

## **Response to the proposed LDF and the Greyhound stadium, site 37**

Site 37 is in a flood plain which carries the highest risk of flooding and has limited transport infrastructure. As such there are a limited number of developments that can be built on the site that are consistent with national and local planning policies. Its development as an open space with playing fields and tennis courts for schools and local residents is a use which is compatible with, and supported by, such policies. The use of site 37 for light industrial is supported by many national and local policies but it is not completely consistent with the flood risk the site carries. However, the development of significant residential housing or retail on all, or part of the site, is inconsistent with national and local policies, as is the building of a major stadium. Hence, while we support the site designation of sporting intensification or light industrial for site 37, it is important that the council makes clear that it will abide by national and local policies and the consequences they imply for site 37. Below we will spell out these arguments considering the possible uses for the site one by one before concluding.

### **Housing**

We note that site 37 is in the flood plain of the River Wandle and has been assigned the highest level of risk (3b) which is defined as a "zone comprising land where water has to flow or be stored in times of flood". Furthermore the National Planning Policy Framework places extremely stringent requirements on developments in a (3b) flood zone; for example it states that "the zone should remain operational and safe for users in times of flood, result in no net loss of floodplain storage,..." It also lists in table 2 the permitted uses which are things like "sand and gravel working, Docks, marinas and wharves,..." These uses do not include residential housing or anything remotely related to it. Merton has stated that "Developments will therefore need to comply with Environment Agency" (18.45). However, the Environment Agency has stated that site 37 is not suitable for residential development and in particular have stated that " We do not believe that any mitigating measures can address the issues associated with the functional floodplain and with the critical drainage areas to minimise flood risk for the future occupiers and the potential for water pollution from the site".

From a wider perspective we note that any substantial housing would result in an increase in new residents to the Borough of Merton and necessitate the provision of further school places, GP surgeries and any other required social amenities. Unless these were to be fully funded directly by the developer through S106 contributions, it would place a burden on the tax payers of Merton while the profits from such a scheme are diverted elsewhere. We also note that the new residents will require the provision of additional jobs in Merton which may be greater than the number created by any other developments on this site. In addition this would lead to an increase in the levels of car traffic that could not be supported by the local road system (see comments on retail and transport given below).

**We can conclude that any study undertaken is very unlikely to justify residential housing on site 37.**

## Retail

We now consider the suitability of a retail development including a substantial supermarket. We note that in the recent past a planning application for a supermarket on the site of the former football stadium at the junction of Plough Lane, Gap, Haydons and Dunsford Road, which is only a short distance from site 37, was comprehensively rejected on the grounds that it was an out of town centre location and it would lead to higher levels of traffic than the neighbouring road system could support. Since that time, the junction of Plough Lane, Gap, Haydons and Dunsford Roads has been improved to take account of the new housing that was subsequently built on this site and this junction can not be further improved to accommodate more traffic. Retail is also not one of the uses in a (3b) flood zone that is permitted in the National Planning Policy Framework.

The area is now well provided with supermarkets, Morrisons in Wimbledon town centre, Savacentre in Merton High Street, a new Waitrose supermarket on Alexandra Road as well as an enlarged Co-Operative on Arthur Road and a significant number of smaller supermarkets. Furthermore, there is expected to be a substantial amount of vacant retail space within the borough and any proposed retail scheme would once again fail the required sequential test demanded by the National Planning Policy Framework. Such a store would take shopping away from the existing provision in Wimbledon town centre and so be inconsistent with policy CS6 which wishes to strengthen the position of Wimbledon town centre, with policy 17.1 which places Wimbledon at the top of its hierarchy of retail centres and with table 17.2 which expects 80% of the growth to be in Wimbledon town centre.

**The building of a substantial supermarket, or other such retail store, is inconsistent with a large number of planning policies**

## Transport

Now we consider the impact of having a development, such as a football stadium, that would generate a large number of people travelling to and from site 37 which would not only be on match days as the stadium would be used for a wide range of other events such as concerts. We note that the site is very poorly served by public transport with a PTAL score of 2 and that "the road network, railway line, rivers and utilities infrastructure in the wider area limit opportunities for improving access to the site". The junction of Plough Lane, Dunsford, Gap and Haydons Roads, despite improvements undertaken to facilitate the residential development of the adjacent site, suffers from considerable traffic congestion with very long tail backs at peak times. Although there are a number of railway and tube stations within walking distance of site 37, only Haydons Road Station can be considered as close but this is limited to a Thameslink service only. We should bear in mind that the number of car journeys is likely to increase substantially as the population grows.

As a result, such a development is not consistent with Policy 26.14 that requires "that proposals that generate a significant number of trips are located in areas of good public transport accessibility ..." , and also with Policy 26.19 which states that "planning

applications are supported where they demonstrate that the existing public transport levels sustain the public transport needs generated by the development ..... ". It is also in conflict with policy CS19 which states that developers must demonstrate that " their proposals are adequately served by a varied of modes of transport and that the proposals do not have an adverse effect on transport within the vicinity of the site".

It is acknowledged in policy 16.18 that in Wimbledon town centre the "pedestrian access and movement is restricted" and the passage of large number of pedestrians going to and from this station will have adverse effects that are not compatible with policy CS20 (e) that requires "developers to demonstrate that their development will not adversely affect the pedestrian and cycle movements, safety, the convenience of local residents or the quality of bus movements and/ or facilities; on street parking, traffic management." The resulting disruption in Wimbledon town centre will inevitably have an adverse effect on the retail and other activities in the town centre as it will strongly discourage visits to the centre and it is not likely that the pedestrians going to the events at site 37 will make use to any great extend of the retail and other facilities in the town centre. Consequently such a development would have a very negative effect on Wimbledon town centre and it is in conflict with the strategic goal (Policy 17.1) of strengthening the position of Wimbledon town centre.

The same considerations apply to the use of Wimbledon Park tube station which is situated on the Arthur Road shopping centre that has been selected as one of the local shopping centres that is to be preserved see table 17.1 and Haydons Road station which is in a residential area. The Earlsfield railway station and the Tooting Broadway tube station are at some distance from the site, but many of the same comments apply, we expect that Wandsworth council will comment on this.

The large numbers of pedestrians who will be passing through the surrounding residential areas situated on the route to the stadium will inevitably lead to a deterioration in the peace and quiet of the local area and the anecdotal evidence from the time when Wimbledon Football club played in their old stadium at Plough Lane is not encouraging. We also note that recently built football stadiums have necessitated the redesign of local transport hubs to enable effective policing and safe passage of supporters. One relevant example where football supporters were a consideration in the planning and design of a new London underground station is Fulham Broadway. Rebuilt in 2001 as part of a retail development, the final design incorporated separate access arrangements to and from the tube station specifically for the home and away fans to allow effective policing, ensure the safe passage for supporters directly to and from the Chelsea football ground next door and enable shoppers and local residents to live and enjoy Fulham Broadway on match days without unnecessary negative impact on their streets and amenities. We note that Wimbledon town centre and its railway station, Wimbledon Park station and Haydons Road station have not been designed with football crowds in mind and, with the exception of the latter which has a poor service, are remotely located in relation to site 37. It is difficult to envisage how the well policed and safe movement of supporters would be possible without negatively impacting on the local residential areas and shopping centres and we do not believe this could be achieved in relation to site 37.

We also note that site 37 is on the main route between St George's Hospital and the

large shopping and residential areas of Wimbledon town centre and Wimbledon Hill and the presence of large numbers of pedestrians attending sporting events and concerts will inevitably lead to an increase in car traffic which will impact negatively on the free passage of A&E ambulances going to and from the hospital.

**The development of a stadium accommodating many thousands of people is incompatible with so many of the policies set out in Core Planning Strategy that it is difficult to see how it can be justified.**

### **Light Industrial**

Light industrial is not specified as a permitted use in a (3b) flood zone, however, it is much more appropriate than housing and retail. Site 37 is surrounded by land which is in a designated industrial area and as such should really be considered for this use. This use is consistent with the National Planning Policy Framework which in paragraph 21 which requires local planning authorities "to set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;... identify priority areas for economic regeneration ,..... ". Such policies can be found in the Core Planning Strategy document of Merton. For example, policy CS12 which requires plans that are "protecting and managing the designated Strategic Industrial Locations and maintaining and improving our Locally Significant Industrial locations...". Policy 20.13 states that "Merton has low levels of industrial land relative to demand .." and Policy 20.14 which 'substantially protect and where possible improve the quality of the borough's Strategic Industrial Locations". Furthermore it is in the Wandle valley corridor which is regarded in policy 27.34 " ....as a key business corridor". In addition such a development would bring additional employment to the borough without introducing new residents and so create a net increase in the number of jobs for local people as required in policies CS12 (a,b) and (c iii) and policy 20.3.

**Light industrial on site 37 is supported by many national and local policies, however, such a development would have to comply with the fact that the site is in a floodplain.**

### **Conclusion**

Site 37 has no specific designation in the current UDP, however, in the LDF its proposed designation is "Intensification of sporting activity (D2 Use Class) or industrial (B1(c), B2 Use class) and warehousing (B8 Use Class) on cessation of sporting use". The main justification for this would appear to be that site 37 is in a flood plain and to give continuity with its use as a Greyhound Stadium.

Site 37 is not an easy site to develop; it is in a flood plain at highest risk (3b) and is inadequately served by public transport and the surrounding roads are subject to considerable traffic congestion. Also it is isolated from the rest of Merton by a railway line and the River Wandle severely limiting the possible improvements in transport. In recent years the consequences of building on floodplains have become only too apparent. It would clarify matters if Merton could clearly state, at least for this site which is situated on the

border of the borough, if it intends to comply with the policies in the National Planning Policy Framework and the advice of the Environment Agency.

As we have mentioned, the National Planning Policy Framework places very strong constraints on what one can build on a floodplain at highest risk. However, one of the allowed uses is "outdoor facilities and recreation and essential facilities such a changing rooms..." This is the ideal use for this site. Some of the site could be used for playing fields for local schools and residents. This would have the by product that it could help local schools meet the inevitable increase in demand for school places. Another part of the site could be turned into a green area which could be used for walking, tennis and other sporting uses by local residents. We note that local councils are to take over the responsibility for public health from the NHS and the provision of areas in which local residents can exercise could form an important part of this strategy. It would of course also be consistent with the Olympic legacy in that it would encourage residents to undertake sporting activity. If the designation of sporting intensification is taken to mean playing fields for residents and schools, tennis courts etc then this is compatible with local and national planning policies and would be a very good use for site 37. Such a development would also fit very well with the proposed Wandle Valley Regional Park. We would encourage the council to actively engage with organisations that might help to bring this possibility about.

However, the same cannot be said if the sporting intensification designation is used to support the development of a major football stadium, especially if it is in conjunction with residential housing or a supermarket. The latter are excluded by national and local policies that relate to the fact that site 37 is a floodplain in the highest risk category. In addition building a major stadium at site 37 is also inconsistent with the policies in Merton's Core Planning Strategy document taking into account the inadequate transportation infrastructure and the considerable adverse effects on the residential areas, Wimbledon town centre and the Arthur Road local shopping centre. It is difficult to find a planning policy that could support such a development. We note that the National Planning Policy Framework states in paragraph 174 that "Where safeguards are required to make a particular development acceptable in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements."

The continued use of the site as a Greyhound Stadium has the merit that it provides continuity with the existing use with which local residents are familiar and by-and-large have not found to have an adverse effect on the surrounding residential area and Wimbledon town centre. This is due to the limited number of people travelling to and from the site for their events. Furthermore, being the last remaining dog track in London, such a stadium would be of national importance and so bring kudos to Wimbledon as a whole. While there is an ongoing issue with the noise due to stock car racing, this can presumably be restricted as part of planning conditions imposed on a new development. However, the building of an associated large supermarket is excluded by the national and local policies, as we have documented above.

Light industrial has the merit that it is consistent with many of the policies in the National Planning Policy Framework and the Core Planning Strategy document of Merton. It would not adversely affect the local area, indeed it would enhance it as it would be bring

employment to the area. While there is some conflict with the area being in a floodplain this is greatly reduced as compared to residential housing and retail. Thus we feel that light industrial is an acceptable use for this site.

Local residents are almost completely unaware that Merton was in effect carrying out a consultation about the possible uses for site 37 and as a result this document has been prepared at relatively short notice. We hope to present a more comprehensive response for the next round of consultation.

**To summarise; to develop playing fields for use by residents and local schools as well as other spaces that local residents can use for exercise on site 37 would be consistent, and very much supported by, local and national policies. As would the use of the site for light industrial provided such a development could be shown to be compatible with the flood risk of the site**

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