

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

25 July 2012

Dear Sirs

Submission of representations to the Site & Policies Development Plan Document (Stage 2a) – Wimbledon Stadium

Following an initial meeting at London Borough of Merton Civic Centre on 25 April 2012, and subsequent submission of representations to the London Borough of Merton Site & Policies Development Plan (Stage 2) Document (DPD), on behalf of our client, Hume Consulting Limited, we enclose further representations to the Stage 2a Sites & Policies Development Plan Document. This submission is made in advance of the deadline of 25 July 2012. Our client has a specific interest in Wimbledon Greyhound stadium (Site 37).

The representations contained in this letter supplement our submission to Stage 2 of the consultation process.

Existing & Emerging Policy Position

The Wimbledon stadium site extends to 5.29 Hectares. It is not allocated for any specific use in the existing 'up-to-date development plan' for the area - The Merton Unitary Development Plan, which was adopted in October 2003. The Existing use is a Greyhound stadium that is also used for Stock Car Racing. The stadium is identified as Site Proposal 37 in both Stage 2 and Stage 2a of the Site & Policies DPD. The Stage 2a consultation document confirms that the site has a number of strategic physical constraints, namely:

- It is within the functional flood plain (Flood Zone 3b) of the River Wandle;
- It is surrounded on all sides by Strategic Industrial Locations;
- The site has limited Public Transport Accessibility (PTAL Level 2), with the existing highway network, railway lines, river and utilities infrastructure (including a major substation adjacent to the site), limiting opportunities for improving access; and
- The site is within an Archaeological Priority Area.

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Our client notes that, Merton Borough Council's preferred use for the site remains for 'Intensification of sporting activity (D2 Use Class) or Industrial (B1[c], B2 Use Class) and warehousing (B8 Use Class) on cessation of a sporting use)' – as in Stage 2 of the consultation. However, our client welcomes the insertion of our previous representation as a potential further option for the site – namely '*to Retain greyhound use of site with enabling development (A1 retail) – (Drivers Jonas Deloitte on behalf of Hume Consulting Ltd)*'. Our client maintains support for this mix of uses that would enable retention of greyhound racing to the most iconic greyhound racing venue in the United Kingdom.

Wimbledon Stadium & Greyhound Racing in the United Kingdom

As stated in our previous representations, Greyhound racing attracts approximately 3 million spectators per year in the UK, making it the 3rd highest spectator sport. There are 25 licensed stadia in Britain, with on-course and off-course betting available, with a turnover of £75,100,000. In 2007 the Greyhound Board for Great Britain (GBGB) regulated sector approximately consisted of 26 racecourses (Walthamstow has since closed), 1,520 trainers, 4,135 kennel staff, 867 racecourse officials, and in excess of 15,000 greyhound owners with approximately 10,000 greyhounds registered annually for licensed racing.

Wimbledon Stadium is the most famous Greyhound stadium in the United Kingdom, following the closure of Walthamstow, and has been used for that purpose since May 1928. It is a historic site which has been the home of the World's most prestigious Greyhound race, the English Greyhound Derby since 1984. Wimbledon and the significantly smaller Romford stadium are the only remaining Greyhound venues within Greater London, following the politically sensitive closure of Walthamstow stadium for residential development.

The stadium is beyond repair or refurbishment, and it is likely to be forced to close entirely on grounds of health and safety in the not too distant future. Closure of Wimbledon stadium would result in the loss of a substantial number of jobs and an iconic arena of national significance. A number of trainers would directly lose their jobs immediately. Furthermore, the impact upon the Greyhound industry would put at risk the welfare of a number of dogs, which is already a sensitive topic in the UK.

Representations & the Opportunity Proposed

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

Our client wishes to dramatically enhance the profile of the stadium as a world class leisure destination of national significance; safeguard the long-term retention of Greyhound racing in London; and raise its profile as a sport, reaching out to a wider and more cosmopolitan population. Our client has a proven track record in the sport of greyhound racing and have sustained an eleven year tenure as the Government appointed chair of the quasi-state run Irish Greyhound Board. Our client has successfully repositioned the Greyhound industry in Ireland from one of relative obscurity, to one of the most popular night time activities in the country. They have overseen the redevelopment of a number of existing stadia, as well as the development of new stadia, which has led to annual attendances across the tracks rising

from 586,000 to 1.4million persons per annum. Furthermore, our client's input has had a direct correlation with achieving the following successes:

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

Our clients Proposals for Wimbledon Stadium

Our client proposes to demolish the existing stadium, which is beyond repair, and to re-orientate it within the site. They propose to subsequently construct a new world class track, with a grandstand capable of accommodating up to 6,000 people and it is our client's objective to deliver the best Greyhound racing facility in the world to Wimbledon. Providing such a high quality leisure destination will attract a far wider range of clientele than that which currently frequents the stadium, with a particular target to attract a number of corporate companies serving the financial centre of London.

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

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

It is proposed that the stadium would have up to 120 car parking spaces dedicated to trainers and kennels for up to 150 greyhounds designed foremost to protect the welfare of the dogs. This would also attract a far wider number of trainers and owners to invest in, and compete at Wimbledon, safeguarding the welfare of existing dogs, and the trainers that currently use the stadium.

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

for local sports/youth clubs and charities, which could benefit a number of local charities, as well as football, rugby, hockey and sports groups.

The Need for food retail (convenience goods) as an enabling form of investment

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

The greyhound stadium would become a viable business in its own right. However, the stadium alone could not support the capital costs associated with redevelopment and remediation of the site. Therefore, a high value use must be identified to contribute to the costs of the development that is not only acceptable in planning terms, but would secure a long-term sustainable solution that can contribute to the wider regeneration of the area.

As set out earlier in our previous representations, our client strongly supports the Council's identified commitment to maintaining the leisure, and stadium use of the site. As identified by the Council in this process of consultation, the first priority must be the retention of an iconic stadium. However, an enabling use is required to underpin the proposed investment, and in our previous representations we set out that Offices, Industrial/Warehousing, Leisure facilities, non-food retail (standalone comparison retail units) and residential development would either be inappropriate to the location, or ultimately fail to deliver the financial return necessary to support ensure the retention of the stadium.

We note the ongoing reference to Savill's proposals for a residential redevelopment, and as such would like to re-iterate it would be very difficult to achieve a satisfactory environment and level of amenity, particularly given the site's high cost to re-mediate from contamination, need for engineering works to reduce the risk of flooding from what is a sensitive use, as well as provide sufficient acoustic and landscape screening from the adjacent electrical substation and industrial uses. The pressure for additional open space, given the limited offer in the surrounding area, and relatively low residential values places further pressure on the potential return and viability of residential use, a matter further exacerbated by the relatively limited public transport provision nearby and the site's PTAL rating of 2.

Our client maintains that that food (convenience) retail (Use Class A1) is the most appropriate use to achieve a sustainable development, and assist in funding the redevelopment of the stadium. The site is located at the boundary of the London Boroughs of Wandsworth and Merton. A supermarket in this location would most likely draw on a catchment within 10 minutes drive (off-peak) of the site. As such any supermarket would draw on expenditure from both Wandsworth and Merton Boroughs. There is identified capacity for additional food retail in the up-to-date retail assessments for both of the Boroughs.

In the context of the capacity identified, it is evident that the existing centres of both Wandsworth and Merton are healthy, and that there is a strategic qualitative gap in supermarket provision between Wimbledon and Wandsworth – each of which are a reasonable distance from the site. As such our client would like to work with the Council to test the suitability of a supermarket/foodstore at the site against the sequential and impact tests defined in the National Planning Policy Framework, in particular the need to provide consumer choice to the local community, and the impact any proposal may have upon the surrounding defined centres of Wimbledon, Colliers Wood, Wandsworth and Tooting. Our client is in the

process of preparing such an assessment for submission to LB Merton, and our initial work indicates that a development such as we propose would meet the criteria for a retail impact study.

Additional Support for the Proposal

Following the closure of Walthamstow Greyhound Stadium, which attracted considerable political and local opposition, the potential redevelopment of Wimbledon Stadium has attracted increasing media exposure and opposition. The All Party Parliamentary Greyhound Group (APPGG), supported by Lord Dennis Bilton and Andrew Rosindell MP, have closely followed events since the stadium was purchased by Capital and Galliard Homes in 2005. APPGG have been concerned at proposals to redevelop the stadium for housing, particularly given it is host to the sport's most prestigious annual race, the Greyhound Derby and given that it is the sport's flagship and most iconic stadium in the UK, following the loss of Walthamstow. The APPGG have been concerned at the existing owner's neglect towards the current facilities. As such the APPGG fully support our client's proposals, which would facilitate a regeneration of the stadium and the sport itself, whilst delivering up to 400 new jobs to the local and regional economy.

Summary

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

The redevelopment would also bring substantial economic benefits in the form of up to 400 new jobs as well as construction jobs that would be directly targeted at low-skilled local unemployed people.

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

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

Drivers Jonas Deloitte.

Yours sincerely

