

Draft Sites and Policies Development Plan Document and draft Proposals Map January 2012

Representations Submitted on behalf of the Greyhound Racing Authority (GRA)

Part 1: Draft Detailed Planning Policies

DM R2: Out of centre commercial development

Part C) ii. of the draft policy which states that local convenience development outside of town centres will be considered to meet local needs in an area identified as deficient in local convenience shopping, is supported. Figure 1.1 illustrates that Wimbledon Greyhound Stadium falls within an area of deficiency (outside of the 400 and 500m “convenience buffers”).

However, the draft policy states that this should meet all of the 3 criteria under part C which includes reference to new convenience retail only being permitted where it replaces existing retail. New, out of centre residential development with ground floor convenience retail is often more likely to create a vibrant, economically successful and safe environment. This mix of uses also has the potential to provide the basis for cross-subsidising other elements of a scheme. There are many towns throughout the UK where out of centre supermarkets trade alongside healthy, vibrant and vital town centres, complementing a town’s retail offer. A more flexible approach should therefore be applied to take into account socio-economic and regenerative benefits of such a scheme, applied on a site-by-site basis, in order to meet a local need.

In addition, convenience retail is considered appropriate where it is capable of attracting high numbers of visits from the general public (existing and new households). In this regard, it is important that the policy recognises the need to undertake an assessment of expenditure using a catchment area for the proposed development site. Such an assessment would identify the total population and expenditure available within that catchment area and the anticipated turnover of the existing stores to estimate the available surplus of convenience expenditure. The policy should recognise that this catchment area will often extend beyond Merton’s administrative boundary.

The above, more flexible approach would also meet the socio-economic objectives of the Colliers Wood and South Wimbledon Area for Intensification (AFI) within which retail is, and will continue to be a significant contributor to local employment supply.

DM R5: Food and drink / leisure and entertainment uses

Part (h) of the draft policy which states that “proposals for the loss of entertainment and leisure facilities will be supported where the applicant can demonstrate to the council’s satisfaction that the uses are no longer viable”, is supported. The text should also acknowledge the requirement to demonstrate the regenerative and socio-economic benefits the replacement use will have (particularly relevant in the borough’s central and eastern wards).

Paragraph 1.82 of the policy’s supporting text states that “for proposals outside of town and local centres, where proposals for change of use from leisure and entertainment to residential use are proposed, the council would require full and proper marketing of the property for its permitted use at reasonable prices for at least 30 months (2 and a half years).”

This blanket approach to all leisure and entertainment uses is not considered appropriate given their diverse range of uses, which are marketed in different ways. Notwithstanding this, marketing is not the only way to demonstrate that the existing facility is no longer viable and 30 months is considered an excessive time period (there is no supporting justification for this suggested requirement is provided).

DM R6: Cultural, arts and tourism development

For the reasons identified in the above response to policy DM R6, the draft policy’s requirement (part (e)) to demonstrate marketing of the existing use for 30 months to justify a change of use is objected to.

DM C1: Community facilities

For the reasons identified in the above response to policy DM R6, the draft policy's requirement (paragraph 3.6) to demonstrate marketing of the existing use for 30 months to justify a change of use is objected to.

DM H2: Housing mix

The council's approach (as identified at paragraph 2.24) to apply housing mix having regard to individual site circumstances and viability is supported.

Major, brownfield sites (particularly in the Afl) with the critical mass to deliver a genuine mix of housing (including affordable) in addition to significant socio-economic and public realm improvements should be supported. This should be acknowledged in the policy's text.

DM E1: Employment areas in Merton

The council's recognition of the need to strike a balance between economic growth and protecting town centres is acknowledged. However, the requirement for a sequential test is strongly objected to. Government guidance contained in the recent NPPF indicates that the sequential approach will now not apply to new office development – in order to relax controls and encourage commercial investment.

High density, residentially-led mixed use development to include employment generating uses (particularly within the Colliers Wood and South Wimbledon Area for Intensification (AFI)) would also help to attract the demographic mix currently needed to rebalance the socio-economic make-up of the Borough's central and eastern wards. Economic growth will depend heavily on a sufficient and more skilled labour market (to strengthen the area's economic base) which in turn requires more aspirational housing in order to sustain it. New private housing will be required in addition to considerable investment in existing social rented stock.

Out of centre sites that benefit from excellent access to a range of local employment opportunities will ensure that both current and future residents of the locality are able to access nearby employment opportunities leading to the creation of more sustainable live-work movement patterns.

The above relationship between employment and residential development (outlined in the draft NPPF) should be emphasised in the policy wording.

DM O1: Open Space

The council's aspiration to exploit the informal recreation potential of open spaces and waterways by making them more accessible to the public is supported.

The text should acknowledge support for that schemes which can enable improvements to the existing public realm.

DM D1: Design considerations in all developments

Whilst the council's aspiration for high quality design is acknowledged (part (a)), it is important that each proposal is assessed on a site-by-site basis, and that the cost of accessibility, crime prevention and adaptability guidance does not impact the viability of a scheme.

We will comment on detailed design guidance to be contained in Merton's Design SPD when it is published in Autumn this year.

DM D4: Urban design and the public realm

As outlined above in the response to draft policy DM D1, urban design and public realm principles are acknowledged; however, the text must confirm that each proposal is assessed on its individual merits.

The policy text should also emphasise the need to assess proposals on the basis of their improvements to the existing public realm.

A fundamental element of public realm improvement relates to providing a mix of land uses. As mentioned previously, large residentially led-mixed use developments with the critical mass to create a vibrant living, working and social 'place' and deliver significant public realm improvements should be supported.

DM F1: Support for flood risk management and DM F2: Sustainable drainage systems

It is considered that LB Merton should take a flexible approach to addressing flood risk where there is an absence of flooding history. Consideration should also be given to the advice of PPS25 that urban flood plains should be treated differently to those in rural areas.

By designing the redevelopment of sites to be resilient to flooding and incorporating sustainable drainage techniques a strong case can be made to develop a scheme that will be safe for its occupants and will not increase fluvial flood risk, whilst contributing to a reduction to the existing risk of surface water flooding within the area.

There is general acknowledgement in national policy that it may be necessary to develop in such flood risk areas to maximise the use of sustainable sites. Also that the use of resilient building design as well as incorporating flood flow routes and additional flood storage into the urban landscape can provide benefits, both in terms of flood management and urban regeneration.

The recently published draft NPPF proposes a shift in respect of flood risk and how it should be considered. Whilst the advice is still to avoid such areas where possible, it suggests that they should not be dismissed if they can be appropriately managed.

It is considered that flooding (particularly if comprehensive redevelopment of sites can successfully manage potential risk) should be balanced against the significant housing, socio-economic and environmental benefits resulting from sites with the critical mass to deliver strategic residentially led-mixed use development.

Part 2: Potential Sites for New Uses

Comments in Relation to Site Proposal 37: Wimbledon Greyhound Stadium

Adopted London Plan Context

The original London Plan (Adopted February 2004) and the London Plan Consolidated with Alterations (February 2008) stated (at Paragraph's 5.148 and 5.146 respectively) that the Colliers Wood/South Wimbledon area “contains four major opportunities for intensification and brownfield redevelopment – Wandle Valley Sewage Works, Wimbledon football club and dog track sites, Durnsford Road industrial estate and Colliers Wood itself.” The consultation draft London Plan (October 2009) again identified Wimbledon Stadium as one of the “major opportunities for intensification and brownfield redevelopment”.

The fact that the Stadium has been specifically referred to within a Regional Spatial Strategy for almost a decade illustrates its strategic importance. In addition, the site is referred to in the context of South West London's only Area of Intensification (Afl) within which developments should seek to optimise residential and non-residential output densities, provide necessary social and other infrastructure, contain a mix of uses, and contribute to or exceed the minimum guidelines for housing.

LB Merton state in their adopted Core Strategy (July 2011) that due to the site lying in the functional flood plain and environmental constraints regarding barriers to movement (railway lines and the River Wandle), “*The Mayor of London has proposed changes to the draft London Plan to recognise this and focus proposals and masterplanning on South Wimbledon and Colliers Wood.*”

Subsequently, the London Plan was adopted (later in July 2011) and states that the Colliers Wood/South Wimbledon Area of Intensification “contains a range of major opportunities for intensification including South Wimbledon and Colliers Wood. Any new development and infrastructure brought forward in this area must have regard to the strategic flood risk assessment.” Although South Wimbledon and Colliers Wood are cited, the text does not suggest a “focus” towards developing proposals at these locations and the overriding principle to optimise development potential at a “range of major opportunities for intensification” within the Afl remains.

In light of the above policy context, these representations address:

- 1) Flooding issues – particularly given that this was the primary reason for removing specific reference to the Stadium in the London Plan.
- 2) Housing need and demand over the next 10 years and the range of major opportunities within the borough and the Afl to meet this requirement.
- 3) The socio-economic benefits of a residentially led, mixed use scheme in comparison to intensification of sporting activity / Industrial and warehousing as suggested in this Draft Sites and Policies DPD consultation document.

Flood Risk

It is considered that LB Merton should take a flexible approach to addressing flood risk at the Stadium site given the Afl's objectives and in the absence of a significant history of flooding. Consideration should also be given to the advice of PPS25 that urban flood plains should be treated differently to those in rural areas.

By designing the redevelopment of the Stadium site to be resilient to flooding and incorporating sustainable drainage techniques a strong case can be made to develop a scheme that will be safe for its occupants and will not increase fluvial flood risk, whilst contributing to a reduction to the existing risk of surface water flooding within the area.

There is general acknowledgement in national policy that it may be necessary to develop in such flood risk areas to maximise the use of sustainable sites. Also that the use of resilient building design as well as incorporating flood flow routes and additional flood storage into the urban landscape can provide benefits, both in terms of flood management and urban regeneration.

The recently published draft NPPF proposes a shift in respect of flood risk and how it should be considered. Whilst the advice is still to avoid such areas where possible, it suggests that they should not be dismissed if they can be appropriately managed.

It is considered that flooding (particularly if comprehensive redevelopment of the site can successfully manage potential risk) should be balanced against the significant housing, socio-economic and environmental benefits resulting from residentially led-mixed use development. This is examined below.

Housing need and demand over the next 10 years and the range of major opportunities within the borough and the Afl to meet this need

PPS3 states that Local Authorities should deliver “a sufficient quantity of housing taking into account need and demand and seeking to improve choice”. The DCLG Practice Guide 3 sets out the requirement for analysis of past and current housing market trends, including balance between supply and demand in different housing sectors in addition to consideration of future household estimations.

This is also reflected in the Government’s draft NPPF which indicates the importance a presumption in favour of new development which meets housing demand and results in economic growth for an area. It places emphasis on the importance for Authorities to identify a scale and mix of housing that the local population is likely to require over the plan period which “meets household and population projections, taking account of migration and demographic change.”

Further, Annex C of PPS3 adds that Strategic Housing Market Assessments (SHMAs) should “determine how the distribution of need and demand varies across the plan area”, consider “demographic trends, and identify the accommodation requirements of specific groups”. In essence, future housing development should meet the forecasted levels of housing growth. PPS3 also indicates that plans should provide certainty in identifying suitable locations for new housing development as part of the wider spatial vision for the local area.

It is therefore essential that LB Merton’s housing delivery for the plan period is regularly reviewed and justified by a robust evidence base that takes into consideration existing and projected population and household growth.

Appendix B of this Site and Policies DPD consultation document acknowledges that Merton’s birth rates have risen substantially every year since 2003 which is expected to continue. This demographic trend coupled with increasing life expectancies and shrinking household sizes means that even before considering migration, the natural growth of the existing population generates the requirement for a significant number of new homes.

The Council acknowledge in Paragraph 2.12 of Appendix B that “*in forecasting future demand, this study uses the GLA low projections.*” At 2.14 the Council adds “*the GLA data must be seen to be an extremely conservative view of the population.*” At Paragraph 2.23, the council states that households living within the Borough will increase from a total of 84,100 at the start of the plan period in 2011 to 87,300 in 2021 (based on the GLA’s 2009 Round of Household Projections).

However, the ONS’s “Live Tables on Household Projections” (November 2010) identify that household projections (based on natural population growth) are in fact in the region of 94,000 households (2013) rising to 111,000 by the end of the CS plan period (2026). This suggests that at least an additional 7,000 new homes are needed over the plan period compared to the London Plan’s minimum target of 4,800 dwellings.

There are significant consequences of not providing enough homes to meet natural population growth in accordance with national policy in terms of affordable housing, town centre vitality and economic regeneration. There has been longstanding recognition of these impacts. The Barker Review of Land Supply (2004) states that “a weak supply of housing contributes to macroeconomic instability and hinders labour market flexibility, constraining economic growth...Housing has become increasingly unaffordable over time. This brings potential for an ever widening social and economic divide between those able to access market housing and those kept out.”

Notwithstanding the above, based on adopted London Plan minimum housing targets of 320 dwellings per annum, LB Merton’s latest housing trajectory (2010/2011 Annual Monitoring Report, January 2012) identifies a 5 year land supply of only 1,655 dwellings. When the additional 20% required by the (soon to be adopted) Draft NPPF is taken into consideration, the Council’s 5 year land supply demonstrates a shortfall of 255 dwellings.

Projected housing supply from years 6-10 of the housing trajectory (2017/2018 – 2021/2022) identifies only 547 dwellings. This equates to a shortfall of a significant 1,053 dwellings. From years 11-15 (2022/23-2026/27), the housing trajectory identifies a housing supply of 751 dwellings, equating to a shortfall of 849 dwellings.

In total, from 2012 to the end of the Plan period the Council have identified a land supply of 2,963 dwellings which equates to a shortfall of 1,837 dwellings (excluding the additional 20% in the first 5 years). When this is compared against the ONS’ Household Projections (a need

for approximately 7,000 dwellings), there is a significant shortfall of circa 4,000 dwellings over the Plan period.

There is also a shortfall of affordable housing within the Borough, recognised at Paragraph 18.15 of the adopted Core Strategy which states “*demand for affordable housing significantly outstrips supply*”.

It is clear that over the next 10 years there is a need to address these housing shortages. In accordance with the adopted Core Strategy’s “Strategic Objectives”, it will also be important to provide a choice and mix of housing types and tenures while enhancing the public realm and improving access to education, training and jobs. A comprehensive approach to the redevelopment of a large brownfield site with good access to employment opportunities can deliver significantly more socio-economic benefits and environmental improvements than a number of smaller infill sites.

Within the Colliers Wood / South Wimbledon Afl, the adopted London Plan seeks to deliver “*major opportunities for intensification*”. The Council’s adopted Core Strategy intends to provide between 500 and 600 additional new homes throughout the plan period. Given the Borough wide shortage of housing and the fact that Colliers Wood / South Wimbledon is the only Afl in South West London, it is considered that this indicative target should be reviewed.

Notwithstanding, this Site and Policies DPD consultation document only identifies two genuinely “major” brownfield sites within the indicative Afl boundary (as set out at page 40 of the adopted Core Strategy) being promoted for housing.

The first of these is the “Thames Water Site” (1.36 hectares) where the council’s preference is “*open land (flood storage) and nature conservation*”. This is considered an appropriate use that could alleviate flooding within the surrounding area and result in significant ecological and environmental benefits. Sutcliffe Park which addresses the potential flooding of the River Quaggy in LB Lewisham/Greenwich is a successful example of how such a scheme can work in practice.

The other major site within the Afl is Wimbledon Greyhound Stadium (a significant 5.29 hectares in area). The site therefore represents a unique opportunity to realise the development potential which has been identified in the London Plan for almost a decade. It is the largest brownfield site identified within the Site and Policies DPD and the only one in

the Afl considered to have the critical mass to deliver a genuine mix of housing (including affordable) in addition to significant socio-economic improvements and public realm improvements.

Recognition of this potential is particularly important in the context of the economic downturn and the significant delay to the formulation of the Council's Colliers Wood Masterplan (scheduled to be adopted by 2012 in the adopted Core Strategy). Paragraph 5.19 of the adopted Core Strategy states that "*the uncertainty caused by the recession in terms of available finance for development schemes is currently affecting when development schemes are being completed in their entirety.*" Wimbledon Greyhound Stadium is deliverable within the next 5 years.

The socio-economic and environmental benefits of a residentially led, mixed use scheme in comparison to intensification of sporting activity / Industrial use

Firstly, it is worth highlighting that greyhound racing is not a sport. The current use is not a sporting use but rather leisure. The Council's aspiration for the "intensification of sporting activity" is therefore questioned.

In addition to the above comments, LB Merton's preferred use is strongly objected to and the evidence supporting their recommendations is not considered robust. The Council's Sustainability Appraisal of this Site and Policies DPD consultation document is questioned on a number of grounds.

In terms of Sustainability Objective 4 (access to nature and open space), the Sustainability Appraisal indicates that a residential or mixed use scheme would have no significant effect. This is objected to on the basis of the Stadium's proximity to the planned Wandle Valley Regional Park which "*has the potential to improve access to a linked network of open space...increase the quality of the environment and contribute to the identity of the valley as a place to live, work and visit*" (Paragraph 15.8 adopted Core Strategy). The Stadium has the critical mass to significantly contribute to this aim and improve the public realm within the area linked to the emerging green grid, in turn improving access to open space for new and existing nearby residents. Sporting / industrial uses have considerably less potential to contribute to these aims.

Sustainability Objectives 11, and 16 seek to increase the proportion of the population with good access to health centres and leisure activities. The Stadium's redevelopment for residential / mixed use purposes would result in new residents benefitting from close proximity to Springfield University Hospital, St Georges Hospital and Mitcham Medical centre and, in terms of leisure, Wimbledon Art Studios and Tooting Leisure Centre. Broadwater and Smallwood Primary Schools, and Burtwood Sixth Form College are also located nearby in accordance with the aims of Sustainability Objective 20. Redevelopment of the Stadium could itself provide additional health and leisure facilities.

The site would have a "significant positive" impact when assessed against Sustainability Objective 19 (housing) given that it is the largest brownfield site in the Site and Policies DPD and can make a significant contribution to housing supply and the delivery of a mix of housing types (including affordable). In this context, proposed housing / mixed use development should also score positively in relation to Sustainability Objective 12 (poverty and social inclusion), 13 (diversity and equality) and 14 (basic needs). Again, Sporting / industrial uses have significantly less potential to contribute to these objectives.

When assessed against Sustainability Objective 21 (work and the economy), both residential and mixed use development should be viewed as having "significant positive" effects due to the socio-economic make-up of the surrounding area and the Stadium's proximity to employment opportunities.

Paragraph 4.23 of the adopted Core Strategy outlines that the Eastern half of the Borough (to include the surrounds of the Stadium as per Figure 4 of the Site and Policies DPD Appendix B) is characterised by problems relating to poor economic prospects, lower educational attainment and lower incomes. Paragraphs 4.25 and 4.26 of the adopted Core Strategy recognise that regeneration is required to address these pockets of deprivation and improve poor public realm.

In this context it is considered that a mixed use approach should be applied to the strategically located stadium site. Its comprehensive redevelopment for a residentially-led, mixed-use landmark scheme will help to facilitate LB Merton'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.

High density, mixed-use growth would also help to attract the mix of demographic currently needed to rebalance the socio-economic make-up of the Borough's central and eastern wards. Economic growth will depend heavily on a sufficient and more skilled labour market (to strengthen the area's economic base) which in turn requires more aspirational housing in order to sustain it. New private housing will be required in addition to considerable investment in existing social rented stock.

A new residential population at the Stadium site will directly support planned business and social infrastructure for existing and future communities. The site benefits from excellent access to a range of local employment opportunities to ensure that both current and future residents of the locality are able to access nearby employment opportunities leading to the creation of more sustainable live-work movement patterns.

On the above basis, it is considered that the comprehensive redevelopment of Wimbledon Greyhound Stadium for residentially-led mixed use purposes has significantly more socio-economic and environmental benefits than the Council's preferred sporting / industrial uses. There is no justification for the Sustainability Appraisal's conclusion that "the Sustainability Objectives score favourably for industrial/warehouse and/or possible sport leisure activity" and therefore no justification for the Council's preferred use outlined in Site Proposal 37 of this consultation Site and Development Policies DPD consultation document.

In addition, there is nothing in the LB Merton's evidence base to demonstrate that there is a need for sporting intensification in the locality of the Stadium.

In terms of the site's suggested industrial use, the Council's Employment & Economic Land Study (October 2010) states that "*Using different approaches, such as forecasts of job growth and past completion rates, four different estimates of future employment space requirements have been prepared...Under most of the estimates, significantly less industrial space would be required.*" Significant questions are therefore raised over the consultation document's assessment of need to justify the suggested industrial use.

Finally, it is noted that the consultation document incorrectly identifies that the Stadium has a PTAL of 2. TFL confirm that it has a PTAL of 3 (<http://webpid.elgin.gov.uk/>).