildings, for the store of fuel, feed and supplies integral to service provision. In some stations a workshop, often over two stories, would be incorporated. These have in many cases been cleared to provide parking spaces or to enlarge the yard, although some survive in whole or in part.

Separate firefighters' cottages within the yard were also once a common feature, although few survive and none are in use.

Drill towers are a common feature, especially in Victorian stations. They were historically used as practice towers and as hose hoists to dry out the old-fashioned hoses. Often these are described in historic documentation as 'watch towers', although it is widely believed that this is an inaccuracy and was an honorary title only. Hose hoists can sometimes be seen as separate pulley-and-hook systems either on the external faces of buildings, or within the stairwells.

A well known element of the fire station is the pole. These were introduced after 1904 following an LCC 'fact finding' trip to the New York Fire Department. They subsequently became a feature in every station. They would commonly run a floor at a time from the very top floor of the building down to the appliance bay. In larger stations there may have been two or three poles arriving on the ground floor.



The pole is still used by today's firefighters although the older pole houses are no longer in operation as they fall below modern safety requirements. Whilst some stations have seen them removed, remnants can often be located, such as the opening in the ceiling, the joinery details that once formed the closet in which they were housed, or even the ceiling brackets, which often survive in situ. The associated joinery is commonly of a good quality, and often features characteristic detailing or lettering, such as at Westminster station or the Lambeth station part of former Brigade headquarters.

Most stations feature a mess room or recreation room, which will often be fitted out with a good quality fireplace and over-mantle or timber panelling, and could be located on the ground or first floor. The first of these spaces will usually adjoin a kitchen, with larger stations often having more than one of these spaces. The second mess room would commonly be a billiards room. Built-in benches and storage for billiard cues can sometimes still be found, for example at Knightsbridge or Belsize.

Upper floors were originally laid out as residential accommodation for staff, with a mix of cubicles and flats of varying sizes. Communal facilities such as laundry rooms and washing facilities were also a common feature.

Many stations, particularly those from circa 1900 onwards, are organised with balcony access to the rear, allowing separate entrances for flats located above the station and originally designed for use by station staff.

10 Former fire station in Tranquil Vale, Blackheath, 1871 by the MBW under superintending architect Alfred Mott. This building shows that the style of earlier stations was far more industrial than the LCC stations. This building survives, de-commissioned.

11 Lee Green fire station of 1905 by LCC architects, the first station built for motorised appliances. This building is characteristic of the standard house-style of the LCC, with red brick and Portland

stone dressings. This fire station remains in active use.

12 Floorplan of the former Vauxhall fire station, built 1902 by LCC architects. This building was de-commissioned and demolished. The 'return' (gated entrance to the yard) was once a common feature used to bring horses through, as they were stabled facing towards the engine room doors. 'Returns' and stables have long since gone, but the centralised watch room remains a feature of fire station design.

2.3 ARCHITECTURAL STYLE

The architectural language used to express the fire station has been through a number of changes of fashion. Stations of the 1860s and 1870s are plain with flat façades and simple roof profiles. They have the appearance of the cart shed or, if larger, the warehouse. None of these remains in use, although examples may be seen in Renfrew Road, SE11 or Clapham Green.

Later Victorian stations, from about 1880 onwards, become much bigger and more decorative. The former stations at Manchester Square or Bethnal Green demonstrate this very well. The only station from this time that remains operational is Fulham, built 1895-6 and still dominating the streetscape today.

After 1900, and under the LCC architects department, a revolution in fire station design began. The former station at Redcross Street, EC1 used the designs successfully applied by the LCC to large scale housing projects. This was an expression of British design and civic pride, intended as the development of a new architectural style. Form and material were of critical importance, hence the instantly recognisable 'brand' of London's early 20th century civic buildings. It is from this period, 1900 to 1916, that the vast majority of today's operational historic fire stations date, and whilst materials and details are formulaically repeated, the architectural style of fire stations of this time varies considerably.

The deployment of architectural detailing ranging from Classical and Queen Anne through to Arts and Crafts can be seen producing stations that resemble suburban mansions. The crucial emphasis seems to be designing for the location – hence Cannon Street station of 1906 had a façade like a city bank, whilst Belsize of 1916 emulates the artists' studios of its neighbourhood.

2.4 MATERIALS

Fire stations are characterised by plain, robust and functional elevations.

The appearance of the street frontage, and often also of the return elevations of a fire station are without

13 Characteristic brown glazed brick tiles in the stairwell of West Hampstead fire station of 1901 by W.A. Scott. Also the black banisters and the arched-headed opening on the left are typical details that can be seen repeated throughout the LCC's pre-war fire stations. This station remains in active use.

14 The repeated use of the same materials is evident here at the Westminster fire station, 1901

by LCC architects, where banded Portland stone and red brickwork sit between red brick pilasters over a Portland stone ground floor treatment. The timber window surrounds are unusually painted green here. Also note the attractively applied individual bronzed lettering, another typical detail seen at many active and former fire stations.

exception a considered and balanced design. Red brick and Portland stone dressings are the typical elevational materials, although this does vary with some of the more exceptional designs. Ground floor treatment externally is almost exclusively banded or rusticated Portland stone. Many original appliance bay doors have been replaced in modern materials and with self-opening mechanisms, to benefit turn-out times.

Within the appliance bays, original sets and ironstone floors have been systematically replaced with modern, cream coloured, non-slip tiles.

Original internal wall coverings traditionally feature glazed brick tiles. These are practicable, functional and characteristic of the use, history and design intentions of the Brigade historically. For reason of their practicality, these usually survive.

Staircases tend to be plain concrete with very simple black handrails, fitting into the robust and functional character of the buildings.

A commonly used device for internal walls was the part-glazed timber screen. These are often seen between the watch room and the appliance bay, and in other locations where internal light or views were of importance. These screens are characteristic and of interest, although they have often been left as remnants as the operational use of the buildings has changed.

A feature once standard was the fire lamp, appended to the outside of the building, or positioned on a stone gate or railing pier. These have fallen from use, and therefore they are becoming rarer.

2.5 SUMMARY OF SIGNIFICANCE

As adaptations to historic fire stations have often been made in an honest and robust fashion, stations are commonly rich in physical evidence that demonstrates the former function of their spaces. Blocked in doorways, fragments of stable fittings and pole-drops, remnants of former layouts and redundant features such as communal washing facilities often



survive. These yield evidence of the history of the Brigade and the building. This evidence has value and future adaptations should respect, retain and add to this historic development.

The extant stations have value in the information they can provide by association. The pattern and spread of their locations across the city, and the size of certain stations in certain places, can tell the story of where there was a greater or lesser need for stations historically, and how London has grown and changed.

Also, the pomp and pride expressed in the historic design of fire stations has value, as it enshrines the ambition, design sensibilities and drive of both the Brigade and its architects. The evolution in architectural design of fire stations correlates to the changes in the governing bodies responsible for delivering their architecture – from the Victorian ambition of the MBW to the confidence of the Edwardian LCC and the functionalism of the 20th century GLC, LFCDA and now LFEPA.

Architectural and artistic expression adds a great deal of significance. The designs of stations are often exuberant and stylized. As both an historical document and an artistic expression they have value on an individual basis, as a thematic building type, and as part of the streetscape and townscape into which they are individually built.

It is clear that fire stations are often highly tailored design solutions that respond to their localities, exploiting plan form and materials to create a contextual link to different areas and locations.

Station interiors are generally rather plain, although this is considered part of their robust and functional character. The contrast between plain interiors and some of the more decorative exteriors, such as Brixton or Euston, has significance in its own right.

The Brigade's unique civic capacity means that historic station buildings often play an important role in a community's shared memory. Collective local experience and memory add an additional layer of significance to these buildings.

3 CONSTRAINTS

The evolution of service provision has been rendering stations obsolete since the earliest days of the Brigade. This is not a new phenomenon. From the Brigade's oldest active station, Clerkenwell, through to those that are relatively recently built, the changing requirements of service provision can exceed the capacity of historic buildings.

The preferred use of stations has changed over time. Prior to the introduction in 1920 of the non-residential shift system, firefighters usually lived full-time in the upper floors of the station. Stations were therefore constructed with self-contained flats for married firefighters, and in addition, cubicles for single firefighters. These cubicles were subsequently cleared in preference of dormitories, which in turn needed to be adapted to accommodate increasing numbers of female firefighters.

Because of these histories, upper floors tend to contain a mixture of large dormitory rooms or small cubicles for single firefighters, and in addition, self-contained flats varying in size but commonly containing small compartmentalised spaces – usually accessed from rear balconies and/or by a single common staircase. Accommodation above second floor level is usually of little or no use operationally given the remoteness from the operational areas on the ground floor of the station.

In some larger stations grand apartments can be found. The fourth floor at Euston fire station in Euston Road demonstrates this. These heavily compartmentalised spaces do not often lend themselves easily to alternative uses, which is a problem that has faced the Brigade since the 1930s.

The former flats have often been given over to office accommodation and in many cases have been significantly amended. This has led to awkward layouts, redundant spaces and inoperable floor plans. In two stations,

Knightsbridge and Euston, some parts of the upper floors have successfully been separated into private flats. Whilst this can work well, it does depend upon separate access and circulation, which has not been achievable in other operational stations.

Often incremental growth of a station, such as at Clerkenwell or Southwark, means the layout of spaces can become irregular or illogical, and can cause certain parts of the building to either be very over crowded, or under used.

The Brigade went through a transition in the early part of the 20th century from horse-drawn to mechanised appliances. All stations designed prior to 1921 were originally intended to accommodate horses. Remnants of this tradition, in plan-form, materials and details, remain as redundant features in many stations today.

The development of motorised appliances has led to an increase in their size. Historic stations were not expected to accommodate such large appliances, and as such, the appliance bay doors are frequently too small. Internally, the bays are often insufficiently wide, with structural piers causing obstacles to the safe accommodation of modern appliances. Additionally, the limited size of bays causes problems with health and safety requirements for working spaces around appliances, and space for proper manual handling procedures.

MEETING THE NEEDS OF MODERN FIRE BRIGADE SERVICES

Common problems arising are:

- Doors and structural bays constrain the width and operation of appliances. In many cases doors and even door-openings have been altered historically. If this is the case, further alterations that are designed within the spirit of the building may be acceptable.
- Doors, entranceways and passing traffic restrict the reversing in of vehicles. Although highway configuration is not strictly an historic buildings matter, this issue is of vital importance to the Brigade. The inability to adapt historic buildings necessitates the continued operation of difficult and dangerous ingress and egress points for appliances and other vehicles.
- Ground floor stores – modern stations need a number of stores and wash-down facilities to be located directly adjacent to the appliance bays, which is often not possible in constrained historic buildings. These include gear rooms, drying rooms, specialist

15 The practice tower at West Hampstead fire station, 1901 by W.A. Scott. The roughcast render and red bricks tie in with the architectural treatment of the whole building, although the tower's copper roof structure stands out, giving this otherwise very discrete building

a distinctive landmark. The practice tower is currently unused as it is restrictively narrow and located on the edge of this tightly hemmed-in site.

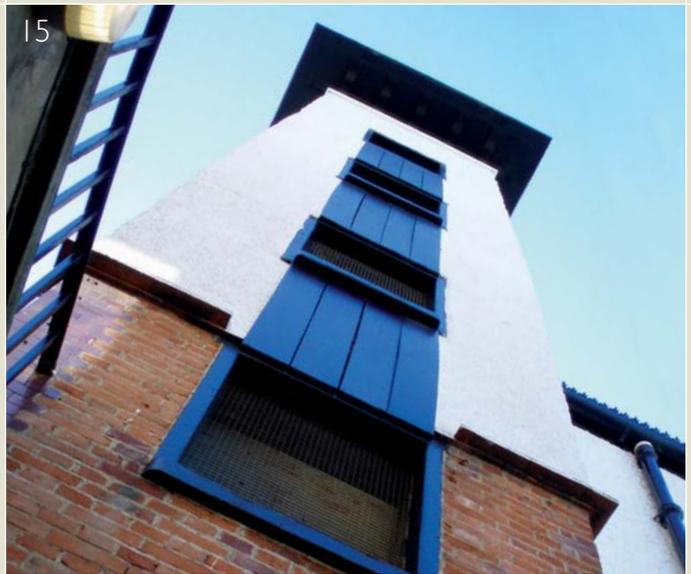
16 A modern firefighter undertaking a practice exercise at Barking fire station.

equipment stores for resilience units, sandbag stores and breathing apparatus rooms. Incorporating these as close as possible to the appliance bay should be a priority. Listed building consent practice would normally place retention of historic plan form in precedence over the incorporation of these needs; however, flexibility should be applied.

- Circulation – buildings that have been significantly altered are often impractical in terms of circulation and use. Rationalisation of circulation could be considered in relation to other organisational restructuring, but should be sympathetic to the original plan form of the building where possible.

At some stations with balcony access to the rear, a glazed atrium has been considered to improve internal circulation and create additional internal space at ground level. Proposals for these should be individually assessed, but not dismissed out of hand, as in some locations this could be a logical and successful modern intervention. At Westminster, the balconies have been glazed in. Whilst the handling of this is not, in this instance, sympathetic to the historic building, the principle could work well as a modern lightweight intervention.

- Training facilities – training rooms and yards for physical training are commonly insufficient in terms of space. The use of space in a flexible manner should be considered.
- Accommodation space – layouts of historic buildings can cause constraints to person and office accommodation. Creative solutions should be sought and encouraged.
- Signage is an important and necessary factor for an operational fire station. When applying new signage and graphic to stations of historic interest, it will be necessary to consider the most appropriate way to clearly display new signs without compromising the building's setting or sacrificing any historic signage that may be of significance. Even where it is redundant, historic signage normally contributes to an historic building, and should be retained. Whilst new signage will be of a consistent design, signage strategies



(positioning, location etc.) for each historic station will need to be considered carefully on a case by case basis. Local authorities should help applicants to identify suitable solutions that deliver the wayfinding needs with the least harm.

- Out dated towers and hose hoists that have become redundant require maintenance but have no function or benefit. These are highly characteristic details of historic stations and normally should be retained.
- The Brigade is committed to green issues and sustainability. Applications for energy saving features such as secondary glazing, solar panels, micro-generation and wind turbines will be increasingly submitted. General support of the principle of cutting carbon emissions would be expected, and local authorities should help applicants to identify solutions that deliver climate change mitigation with the least harm to the significance of the heritage asset and its setting.

As each station is organised differently, and each station raises different issues, therefore each of the points above will require sensitive, flexible and creative design solutions on a case by case basis.



17



18



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Belsize fire station, Lancaster Grove, 1914-15 by C.C. Winmill. This building abounds with unusual detail, making it one of the most intact and interesting of all of the LCC fire stations. This fire station remains in active use.

17 The appliance bay front with tall dormer windows above that relate the building to its architectural context.

18 A tiled overmantle panel to the chimney breast of the recreation room.

19 Disused halter pegs, originally used to hang harnesses in the appliance bays. These commonly survive as they are unobtrusive and handy to hang ladders and other equipment from.

20 Hand painted individual lettering demarks a run of pegs in the kit room. This is a rare survival, as these details have mostly been replaced. Where items like this do survive, their retention adds to the character of the building, and should be preserved.

The Local Authority conservation officer and design team will need to work with the LFB to solve any potential conflict between historic conservation and operational necessity. They will need to apply flexibility and consider bespoke solutions to the needs of individual stations.

4 STATUTORY CONTROLS

As Heritage Assets, any statutorily listed buildings are protected by national legislation as laid out in Government Guidance PPS15, which means that works to alter them may require listed building consent.

The relevant sections from Part Three of this document relate to Listed Building Controls, and can be found here: <http://www.communities.gov.uk/publications/planningandbuilding/ppg15>

Local Authority Supplementary Planning Documents (SPD) on Listed Building Controls may have been adopted and therefore may apply to certain stations in certain boroughs; although SPDs are usually generic and not specifically written in relation to buildings that provide emergency services.

This building type and the particular issues of service provision may mean that it is necessary not to comply with local SPD policies. This must be considered on a case by case basis. Local Authorities should be prepared to consider circumstances where designs do not comply with SPD guidance.

5 WHAT SHOULD BE PROTECTED?

When planning or assessing proposed alterations to historic or listed fire stations, it is essential that their significance is understood, and that new work or adaptation preserves or enhances the special interest of the building.

This section discusses special interest, and considers how, in some common situations, steps may be taken to preserve this without compromising modernisation.

5.1 PLAN FORM

The plan form of stations is an important aspect of their significance. However, adapting stations to modern use would usually necessitate some alterations to plan form. A balance must, therefore, be struck.

The relationship of appliance bay, watch room, entrances and stores is of historic importance and presumption is in favour of retaining this form where possible. However, the majority of older stations have problems with the size of the appliance bay, and if modern requirements cannot be accommodated they can remain a hindrance to efficient operation and may need to be adapted. Additional accommodation or amendments may be successfully designed within this historic framework, for example the new public entrance at Kensington. The provision of the necessary ground floor stores should be given some priority, as discussed in section three.

The mess room, billiard room or other recreation spaces should be kept intact – subdivision of these spaces should be avoided where possible. Reuse of a mess room as a dormitory, locker room, training room or other use that keeps the open space intact should be considered.

In respect of upper floors, usually built as residential flats, there are often characteristic, if plain, details here – in particular fireplaces and built-in alcove cupboards. In reordering upper floors, consideration should be given where possible to the retention of these items, and efforts made to avoid compromising them.

These spaces have often accommodated alterations historically, and future alterations should be (where possible) designed in previously compromised spaces, leaving historically intact spaces as they are.

If major alteration is unavoidable, then the potential for one 'flat' to be kept within a station as an illustration of the historic layout should be explored. There may then be more flexibility with regard other spaces, although it should be noted that the solid masonry walls are likely to be load-bearing and difficult to move and such major intervention would require thorough justification.

5.2 REDUNDANT DETAILING

Where possible historic details that have fallen out of use should be retained as they have value and significance. Items such as halter pegs, hose hoist hooks, signage (be it external stone cut or bronze lettered station signage or rare survivals such as internal hand painted signage or numbering), poles and associated joinery, fireplaces etc. should be retained.

When it comes to larger redundant spaces, for instance the historic communal laundry facilities at Clerkenwell, their historic and illustrative values should be carefully considered. Where they cannot be brought back into use, they will need to be retained.

5.3 MATERIALS

The historic palette of materials for fire stations reinforces the functionality from which their character is derived. These materials should be respected, and modern interventions should respond to them e.g. glazed brick, non-slip tiles, timber and glass partitions, plain concrete stairs and corridors, plain black railings, timber doors and windows.

Materials should be retained wherever possible, or replaced on a like for like basis. New work should aim to use these materials if possible.

Alterations to main street elevations or prominent flanks are unlikely to be acceptable. Some stations which are of unique and unusual designs may well be impossible to extend. If this is the case the LFB has only two options – demolition and rebuild or the purchase of an alternative suitable site within the station's coverage area.

5.4 FUNCTIONALITY

Historically fire stations were constructed in a plain and functional manner, to be robust, working spaces. For this reason, services are commonly run across ceilings in appliance bays. This is a tangible part of the character of these spaces, and therefore new service routing should be allowed to follow this historic precedent.

This would not apply to 'higher end' areas such as mess rooms or formerly residential spaces.

6 DESIGNING FOR THE FUTURE OF AN HISTORIC FIRE STATION

6.1 FOR LONDON FIRE BRIGADE

First, the Brigade must consider whether they can continue to maintain an historic or listed station in active use. If constraints on the operations are excessive, it may be necessary to decommission the station and relocate. This has many associated problems: coverage patterns, land values, building costs etc., but once a station has reached the end of its active life, it falls to the LFB to identify this.

If it is decided that operations are to continue within an historic station, a review of the accommodation should be undertaken, identifying what plan form, materials and details are of significance.

The second step is to consider what operational constraints are being caused and where, in order to try and design out problems. The third step is to decide what different uses, functions or layouts are required.

A proposal for alterations should then be designed, avoiding areas or items of significance and maintaining the characteristic materials and architectural style of the individual station. Early consultation with the local authority and English Heritage should be sought.

Creative uses for upper floor spaces must be considered. As the presumption will always be in favour of retention rather than replacement, lower impact proposals should be put forward wherever possible.

Keeping an historic fire station in active use should not be dismissed as problematic – the stations have great significance and the historical association of continued use is a valuable asset. Retaining historic stations will require creative and flexible solutions.

6.2 FOR THE LOCAL AUTHORITY

For conservation officers, it is important to understand the fire station in respect of its historic role, heritage value, and areas or items of significance. Redundant features or layouts should remain legible, items of significance should be protected, and new works or details should also be legible as alterations, whilst being designed to fit within the character of the station – both in respect of the architectural style of any particular station, and the functionalist manner characteristic of this building type.

Amendments to the main doors, and the provision of the appropriate stores at ground floor level should be prioritised, unless they would directly cause significant or unacceptable harm to an item or area of particularly special interest.

It is worth spending extra time trying to understand the need for any proposed alteration. If the need for change is fundamental to the operation of the fire station, then creative and flexible solutions that retain character should be thoroughly explored. If not, alternative solutions or locations should be considered.

The retention of use is a priority, which may mean that certain flexibilities in accommodating change should be accepted where otherwise they would not be.

7 CONVERTING DE-COMMISSIONED FIRE STATIONS

Many fire stations that are no longer operating are also listed buildings and within conservation areas. Whilst the pressures of service provision are removed from de-commissioned stations, the same layers of significance can be attributed.

Local Authorities should seek to preserve the significant qualities of former stations when handling applications relating to converted stations.

Issues for consideration:

- Can a suitable new use be found that will keep the appliance bay and yard as open spaces?
- Can the plan form of the watch room be retained for legibility?
- Can appliance bay doors be retained with modern glazing behind them?
- Presumption should be in favour of retaining internal detailing and materials unless good justification for its loss can be demonstrated.

- Upper floors were usually designed as residential flats, and the best use for a historic building will often be that for which it is originally designed. Can upper floors be put back into residential use? Subsequent alterations may have changed them – is it simpler to reinstate them? Reused flats should respect original details such as plan form, fireplaces, internal doors, skirting and cornice.
- Can the former residential entrance be reused for the upper floors? Can the circulation be organised by using the stair to give access to the rear balconies?
- The mess room and kitchen, if on an upper floor, may be difficult to handle without subdivision. Can an imaginative alternative use be found?
- Whilst historic alterations (such as blocked-in doors or evidence of stables) are of value, some may be modern alterations that detract from the special interest of the building. Can these be 'unpicked' to reinstate some of the special interest?
- Can flexibility be applied to the mix of residential units, given the importance of retaining plan form and working within the framework of the historic building?
- If there is an historic watch tower built as part of the overall design of the building, it will require retention. Is it possible or practicable to retain it as an accessible feature? Bear in mind that it will require maintenance, and if the building is in residential use, that a service charge may need to be signed up to by residents to upkeep the building.
- Roof profiles of fire stations are most commonly an integral part of the overall design. It will be unlikely that adding any additional stories or interrupting the roof profiles will be acceptable.

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fax: 01793 414926 textphone: 01793 414878
email: customers@english-heritage.org.uk

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For further information on the London Fire Brigade, please visit www.london-fire.gov.uk

Andrew Wood (Future Merton)

From: Tim Rainbird <tim.rainbird@quod.com>
Sent: 30 October 2013 15:44
To: Andrew Wood (Future Merton)
Cc: Kirill Malkin
Subject: Merton's Sites and Policies Plan - Land at Bushey Road

Dear Andrew,

James Honeyman has now left AXA so I thought, given our previous dialogue, that I would respond to your email of 23 September, as I believe you may not have been contacted.

As the Fund's representations confirmed, the site has only just been purchased and the Fund are some way off formalising a strategy for the site. Clearly the Fund will not proceed with a development for which the market has no appetite and the Fund have been advised is that there is very little demand to support an employment-led mixed use scheme on the site, as envisaged by the emerging policy. Furthermore, the allocation of the two sites as a whole may not be deliverable and its deletion may be the only way forward for Merton.

Please do not hesitate to contact me if you would like to discuss this further.

Regards,

Tim



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Director

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From: Andrew Wood (Future Merton) [<mailto:Andrew.Wood2@merton.gov.uk>]
Sent: 23 September 2013 12:25
To: HONEYMAN James
Subject: RE: Merton's Sites and Policies Plan - Land at Bushey Road

Hi James

Thanks for sending through the information, we acknowledge receipt of the information. Apologies for the delay in responding as I have been away on leave.

As you will know, Merton council is submitting the final draft of the Sites and Policies Plan to the Secretary of State for independent examination at the end of this week. At this point in time Site 48 is included in the plan with an allocation for an employment led mixed use scheme with some alternative uses considered suitable on the site. You advised you are acting on behalf of the owners of Site 48b, Friends Life Limited.

Given the change of ownership, we sought information from you with regard to the deliverability of the site in accordance with the Sites and Policies Plan and the NPPF. Following receipt of your information, we simply do not have any information regarding the deliverability of the site in accordance with the allocation. We had information available from the previous owner but this can no longer be used obviously. We now have a case of a site being allocated for a range of uses without any information or evidence to support the case. The only common point between both parties is that the council acknowledges the site has limited scope for office use. Also as you know, the adjoining part of the site (48a) has an active planning application.

You will also note in the allocation, and we had previously emphasised this several times to both owners of 48a and 48b, that it is expected you will consult and work together on a number of issues. Given the nature of the owners being similar entities and Axa acting on the behalf of both entities, we would expect this be given more consideration than previous.

To summarise, if we are to proceed to the examination in public with the site in the plan, we will require information from Friends Life Limited with regard to the development opportunities enabled by the allocation with supporting evidence (such as interest from potential occupiers/purchasers, delivery of future uses or developments on the site etc). If the status quo remains with no information regarding Site 48b and a live planning application for Site 48a, we may consider recommending to the inspector that the site be removed from the plan.

I am happy to discuss further if you wish. Please do not hesitate to contact me if you have any queries.

Regards,
Andrew

From: HONEYMAN James [<mailto:James.Honeyman@axa-im.com>]
Sent: 23 August 2013 13:55
To: Andrew Wood (Future Merton)
Cc: Tara Butler
Subject: RE: Merton's Sites and Policies Plan - Land at Bushey Road

Andrew/Tara,

Please find attached a letter summarising the position of Friends Life Ltd in advance of the 30 August deadline for representations.

I have taken Phillip Shalless off the circulation as he acts for another Fund managed by AXA Real Estate with different investors and is not therefore party to this discussion. I appreciate you understand that there are two different Funds operating here.

Please do let me know if you require anything further.

Regards,

James

From: Andrew Wood (Future Merton) [<mailto:Andrew.WoodFutureMerton@merton.gov.uk>]
Sent: 20 August 2013 15:56
To: HONEYMAN James
Cc: SHALLESS Phillip; Tara Butler
Subject: RE: Merton's Sites and Policies Plan - Land at Bushey Road

Hi James

Hopefully you receive my phone message and we can have a discussion soon. I am away on leave from tomorrow for a few weeks so would appreciate the opportunity to have a chat today if possible. The reasons for this are outlined below. If not, please contact Tara Butler tomorrow on 020 8545 4855.

It is obviously with regard to the Land at Bushey Road (Site 48) in Merton's Sites and Policies Plan. As alluded to previously we understand that the site has been purchased by Friends Life Limited and that Axa is acting on their behalf. Accordingly, we require information from Axa (if acting on their behalf) to advise use of the intentions for the site. We have information from the previous owners regarding the delivery of the site however it is quite likely this is no longer relevant and cannot be used without their permission.

The Sites and Policies Plan is currently out for pre-submission consultation until 30 August 2013 prior to submitting it to the Secretary of State for examination by an independent inspector. We require information prior to the conclusion of the consultation period.

In a nutshell, we now have no information regarding the availability or viability of the site for development in accordance with the allocation. We will require this information to be submitted to the council prior to the closing of the consultation period otherwise the site will have to be recommended to the inspector for removal from the plan. We cannot defend the allocation at examination without any evidence of its deliverability in accordance with the NPPF.

We have previously been liaising with Phillip Shalless at your office regarding the adjoining piece of land. We have always portrayed our opinion that the two sites should be considered together, particularly with regard to transportation and access to the site. Phillip will no doubt be able to pass on previous information requests and correspondence regarding this if need be.

Please feel free to ask questions.

Regards,
Andrew

From: HONEYMAN James [<mailto:James.Honeyman@axa-im.com>]
Sent: 12 August 2013 16:08
To: Andrew Wood (Future Merton)
Subject: RE: Merton's Sites and Policies Plan - Land at Bushey Road

Hi Andrew,

I have just returned from holiday and playing catch up!

Can I call you later in the week?

Regards,

James

From: Andrew Wood (Future Merton) [<mailto:Andrew.Wood2@merton.gov.uk>]
Sent: 08 August 2013 15:26
To: SHALLESS Phillip
Cc: HONEYMAN James
Subject: RE: Merton's Sites and Policies Plan - Land at Bushey Road

Thanks for the information Phillip.

James could you please pass on your contact phone number – we will want to have some discussions with you in the very near future.

Thanks in advance.

Andrew Wood
futureMerton
London Borough of Merton
London Road
Morden SM4 5DX

Tel: 020 8545 3693
Fax: 020 8545 3326
E-mail: andrew.wood2@merton.gov.uk
www.merton.gov.uk



From: SHALLESS Phillip [<mailto:Phillip.Shalless@axa-im.com>]
Sent: 08 August 2013 14:31
To: Andrew Wood (Future Merton)
Cc: HONEYMAN James
Subject: RE: Merton's Sites and Policies Plan - Land at Bushey Road

Andrew

Apologies for the delays.

The former Ignes site has been acquired by one of the other funds which we manage and as such is being dealt with by my colleague James Honeyman. The acquisition of the Ignes site was no doubt a logical purchase for them as they own the adjoining Pets at Home Unit. I also understand there was a confidentiality agreement in the contract although I was not involved in the acquisition.

This site and the site which is subject to the Next application are therefore held in different funds with different strategies, and beneficiaries.

I am afraid I have no information on the deliverability of the Ignes site but no doubt James will be able to confirm the position to you.

Regards

Phillip

AXA Real Estate

PHILLIP SHALLESS

8th Floor, 155 Bishopsgate, London EC2M 3XJ

Tel: +44 20 7003 2864

Fax:+44 20 7575 8415

E-mail: <mailto:phillip.shalless@axa-im.com>

From: Andrew Wood (Future Merton) [<mailto:Andrew.Wood2@merton.gov.uk>]

Sent: 08 August 2013 10:38

To: SHALLESS Phillip

Subject: FW: Merton's Sites and Policies Plan - Land at Bushey Road

Hi Phillip

I have left a message for you to call further to my email below. Firstly we require confirmation of the change in ownership that we have been advised of. I wish to make it clear that at this point in time, the council has no deliverability information regarding Site 48b in the Sites and Policies Plan. We require contact and information from you regarding this matter. There is only a short period of time remaining in which to make a representation, following which we will be submitting the plan to the Secretary of State. We require deliverability information for this otherwise the future of the site in the plan is in jeopardy.

Please get in touch with Tara or myself to discuss further.

Regards,

Andrew Wood

futureMerton

London Borough of Merton

London Road

Morden SM4 5DX

Tel: 020 8545 3693

Fax: 020 8545 3326

E-mail: andrew.wood2@merton.gov.uk

www.merton.gov.uk



From: Andrew Wood (Future Merton)
Sent: 05 August 2013 13:04
To: 'Phillip.Shalless@axa-im.com'
Subject: Merton's Sites and Policies Plan - Land at Bushey Road

Hi Phillip

It has been a while since our last contact and we are obviously both aware of the proposal that has been submitted for Next on part of the site currently allocated in the *Sites and Policies Plan*.

The council now understands that the adjoining land containing the former Thales Avionics buildings previously owned by Ignis Asset Management (Site 48b in the *Sites and Policies Plan*) is now under the ownership of Friends Life Limited. Could you please confirm that this is the case and whether you/Axa are acting on their behalf, and whether it is Friends Life Assurance Society Limited or Friends Life Limited (we understand they are separate funds).

Secondly and more importantly, obviously with the site being allocated in the Sites and Policies Plan which is scheduled to be submitted to the Secretary of State at the end of September, we will require information from you regarding the deliverability of this site for the allocated use. This deliverability information is crucial for the inspector to make a judgement on whether the site is deliverable within the lifetime of the plan.

It would be appreciated if you could get in touch with us with as much information as possible, as soon as possible. The council timeframes are very short now with pre-submission consultation concluding on 30 August 2013, and submission following shortly after (more information is available at http://www.merton.gov.uk/sites_policies_plan).

It may be useful to meet again to discuss the site and the allocation in the plan given the council has been pushing for an employment led redevelopment of the entire site since the outset, but this was not available given the segmented ownership.

I look forward to hearing from you.

Regards,

Andrew Wood
futureMerton
London Borough of Merton
London Road
Morden SM4 5DX

Tel: 020 8545 3693
Fax: 020 8545 3326
E-mail: andrew.wood2@merton.gov.uk
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Site and the northern end of Rookwood Avenue

Site Visit: 3.12.12

Site Description

A row of tall *Leylandii* interspersed with sycamore and elm trees along the northern boundary. Mainly ruderal vegetation throughout the rest of the site with patches of scrub/ bramble and occasional trees.

Site does not currently merit SINC designation. However if allowed to mature and with some management could meet the criteria at the time of the next review.

Martin Boyle MCIEEM
Merton Greenspaces Team

Site Re-visit: 22.10.13

Row of *Leylandii* still present. The rest of the site has been cleared of all vegetation apart from a single elder and prunus (spp.) tree.

Andrew Wood (Future Merton)

From: David.Wilson@thameswater.co.uk
Sent: 15 November 2012 10:35
To: Andrew Wood (Future Merton)
Cc: Carmelle.Bell@thameswater.co.uk; Alec.Arrol@thameswater.co.uk;
Richard.Hill@thameswater.co.uk; Tara Butler
Subject: Fw: Merton's Draft Sites and Policies DPD

Dear Andrew,

Further to the attached I confirm that we will not be in a position in the near future to provide the requested information and therefore accept that this will not tie in with the programme for the current DPD.

However, we still consider that there are opportunities at this site which we would like to discuss in relation to a future review of the DPD.

Therefore, there is no imminent need for a meeting and we will contact you when we are in a position to provide more of the requested information.

Regards
David

David Wilson
Senior Town Planner
Thames Water Property
Ground East
Clearwater Court
Vastern Road
Reading
RG1 8DB

Tel: 0203 577 5642 (Ext: 85642)

Mobile: 07747 645642

----- Forwarded by David Wilson/TWP/ThamesWater on 15/11/2012 10:26 -----

From: "Andrew Wood (Future Merton)" <Andrew.Wood2@merton.gov.uk>
To: <TownPlanningPolicy@thameswater.co.uk>, <Carmelle.Bell@thameswater.co.uk>
Cc: <Alec.Arrol@thameswater.co.uk>, <david.wilson@thameswater.co.uk>, <Richard.Hill@thameswater.co.uk>, "Tara Butler" <Tara.Butler@merton.gov.uk>
Date: 15/11/2012 10:14
Subject: RE: Merton's Draft Sites and Policies DPD

Dear Carmelle

Thank you for the response.

As referred to below, if the site is to have any future in Merton's DPD we would require further information regarding the deliverability of the site.

I will await your response regarding a meeting. If Thames Water still envisage providing information regarding the deliverability, this meeting should take place sooner rather than later. If you could provide some indication on behalf of Thames Water regarding the likelihood of proceeding with the information and further investigation, it would be appreciated.

Regards,

Andrew Wood
Future Merton
London Borough of Merton
London Road
Morden SM4 5DX

Tel: 020 8545 3693
Fax: 020 8545 3326
E-mail: andrew.wood2@merton.gov.uk
www.merton.gov.uk

-----Original Message-----

From: Carmelle.Bell@thameswater.co.uk [mailto:Carmelle.Bell@thameswater.co.uk] On Behalf Of TownPlanningPolicy@thameswater.co.uk
Sent: 15 November 2012 09:34
To: Andrew Wood (Future Merton)
Cc: Alec.Arrol@thameswater.co.uk; david.wilson@thameswater.co.uk; Richard.Hill@thameswater.co.uk
Subject: Fw: Merton's Draft Sites and Policies DPD

Dear Andrew,

I apologise for the delay in responding.

I have now confirmed with colleagues that we are not currently in a position to provide the information set out in your letter.

However, we would welcome a meeting with you to discuss the future of the site and will contact you in due course to arrange.

Regards
Carmelle Bell

Town Planning Team
Thames Water Utilities Ltd
Clearwater Court (Ground East)
Vastern Road

Reading
RG1 8DB
0203 577 7799 (ext: 87799)

From: "Andrew Wood (Future Merton)" <Andrew.Wood2@merton.gov.uk>

To: <Carmelle.Bell@thameswater.co.uk>

Date: 13/11/2012 16:10

Subject: Merton's Draft Sites and Policies DPD

Dear Carmelle

I refer to the attached letter sent previously to Thames Water.

We require information from Thames Water as outlined in the attached letter. Without this information we will have insufficient evidence to justify the site being retained in the Sites and Policies Development Plan Document.

Please provide this information as soon as possible and preferably before the end of November. As mentioned, if we do not receive further evidence to support the sites' proposed redevelopment, we will have no option but to exclude the site from consideration in the final Sites and Policies Plan.

We would welcome a meeting with you to discuss any issues.

If you have any queries please let me know.

Regards,

Andrew Wood
Future Merton
London Borough of Merton
London Road
Morden SM4 5DX

Tel: 020 8545 3693
Fax: 020 8545 3326
E-mail: andrew.wood2@merton.gov.uk
www.merton.gov.uk

From: Andrew Wood (Future Merton)

Sent: 18 October 2012 16:39
To: 'townplanningpolicy@thameswater.co.uk'
Subject: FAO: Carmelle Bell

Dear Carmelle,

Re: Merton's Draft Sites and Policies Development Plan Document
Site 38 - Thames Water, Byegrove Road, Colliers Wood SW19

Please refer to the attached correspondence regarding Merton's draft Sites and Policies DPD.

If you have any queries please let me know.

Regards,

Andrew Wood
Future Merton
London Borough of Merton
London Road
Morden SM4 5DX

Tel: 020 8545 3693
Fax: 020 8545 3326
E-mail: andrew.wood2@merton.gov.uk
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(See attached file: 2012-10-18 Ltr to Thames Water re deliverability.pdf)

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Andrew Wood (Future Merton)

From: Eben Van Der Westhuizen
Sent: 24 September 2013 10:21
To: 'thameswaterplanningpolicy@savills.com'
Cc: Tara Butler; Andrew Wood (Future Merton)
Subject: Merton's Sites and Policies Development Plan and Policies Map - Pre-Submission Version
Attachments: ThamesWater_AUG2013.pdf

Dear Mr Mathews,

1 Thank you for your consultation response letter dated 3 September 2013, which is attached to this email for your convenience. I am writing to clarify some matters regarding the Thames Water Byegrove Road Site and the Wandle Valley Regional Park Boundary site.

2 On page 285 of the consultation document for the final draft of the Policies Map (Stage 3) the following officers' recommendation is made with regards to this site's inclusion in the Wandle Valley Regional Park:

"Include: Wandle Valley Sewage Works - only approximately 25% of the site (along the eastern boundary) is not designated as MOL and the whole site is within Flood zone 2 (1in100 - 1in1000 years). The inclusion of this site would be in accordance with the objectives of the WVAF (Managing Flood Risk and Urban Heat Island)." (WVAF is Wandle Valley Area Framework)

3 Paragraph 15.9 of Merton's Core Strategy states:

"The map below proposes indicative boundaries for the park. The final boundary will be set following recommendations of the Wandle Valley Regional Park Development Board comprising the local authorities along the Wandle. Once agreed, it will be integrated into the next revision of Merton's Proposals Map."

4 The Wandle Valley Regional Park Trust Board response dated 15 June 2013 states that they are "in general agreement with the location of the WVRP boundary as shown in the Stage 3 Policies Map consultation document and agree with the officer's recommendations regarding the inclusion and exclusion of the specific portions listed." The only matters on which they disagreed are not relevant to this site.

5 The council accepts all the Board's recommendations but it has become apparent that the boundary for the Wandle Valley Regional Park that was published in the Stage 4 Submission Draft version of the Policies Map, does not accurately reflect the Board's recommendations. I apologise for any confusion that this may have caused and can inform you that amendments will be proposed for the Inspector's consideration.

6 These amendments will show the boundary in accordance with the Board's recommendations and therefore the Thames Water Bygrove Road site will be shown to be within the Wandle Valley Regional Park Boundary.

7 With regards to your proposed designation of the site as a Major Developed Site (MDS) in the MOL, I can inform you that officers have investigated this matter but found no reference to MDS in relevant current planning policies. The last bullet point of paragraph 89 in the National Planning Policy Framework (NPPF) would be a material consideration with any planning application on the this site but in Annex 3 of the NPPF it is clarified that PPG2 has been replaced by the NPPF and it is evident that the NPPF does not incorporate the concept of 'Major Developed Sites' as set out in the former PPG2. Neither the NPPF nor the London Plan requires the council to identify MDS's in MOL and Merton has no policies identifying or referring to MDS. The council will therefore not be showing any MDS's on its Policies Map.

Regards

Eben van der Westhuizen

Policy Planner

Strategic Policy & Research

Future Merton

Environment & Regeneration Department

Merton Council

Tel: 020 8545 3814

Fax: 020 8545 3326

www.merton.gov.uk

ENVIRONMENT AND REGENERATION DEPARTMENT

Chris Lee - Director



Duncan Parr
Savills

By email: DParr@savills.com

Sustainable Communities
London Borough of Merton
Merton Civic Centre
London Road
Morden SM4 5DX

Direct Line: 020 8545 3889
Fax: 020 8545 3245

My Ref : Wimbledon stadium
Please Ask For: James McGinlay
Your Ref:

Date: 23 July 2013

Dear Duncan

Re: Wimbledon Greyhound Stadium – Merton’s Sites and Policies Plan

We are writing to you to tell you about the immediate actions necessary to progress your client’s proposal for the Wimbledon Greyhound Stadium, Site 37 in Merton’s *Sites and Policies Plan*.

You will be aware that on 10 July 2013, Merton Council resolved to submit Merton’s *Sites and Policies Plan* to the Secretary of State. The Secretary of State will now appoint an independent planning inspector to examine the plans.

Throughout the plan’s preparation over the past two years, you have submitted evidence proposing the allocation and redevelopment of one of the sites within the plan, the Wimbledon Greyhound Stadium (Site 37). Based on the information we have received, the council’s allocation for the Wimbledon Greyhound Stadium is:

“Intensification of sporting activity (D2 Use Class) with supporting enabling development. Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation.

This site must be delivered via a site-specific planning brief (Supplementary Planning Document) to ensure the delivery of sporting intensification and six weeks of community consultation on proposals.”

A summary of the key dates are outlined as follows:

- On **10 July 2013**, councillors agreed to submit Merton’s Sites and Policies Plan to the Secretary of State in September 2013 for examination by an independent planning inspector;
- Pre-submission consultation is open between **15 July 2013 and 30 August 2013**;
- Submission to the Secretary of State is likely by **the end of September 2013**; and
- **December 2013** – planning inspector’s public hearing to examine the plans (the exact timeframe will be set by the inspector).

As you will be aware, in accordance with the National Planning Policy Framework 2012, the council must satisfy the inspector that your proposal for the site is capable of being built within the next 10 years.

Over the past two years, we have been advising you of the main issues that will need to be investigated and either resolved or have a clear way forward to assure the inspector that your proposal is reasonably deliverable on the Wimbledon Greyhound Stadium site.

The inspector may consider the following in assessing whether or not the site is deliverable:

- Whether or not the site is suitable for your proposal: how flood risk will be managed, how transport in and around the site will be accommodated, the extent of contamination on site, the impact on neighbouring uses, whether the land uses proposed will meet other planning policy issues etc;
- Whether or not the site is available to you or likely to be available to you during the next 10 years. This includes issues of land ownership, legal covenants and other factors that may affect the ability to development the site;
- Whether or not the proposal will be achievable - is your scheme likely to be financially viable taking into account the constraints that exist on site and the enabling costs.

It would be helpful, but not essential, to submit a full assessment of flood risk, transportation and detailed viability. We would expect you to be in a position to present a reasonably assured case to the council, the planning inspector and others to support the delivery of your proposal on the Wimbledon Greyhound Stadium site, to be submitted to the Secretary of State in September 2013. The council, and the inspector, will want to be assured that you have conducted investigations into the site's suitability, especially around flood risk, transport and land uses, to inform decisions on the site's progress.

If a joint proposal is put forward, we would expect to receive written acknowledgement between relevant parties to summarise the way forward and main responsibilities in delivering the site.

Delivery of the site is required through the preparation of a masterplan to be adopted as a Supplementary Planning Document (SPD) by the Council in advance of any planning applications. This will enable information regarding deliverability, the preparation of evidence and site specific consultation to be undertaken for any development of the site. The entire site including the land currently owned by the Greyhound Racing Association and Volante must be included in the masterplan area to ensure a unified approach to plan making, decision making and delivery of the development across the site(s).

As we have previously stated over the past two years, if you haven't done so already we strongly suggest you engage in on-going discussions with all the parties below to ensure that they are aware of your proposals for the site and that you have considered their views and are working towards resolution of any objections:

- **Flood risk management** - Environment Agency – Joe Martyn 0203 263 8087, joseph.martyn@environment-agency.gov.uk
- **Transport movements** - Transport for London – Alex Andrews, 020 3054 7041 (auto 87041), AlexAndrews@tfl.gov.uk
- **Stadium development and security** - Metropolitan Police Counter Terrorism Security Advisor – Mark Flanagan Mark.Flanagan@met.police.uk
- **Metropolitan Police (in conjunction with CTSA above)** – Pat Simcox, 020 8649 3245, Pat.A.Simcox@Met.Police.UK

- **Neighbouring council (planning and transport authority)** - London Borough of Wandsworth – Martin Howell (Planning Policy) mhowell@wandsworth.gov.uk
- **National Grid (neighbouring landowner to west)**– Vicky Stirling
Vicky.Stirling@nationalgrid.com
- **Greater London Authority** – Jonathan Finch 020 7983 4799 (planning policy)
- **Existing site occupiers** including Christopher’s squash and fitness club

These organisations have all responded to Merton’s *Sites and Policies Plan* concerning the Wimbledon Greyhound Stadium and their comments are all publicly available via Merton Council’s website (follow the links to the left hand side of the page to access responses to the three consultation stages so far): www.merton.gov.uk/sites_policies_plan

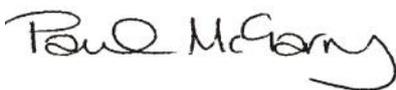
These organisations are all key parties in the delivery of the site for sporting intensification and evidence of consultation and their support – or at least not their objection – will be required for both the examination in public, masterplan and any subsequent planning applications.

Local residents and others have also responded to Merton’s *Sites and Policies Plan* and shared their concerns on the future development of the Wimbledon Greyhound site, particularly around flood risk, traffic and land uses among other issues.

The council will continue to undertake its own research into the opportunities and risks for a range of possible proposals for the site, including engagement with the above organisations. As with any site in the plan, if we are not satisfied that there is a reasonable way of progressing the site’s redevelopment and demonstrating a credible way forward towards examination, we may recommend that your proposal be removed from further consideration during the independent examination.

Please do not hesitate to contact me or the futureMerton team if you have any queries.

Yours sincerely

pp. 

James McGinlay
Head of Sustainable Communities
Email: james.mcginlay@merton.gov.uk

ENVIRONMENT AND REGENERATION DEPARTMENT

Chris Lee - Director



George Brolly
Hamilton Architects

By email: george.brolly@hamiltonarchitects.com

Sustainable Communities
London Borough of Merton
Merton Civic Centre
London Road
Morden SM4 5DX

Direct Line: 020 8545 3889
Fax: 020 8545 3245

My Ref : Wimbledon stadium
Please Ask For: James McGinlay
Your Ref:

Date: 23 July 2013

Dear George

Re: Wimbledon Greyhound Stadium – Merton’s Sites and Policies Plan

We are writing to you to tell you about the immediate actions necessary to progress your proposal for the Wimbledon Greyhound Stadium, Site 37 in Merton’s *Sites and Policies Plan* in your role as representatives for your client, Hume Consulting.

You may be aware that on 10 July 2013, Merton Council resolved to submit Merton’s *Sites and Policies Plan* to the Secretary of State. The Secretary of State will now appoint an independent planning inspector to examine the plans.

Throughout the plan’s preparation over the past two years, you have submitted evidence proposing the allocation and redevelopment of one of the sites within the plan, the Wimbledon Greyhound Stadium (Site 37). Based on the information we have received, the council’s allocation for the Wimbledon Greyhound Stadium is:

“Intensification of sporting activity (D2 Use Class) with supporting enabling development. Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation.

This site must be delivered via a site-specific planning brief (Supplementary Planning Document) to ensure the delivery of sporting intensification and six weeks of community consultation on proposals.”

A summary of the key dates are outlined as follows:

- On **10 July 2013**, councillors agreed to submit Merton’s Sites and Policies Plan to the Secretary of State in September 2013 for examination by an independent planning inspector;
- Pre-submission consultation is open between **15 July 2013 and 30 August 2013**;
- Submission to the Secretary of State is likely by **the end of September 2013**; and
- **December 2013** – planning inspector’s public hearing to examine the plans (the exact timeframe will be set by the inspector).

As you will be aware, in accordance with the National Planning Policy Framework 2012, the council must satisfy the inspector that your proposal for the site is capable of being built within the next 10 years.

Thank you for providing the information over the past two years regarding your approach to flood risk, transportation and detailed viability for your proposal. We are currently reviewing in detail the information received from all parties and will advise if we need anything further from you. This information will be presented to the inspector if required and will need to satisfy them that the site is deliverable. Please let us know if there is anything you would wish kept commercially confidential.

The inspector may consider the following in assessing whether or not the site is deliverable:

- Whether or not the site is suitable for your proposal: how flood risk will be managed, how transport in and around the site will be accommodated, the extent of contamination on site, the impact on neighbouring uses, whether the land uses proposed will meet other planning policy issues etc;
- Whether or not the site is available to you or likely to be available to you during the next 10 years. This includes issues of land ownership, legal covenants and other factors that may affect the ability to develop the site;
- Whether or not the proposal will be achievable - is your scheme likely to be financially viable taking into account the constraints that exist on site and the enabling costs.

We would expect you to be in a position to present a reasonably assured case to the council, the planning inspector and others to support the delivery of your proposal on the Wimbledon Greyhound Stadium site, to be submitted to the Secretary of State in September 2013. If a joint proposal is put forward, we would expect to receive written acknowledgement between relevant parties to summarise the way forward and main responsibilities in delivering the site.

Delivery of the site is required through the preparation of a masterplan to be adopted as a Supplementary Planning Document (SPD) by the Council in advance of any planning applications. This will enable information regarding deliverability, the preparation of evidence and site specific consultation to be undertaken for any development of the site. The entire site including the land currently owned by the Greyhound Racing Association and Volante must be included in the masterplan area to ensure a unified approach to plan making, decision making and delivery of the development across the site(s).

As we have previously stated over the past two years, if you haven't done so already we strongly suggest you engage in on going discussions with all the parties below to ensure that they are aware of your proposals for the site and that you have considered their views and are working towards resolution of any objections:

- **Flood risk management** - Environment Agency – Joe Martyn 0203 263 8087, joseph.martyn@environment-agency.gov.uk
- **Transport movements** - Transport for London – Alex Andrews, 020 3054 7041 (auto 87041), AlexAndrews@tfl.gov.uk
- **Stadium development and security** - Metropolitan Police Counter Terrorism Security Advisor – Mark Flanagan Mark.Flanagan@met.police.uk
- **Metropolitan Police (in conjunction with CTSA above)** – Pat Simcox, 020 8649 3245, Pat.A.Simcox@Met.Police.UK
- **Neighbouring council (planning and transport authority)** - London Borough of Wandsworth – Martin Howell (Planning Policy) mhowell@wandsworth.gov.uk
- **National Grid (neighbouring landowner to west)**– Vicky Stirling Vicky.Stirling@nationalgrid.com

- **Greater London Authority** – Jonathan Finch 020 7983 4799 (planning policy)
- **Existing site occupiers** including Christopher's squash and fitness club

These organisations have all responded to Merton's *Sites and Policies Plan* concerning the Wimbledon Greyhound Stadium and their comments are all publicly available via Merton Council's website (follow the links to the left hand side of the page to access responses to the three consultation stages so far): www.merton.gov.uk/sites_policies_plan

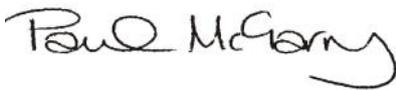
These organisations are all key parties in the delivery of the site for sporting intensification and evidence of consultation and their support – or at least not their objection – will be required for both the examination in public, masterplan and any subsequent planning applications.

Local residents and others have also responded to Merton's *Sites and Policies Plan* and shared their concerns on the future development of the Wimbledon Greyhound site, particularly around flood risk, traffic and land uses among other issues.

The council will continue to undertake its own research into the opportunities and risks for a range of possible proposals for the site, including engagement with the above organisations. As with any site in the plan, if we are not satisfied that there is a reasonable way of progressing the site's redevelopment and demonstrating a credible way forward towards examination, we may recommend that your proposal be removed from further consideration during the independent examination.

Please do not hesitate to contact me or the futureMerton team if you have any queries.

Yours sincerely

pp. 

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