



Wimbledon Stadium

EIA Scoping Report

On behalf of **Galliard Homes, GRAA Ltd and AFC Wimbledon**



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1 Introduction

1.1 Project Background

- 1.1.1 This EIA Scoping Report has been prepared in respect of a forthcoming planning application to be submitted by **Galliard Homes Ltd, Greyhound Racing Association Acquisition (GRAA) Ltd** and **AFC Wimbledon** for the redevelopment of the Wimbledon Greyhound Stadium, Wimbledon, SW17 0BL. The application relates to a mixed use development comprising new residential development, a football stadium and retail development.
- 1.1.2 A description of the site is provided in Section 2 of this report and an outline of the proposed scheme is presented in Section 3.

1.2 Purpose of this Report

- 1.2.1 Due to the nature of the proposed development, the developer intends to undertake an Environmental Impact Assessment (EIA) of the proposed development which will be documented in an Environmental Statement (ES). The ES, which will be prepared in compliance with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (the EIA Regulations), will be submitted with the planning application.
- 1.2.2 Understanding the potential effects of the development on the environment is an integral part of the design process currently underway for the proposed development at the former Wimbledon Greyhound Stadium. As it is considered that a formal EIA would be required for this development, this report documents the scoping exercise that has been undertaken to identify the nature and extent of the significant environmental issues potentially associated with the proposed development. Accordingly this report details how the environmental issues are being examined and how it is proposed that they are to be progressed as part of the EIA of the development. The aim is to ensure that the development has due regard for the environment, minimises adverse environmental effects and takes advantage of opportunities for environmental enhancement.
- 1.2.3 This report provides information to key consultees regarding the proposals and sets out the intended scope of the EIA and content of the ES. On the basis of this report, the developers request Merton Council's Scoping Opinion in accordance with Regulation 13 of the EIA Regulations.

1.3 Study Team

- 1.3.1 The project team undertaking the EIA is as follows:
- **Savills:** Planning;
 - **Peter Brett Associates LLP (PBA):** EIA Coordination, Socio Economics, Hydrology and Flood Risk, Land and Water Quality, Transport and Access, Noise & Vibration, Air Quality, Lighting, Wind Microclimate;
 - **Price and Myers:** Drainage;
 - **Metropolis Green:** Sustainability and Energy;
 - **CgMs:** Heritage Assets;

- **Anstey Horne:** Daylight and Sunlight;
- **Galliard:** Utilities, Waste;
- **Baker Sheppard Gillespie (BSG):** Ecology and Nature Conservation; and
- **Turkington Martin:** Townscape/Landscape and Visual.

1.4 Report Structure

1.4.1 This report continues with the following:

- Chapter 2 Environmental Setting;
- Chapter 3 Proposed Development;
- Chapter 4 Planning Policy Context;
- Chapter 5 Description of the EIA Process;
- Chapter 6 Proposed Scope of the EIA;
- Chapter 7 Topics Included in EIA Scope;
- Chapter 8 Topics Not Included in EIA Scope; and
- Chapter 9 Summary & Next Steps

2 Environmental Setting

2.1 Location

- 2.1.1 The site is located at Grid Reference TQ 262 718, and occupies an area of approximately 5.1 hectares.
- 2.1.2 A Site Location Plan and an Indicative Site Layout Plan are provided in **Appendix A**.
- 2.1.3 It should be noted that planning application boundary will be clarified through the on-going design and consultation process.
- 2.1.4 The site is located on the Wimbledon Greyhound Stadium and is accessed from Plough Lane in the south and Summerstown in the east (both of which form the B235). The site is located in a predominately commercial / industrial area with residential uses present to the east. Lambeth Crematorium is located to the south-east of the site. A large National Grid electricity sub-station forms the western boundary with the site.
- 2.1.5 The site is located approximately 1.5km north-west of Wimbledon mainline station and Wimbledon town centre. Other underground stations are located nearby, including Wimbledon Park Station (750m west) and Tooting Broadway Station (1km east). Haydon's Road Station is the closest over-ground station and is located approximately 700m south of the site. Local bus numbers 77, 44 and 270 buses stop close to the site.

2.2 Site Description

- 2.2.1 The site is currently occupied by Wimbledon Greyhound Stadium and its associated parking areas.
- 2.2.2 The principal existing use of the site is for greyhound racing within the stadium. Race days occur weekly on Fridays and Saturdays and the stadium can accommodate up to 6000 spectators. The stadium also hosts a range of other events including speedway. It is supported by a large unmarked car park that can accommodate some 900 cars. The site also accommodates a market which is held regularly on Wednesdays, Saturdays and Sundays.
- 2.2.3 There are two commercial activities recorded on site, G&J auto services and WVC, for vehicle repair/servicing and hire respectively.
- 2.2.4 An extended culvert is shown passing through the NE corner connecting the River Wandle and a tertiary water body in the crematorium.
- 2.2.5 The site does not form part of any statutory designated sites of nature conservation importance.
- 2.2.6 The River Wandle is located approximately 150m west of the site and flows in a south to north direction. The land to the west of the River Wandle is designated a Local Nature Reserve and is the only recorded designated environmentally sensitive site within 500m of the site. There are no recorded surface water abstractions within 500m of the site.
- 2.2.7 The flood levels provided by the Environment Agency show the site as lying entirely within the 1 in 100 year flood outline and partially within the 1 in 20 year flood outline.
- 2.2.8 The noise climate at the site is likely to be dominated by noise from the local road network.

- 2.2.9 The Merton Council has declared an Air Quality Management Area (AQMA) for the entire borough (therefore including the site) with particular emphasis placed on the emission of nitrogen dioxide and fine particulates.

3 Proposed Development

- 3.1.1 The proposed development comprises the demolition of existing buildings and the comprehensive redevelopment of the former Greyhound Stadium site in Wimbledon.
- 3.1.2 The proposed development will provide a modern, football stadium facility, new community facilities, retail and enabling residential development. The eastern part of the site will be redeveloped to provide new residential apartments (of up to ten storeys). The western part of the site will be redeveloped to provide a new football stadium.
- 3.1.3 It is anticipated that the proposed development will provide approximately:
- 20,000 seat football stadium, with hospitality and coach parking;
 - 1,000 sqm retail unit (supermarket);
 - 600 circa residential units with basement parking and refuse stores; and
 - A squash club.
- 3.1.4 It is anticipated that the proposed development will be constructed in phases, with an interim football stadium of 11,000 seats being constructed initially.
- 3.1.5 Sustainability will be an important consideration within the proposed development and the sustainability performance of the development will be documented in a Sustainability Statement to be submitted with the planning application.
- 3.1.6 Other application documents will include a Design and Access Statement, Planning Statement, Statement of Community Involvement, Sustainability Statement, Flood Risk Assessment and a Transport Assessment.

4 Planning Policy Context

4.1 Planning Policy

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the development plan contains relevant policies, applications for development which are in accordance with the plans should be allowed unless material considerations indicate otherwise. The current Development Plan for the site comprises:

- London Plan, 2011;
- Merton Core Strategy, adopted July 2011;
- Merton draft Sites and Policies Plan and Policies Map, 2013 (formerly Merton Council's Proposals Map, 2003);
- South London Waste Plan, 2012; and
- Merton Unitary Development Plan (UDP), 2003.

4.2 Merton Council's Core Strategy

4.2.1 The following is a summary of the key policies from the Core Strategy that are considered relevant to the proposed development.

4.2.2 **Policy 1** (Colliers Wood and South Wimbledon Sub-Area) of the Merton Core Strategy indicates that although the site falls within the designated 'Area for Intensification (Afl)' because it lies within the functional floodplain and has other environmental constraints (such as utilities infrastructure and barriers to movement) the site is considered to offer limited to no viable opportunities for intensification.

4.2.3 **Policy 8** (Housing Choice) sets a baseline affordable housing target of 40% of all new units, with a tenure mix of 60% housing for social rent and 40% intermediate housing, on sites capable of ten or more units gross. Further requirements are set out for new homes in relation to design and sustainability expectations, the mix of housing types, achievement of the lifetime home standards, a minimum of 10% wheelchair accessible or adaptable.

4.2.4 **Policy 9** (Housing Provision) states that Merton Council aim to achieve a minimum of 4,800 additional homes for the period 2011 - 2026 of which approximately 500 - 600 homes are identified as being built within the Colliers Wood and South Wimbledon sub-area.

4.2.5 Paragraph 18.45 within the justification of Policy 9 states that potential housing development within the Colliers Wood and South Wimbledon sub-area must have regard to the impacts of environmental factors affecting the viability and deliverability of housing, particularly in relation to the risk of flooding identified in the Strategic Flood Risk Assessment and set out in Policy 1. It goes on to say that '*Developments will therefore need to comply with Environment Agency advice and Chapter 24 'Flood Risk Management - Policy 16'.*

4.2.6 **Policy 11** (Infrastructure) states that new development will be required to provide for any necessary infrastructure.

4.2.7 **Policy 13** (Open space, nature conservation, leisure and culture) supports improved access to open space and expects development to incorporate (or contribute towards) and maintain open space, play areas and landscape features (e.g. trees) to contribute to the wider open

space network. Development proposals must also demonstrate that they will not adversely affect the nature conservation values of designated sites. In relation to leisure and culture, Merton Council support proposals for new and improved facilities. Merton Council indicate support for a sports stadium within the borough but note that the former Wimbledon Greyhound Stadium site is restricted in the range of uses it can offer, because of its location within the functional floodplain.

- 4.2.8 **Policy 14** (Design) states that ‘all development needs to be designed in order to respect, reinforce and enhance the local character of the area in which it is located and to contribute to Merton's sense of place and identity’. This is to be achieved by conserving existing heritage assets, promoting high quality sustainable design, avoiding impacts to townscape, encouraging good design quality for housing and public areas.
- 4.2.9 **Policy 15** (Climate Change) required all development to demonstrate full compliance with climate change aspects of effective use of resources and materials, minimisation of carbon dioxide emissions, resilience to long term impacts, be Multi Utility Services Company (MUSCo) ready where viable, achieve Code for Sustainable Homes Level 4 and BREEAM Very Good standards.
- 4.2.10 **Policy 16** (Flood Risk Management) sets out how flood risks are to be managed. The policy states that the sequential and exception tests will be applied to avoid inappropriate development in relation to flood risk and that sustainable drainage systems (SUDs) will be implemented across the borough for effective management of surface water flooding.
- 4.2.11 **Policy 17** (Waste Management) states Merton Council’s support of sustainable waste management as set out in PPS10 and the London Plan. For new development, to support recycling targets, Merton Council require new development to incorporate well-designed waste storage facilities which include recycling facilities.
- 4.2.12 **Policy 18** (Active Transport) sets out how Merton Council will promote active transport within the borough including safe pedestrian access, reducing conflict between different road users, delivering high quality links and encouraging design that provides suitable cycle storage, cycle parking and associated facilities.
- 4.2.13 **Policy 19** (Public Transport) sets out how Merton Council will enhance the public transport network and ensure new development does not have an adverse effect on transport within the vicinity of the site. Transport Assessments and Travel Plans will be required for all major developments.
- 4.2.14 **Policy 20** (Parking, Servicing and Delivery) outlines Merton Council’s requirements for developers to demonstrate that their development will not adversely affect pedestrian and cycle movements, safety, the convenience of local residents or the quality of bus movement and/or facilities; on-street parking and traffic management. It also states that car parking should be provided in accordance with Merton Council’s current parking standards. The policy also sets out the requirements for developers to incorporate adequate facilities for servicing to ensure loading and unloading activities do not have an adverse impact on the public highway or safety and to incorporate safe access to and from the site for all vehicles.

4.3 Merton Unitary Development Plan (adopted 2003)

- 4.3.1 Many of the policies relating to sustainable development were replaced with the policies in the Core Strategy. Merton UDP has a number of saved policies.

4.4 Sites and Policies Plan and Policies Map

- 4.4.1 Merton's Sites and Policies Plan will contain the detailed planning policies to help assess planning applications in Merton and will allocate sites for redevelopment between 2014 and 2024.
- 4.4.2 Merton's Policies Map (formerly known as the Proposals Map) will be published alongside the Sites and Policies Plan and will update town centre boundaries, areas of open space and nature conservation, shopping frontages, industrial areas and will also show sites allocated for specific developments. The document is being consulted upon until the end of August 2013.
- 4.4.3 The site of the former Wimbledon Greyhound Stadium is site proposal no.37. An extract of the site proposal map and a copy of the text from the Sites and Policies Plan is provided below

Site Proposal 37 – Wimbledon Greyhound Stadium, Plough Lane, Tooting, SW17 0BL

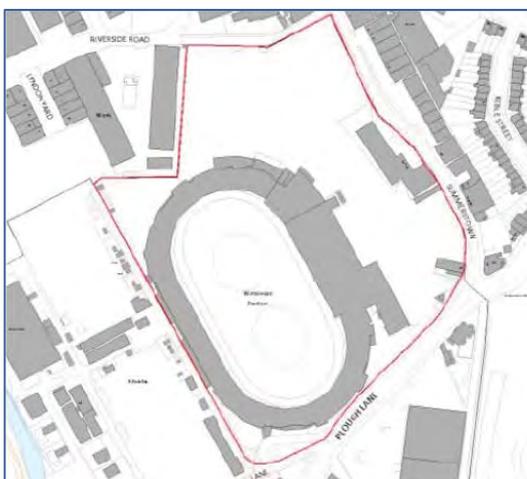


Figure 1: Extract from Policies Map – Site Proposal 37 Wimbledon Greyhound Stadium

Site Description:

- Approximately two thirds of the site is dominated by the Wimbledon Greyhound Stadium, the remainder of the site is a car park with some commercial and industrial uses. The buildings on the eastern boundary are in separate ownership and contain a light industrial use (Volante) and Elite motorcycle training fronting Summerstown. The building in the southeast corner contains a food establishment. The site also accommodates Christopher's Squash and Fitness Club within the stadium buildings and a hand car wash access from and adjacent Copper Mill Lane. Weekly car boot sales are also operated from the car park.
- The site adjoins an industrial estate along the northern and eastern boundary. To the south of the site is Merton; on the other side of Plough Lane is an industrial estate. Running along the western boundary of the site is a large operational electricity substation owned by National Grid.

Strategic Planning Factors:

- The site and its surrounds are within the functional floodplain of the River Wandle (Flood Zone 3b). The majority of the site is within a critical drainage area for surface water flooding.

- The site is surrounded on all sides by strategic industrial locations. To the north and east of the site is Summerstown Road strategic industrial location (London Borough of Wandsworth), which includes a waste management site to the northwest. To the south and west is part of Durnford Road / Plough Lane strategic industrial location (London Borough of Merton).
- The site has poor / moderate accessibility to the public transport (PTAL 2/3). The road network, railway lines, river and utilities infrastructure in the wider area limit opportunities for improving access to and around the site.
- The entire site lies within an archaeological priority zone.
- National Grid has identified that the operational substation adjacent to the west of the site may need to have further utility development beyond 2012 to maintain essential electricity transmission to homes and businesses. National Grid has also advised that this is unlikely to extend into the boundary of this site.

Current Use: Greyhound stadium (D2 Use Class) and car park (Sui Generis Use Class).

Use suggested / organisation:

- Stage 2 (January 2012): residential led mixed use scheme – Savills L&P Ltd on behalf of Greyhound Racing Association Ltd
- Stage 2a (June 2012):
 - Retain greyhound use of the site with enabling large foodstore – Drivers Jonas Deloitte on behalf of Hume Consulting Ltd
 - Football stadium with associated leisure and retail activities – AFC Wimbledon
- Stage 3 (January 2013)
 - 10-15,000 seat football stadium and associated community / leisure facilities, circa 450-500 residential units and a substantial retail store – Greyhound Racing Association Ltd in discussions with AFC Wimbledon.
 - An enhanced greyhound stadium, enhanced squash / leisure facility, with enabling retail and residential development – Hume Consulting Ltd.
 - New light industrial and warehousing development, relocation of development from other sites including existing industry and warehousing, leisure facilities, school use – Wimbledon Park Residents Association.

Allocated use:

- 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.

Delivery timescales: 2015 to 2024

Issues:

- Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional floodplain and with the critical drainage area to minimise flood risk for future occupiers and the potential for water pollution from the site. A flood risk assessment should also consider the treatment of the non-main rivers that pass through the site and incorporate sustainable drainage systems into development proposals.
- Redevelopment proposals should take account of the electricity substation to the west of the site to minimise the effects on amenity of future occupiers.
- Investigating the potential impact of any proposed development on archaeological heritage.
- Facilitating improved accessibility including improving bus infrastructure, walking and cycling facilities. Resolving road network capacity, movement and safety concerns. Site access arrangements require careful scrutiny / improvement.
- The proximity of the waste management site to the north-west.
- A squash and fitness club exists on the site. Proposals should include the provision for an equivalent or enhanced squash and fitness club as part of sporting intensification.
- There is currently identified need for school places across south London. Residential development would be expected to deliver the necessary school places, healthcare and other associated infrastructure.

Summary of consultation responses: Issues were raised from various parties during each of the consultation stages and are summarised as follows (abridged):

- Parking, traffic, access and congestion on the site and surrounding area;
- Loss of the Greyhound Stadium, squash club and associated activities which exist on the site
- Loss of existing employment and other uses on the site
- The site is not suitable for further industry
- Impact on the nearby waste management site (in Wandsworth)
- Potential increase for policing needs
- Objection to residential or retail use
- Flood risk and its mitigation
- Support for sporting intensification
- The site has potential for alternative uses including a school, retail, car dealerships, employment and a food store.
- Support for AFC Wimbledon returning to Merton.

- Concern over transport to and from the site
- Site should be used for a school; the relocation of existing industry or leisure facilities (including council-owned facilities).

Further research:

- The majority landowner, GRA Ltd, have submitted representations which outline their intention to redevelop the site to provide the land for a new football stadium with enabling residential and retail development. GRA Ltd's previous representations have not been withdrawn. GRA Ltd are in discussions with AFC Wimbledon regarding the delivery of the football stadium element.
- Council previously published preferred uses for the site as sporting intensification, or industrial and warehousing. Research demonstrates that demand for industrial and warehousing land in Merton and across London and the southeast has been declining for two decades and there is no evidence that would support the allocation of this large site as additional industrial land. The council has therefore removed this reference to industrial and warehousing from the Wimbledon Greyhound Stadium allocation.
- The Environment Agency is supportive of exploring potential mitigation measures to alleviate flood risk on the site.
- November 2012 - The site's potential for a primary school was assessed in an external report commissioned by the London Borough of Merton, but was rejected on grounds of size and suitability for a school.

5 EIA Process

5.1 EIA Regulations

5.1.1 Procedures relating to the assessment of the environmental effects of development are described in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, known as the 'EIA Regulations'. These implement EC Directive 85/337/EEC, as amended by Directive 97/11/EC, into domestic legislation. The EIA Regulations set out the procedures for undertaking an EIA and the information which is required in an Environmental Statement (ES). An extract from the EIA Regulations, setting out the information required in an ES, is reproduced in **Appendix B**.

5.2 Screening

5.2.1 As stated in section 1, the developer intends to undertake an EIA of the proposed development which will be documented in an ES in full compliance with the requirements of the EIA Regulations.

5.3 Scoping

5.3.1 The purpose of scoping is to identify the key issues relating to the proposed development – policy, economic and social as well as environmental - and to ensure that they are subject to the appropriate level of assessment, thereby providing a focus for the EIA. It also gives relevant stakeholders an opportunity to express their views on the proposed development and the scope of the EIA.

5.3.2 It should be noted that this EIA Scoping Report encompasses the environmental effects of the construction and operation of the proposed development on the site and its locality as well as the potential effects and interactions with existing and committed development. The assessment process should be of sufficient depth to enable an adequate appreciation of how each of the issues listed may be affected by the development although some topics will be more important than others.

5.4 Consultation

5.4.1 The proposals are being developed as an iterative process of design, assessment and review. As a result, it is the intention that the proposals submitted for planning approval will incorporate measures designed to mitigate potentially adverse effects and enhance benefits wherever possible.

5.4.2 Consultation is underway with Merton Council, the Environment Agency and Transport for London. This consultation has informed this scoping stage and will be used through the course of the EIA and design process. Public consultation planned for October 2013. All consultation will inform the EIA and the design of the proposed development.

5.5 Assessment

5.5.1 In general terms the main stages in the EIA are as follows:

- Data Review – draw together and review available data;
- Scoping – identify significant issues, determine scope of EIA;
- Baseline Surveys – undertake baseline surveys and monitoring;

- Assessment and iteration – assess likely effects of development, evaluate alternatives, provide feedback to design team on adverse effects, incorporate mitigation, assess effects of mitigated development; and
- Preparation of the ES.

5.6 Mitigation

- 5.6.1 One of the most important roles of the EIA is to identify ways to mitigate negative environmental effects and opportunities that the scheme presents for environmental improvements.
- 5.6.2 A hierarchy of methods for mitigating negative effects will be followed; these are, in order of preference:
- Enhancement, e.g. incorporation of green roofs in the design;
 - Avoidance, e.g. repositioning of sensitive receptors to remove potential significant effects;
 - Reduction, e.g. employment of sustainable urban drainage; and
 - Compensation, e.g. off-site ecological enhancement.
- 5.6.3 Environmental effects remaining after mitigation measures have been incorporated are termed residual effects and these will be fully described in the ES.
- 5.6.4 Where necessary, the ES will describe measures that will be taken to monitor the effectiveness of controls, compensation, mitigation, enhancement and remediation. Monitoring will enable any shortfall in expectations directly attributable to the development to be addressed.

5.7 Environmental Statement

- 5.7.1 The ES provides the documentation of the EIA process. The ES will describe the proposed development, EIA methodology, policy context, assessment of potentially significant environmental effects (including cumulative effects and impact interactions), as well as providing supporting graphics, technical appendices and a non-technical summary.
- 5.7.2 A draft contents list of the ES is provided at **Appendix C**. Comments on this are invited from consultees

6 Proposed Scope of the EIA

6.1 Technical Scope

6.1.1 The technical scope describes the environmental topics that should be addressed by an EIA, in line with the requirements of Schedule 4 of the EIA Regulations. The aspects of the environment that could be significantly affected by the development are:

- Population;
- Fauna;
- Flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets including architectural heritage and the historic environment;
- Landscape; and
- The inter-relationship between the above factors.

6.1.2 This requirement and the broad categories set out above have to be interpreted and applied in the context of the site. **Chapter 7** provides a detailed analysis of the resultant technical scope of the EIA. The following therefore sets out the principles that will be applied to the EIA process rather than site specific issues.

6.2 Temporal Scope

Environmental Baseline

6.2.1 As a general principle, potential environmental effects will be assessed by comparing the predicted state of the environment without the development with the state of the environment with the development for a particular year. This will necessitate predicting how current conditions at the site may change without the proposed development occurring.

6.2.2 The EIA will take into account major extant planning permissions and committed developments that are likely to come forward during the construction of the project. Where appropriate, these will be factored into the definition of the baseline or identified as receptors at the relevant points in time.

6.2.3 The schemes to be included in the assessment will be agreed with Merton Council and Wandsworth Council.

Duration of Effects

- 6.2.4 Environmental effects will be classified as either permanent or temporary, where appropriate. Permanent changes are those which are irreversible (e.g. permanent land take) or will last for the foreseeable future (e.g. noise from generated road traffic).
- 6.2.5 The duration of temporary environmental effects is defined as follows:
- Short-term - less than three years; or
 - Medium-term - three to ten years.
- 6.2.6 Such definitions are considered to be appropriate for this study as the construction would be expected to take less than five years and hence construction effects would typically be either short or medium term effects, and the operation of the interim 11,000 seat stadium would be up to 10 years so effects would be considered medium-term, whilst effects that would result from the operation of the development would be considered to be permanent.

Frequency of Effects

- 6.2.7 Where environmental effects are episodic, the frequency of the events will be predicted.

Phases of the Scheme

a. Construction

Certain environmental effects will only occur during construction of the project and will cease once construction activities have ceased. These will typically be the temporary effects of the scheme and will be described as “short-term” or “medium term”, as the case may be, using the definitions set out in section above. Examples include but are not limited to:

- Creation of dust;
- Risk of pollution during construction; and
- Noise from construction activities.

b. Operation

Environmental effects that occur during the operation will be described as permanent. Examples of effects which might occur during the operation of the scheme are:

- Changes to habitats;
- Altering the local flood risk; and
- Noise from generated road traffic.

c. Decommissioning

Decommissioning is not a foreseeable event and the environmental effects of decommissioning or abandonment of the development are not therefore part of the proposed EIA scope.

Spatial Scope

6.2.8 The spatial extent of each of the specialist studies will vary from one to another; in some instances the environmental effects will extend no further than the site boundary and in most cases their extent will not extend further than 400m beyond the proposed site boundary. Exceptions are likely to be:

- Transport and related effects (e.g. severance, air quality, noise) – scope will include effects on the local road network where significant changes are expected.
- Community – effects on local communities and facilities.
- Visual amenity – determined by the visual envelope.

6.2.9 The study area for each technical discipline will be outlined as appropriate in the Environmental Statement.

6.3 Types of Effects

6.3.1 In assessing the significance of potential effects identified during the EIA, account will be taken as appropriate as to whether effects are:

- Beneficial Effects - effects that have a positive influence on the environment;
- Adverse Effects - effects that have a negative influence on the environment;
- Direct Effects - effects that are caused by activities which are an integral part of the scheme;
- Indirect Effects - effects that are due to activities that are not part of the scheme, e.g. regeneration benefits attributable to the scheme;
- Primary Effects - the first effect of a scheme activity e.g. alteration to watercourse;
- Secondary Effects - effects that are a consequence of a primary effect, e.g. changes to aquatic fauna as a result of altering watercourse;
- Cumulative Effects - many effects that singly are not significant, but when assessed together may be significant; and
- Residual Effects - effects that remain after the positive influence of mitigation measures are taken into account.

6.3.2 For clarity within the assessment, 'impact' will be used in relation to the outcome of the project (e.g. the removal of trees or the generation of noise), while the 'effect' will be the consequent implication in environmental terms (continuing the above example, e.g. the loss of a potential bird breeding site or the reduction in residential amenity).

6.4 Consideration of Alternatives

6.4.1 It is necessary for the ES to document the consideration of alternatives within the EIA process. This will entail identifying alternative forms of development (e.g. different layouts, massing, land use and size) and considering the environmental implications of these alternatives, to demonstrate that the proposed scheme is environmentally preferable.

6.5 Residual Effects

- 6.5.1 The incorporation of mitigation measures, primarily as part of the scheme design and construction phase, will be reported where appropriate and potentially significant residual effects that remain after mitigation will be described and assessed according to the significance criteria set out below.

6.6 Assessing Significance

- 6.6.1 As noted above, the EIA Regulations require that the ES describes likely significant effects of the proposed development. However, there is no applicable definition of significance and interpretations differ. In accordance with the European Commission's Guidance on Scoping, the EIA will study those effects that will influence decision-making or those where there is uncertainty about their magnitude. This approach is consistent with best practice for EIA in the UK.
- 6.6.2 The significance of an effect is the product of two factors, the value of the environmental resource affected and the magnitude of the impact. A significant effect may arise as a result of a slight impact on a resource of national value or a severe impact on a resource of local value. In addition, the accumulation of many non-significant effects on similar local resources geographically spread throughout the scheme may give rise to an overall significant effect. An example of this is might be the loss of ecological habitat of low value at many locations.
- 6.6.3 This approach to assessing and assigning significance to an environmental effect will rely upon such factors as legislative requirements, guidelines, standards and codes of practice, consideration of the EIA Regulations, the advice and views of statutory consultees and other interested parties and expert judgement. The following questions are relevant in evaluating the significance of potential environmental effects:
- Which risk groups are affected and in what way?
 - Is the effect reversible or irreversible?
 - Does the effect occur over the short, medium or long term?
 - Is the effect continuous or temporary? Does it increase or decrease with time? Is it of local, regional, national or international importance?
 - Are health standards or environmental objectives threatened?
 - Are mitigating measures available and is it reasonable to require these?
- 6.6.4 Specific significance criteria will be prepared for each specialist topic, based on the above and the generic criteria set out in Table 6.1.

Table 6.1: Significance Criteria

Significance Level	Criteria
Severe	Only adverse effects are assigned this level of importance as they represent key factors in the decision-making process. These effects are generally, but not exclusively, associated with sites and features of national or regional importance. A change at a district scale site or feature may also enter this category.
Major	These effects are likely to be important considerations at a local or district scale but, if adverse, are potential concerns to the project and may become key factors in the decision-making process.
Moderate	These effects, if adverse, while important at a local scale, are not likely to be key decision-making issues. Nevertheless, the cumulative effect of such issues may lead to an increase in the overall effects on a particular area or on a particular resource.
Minor	These effects may be raised as local issues but are unlikely to be of importance in the decision-making process. Nevertheless they are of relevance in enhancing the subsequent design of the project and consideration of mitigation or compensation measures.
Not Significant	Either no effect or effect which is beneath the level of perception, within normal bounds of variation or within the margin of forecasting error. Such effects should not be considered by the decision-maker.

6.6.5 Within the framework above, the project team will set significance thresholds for each environmental topic. To ensure a balanced approach, the significance threshold for one topic will be equivalent to the significance threshold of any other topic, as far as is possible.

6.7 Uncertainty

6.7.1 The prediction of future effects inevitably involves a degree of uncertainty. Where necessary, the ES will describe the principal factors giving rise to uncertainty in the prediction of environmental effects and the degree of the uncertainty.

6.7.2 Confidence in predictions will be engendered by employing accepted assessment methodologies, e.g. Guidance for Ecological Impact Assessment by the Institute of Ecology and Environmental Management. Uncertainty inherent within the prediction will be described. As a general principle the ES will describe credible, reasonable worst case foreseeable events and their effects.

6.7.3 Uncertainty also applies to the success or otherwise of measures to mitigate negative environmental effects. Where the success of a mitigation measure is uncertain, the extent of the uncertainty will be identified in the ES.

7 Topics Included in EIA Scope

7.1 Introduction

- 7.1.1 This section identifies the environmental topics that it is proposed should be scoped in to the EIA for the proposed development and outlines the methodologies proposed to undertake the assessments.
- 7.1.2 This scoping exercise is based on environmental information collected for the site in relation to preliminary technical studies on flooding and traffic and consultation with key stakeholders, information from previous reports (from 2004) and initial baseline data gathered as part of this EIA scoping process.

7.2 Socio-Economics

Introduction

- 7.2.1 An ES chapter will be written based upon a socio-economics assessment to be undertaken for the proposed development.

Potential Effects

- 7.2.2 The provision of a football stadium for AFC Wimbledon will represent a return of the club to their historic home after over 20 years. The social benefits to the local community for generations to come should not be underestimated. Such a milestone scheme will help to facilitate Merton Council's aspiration for regeneration and transformational change. This will assist in achieving the step change in the perception of the area required to facilitate much needed inward investment, in turn leading to better homes, local amenities and safer, more attractive and connected environments.
- 7.2.3 The socio-economic effects from the development will span the construction and post-construction phases. They will include job creation and losses (if any), changes to the sectoral structure and profile of the local economy. It will consider the population impacts of the proposed residential development and also assess the balance of community infrastructure.

Proposed approach

- 7.2.4 The assessment will set out the national and local policy objectives in terms of economic development, establish a baseline of the economic and demographic profile of the site area and the district, and review the economic performance over the last decade or so. This includes analysing the number and types of jobs available in the local economy; the local labour market activity; the skills and occupation profile of residents; and travel to work patterns. The assessment will include a review the community infrastructure serving the resident population.
- 7.2.5 Finally, the assessment will identify the type and level of impacts likely to affect the key receptor groups in socio-economic terms i.e. businesses and people.

7.3 Hydrology and Flood Risk

- 7.3.1 The purpose of this chapter in the EIA will be to outline the impact of the proposed development in relation to hydrology and flood risk.

Introduction

- 7.3.2 The proposals for the redevelopment of the stadium have been under consideration for some time. During this time the extent and depth of flooding predicted by the Environment Agency models has varied considerably. This is principally due to the complexity and uncertainty in data relating to the catchment of the River Wandle and its tributaries.
- 7.3.3 A chapter will be prepared for the Environmental Statement drawing upon the Flood Risk Assessment and surface water drainage strategy to be prepared for the site.

Potential Effects

- 7.3.4 The current flood levels provided by the Environment Agency show the site as lying entirely within the 1 in 100 year flood outline and partially within the 1 in 20 year flood outline.
- 7.3.5 An extensive review by the developer and by London Borough of Merton through their SFRA has not highlighted any evidence that the stadium site has experienced river flooding since 1968. The absence of flooding over this 44 year period does not suggest that the site is free from flood risk entirely but it does suggest that it is not at risk from the frequent flooding predicted by the Environment Agency (i.e. the 1 in 20 year flood).
- 7.3.6 Surface water drainage from the site will need to be managed in a way that there are no issues in relation to localised flooding.

Proposed approach

- 7.3.7 The methodology adopted within the FRA will involve outlining the flood risk to the existing and proposed development and assessing the potential impacts of the proposed development on surface water and surface water drainage. A surface water drainage strategy will be developed as part of a Flood Risk Assessment. The ES chapter will draw upon this information and assess the likely significant water quality and drainage effects.

7.4 Land and Water Quality

- 7.4.1 This chapter of the EIA will describe the effect of the proposed development in relation to ground conditions, contamination and groundwater quality.
- 7.4.2 The framework for assessment will utilise both national and regional/local policies, including; Part 2A of the Environmental Protection Act (EPA) 1990, the London Plan and the Local Development Framework.
- 7.4.3 In order to inform the assessment effects and impacts, a Phase 1 desk study will be prepared for the site. This report will include a preliminary risk assessment, completed in accordance with Model Procedures for the Management of Land Contamination, Contaminated Land Report 11 (CLR11).

Potential Effects

- 7.4.4 It is considered that there is generally a low risk associated with land quality issues at the site. Should localised contamination (unforeseen contamination) be identified this is likely to be limited in extent and it should be possible to address risks through a combination of source removal and cover soils to landscape areas as well as good practice during construction.
- 7.4.5 The site is occupied by Wimbledon Greyhound Stadium and associated parking. There are two commercial activities recorded on site, G&J auto services and WVC, for vehicle repair/servicing and hire respectively.
- 7.4.6 The earliest historical map shows the site to be developed with residential properties to the north-east (Summertown), a Copper Works to the south-west and Garratt Print Works to the north-west. Later maps indicate the land to the south and south-east as “Watercress Beds” and “Allotments” respectively. By 1959 the allotments are developed as the Crematorium and the beds as Woodhouse Farm. The electricity substation is constructed during the period 1933 and 1948. The land uses off Copper Mill Lane include Laundry, Machine Tools, Leather Works and Plant Hire.
- 7.4.7 The identified land uses on-site are considered unlikely to have generated significant site-wide contamination. However, the site is located in a predominately industrial/commercial area and these uses could give rise to contamination which has the potential to migrate on to the site via the shallow groundwater. The nature of the land use activities hydraulically up gradient (to the S) include Copper Works, Laundry, Engineering Works and latterly Garage, Superstore and Crematorium. The demolition / development in the SE and NW may have residual foundations.
- 7.4.8 Potential effects entail altering the potential for a significant pollutant linkage as a result of the proposed development upon identified receptors, including:
- Future site occupants/users;
 - Surrounding site users;
 - Construction/maintenance workers;
 - Infrastructure, including; drinking water supply pipes and buried concrete;
 - Groundwater (notably the Secondary A aquifer of the Superficial Deposits); and
 - Surface water (River Wandle, located 150m from the western boundary, flowing south to north, an historic watercourse on the eastern boundary and a number of man-made water features north of the site).
- 7.4.9 Such effects could therefore include increasing exposure to existing contamination, creating a new source of contamination or putting new receptors at risk of contamination.

Methodology

- 7.4.10 In order to assess potential effects and any required mitigation measures a Refined Conceptual Site Model will be defined for the site and proposed development. Potential effects will be considered separately for each potentially complete pollutant linkage such that any potential impacts are identified and mitigated as required. This will draw upon desk study data.

7.4.11 The methodology for assessment within the EIA can be summarised as follows:

- Establish baseline conditions;
- Consider the 'do-nothing' scenario (i.e. how baseline conditions may change without the proposed development occurring);
- Determine the potential effects of the development;
- Assess any potential for the development to alter or effect ground conditions; and
- Determine if any mitigation measures are required.

7.4.12 It is intended that the assessment of effects and impacts associated with Land and Water Quality will include consultation with regulatory bodies, including the Environment Agency and the Environmental Health Officer at Merton Council.

7.5 Transport and Access

7.5.1 The Applicant's consultant team has been involved in extensive discussions with the London Borough of Merton Highways. This, and the background work undertaken has provided a good understanding of the issues involved.

7.5.2 A standalone Transport Assessment (TA) will be prepared to be submitted with the planning application. The scope of the TA will be agreed with Merton Council, as the local highways authority, and the TA will be prepared in accordance with the requirements of Transport for London's (TfL) Transport Assessment Best Practice Guidance (2010) and the Department for Transport's Guidance on Transport Assessment (2007).

7.5.3 The assessment of likely significant transport and access effects within the ES will be based on the TA, drawing upon the Guidelines for the Environmental Assessment of Road Traffic by the Institute of Environmental Assessment (1993).

Potential Effects

7.5.4 The impact of the proposed development will be considered in light of the infrastructure proposals, together with accompanying measures such as pedestrian, cyclist and vehicular provision.

7.5.5 The ES will include a description of the temporary transport effects anticipated during the demolition and construction including the implications of construction traffic on the local road system and any junction or highway works that are required.

7.5.6 Operational effects will include a comparative prediction of local vehicle movements with and without the development, based upon the predicted number of trips generated and the likely modal share. Other potential effects considered will include effects on pedestrians, cyclists, other site users, car parking, servicing and safety.

Methodology

7.5.7 The assessment will identify the likely significant environmental impacts arising from the proposed development in respect of all modes of transport. The assessment of individual environmental elements will be carried out drawing upon with the 'Guidelines for the Environmental Assessment of Road Traffic' (1993) published by the Institute of Environmental Assessment (IEA) and, where appropriate, Volume 11 of the Design Manual for Roads and Bridges (DMRB) 'Environmental Assessment' (2008) published by the former Department of

Environment, Transport and the Regions (DETR), now Department for Transport. These are recommended tools for the appraisal of environmental impact of road traffic and they identify appropriate standards for assessment. In addition, reference will be made to the Institution of Highways and Transportation publication, Guidelines for Traffic Impact Assessment (1994).

- 7.5.8 In accordance with the above guidance, the assessment within the Transport and Access chapter of the ES will consider the impact of the development in relation to severance, driver delay, pedestrian delay and amenity, fear and intimidation, accidents, safety and hazardous loads. The assessment will consider the potential effects of both the construction and operational stages.
- 7.5.9 The transport effects will be considered and assessed for the surrounding network where links will experience a change of traffic greater than 30%, or more than 10% where the links contain sensitive receptors. Mitigation will be provided where significant or adverse effects occur as a result of development.

7.6 Noise and Vibration

- 7.6.1 A chapter will be prepared to address the noise and vibration effect of the proposed development, both in terms of the effect of the proposed development on the nearby representative sensitive receptors and the suitability of the site for the development proposed.
- 7.6.2 The methodology presented below considers the uses to be included in the proposed development. It describes the proposed baseline noise monitoring followed by the modelling and assessment methodologies for the construction and operational phases of the development.

Potential Effects

- 7.6.3 It is anticipated that demolition and construction of the proposed development could potentially cause a noise and vibration disturbance to existing sensitive receptors close to the site and, during the later construction phases, occupiers of the initial phases of the proposed development.
- 7.6.4 During the operational phase it is anticipated that the generation of development traffic as well as noise from football events could potentially cause a noise effect upon nearby receptors.
- 7.6.5 Finally the suitability of the site for residential accommodation will also be considered.

Methodology

- 7.6.6 Consultation will be undertaken with the Environmental Health Departments within Merton Council and Wandsworth Council to agree the survey and assessment methodologies.
- 7.6.7 A baseline noise survey will be undertaken to establish the existing noise climate of the site consisting of a minimum of 24-hour unattended measurement with attended shorter measurements taken at up to four additional locations on and off site, the locations to be agreed with both Merton and Wandsworth Council EHO Departments. The results of the survey will assist the preparation of the noise model and assessment.
- 7.6.8 The noise climate is likely to be dominated by the local road traffic surrounding the site, along with noise associating with existing recreational use of the stadium and intermittent plant noise. The stadium facility present on the site is currently used for greyhound racing, Spedeworth Motors and hosts regular car boot sales.

- 7.6.9 A “Match Day Noise Survey” at a similar sized existing ground will also be undertaken to collect noise data from crowd cheering and public announce system.
- 7.6.10 Further to the baseline noise and match day surveys, a noise model will be prepared as the basis for the assessment using the computer software SoundPLAN version 7.2. The baseline survey data will be used to validate the model.
- 7.6.11 The likely noise and vibration arising from the construction phase of the development will be assessed qualitatively using British Standard 5228: 2009 Parts 1 and 2 ‘Code of Practice for Noise and Vibration Control on Construction and Open Sites’ to minimise the effects of noise and vibration.
- 7.6.12 With regards to the operation of the proposed development, the suitability of the noise climate of the site for residential development will be determined having regard to internal and external noise levels.
- 7.6.13 Internal and external noise levels within habitable rooms will be assessed following guidance in World Health Organization (WHO) ‘Guidelines for Community Noise’ and British Standard 8233: 1999 ‘Sound insulation and noise reduction for buildings – Code of practice’. There are currently no national assessment methods for assessment of noise from sports grounds, therefore the assessment methodology to be used will be discussed with the Local Authority.
- 7.6.14 The assessment will include the significance of any noise impact of increased traffic flow using the results of the noise model. The noise prediction from road traffic will be undertaken following the methodology in ‘Calculation of Road Traffic Noise’ (CRTN). The ‘Method for Converting the UK Road Traffic Noise Index LA10,18h to the EU Noise Indices for Road Noise
- 7.6.15 Mapping: 2006’ will be used. Recreational sources will be modelled using ISO 9613 Part 2.
- 7.6.16 The noise effect of the operation of the proposed development upon existing sensitive areas will be assessed. The change in noise levels due to the generation of road traffic upon nearby noise sensitive receptors will be assessed between the ‘with development’ and ‘without development’ situations for existing receptors.
- 7.6.17 Appropriate outlined mitigation measures will be identified and reported with the Noise and Vibration chapter.

7.7 Air Quality

- 7.7.1 A chapter will be prepared setting out the findings of an air quality assessment. The assessment will consider two potential air quality issues:
- The effect of the development on the surrounding area, during both the construction and operational phases; and
 - The effect of existing local pollution sources on the site itself.
- 7.7.2 Existing local air quality, the likely future air quality in the absence of the new development, and the likely future air quality if the development goes ahead will all be defined. The assessment of construction effects will focus on the anticipated duration of works. The assessment of operational effects will focus on the earliest year that the development is likely to be operational to provide a worst case assessment.
- 7.7.3 Merton Council has declared a whole borough Air Quality Management Area (AQMA) for exceedences of both the nitrogen dioxide and fine airborne particles (PM10) objectives.

Potential Effects

- 7.7.4 The principal air pollutants of concern with respect to the development will be:
- Nitrogen dioxide (NO₂);
 - Fine airborne particles (PM₁₀ and PM_{2.5}); and
 - Dust.
- 7.7.5 The main local sources of these pollutants are likely to be road vehicles (nitrogen dioxide, PM₁₀ and PM_{2.5}), and construction activities (dust and PM₁₀). Professional experience indicates that any impacts associated with other air pollutants will be negligible.

Methodology

- 7.7.6 Existing local air quality will be defined drawing upon monitoring carried out by Merton Council and information provided within the Council's air quality Review and Assessment reports.
- 7.7.7 Air quality will be assessed at a range of worst-case receptors. For construction activities these will be existing properties closest to the proposed development, and those new properties occupied prior to completion of construction on site. For traffic-related effects these will be the existing and proposed residential properties that are closest to busy roads, in particular those close to junctions, where traffic emissions are greater.
- 7.7.8 The potential effects of dust during demolition and construction will be assessed, making reference to the London Best Practice Guidance on the control of dust and emissions from construction and demolition. There are no statutory objectives for dust; it is therefore common practice to provide a qualitative assessment based on the size of the site, local meteorological conditions and experience of the distances over which impacts may occur. Emissions from on-site plant during construction will be assessed if any potentially significant sources are identified.
- 7.7.9 The assessment of operational road traffic impacts will be undertaken using the ADMS Roads detailed dispersion model. Model outputs will be verified against local air quality monitoring data. This modelling will make use of mapped background concentration data provided by Defra and predicted traffic flows.
- 7.7.10 Air quality will be assessed in relation to the national air quality standards and objectives, established by the Government to protect human health. The 'standards' are set as concentrations below which effects are unlikely even in sensitive population groups, or below which risks to public health would be exceedingly small. The 'objectives' set out the extent to which the Government expects the standards to be achieved by a certain date. They also take account of, and incorporate as appropriate, limit values set by the European Union. The objectives for seven pollutants are prescribed within the Air Quality Regulations, 2000 and the Air Quality (England) (Amendment) Regulations 2002.
- 7.7.11 All practical and reasonable measures which can be implemented to mitigate any adverse impacts associated with construction and operation of the proposed scheme will be considered, and highlighted within the Air Quality chapter.

7.8 Townscape and Visual

Introduction

- 7.8.1 A Townscape & Visual Impact Assessment (TVIA) will be prepared to address potential impacts in relation to the proposed development on Townscape and Visual receptors.
- 7.8.2 Consultation with Merton Council and Wandsworth Council will be required in order to establish principal townscape and visual receptors the impact assessment is to address. This will include agreeing viewpoints for which photo montages and / or wire line montages will be prepared and to inform the assessment (and will be submitted as an appendix to the ES). Key viewpoints proposed to be used are included in **Appendix D**.
- 7.8.3 The TVIA will assess the existing townscape (as well as landscape) character and visual amenity study area to be agreed with Merton and Wandsworth Councils and identify potential receptors and their related sensitivities to the proposed development.

Potential Effects

- 7.8.4 It is anticipated that the proposed development could affect key views of the site both from the immediate surroundings and from more distant views as the proposed stadium will be a larger structure than the current one and the proposed residential development will introduce buildings up to ten storeys in height. The development also has the potential to affect the townscape character and features of the local area as a result of the provision of modern buildings, a larger stadium and the development of the eastern part of the site which is currently predominantly hardstanding (for car parking).
- 7.8.5 Lighting impacts are also possible, associated predominantly with the new stadium.

Methodology

- 7.8.6 The format for the TVIA would be based upon the current guidelines produced by the Landscape Institute and Institute of Environmental Assessment and Management (Guidelines for Landscape and Visual Impact Assessment, 2013). Guidance will also be sought from 'Guidance for Tall Buildings' July 2007, compiled by CABI and English Heritage. Baseline photographs and photo montages will be prepared in accordance with the Landscape Institute's Advice Note 01/11 'Photography and photo montage in landscape and visual impact assessment'.
- 7.8.7 A desk study and baseline site survey would be carried out for the site and TVIA study area to establish both townscape and visual receptors in the study area, e.g. townscape character areas/ types, designated townscapes, listed buildings and townscape / ecological sensitivities as well as a range of visual receptors. Groups of visual receptors will be represented by a selection of viewpoints illustrating different types of views experienced by these receptors and enable the assessment of visual effects of the proposed development. Theoretical Zones of Visual Influence (TZVIs) based on the existing site and proposed layout and massing would be prepared to identify potential areas of visibility of the site. The survey findings would be used to verify / augment the list of viewpoints to be included in the detailed assessment.
- 7.8.8 Following the identification of potential townscape and visual impacts, mitigation measures will be identified as appropriate, in collaboration with the design team.
- 7.8.9 Residual effects on key townscape (character or features) and visual receptors (groups of viewers represented by selected viewpoints) will be identified and assessed.

7.9 Daylight and Sunlight

- 7.9.1 The taller elements within the proposed development, including the residential towers and the edges of the stadium, may have an effect on the microclimate by changing daylight and sunlight availability at the site.
- 7.9.2 The main issues that will be assessed through the course of the EIA process are: daylight, sunlight and overshadowing availability at relevant neighbouring local receptors as a result of the proposed development.
- 7.9.3 Daylight, sunlight and overshadowing within the proposed development is a consideration for the design but as there is no baseline condition the reporting of the effects are not appropriate for the EIA chapter. The effects on daylight, sunlight and overshadowing within the proposed development will be covered by a stand-alone report outside of the EIA.

Potential Effects

- 7.9.4 The footprint of the proposed development may lead to reductions in daylight, sunlight and overshadowing at existing neighbouring receptors resulting in the potential for daylight, sunlight and overshadowing issues.

Methodology

- 7.9.5 There are no mandatory requirements or criteria for assessing microclimates around buildings.
- 7.9.6 BRE Report 209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (second edition, 2011), provides guidance on achieving good daylight, sunlight and overshadowing for buildings. The guidance covers light availability within new developments, gardens and open spaces, existing buildings and on adjoining development land.
- 7.9.7 The BRE report advises that daylight and sunlight levels should be assessed for property types which may be regarded as 'sensitive receptors'. It is considered that sensitive receptors include main habitable rooms of neighbouring residential properties, schools and hospitals. Habitable rooms in residential properties are defined as kitchens, bedrooms, living rooms and dining rooms.
- 7.9.8 In addition, BS 8206: 2008 Lighting for Buildings – Part 2 code of practice for day lighting, provides recommendations regarding design for daylight in buildings.
- 7.9.9 The daylight, sunlight and overshadowing conditions at relevant receptors across the site and surrounding area will be determined through a combination of a site visit, researching council records, application of BRE Report 209 and professional experience.
- 7.9.10 The vertical sky component (VSC), daylight distribution (DD) and annual probable sunlight hours (APSH) will be calculated at a series of reference points on each main face of the relevant buildings/rooms. The overshadowing effects will be considered using the permanent overshadowing test, as well as transient overshadowing effects on 21st March, June 21st and December 21st.

7.10 Heritage Assets

- 7.10.1 The heritage assets chapter within the EIA will assess the below ground archaeological potential of the site and local built heritage resources and the likely impacts upon such resources. The assessment accords with the national planning policy framework and local planning policy, together with relevant guidelines set out by the Institute for Archaeologists and English Heritage.

Potential Effects

- 7.10.2 The site does not contain any nationally or locally designated (protected) archaeological sites, such as Scheduled Monuments, Listed Buildings or Registered Parks and Gardens. The site is adjacent to the Copper Mill Lane Conservation Area and is within an Archaeological Priority Area that has potential for water-based industry and alluvial/palaeo-environmental deposits associated with the River Wandle.
- 7.10.3 An archaeological desk based assessment was undertaken for the site in 2012 and identified the following:
- a. The site is within an Archaeological Priority Area defined around the floodplain of the River Wandle. However, there has been little physical evidence of prehistoric activity recorded in the vicinity of the site to date.
 - b. A low potential to contain archaeological remains dated to the Roman and Medieval periods when the site is likely to have been prone to flooding and marginal land; and
 - c. A moderate potential to contain post-medieval remains associated with an 18th-century calico bleaching ground.
 - d. Past impacts within the site, namely the construction of the existing stadium building and associated landscaping are likely to have had a widespread severe impact. Overall, the majority of the site has been subject to extensive development between 1896 and 1993. As a result, it is unlikely that any earlier remains survive within areas of Post-Medieval and Modern development.
 - e. Because of past impacts any archaeological remains on the site are unlikely to be of more than local significance.
- 7.10.4 Excavations for proposed basements and the drilling of piled foundations have the potential to impact on late prehistoric, Roman, Medieval and Post-Medieval remains of local significance.

Methodology

- 7.10.5 The site's archaeological potential has been identified through information contained within a preliminary archaeological desk based assessment undertaken in 2012, which updates a previous study from 2006.
- 7.10.6 This information will be reviewed against the proposed development to identify the potential archaeological effects and the requirement for mitigation.

7.11 Cumulative Effects and Impact Interactions

- 7.11.1 The EIA Regulations require consideration of the potential impact inter-relationships and cumulative effects of the development.
- 7.11.2 This assessment will include the interactions of different environmental effects on the same receptor (e.g. a dwelling affected by noise and air emissions) as well as the aggregated impact of the proposed redevelopment of the former Wimbledon Greyhound Stadium and other developments planned in the local area (e.g. the effect on community facilities of this and other local developments).
- 7.11.3 A search of Merton Council's planning website ('Planning Explorer'), has been undertaken of extant planning permissions within the area likely to be considered in the EIA. No current

major schemes were identified within the area of the site as having extant planning permission.

- 7.11.4 Developments identified included the residential and hotel development at Morden Road, South Wimbledon (ref: 13/P1898) and the residential development at the former Risely Playing Fields. However, the developments identified are likely to be too far away from the site for cumulative impacts to be likely to occur.
- 7.11.5 As noted in section 6.2 previously, the schemes to be included in the assessment will be agreed with Merton Council and Wandsworth Council.
- 7.11.6 The assessment of cumulative effects will be considered within each of the technical chapters, considering proposed local major developments along with the former Wimbledon Greyhound Stadium development.
- 7.11.7 Potential impact interactions will be considered in a standalone chapter to draw together the assessment documented in the ES and identify the overall effect of the proposed development.

8 Topics Not Included in EIA Scope

8.1 Introduction

- 8.1.1 The ES should be a focused document considering the assessment of potentially significant environmental effects, both adverse and beneficial. Therefore those effects which are not likely to be significant should not be included in the ES, i.e. they should be scoped out of the EIA.
- 8.1.2 This section sets out those topics that have been determined not to be significant and are therefore not included in the EIA. This section also identified those topics that will be addressed independently in separate assessments and do not form part of the EIA process. The rationale for this determination is also provided.

8.2 Sustainability

- 8.2.1 Sustainability will be incorporated into the design process for the proposed development in line with national, regional and local policy requirements.
- 8.2.2 A Sustainability and Energy Statement will be submitted as part of the planning application documents setting how the proposed development will meet these sustainability and energy requirements based on the opportunities provided by the site and the proposed development.
- 8.2.3 It is therefore considered that sustainability, as an environmental topic, will not require further assessment within the ES. Instead the Sustainability Statement will set out the sustainable performance of the development and the measures that have been included to enhance the sustainability of the development. The EIA will then assess the environmental effects of the proposed development including these sustainability features. A description of these features will be provided in the development description section of the ES.

8.3 Utilities

- 8.3.1 A detailed assessment of utilities will not be provided except in relation to flood risk and surface water drainage. This will include consideration of the proposed development's demand, both on and off-site, for:
- Water supply and network infrastructure; and,
 - Surface water drainage requirements and flood risk.
- 8.3.2 However, the ES will consider the environmental effects of required utility (reinforcements, diversions and abandonments) should additional infrastructure, i.e. water, gas, electricity, lighting and telecommunications, be necessary (see [Appendix C](#) Probable ES Contents). Therefore a description of the utilities infrastructure to be provided will be outlined in the development description of the ES.

8.4 Lighting

- 8.4.1 A lighting study will be undertaken to qualitatively assess the lighting characteristics of the site and its surroundings in accordance with the Institute of Lighting Engineers' guidance (ILE, 2007 et seq). The classification (urban, rural, etc.) will establish existing lighting levels across the site and for adjacent land uses where appropriate and accessible. The ILE guidance provides information on acceptable lighting levels typically encountered in each classification

area, and therefore assists in determining the sensitivity of a particular locality to changes in lighting.

- 8.4.2 A description of the lighting infrastructure to be provided will be outlined in the development description of the ES. Any impacts of the proposed lighting, such as on townscape and visual receptors, or on ecological features, will be assessed within relevant technical chapters.

8.5 Waste

- 8.5.1 The proposed development is likely to generate waste as a result of demolition, site preparation, construction and the operation of the development. It is therefore proposed to prepare a Waste Strategy setting out the strategy for sustainable waste management throughout all stages of the project.
- 8.5.2 Consequently waste will be managed in accordance with this strategy, including ensuring that waste is moved up the waste hierarchy as far as possible:
- Reduction;
 - Re-use;
 - Recovery (i.e. recycling); and
 - Disposal (i.e. landfill/incineration).
- 8.5.3 In line with good design, and effective cost management, materials generated on the site by the demolition and construction works will be retained on site and re-used wherever possible. In accordance with Merton Council's validation requirements a pre-construction Site Waste Management Plan will also be prepared providing further details on waste management arrangements during construction and demolition.
- 8.5.4 With regards to operational waste generation, suitable provision will be included within the development, in the context of Merton Council's refuse and recycling collection strategy, to encourage recycling and minimise the quantities of waste to be sent to landfill.
- 8.5.5 It is intended that the Waste Strategy and Site Waste Management Plan will be submitted as appendices to the ES, and processes and features provided will be summarised in the development description of the ES. This approach provides the best approach for outlining the strategy for sustainable waste management, rather than 'assessing' waste as an environmental topic. The impacts of waste management, such as handling, storage and transport, will be assessed within relevant technical chapters.

8.6 Wind Microclimate

- 8.6.1 It is anticipated that the proposed residential development will include buildings up to ten storeys in height, but that the majority of the residential development will comprise buildings between 6 to 10 storeys. As a result the development does not include particularly tall buildings.
- 8.6.2 In PBA's experience of undertaking wind assessments of comparable and larger developments (utilising desk based assessment, wind tunnel testing and computational fluid dynamics modelling) and drawing upon BRE's Digest DG520 'Wind Microclimate Around Buildings', significant wind effects are more likely to be experienced when buildings are ten storeys or more, or are of significant bulk and extend considerably above surrounding buildings.

- 8.6.3 Given the proposed building heights of the residential development, it is considered that conditions which might lead to unsafe wind conditions are unlikely.
- 8.6.4 However, the new stadium could be of sufficient bulk that unsafe wind conditions might be created at street level and therefore consideration will be given by the design team to wind flows.
- 8.6.5 A preliminary review of the site and surrounding area will be undertaken using Google Street View and available drawings to understand the locality and, in particular, the heights of existing buildings, as well as any nearby planning applications that might impact on the wind patterns around the site.
- 8.6.6 A desktop assessment will then be undertaken of the impact of the proposals on wind flows, focusing on the safety and/or comfort of users of the proposed development and the surrounding area, using local wind data.
- 8.6.7 Depending on the outcomes of the consultation and desktop study, Wind Tunnel Modelling or CFD Modelling may be required in order to quantify the impacts of the development on wind microclimate, identify locations which are unsafe or unsuitable for their proposed use and hence requiring mitigation, and to assess the suitability of any proposed mitigation measures.
- 8.6.8 A wind microclimate report will be prepared, setting out the results of the desktop study (or modelling study, if required).
- 8.6.9 It is intended that the wind microclimate report will be submitted as an appendix to the ES, and referenced within the development description and technical assessments within the ES, as necessary.

8.7 Ecology and Nature Conservation

- 8.7.1 The combination of the suburban location and limited extent and diversity of semi-natural vegetation restricts the opportunity for protected or notable habitats or species to be present at the site.
- 8.7.2 The site does not form part of any statutory designated sites of nature conservation importance and is not covered by any statutory designation. There are no nationally designated sites within 2km however there are two Special Areas for Conservation (SAC) within 5km of the proposed development site, namely Richmond Park and Wimbledon Common.
- Richmond Park SAC lies approximately 4.8km to the west of the site and was primarily selected for its nationally important population of stag beetle (*Lucanus cervus*), which is listed in Annex II of the EU Habitats Directive. Due to the nature of the ecological interest within the SAC, and its distance from the site, it is not considered to present a constraint to the proposed development.
 - Wimbledon Common SAC lies approximately 2.5km to the west of the site and was also primarily selected for its stag beetle population, in addition to two habitats listed in Annex I of the Habitats Directive, namely northern Atlantic wet heaths with *Erica tetralix*, and European dry heaths. Due to the nature of the ecological interest within the SAC, and its distance from the site, it is not considered to present a constraint to the proposed development.
- 8.7.3 There are two Local Nature Reserves (LNRs) situated within 1km of the proposed development site, namely Lower Wandle LNR and Wandle Meadow Nature Park LNR.

- Lower Wandle LNR follows the course of the River Wandle, which runs north-south approximately 150m to the west of the site. This LNR contains riparian habitats, including a diverse aquatic flora, plus woodland, scrub and grassland habitats.
 - Wandle Meadow Nature Park LNR has been created on a former sewage works, and contains a range of habitats including seasonal ponds, damp grassland and willow scrub, and lies approximately 750m south of the Site.
- 8.7.4 Non-statutory designations within Greater London are collectively known as Sites of Importance for Nature Conservation (SINCs). Within the collective SINC designation there is further subdivision on the basis of their importance to a particular defined geographical area, known as Sites of Metropolitan Importance (SMI), Sites of Borough Importance (SBI) and Sites of Local Importance (SLI).
- 8.7.5 Within 1km of the Site there are eight SINC designations, however not all these designations are considered pertinent to the proposed redevelopment of the Site due to the size and nature of the proposed redevelopment together with the spatial relationship and nature of the SINC designations within 1km. The two SINC designations which are considered pertinent to the proposed development are:
- MeBI04 – Wandle Meadow Nature Park and the Lower River Wandle (Grade I Site of Borough Importance) which includes the stretch of river connecting the two LNRs and extending beyond them in a northerly and southerly direction; and
 - WaBII10 – Lambeth Cemetery (Grade II Site of Borough Importance) is a large cemetery located just to the south east of the site, on the opposite side of Plough Lane. This SINC contains semi-improved neutral grassland, acid grassland, occasional reedbed and scattered trees.
- 8.7.6 A preliminary ecological assessment in 2012 recorded limited semi-natural habitats within the site restricted to amenity lawn area within the centre of the stadium track, scattered scrub and tall ruderal vegetation on the periphery of the site including Japanese knotweed *Fallopia japonica* and two mature crack willows *Salix fragilis* on the eastern boundary of the site. The survey also assessed the existing buildings on the site to have a low potential to support roosting bats. The site is immediately surrounded by existing urban development and roads with limited habitat connectivity to wider semi-natural habitat. Furthermore, the site is well lit by street lighting and floodlighting at racing events.
- 8.7.7 A bat emergence and activity survey undertaken in September 2013 did not confirm bat roosts to be present on the site.
- 8.7.8 The potential for significant ecological effects on receptors described above are considered likely to be limited.
- 8.7.9 Based on the information collected to date, it is intended that the planning application will be supported by an ecological assessment report which will inform the EIA but that an ecological impact assessment is not proposed to be undertaken as impacts are not considered likely to be significant.

9 Summary

9.1 Summary

- 9.1.1 This document has been prepared to provide an overview of the potential environmental effects that have been considered in scoping the EIA for Wimbledon Stadium.
- 9.1.2 This Scoping Report has provided information regarding the proposed development, set out the intended EIA scope and methodologies for the assessment of potentially significant environmental effects, and outlined the content of the ES.
- 9.1.3 The aim is to ensure that the proposed development has due regard for the environment, mitigates adverse environmental effects where possible and takes advantage of opportunities for environmental enhancement.

9.2 The Environmental Statement

- 9.2.1 The outcome of the EIA process is the production of an Environmental Statement to accompany the planning application. An ES will be prepared that:
- Describes the proposed development;
 - Outline the main alternatives considered;
 - Describes the baseline environment;
 - Describes the likely significant effects;
 - Describes the measures to mitigate adverse effects; and
 - Includes a non-technical summary.

9.3 Next Steps

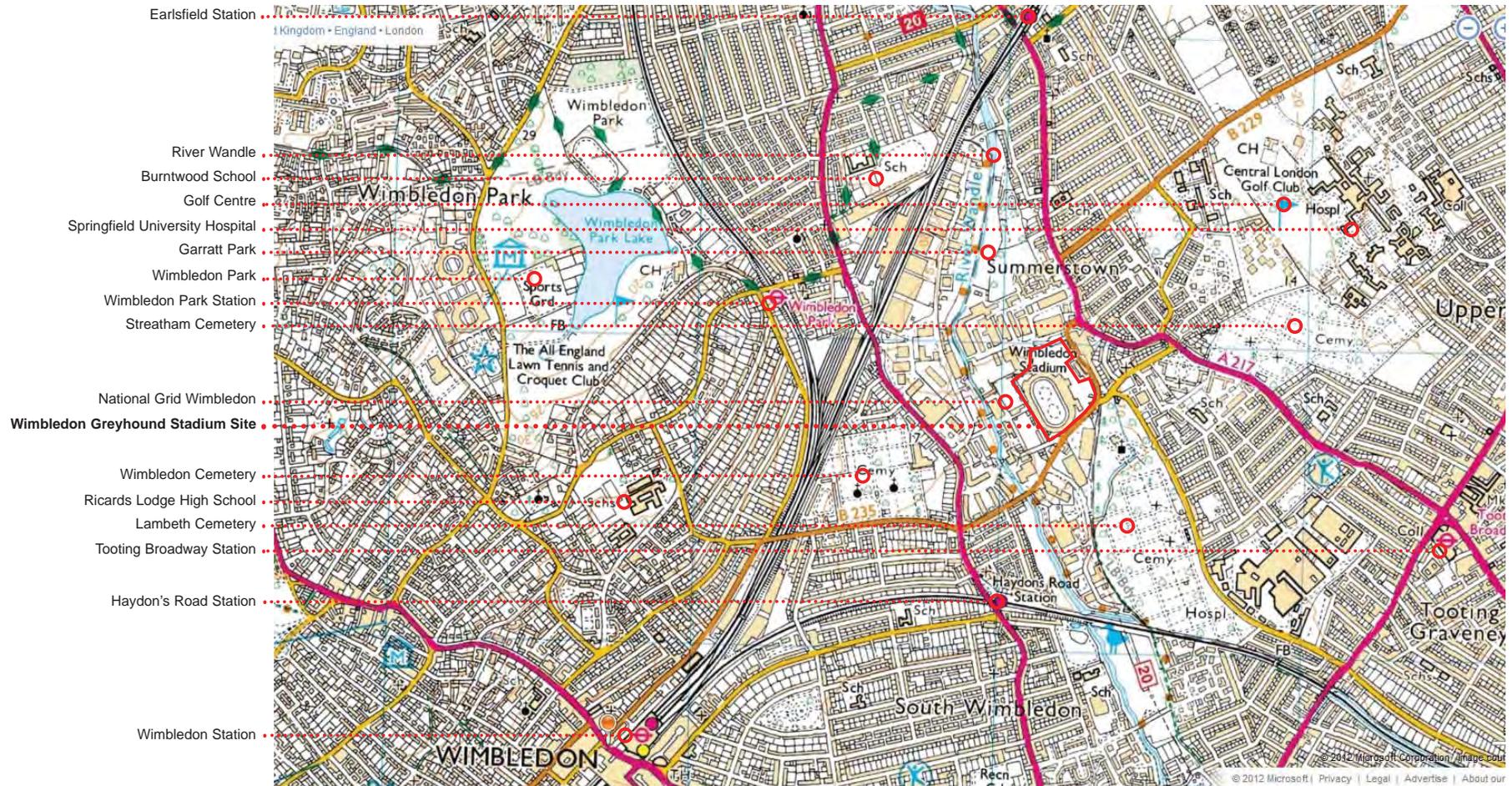
- 9.3.1 The next steps in the EIA process are as follows:
- Request Scoping Opinion from Merton Council (September 2013);
 - Receipt of formal Scoping Opinion (October 2013); and
 - Submission of ES with planning application (estimated to be November 2013).

Appendix A Site Plans

Site Plan
Indicative Layout

01 INTRODUCTION

The purpose of this document is to explain the design approach, analysis and outline initial design concepts for the Wimbledon Greyhound Stadium site. This report also shows an update of the designs since the last meeting on 14 February 2013.



SITE LOCATION AND IT'S WIDER CONTEXT



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NOTES
STADIUM DESIGN:
Derek Wilson Architects

REV.	DATE	AMENDMENT
A	03-10-13	Issued for information
B	22-10-13	Affordable block and retail/residential block amended
C	05-11-13	Residential block revised
D	11-11-13	Residential/retail block updated - Stadium basement added
E	19-11-13	Main residential block updated

KEYPLAN



CLIENT



GALLIARD HOMES LIMITED

SHEPPARD ROBSON

77 Parkway Camden Town London NW1 7PU
T: +44 (0)20 7504 1700 E: london@sheppardrobson.com

PROJECT
THE WIMBLEDON STADIUM DEVELOPMENT

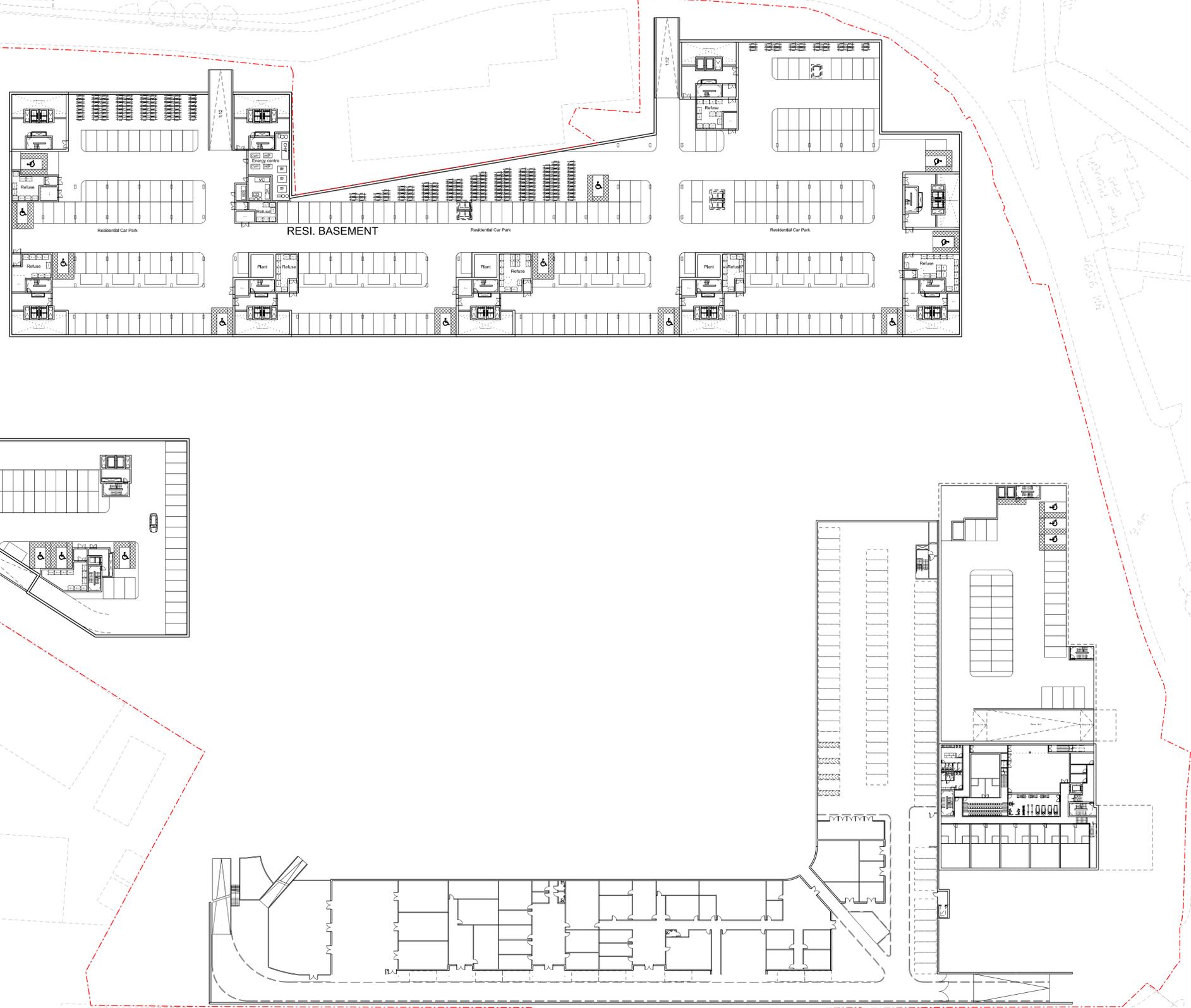
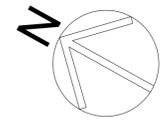
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TITLE
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BASEMENT**

STATUS
PLANNING

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NOTES

REV.	DATE	AMENDMENT
-	13-09-13	Issued for information (as Basement Plan)
A	03-10-13	Layouts revised
B	18-11-13	Retail/residential block revised - Affordable block road junction updated - Temporary refuse storage added
C	19-11-13	Ramps added to affordable and main residential block - refuse temporary storage added

KEYPLAN



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PROJECT
THE WIMBLEDON STADIUM DEVELOPMENT

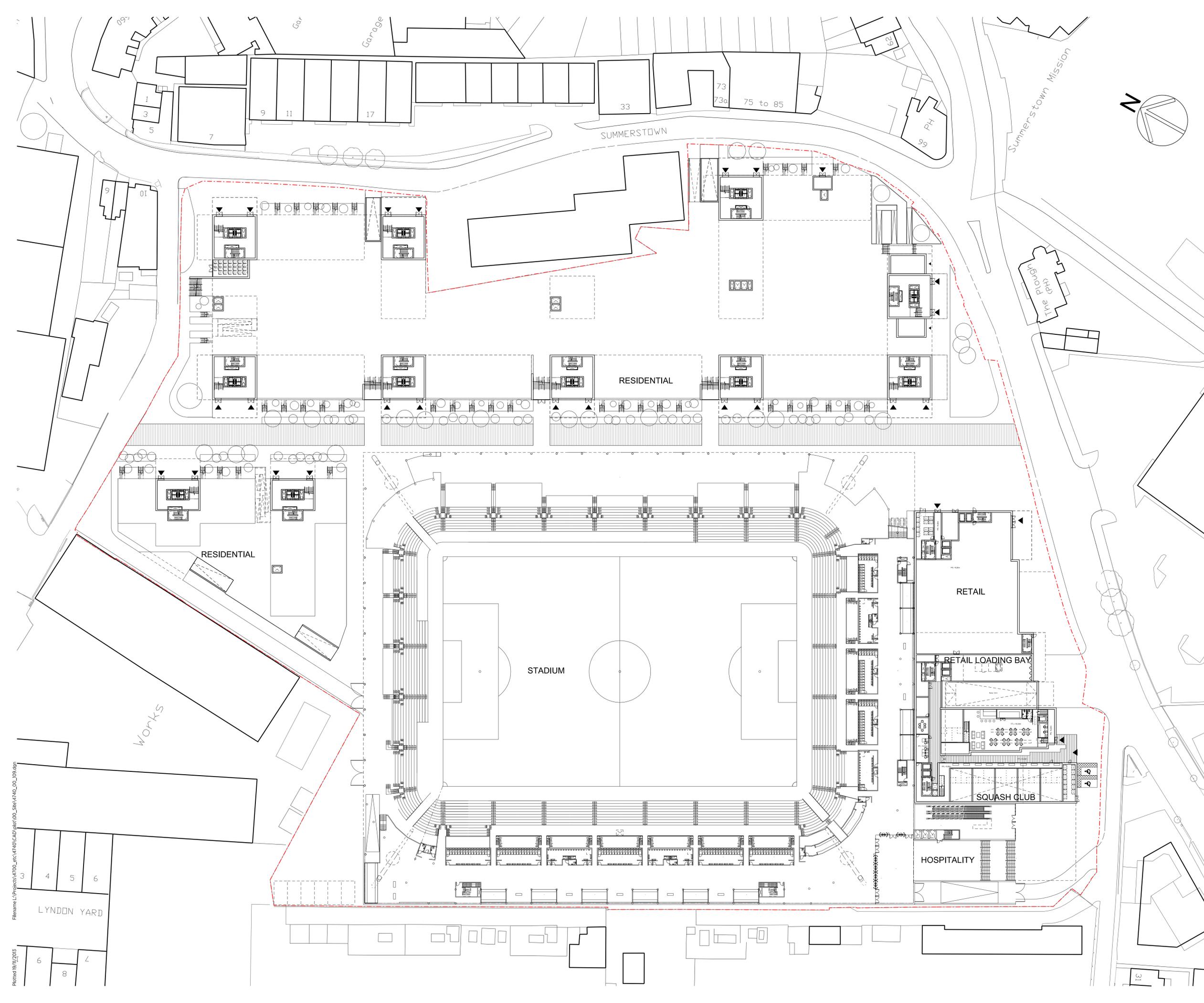
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TITLE
**MASTER PLAN
LOWER GROUND LEVEL**

STATUS
PLANNING

DRAWING NO.
4740-00-109

REV.
C



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NOTES

REV.	DATE	AMENDMENT
-	13-09-13	Issued for information
A	03-10-13	Layouts revised
B	05-11-13	Layouts and landscape updated
C	11-11-13	Landscape revised
D	18-11-13	Retail/residential block revised - Affordable block road junction updated - Temporary refuse storage added
E	19-11-13	Ramps and plant rooms added to affordable and main residential block - Squash club disabled car parking updated

KEYPLAN



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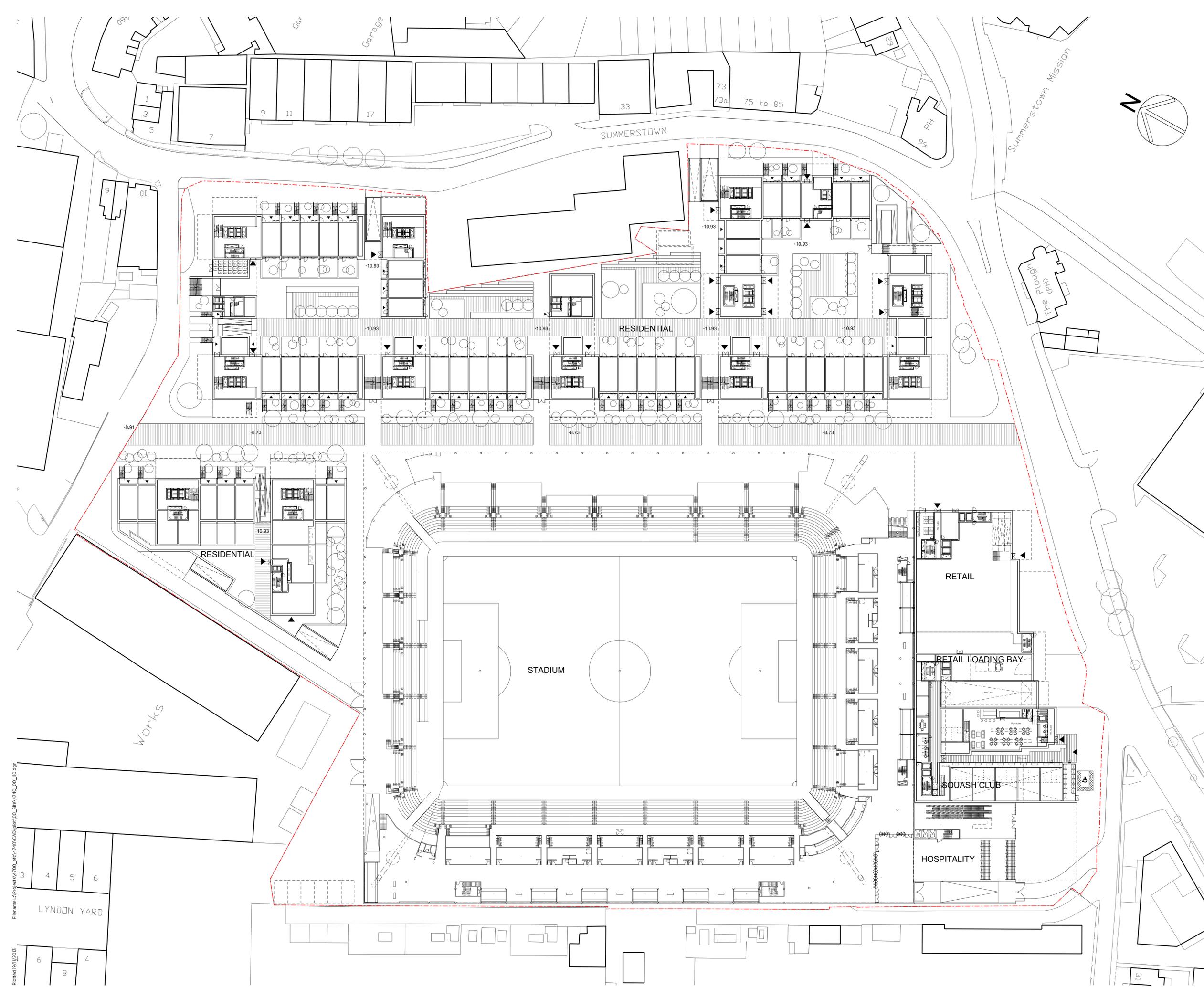
PROJECT
THE WIMBLEDON STADIUM DEVELOPMENT

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1:500 12.09.2013 FW CH CH

TITLE
**MASTER PLAN
UPPER GROUND LEVEL**

STATUS
PLANNING

DRAWING NO. **4740-00-110** REV. **E**



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Printed: 19/11/2013

Appendix B EIA Requirements

Extract from the EIA Regulations, setting out the information required in an ES

SCHEDULE 4

Regulation 2(1)

Information for inclusion in environmental statements

PART 1

1. Description of the development, including in particular—

- (a) a description of the physical characteristics of the whole development and the land-use requirements during the construction and operational phases;
- (b) a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used;
- (c) an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc) resulting from the operation of the proposed development.

2. An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for the choice made, taking into account the environmental effects.

3. A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

4. A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from—

- (a) the existence of the development;
- (b) the use of natural resources;
- (c) the emission of pollutants, the creation of nuisances and the elimination of waste,

and the description by the applicant or appellant of the forecasting methods used to assess the effects on the environment.

5. A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.

6. A non-technical summary of the information provided under paragraphs 1 to 5 of this Part.

7. An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant or appellant in compiling the required information.

PART 2

1. A description of the development comprising information on the site, design and size of the development.

2. A description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects.

3. The data required to identify and assess the main effects which the development is likely to have on the environment.

4. An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for the choice made, taking into account the environmental effects.

5. A non-technical summary of the information provided under paragraphs 1 to 4 of this Part.

Appendix C Draft Contents List

Wimbledon Stadium Environmental Statement

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- [1.2 The Site](#)
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- [1.4 The EIA, ES and Related Documents](#)
- [1.5 Stakeholder Consultation](#)
- [1.6 Project Team](#)
- [1.7 Structure of the Environmental Statement](#)

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- [2.2 History of the Site](#)
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3 The Proposed Development

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- [3.3 Incorporated Mitigation](#)
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[5.11 Residual Effects](#)

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[7.3 Methodology](#)

[7.4 Baseline Conditions](#)

[7.5 Potential Effects](#)

[7.6 Mitigation and Enhancement](#)

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[7.8 Summary](#)

[7.9 References](#)

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[\(as for chapter 7\)](#)

10 Transport & Access

[\(as for chapter 7\)](#)

11 Noise & Vibration

[\(as for chapter 7\)](#)

12 Air Quality

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19.2 Methodology

19.3 Construction Effects

19.4 Operation Effects

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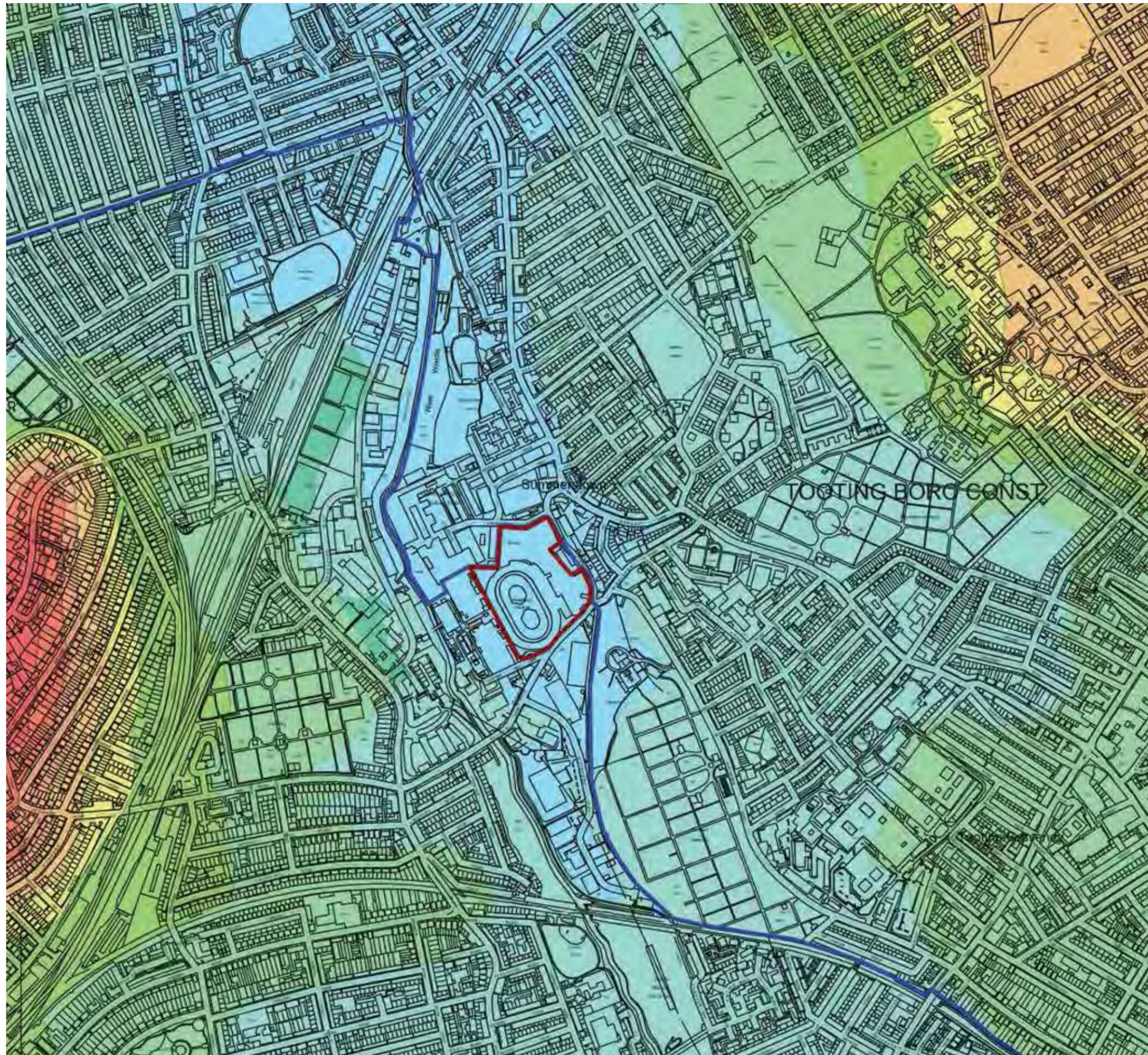
Appendix D Suggested Key Views – Baseline

AFC Wimbledon LVIA

Key Views - Baseline Study

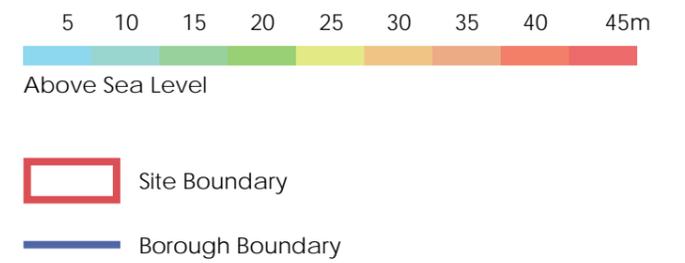
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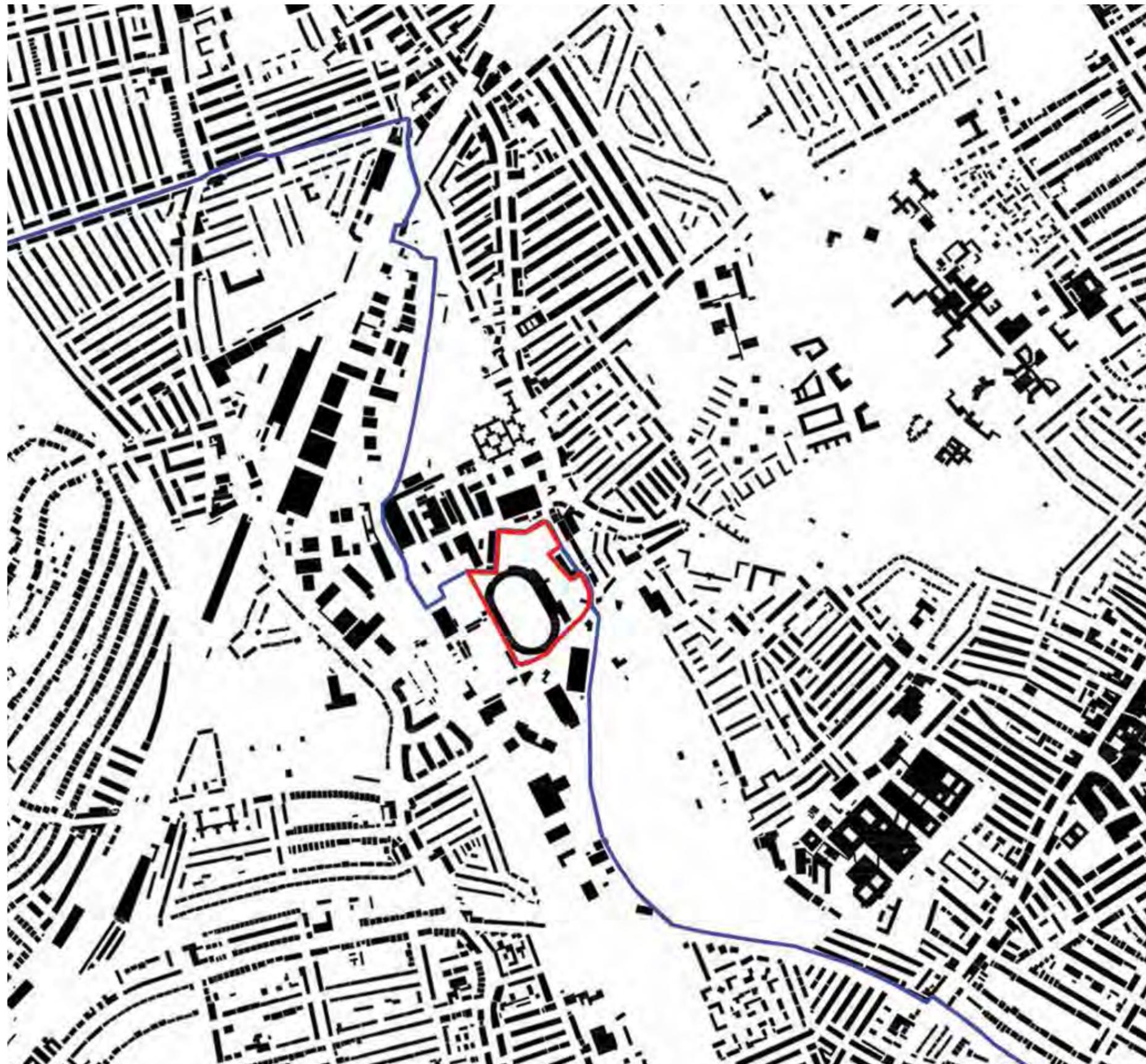
turkington martin



Topography

The site sits at the bottom of the River Wandle valley. The area directly adjacent to the site is generally flat, rising up gently to the east of the site towards Wandsworth and Tooting Common. To the west the land rises more steeply to a high point of 70m above sea level adjacent to Winbledon Common.





Ground Form

-  Site Boundary
-  Borough Boundary



Local Designations

-  Site Boundary
-  Borough Boundary
-  Metropolitan Open Land
-  Conservation Areas



Key View

-  Site Boundary
-  Borough Boundary
-  Key View from London Borough of Merton
-  Key View from London Borough of Wandsworth



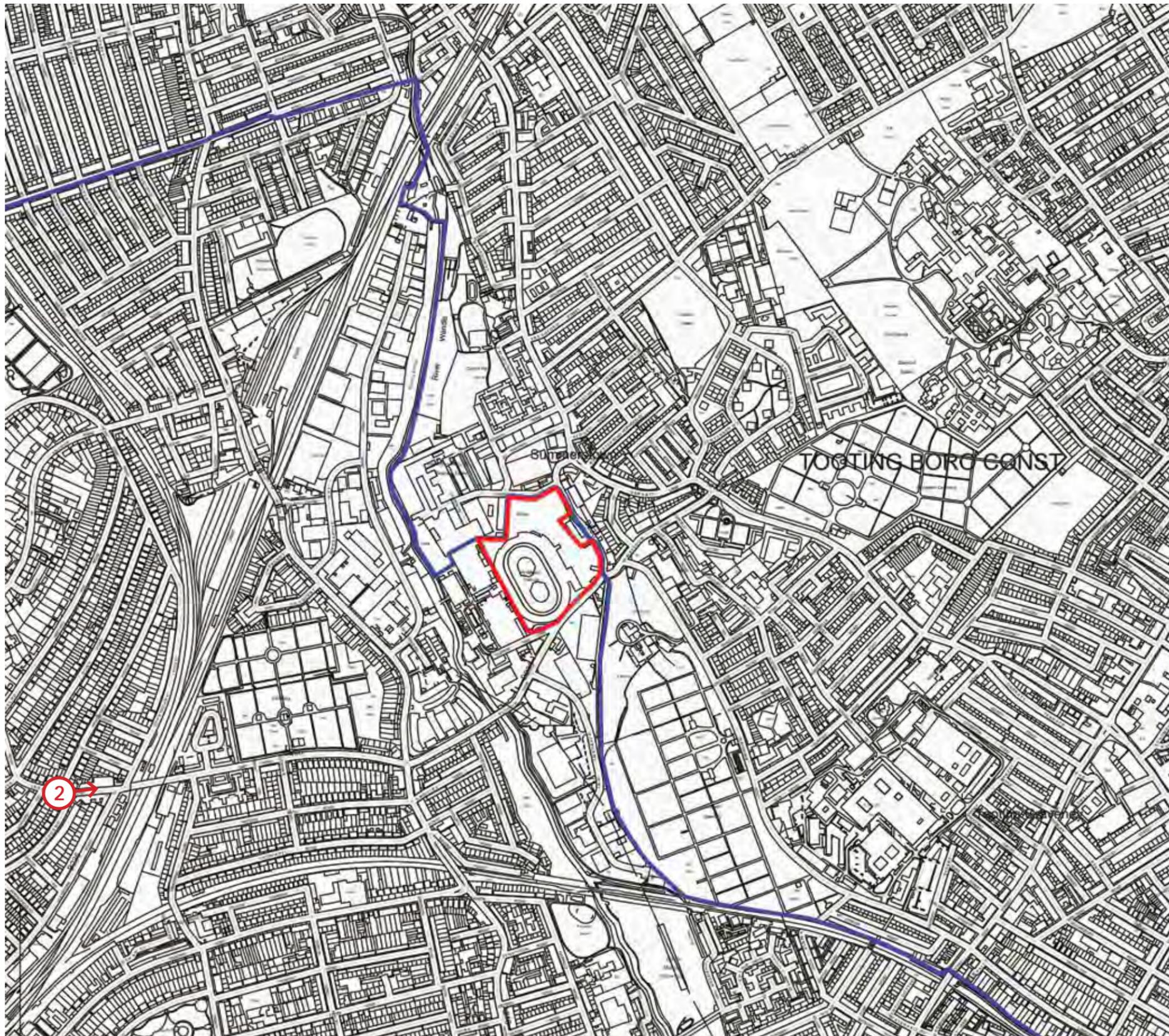
Key View 1: Arthur Road Conservation Area

Key View 1: Arthur Road Conservation Area



 Location of proposed site in view

Key View 2: Leopold Road



Key View 2: Leopold Road



↓ Location of proposed site in view

Key View 3: Wimbledon Cemetery

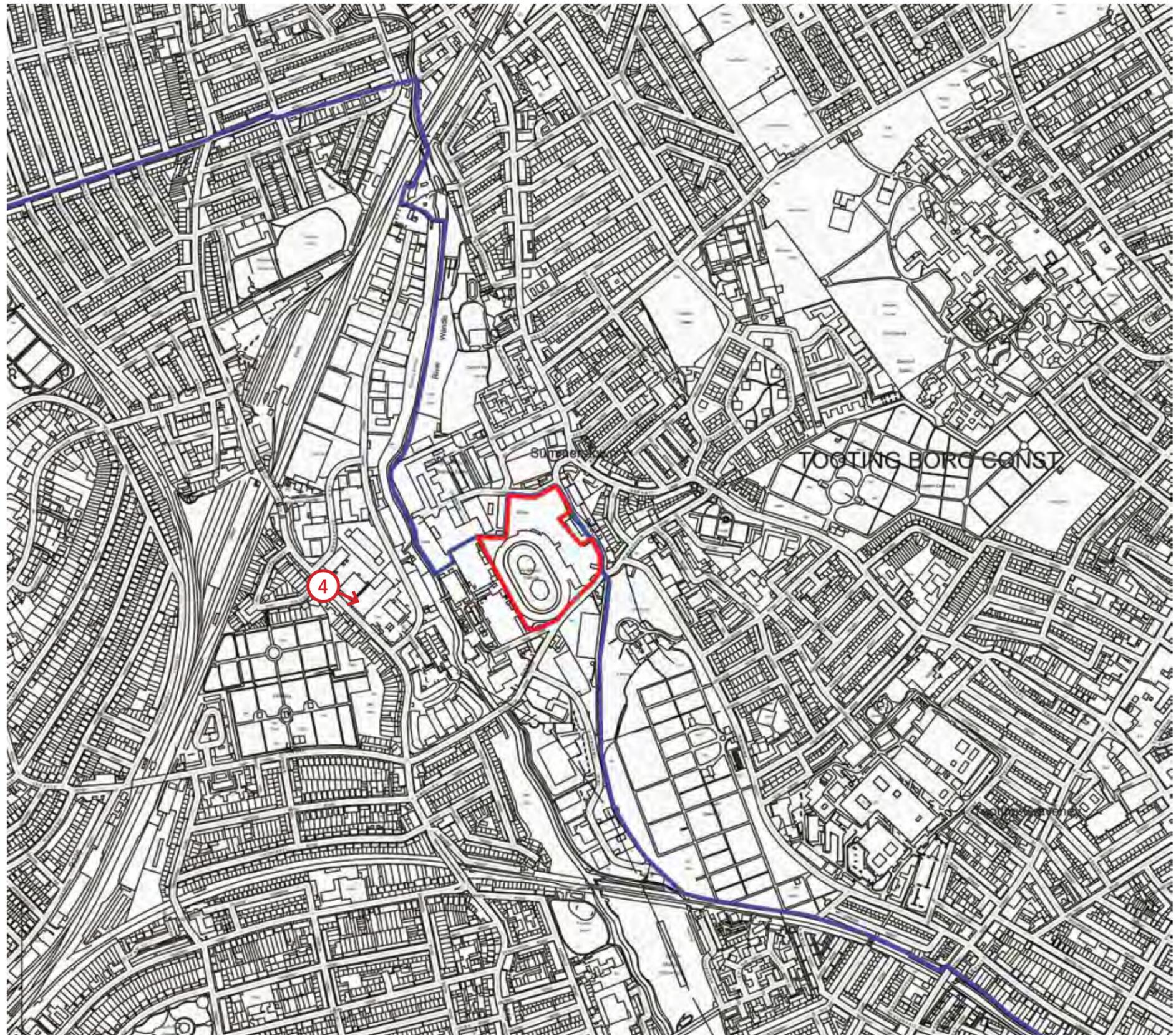


Key View 3: Wimbledon Cemetery



↓ Location of proposed site in view

Key View 4: Dumsford Road

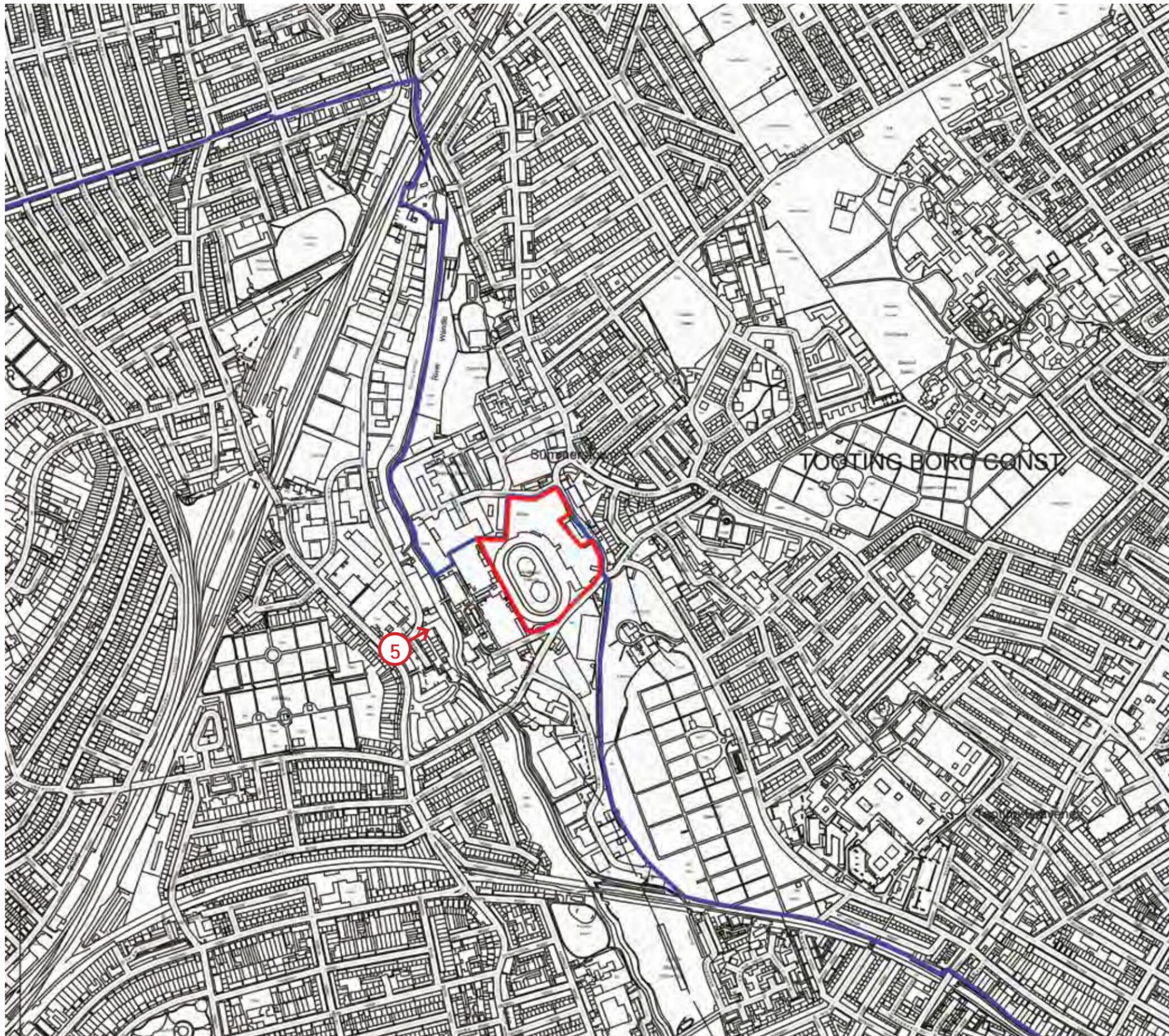


Key View 4: Dumsford Road



↓ Location of proposed site in view

Key View 5:
Weir Road

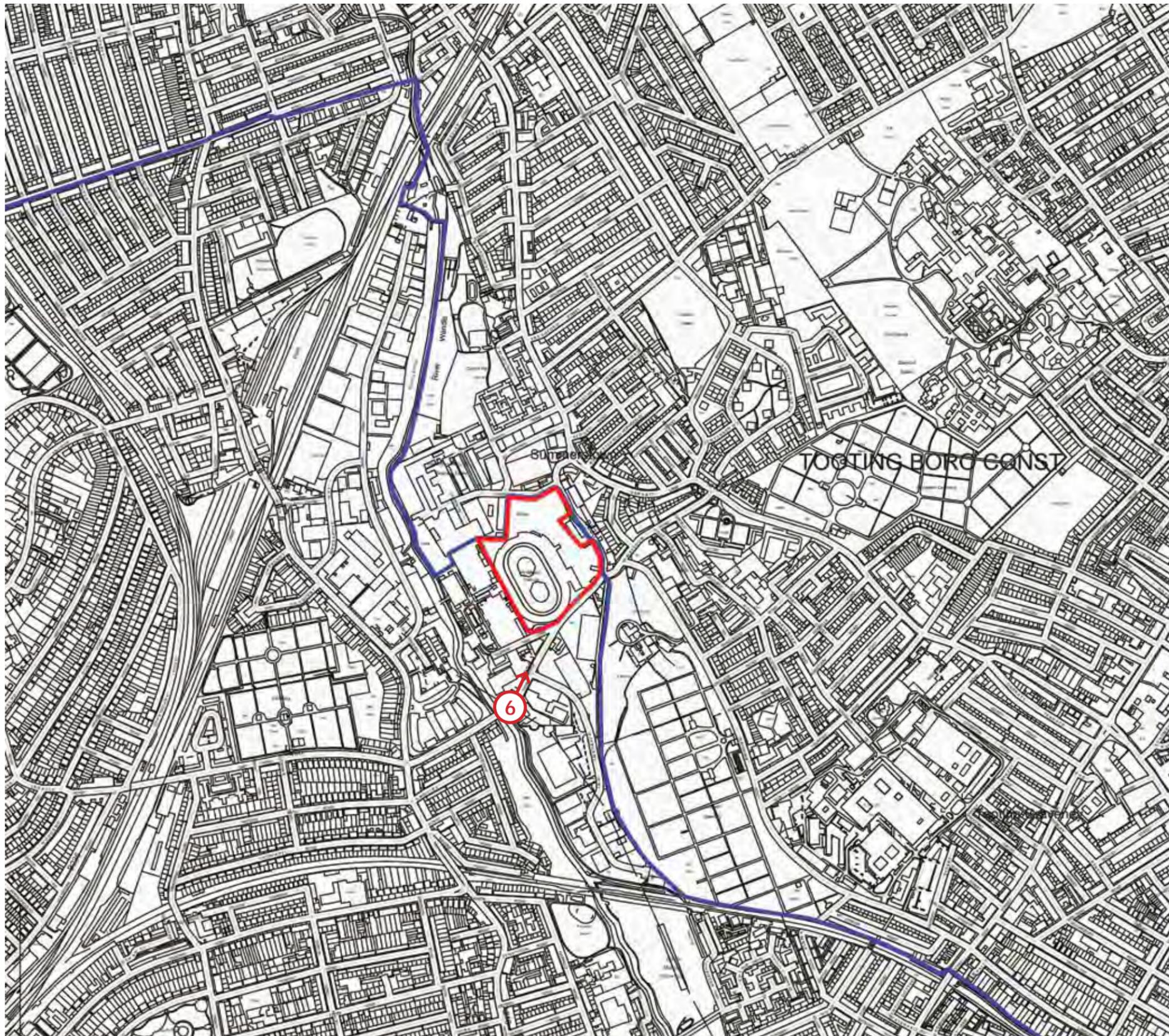


Key View 5: Weir Road



↓ Location of proposed site in view

Key View 6: Plough Lane

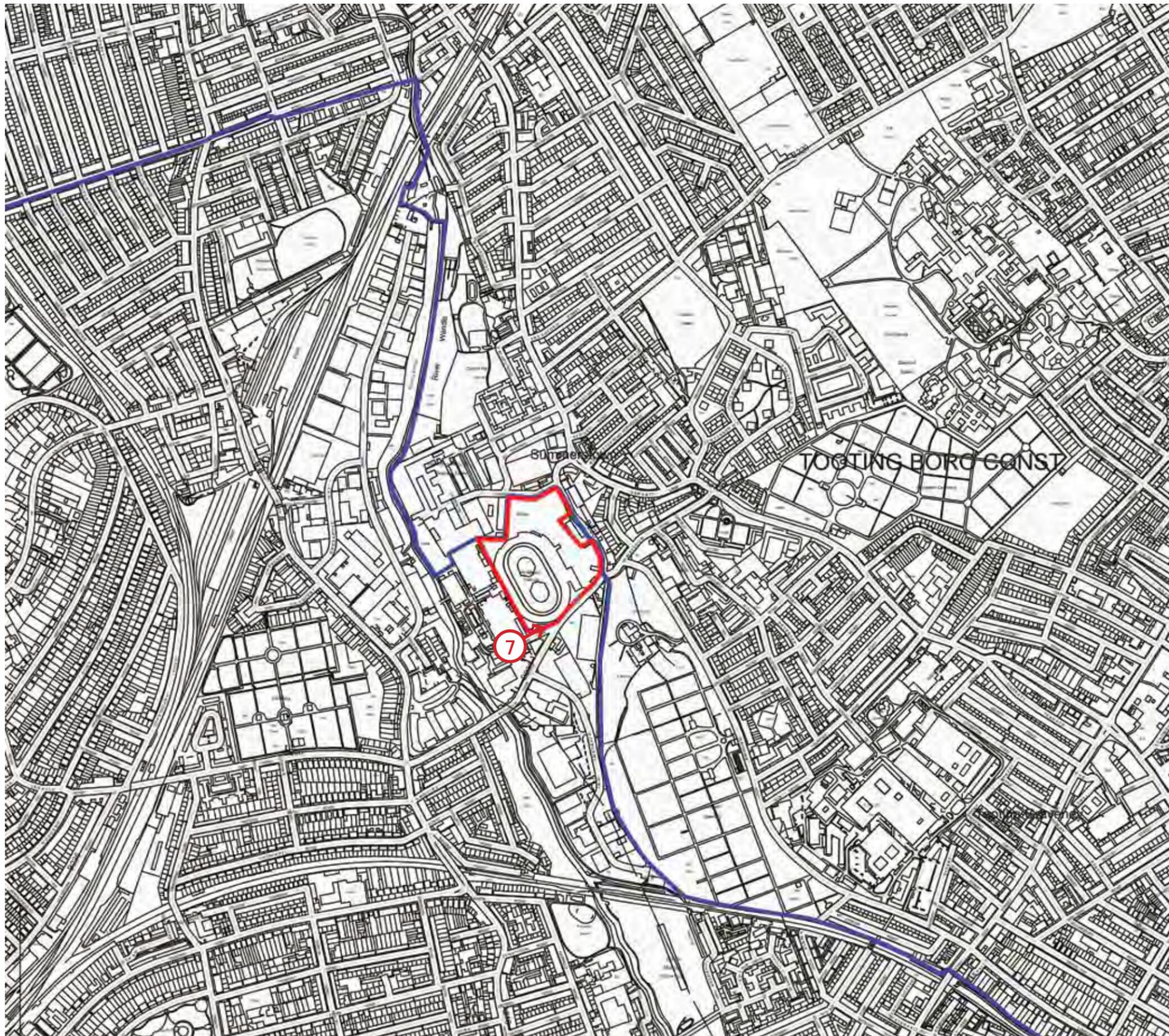


Key View 6: Plough Lane



↓ Location of proposed site in view

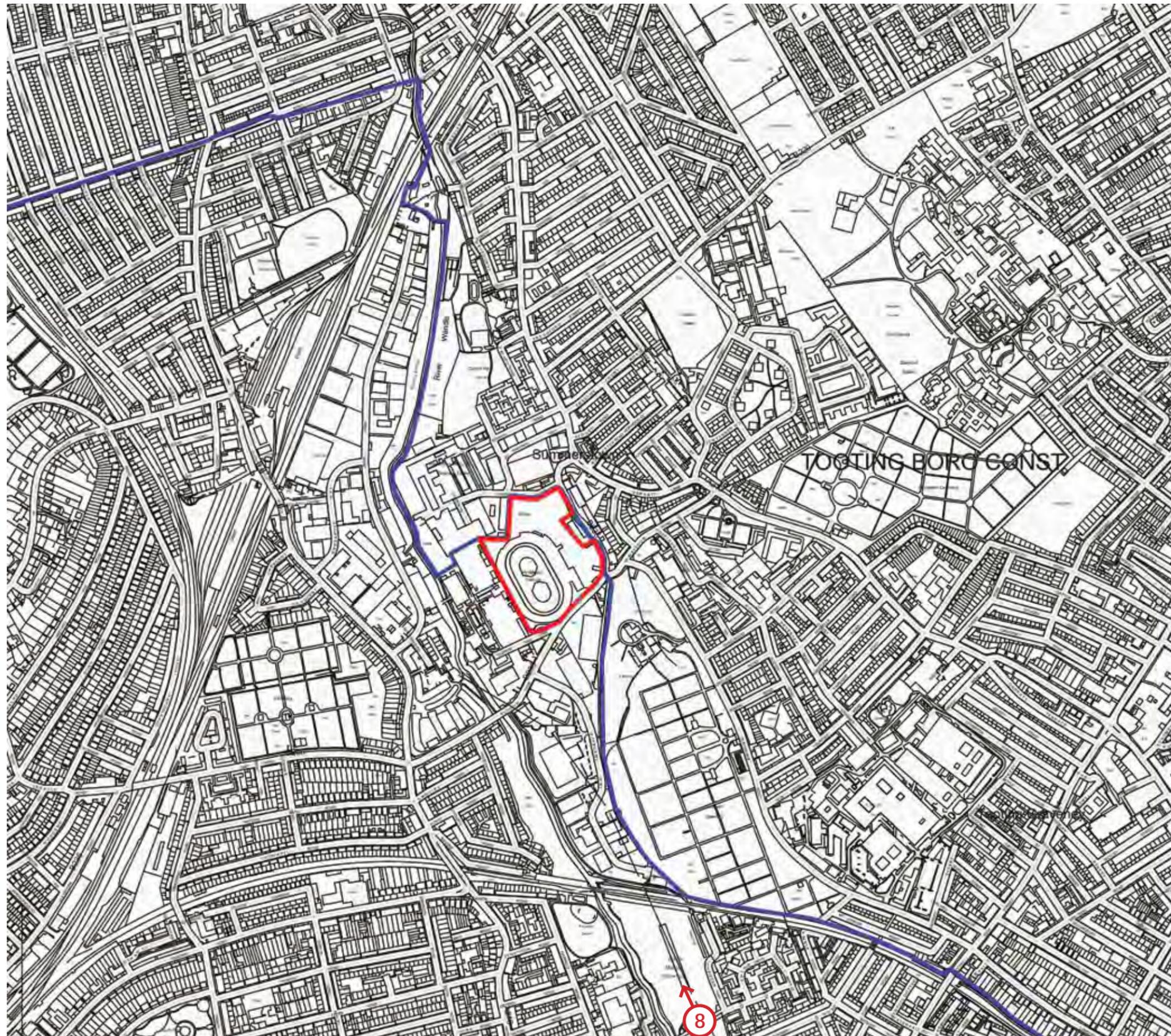
Key View 7: Copper Mill Lane



Key View 7: Copper Mill Lane



↓ Location of proposed site in view



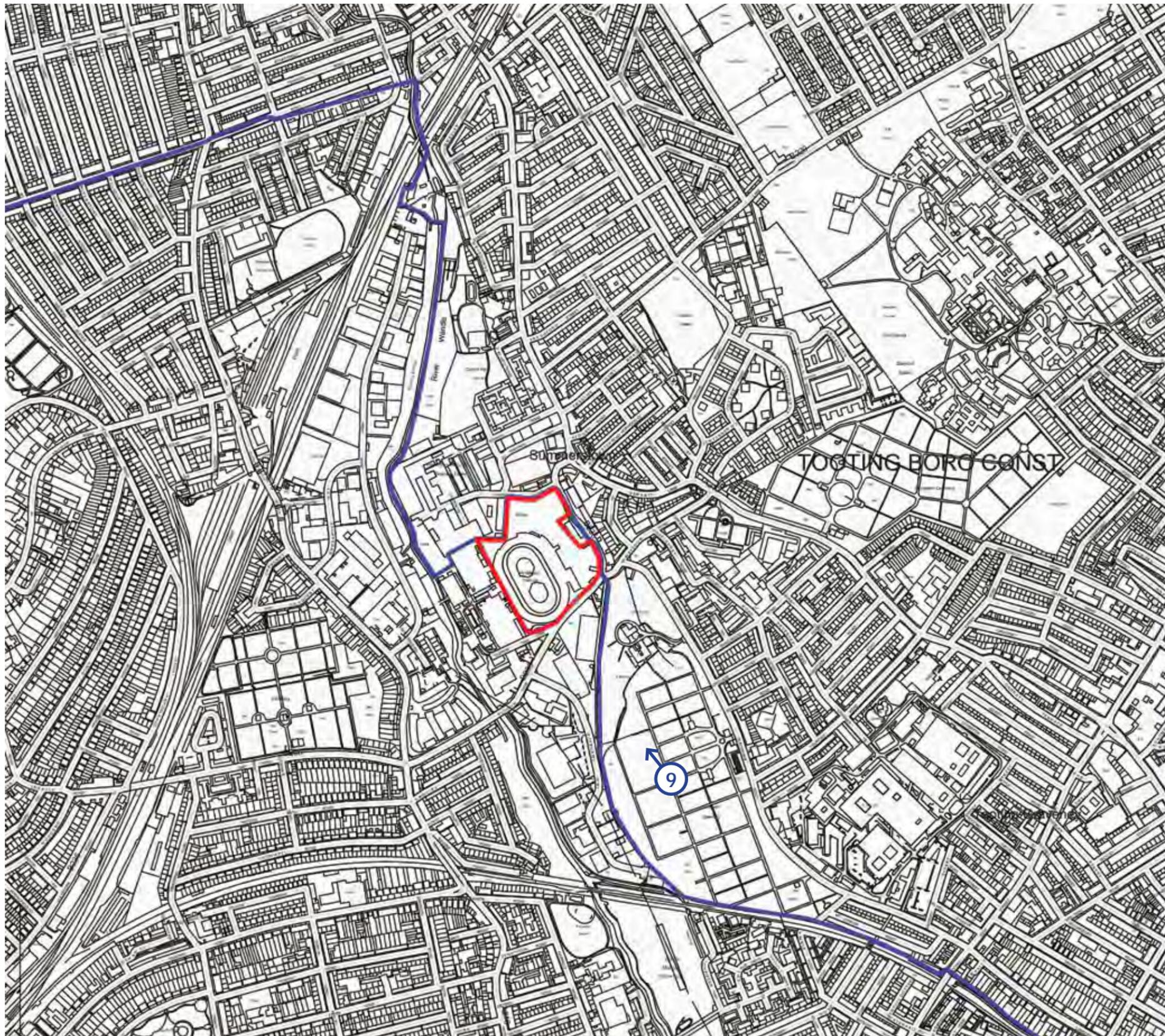
Key View 8:
Wandle Meadow Nature Park,
from North Road

Key View 8:
Wandle Meadow Nature Park, from North Road



↓ Location of proposed site in view

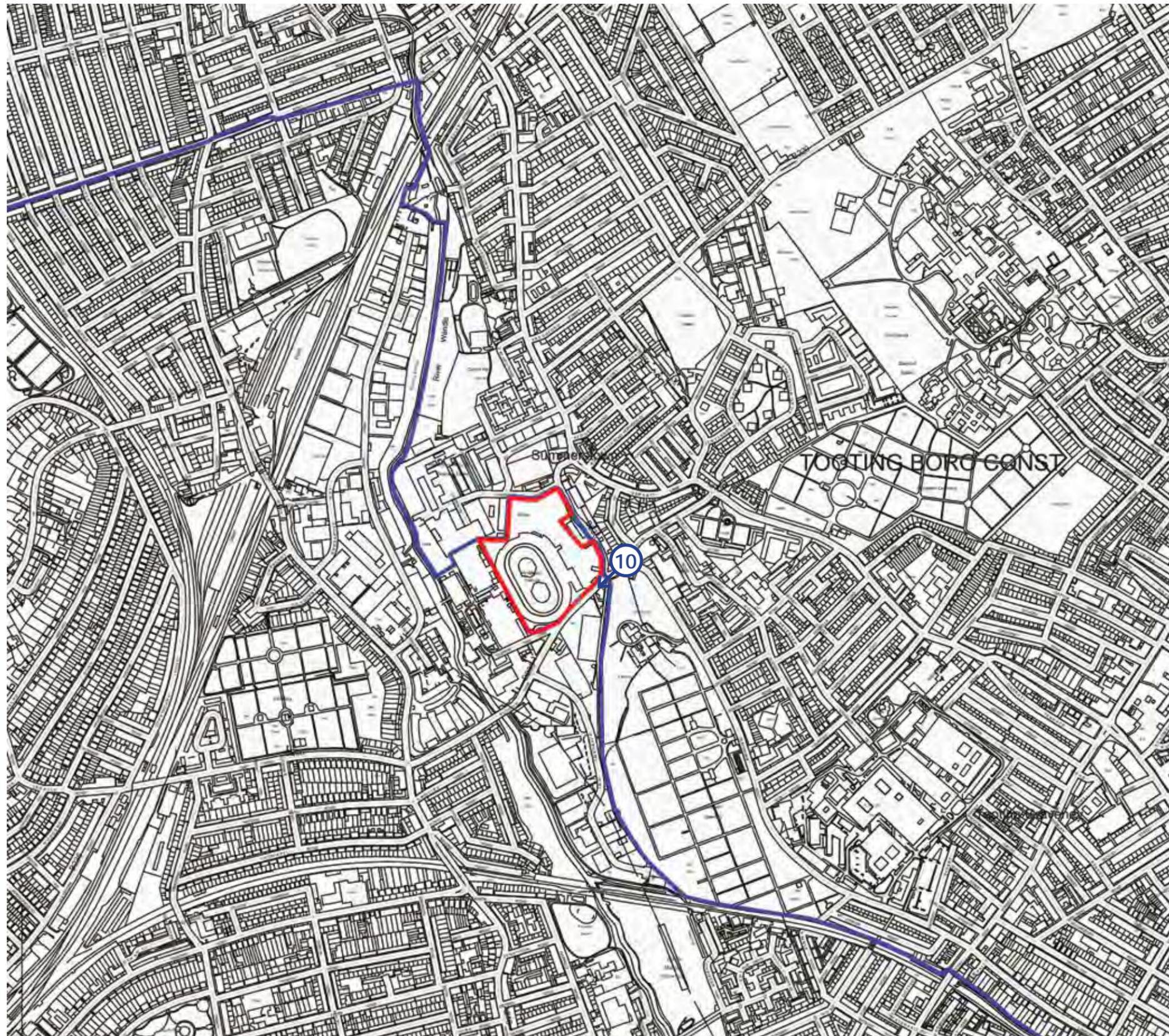
Key View 9: Lambeth Cemetery



Key View 9: Lambeth Cemetery



↓ Location of proposed site in view

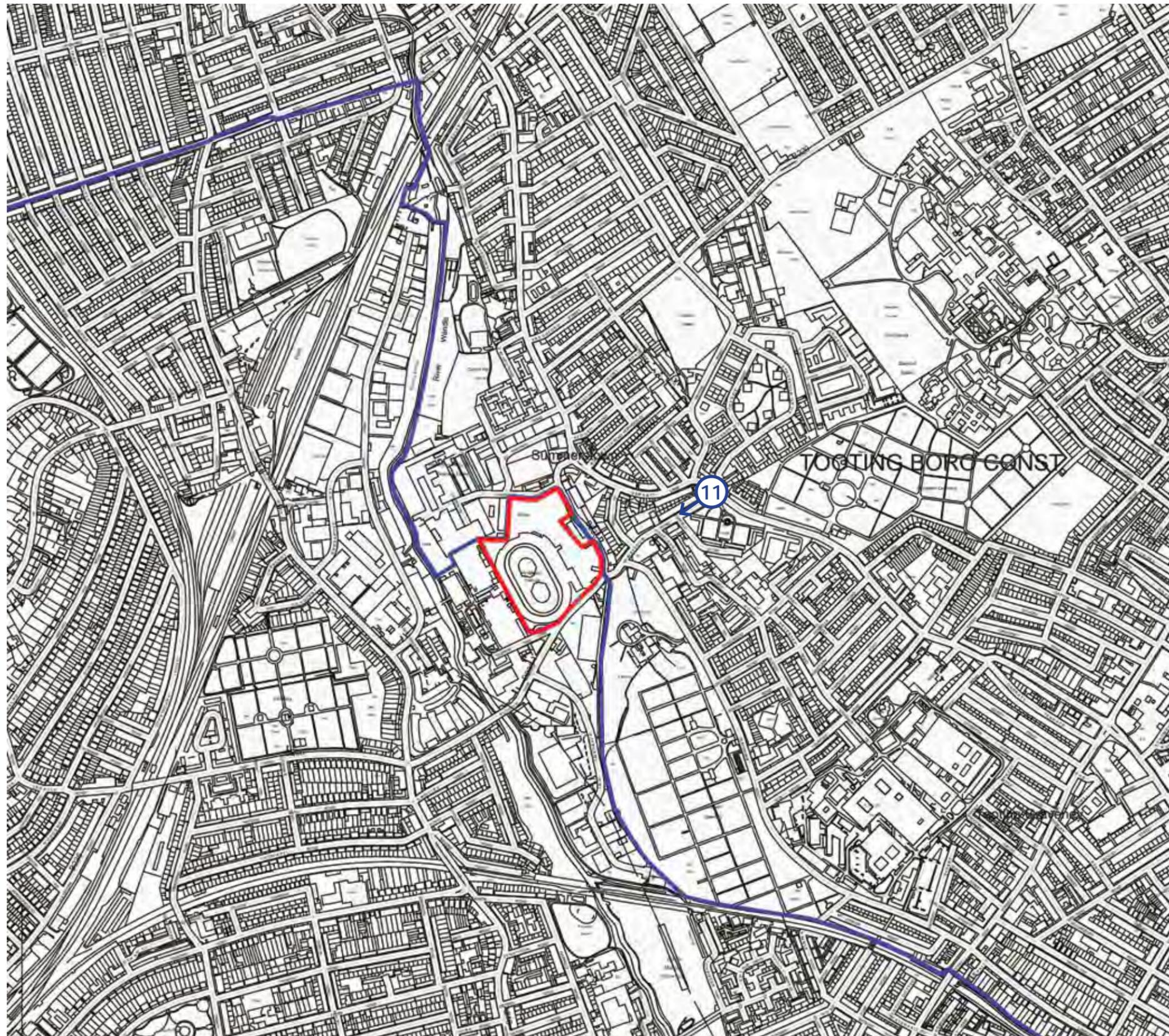


Key View 10:
Plough Lane / Blackshaw
Road Junction

Key View 10:
Plough Lane/Blackshaw Road Junction



↓ Location of proposed site in view

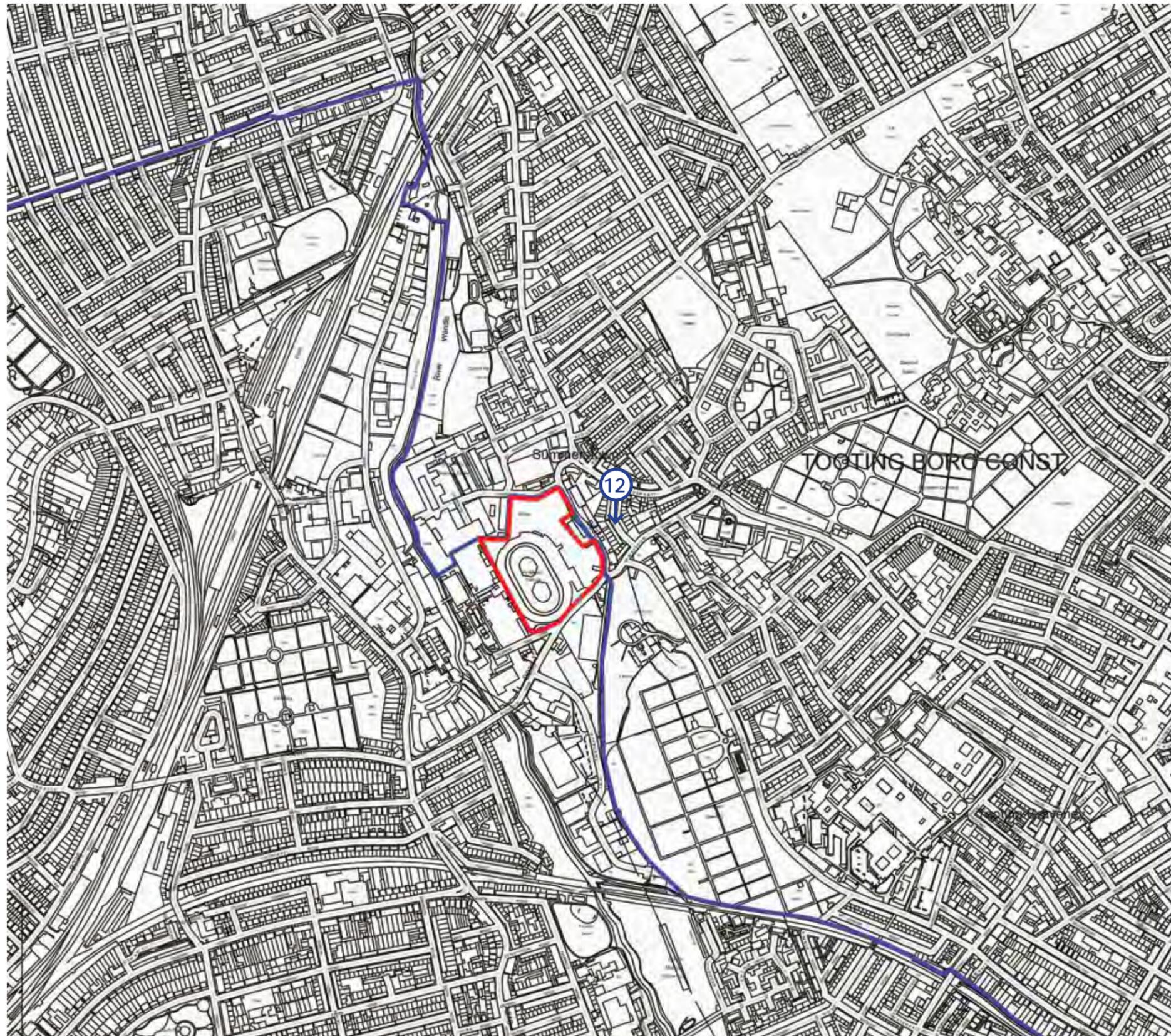


Key View 11:
Wimbledon Road/Garratt
Land Junction

Key View 11:
Wimbledon Road/Garratt Land Junction



 Location of proposed site in view



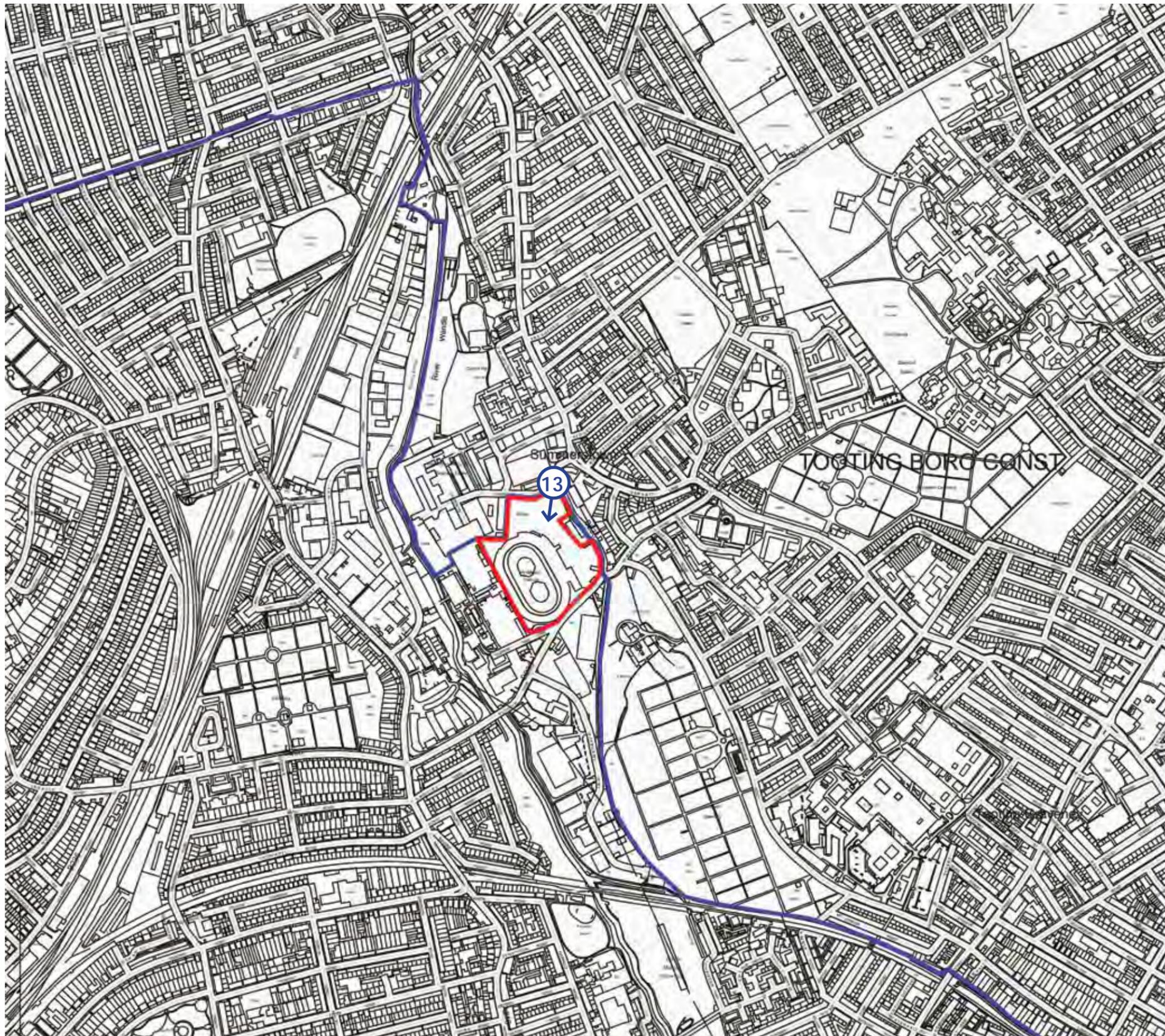
Key View 12:
Garratt Lane/Keble
Street Junction

Key View 12: Garratt Lane/Keble Street Junction



↓ Location of proposed site in view

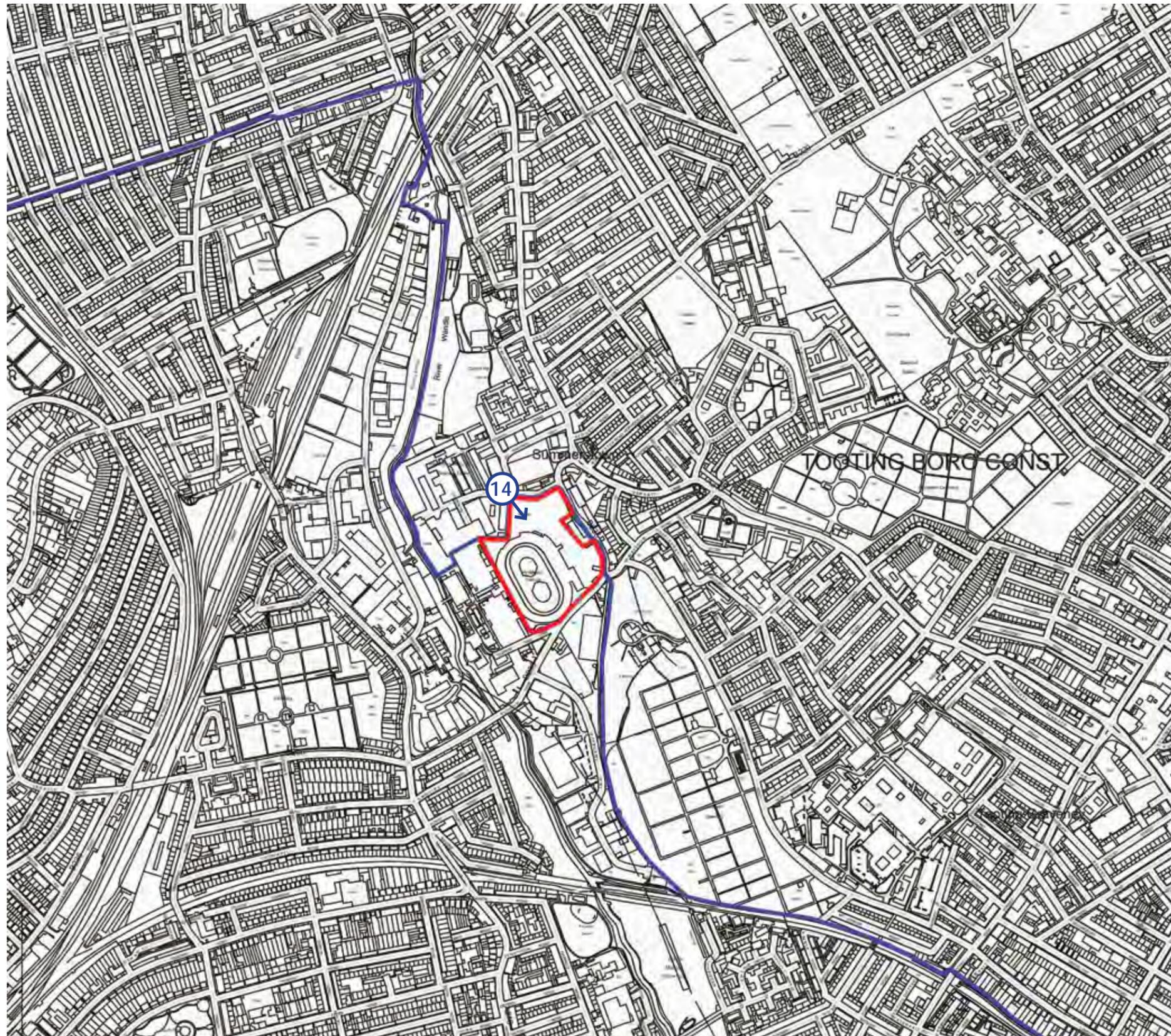
Key View 13: Summerstown Riverside Road Junction



Key View 13: Summerstown Riverside Road Junction



↓ Location of proposed site in view



Key View 14:
Riverside Road/St.
Martins Way Junction

Key View 14:
Riverside Road/St. Martins Way Junction

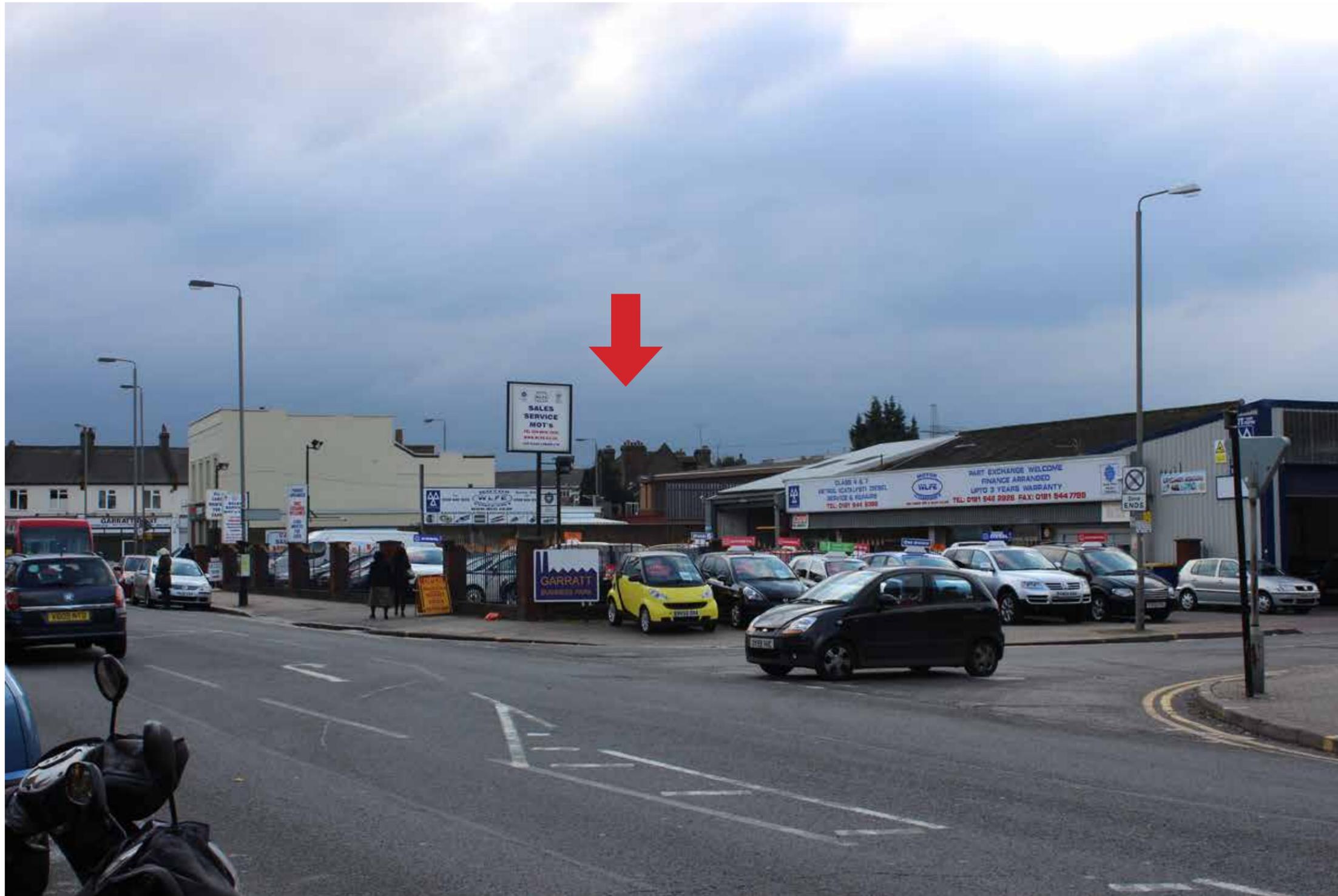


↓ Location of proposed site in view

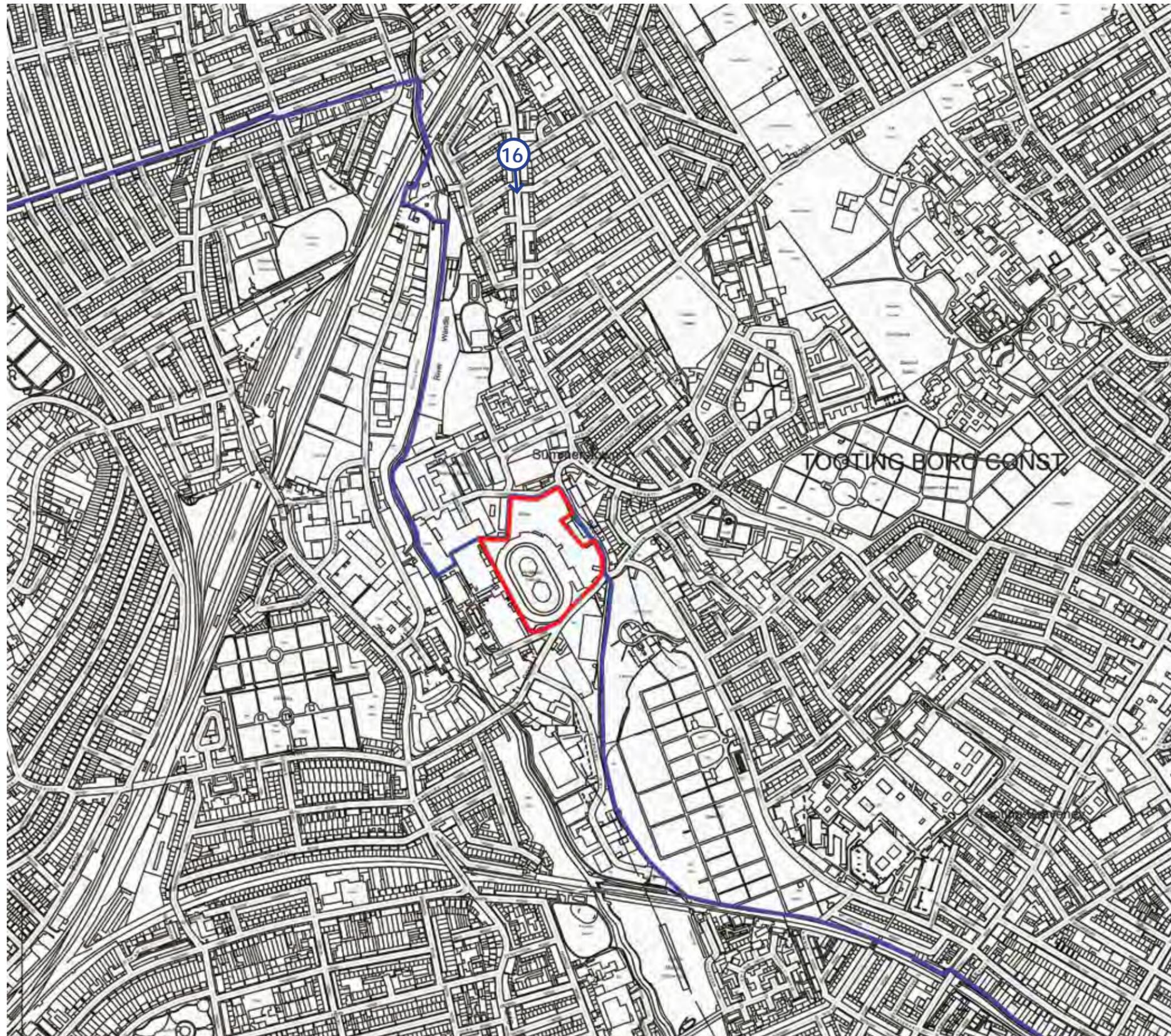


Key View 15:
Garratt Lane/Franche
Court Road Junction

Key View 15: Garratt Lane/Franche Court Road Junction



↓ Location of proposed site in view

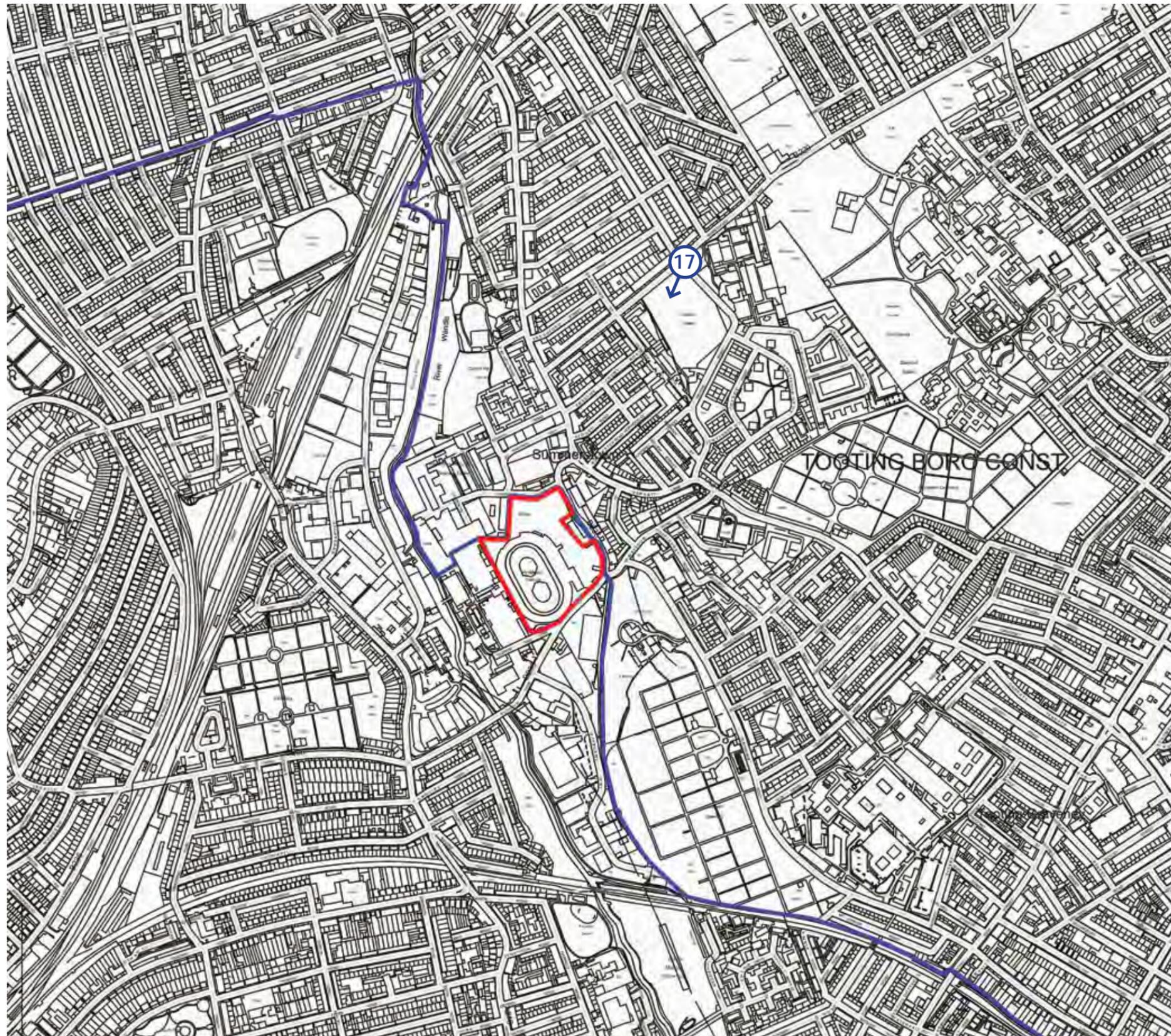


Key View 16:
Garratt Lane

Key View 16: Garratt Lane

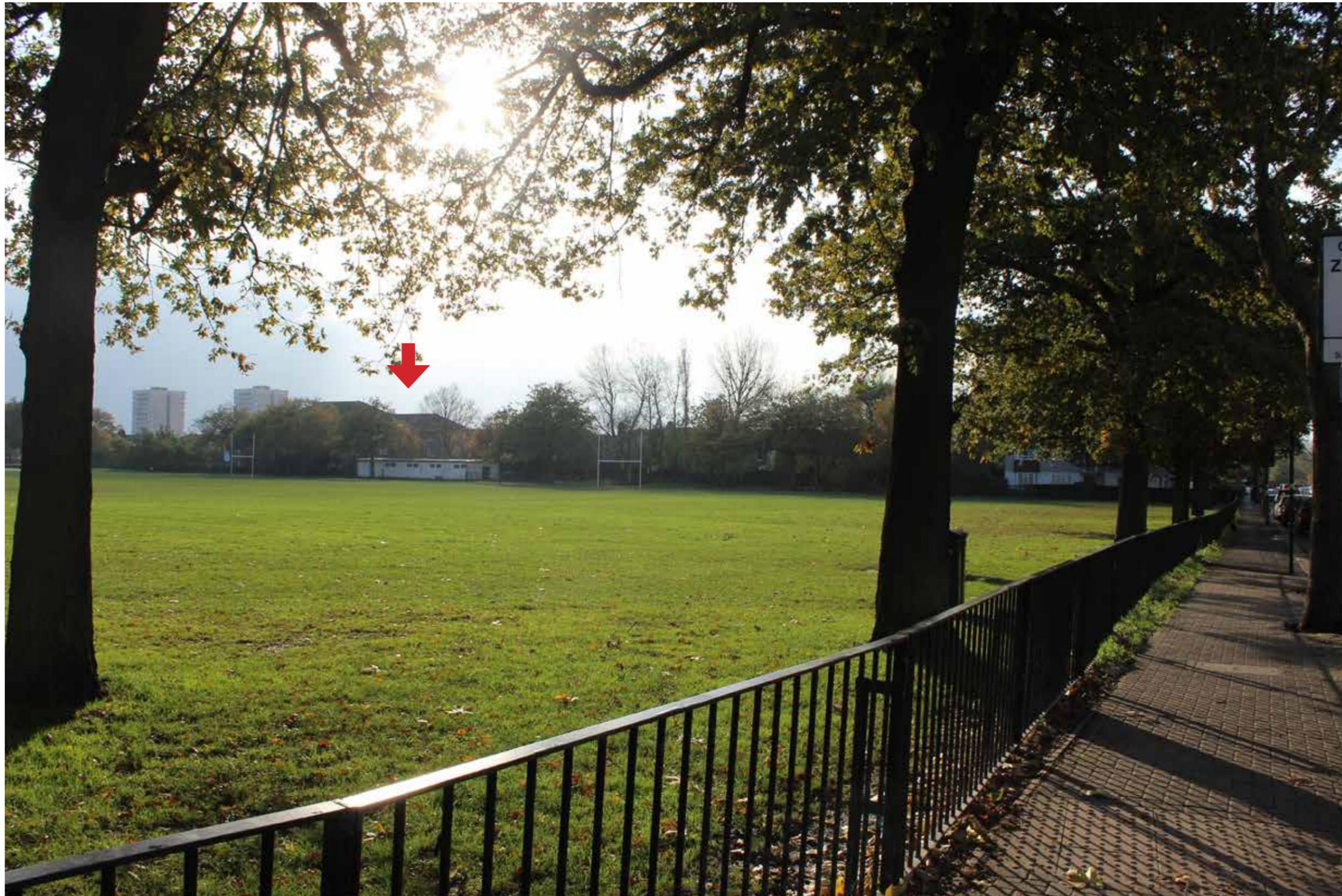


 Location of proposed site in view



Key View 17:
Burntwood Lane
Across Garratt Green

Key View 17:
Burntwood Lane Across Garratt Green



↓ Location of proposed site in view

