



Appendix 6 14/P4361 Wimbledon Stadium Committee Report

Your ref: 14/P4361
Our ref: 14/3623

Sabah Halli

Via email only
sabah.halli@merton.gov.uk

14th January 2015

Dear Sabah,

Wimbledon Stadium, Plough Lane, Tooting, SW17 0BL

This letter follows the recent submission of the above planning application. The following comments are made by Transport for London officers on a 'without prejudice' basis only and are intended to ensure that this development is successful in transport terms and in line with relevant London Plan policies. These comments also do not necessarily represent the views of the Greater London Authority.

Should this application be granted planning permission, these comments do not discharge any requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for any highway works on the Strategic Road Network (SRN) that may arise from the proposals.

Site Location and Development Proposals

The site is bounded to the south by Plough Lane and Copper Mill Lane, to the east by Summerstown, to the west by the River Wandle and to the north by Riverside Road and an industrial estate. The northern and eastern boundaries of the site also form the boundary between the boroughs of Merton and Wandsworth. The nearest part of the Transport for London Road Network (TLRN) is the A24 Tooting High Street approximately 1.2km south-east of the site, although the A217 Garratt Lane, which forms part of the Strategic Road Network (SRN) is less than 100m north-east of the site.

The site is currently occupied by a 6,000 capacity stadium, used predominantly for greyhound racing but occasionally for other events including stock car races. To the east of the stadium and within the application boundary is a large area of open space used for parking of around 900 cars, which also accommodates a weekend market and car boot sale.

The application proposes to construct a new 11,000 seat stadium, with potential to be expanded to 20,000 seats in the longer term for AFC Wimbledon who currently play at the Kingsmeadow stadium in Norbiton approximately 4.5 miles to the south-west. 602 residential units a small foodstore and leisure club are proposed as supporting development. It is also understood that at present the club is not intending to use the stadium for

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concerts or other sports, although the hospitality facilities within the stadium would be opened up for conferencing use outside of match days. This should be confirmed and secured with appropriate planning conditions.

The 493 bus route from North Sheen to St George's Hospital runs along Plough Lane outside the site, with a further four routes (the 44, 77, 270 and G1) running along Garratt Lane a short distance away. A further route, the 156, runs along Gap Road approximately 500m to the west of the site. Haydons Road national rail station is located 800m south of the site and is served by four First Capital Connect trains an hour, running to Sutton, Luton and central London. A limited number of peak hour services also run between Wimbledon and London Bridge. As such, the majority of the site records a Public Transport Accessibility Level (PTAL) of 3 on a scale from 1 to 6, representing average access to public transport. The northern most part of the site is considered to be outside of walking distance to Haydons Road station, and therefore only records a PTAL of 2.

It should however be noted that whilst TfL would normally consider the maximum walking distance to a rail or underground station to be 960m, football fans are generally willing to walk for longer to attend matches. As such, fans could potentially make use of Tooting Broadway station on the Northern line, Wimbledon Park station on the Wimbledon branch of the District line, Earlsfield station providing rail services into and out of Waterloo, and Wimbledon station, providing rail and District line services as well as being the western terminus of London Tramlink.

Site Access

Vehicle accesses to the site will be provided from Summerstown (for the main residential car park) and Riverside Road (for the secondary residential car park and access to the stadium). Vehicles entering the stadium basement will then subsequently exit onto Plough Lane. For pedestrians and cyclists a new north to south spine road will be provided through the centre of the site, between the stadium and the residential blocks. The majority of pedestrian and cycle access will be taken from this spine road, with the exception of away supporters who will have a dedicated stadium entrance on Riverside Road.

The pedestrian impacts of the application are considered in greater detail later in this letter. However, it appears that on match days, access to the site will need to be carefully managed to make sure that there is sufficient space available for spectators arriving and departing on foot. It would be sensible to develop a spectator retention strategy in order to try and spread the departure of spectators over a period of time at the end of matches.

Car and Cycle Parking, Coaches and Taxis

For the stadium use, 73 car parking spaces are proposed of which four will be for blue badge users. It is acknowledged that this level of provision is relatively low but some further information on the anticipated use of these

spaces should be provided, in particular the level of provision that would be made available on non-match days and the likely demand for blue badge spaces. Although stadium or entertainment uses are not explicitly covered in the London Plan policy, TfL would also require provision of electric vehicle charging points covering at least 10% of these stadium parking spaces.

It is also welcomed that the transport assessment identifies potential locations for off-street car parking that may be available to spectators. It will be necessary for the club to work with any landowners that express an interest in opening their sites for matchday parking so that car parks can be allocated to spectators to minimise journey lengths and that agreements can be put in place to ensure impacts are minimised. Other football clubs have also introduced charging regimes to encourage car sharing, with higher tariffs imposed on cars with a single occupant and TfL would support use of this kind of incentive here. All such measures will need to be secured in the s106 agreement.

Cycle parking provision associated with the stadium remains unclear. It appears that no specific cycle parking is proposed for spectators, and for staff the transport assessment simply states that 'cycle parking...will be provided within the periphery of the stadium'. As stated at the pre-application stage, although no specific cycle parking standards apply for a stadium use given its sui generis nature, we consider the best starting point to be the standards set out for other visitor destinations such as cinemas, which require one space per 50 seats. This would require a minimum of 220 cycle parking spaces for the opening 11,000 capacity scenario, rising to a minimum of 400 if capacity is increased to 20,000. Even this would allow for only a 2% mode share, less than the 2.8% stated preference for cycling expressed by current supporters and shown in Table 6.2 of the transport assessment. These minimum standards should be secured by condition or through the section 106 agreement. As such, cycle parking provision for the stadium urgently requires further consideration.

It is intended that coaches will drop off away fans on Riverside Road to the north of the stadium, before parking on an industrial estate in the vicinity of the site. This approach is used by other stadia in London, and is therefore acceptable in principle. However, as no site for parking has been specifically identified a coach management plan should be secured by condition on any consent. This should specify the times and location for coach parking (which should be within an agreed distance from the site) and the number of coaches provided for. For the 11,000 capacity scenario this would need to be a minimum of six, although coach requirements appear to reduce in the higher capacity scenario. This seems unlikely and should be clarified.

Given that Riverside Road suffers from high levels of pedestrian crowding at the end of matches (discussed in more detail in the pedestrian section later) it is likely that crowd management will need to be put in place. The coach management strategy will also need to include how coach drop-offs and pick-

ups will work within this strategy, and therefore coach routings to and from the site. Swept paths should be provided to demonstrate that a 15.5m coach can enter the site, drop off passengers and leave.

No mention is made of taxis or private hire vehicles within the transport assessment. Demand for taxis on matchdays could be significant and consideration should be given to provision of a temporary taxi rank and a demarcated pick up and drop off area for private hire vehicles at these times. The location of any such facilities should be agreed with TfL to ensure it is convenient and accessible to the mobility impaired and any facilities incorporated into the Local Area Management Plan (LAMP).

For the residential units, 222 car parking spaces are proposed at a ratio of 0.37 spaces per unit. It is proposed to prevent residents of the development from applying for parking permits in surrounding Controlled Parking Zones (CPZs) via a legal agreement. This relatively low level of car parking is supported by TfL, as is the proposal that commercial parking will be for blue badge use only. However, the number of blue badge spaces for the proposed retail store should be confirmed.

Within this provision, 20% of spaces will be provided with an Electric Vehicle Charging Point (EVCP) with passive provision for a further 20% of the spaces. This meets with London Plan policy and is supported. However only 22 of the spaces will be designed for blue badge holders, which does not accord with Lifetime Homes standards which would require 10% of the total residential properties to be supported by a blue badge space. You are encouraged to discuss this matter further with the council's access officer, and parking may need to be managed flexibly to ensure that spaces can be redesigned to accommodate a larger provision of blue badge spaces if necessary in future.

A minimum of one publically accessible car club space is to be provided and we understand that the council will seek three years membership of the car club for new residents as part of the commitments made through the Travel Plan. This is supported by TfL and should be secured through the s106 agreement.

A car park management plan should be secured by condition and cover all uses on site in order to minimise traffic congestion and ensure that car parking takes place in a safe and controlled manner. Dependent on the approach taken to off-site parking, a separate parking/ LAMP covering areas of matchday parking beyond the site's red line boundary is also likely to be required. In both cases TfL would like to be consulted on the detail of these plans.

For the residential units, a total of 685 cycle parking spaces are proposed across the three proposed buildings. This does not accord the Further Alterations to the London Plan (FALP), which has now been through its

Examination in Public and will be published shortly and therefore carries significant weight. Cycle parking standards in the FALP, which were not questioned in the inspector's report, would require a minimum of 992 spaces, 45% higher than the provision proposed in this application. This is not considered acceptable by TfL.

Trip Generation

For match day trip generation, a first principles methodology based on supporter surveys, ticket sale information, assessment of journey time and parking availability has been developed in consultation with TfL. This methodology is considered to make the best use of the data available, and the resultant mode shares seem sensible. We would however question why the number of coach trips appears to have reduced with an increase in capacity from 11,000 to 20,000.

Eight scenarios have been considered – matches at weekdays and weekends, with either an 11,000 capacity or 20,000 capacity stadium, and with either existing car parking restrictions or in a scenario where the hours of local Controlled Parking Zones (CPZs) and single yellow line restrictions are changed to discourage parking during matchdays. Given that this will have a significant impact on mode share and therefore the transport impact of the stadium, we would encourage dialogue between the applicant, TfL and Merton and Wandsworth councils to test the robustness and deliverability of this approach. There would have to be a commitment to undertake a wider CPZ review and consultation and commitment by the developer to fund this process and implementation of CPZ and parking measures. TfL would encourage any measures introduced to encourage non car modes, although the comments on public transport impact set out later in this letter will need to be borne in mind.

For the residential units, travel plan data from a recent development on the corner of Plough Lane and Durnsford Road has been used. At the pre-application stage, we accepted that given this site's proximity that it would be likely to be a good comparison to the proposed development, although we did express a concern over reliance on a single source of data and asked that trip rates were compared to data available in TRAVL and TRICS. Although TRAVL data has been used as part of the assessment, a comparison of trip rates has not been carried out. Across all modes and in the peak directions, use of the travel plan data predicts 267 AM peak trips and 274 PM peak trips. The TRAVL sites used in the assessment predict 339 trips in the AM peak and 249 in the PM peak. As a result there is some concern about the robustness of the all-mode trip rates utilised which is disappointing given the importance of this process in agreeing an acceptable position.

Nevertheless, the use of the travel plan data to obtain mode split seems reasonable and has been compared against 2011 census data. With respect to distribution of trips, 2001 census data for local wards has been used.

Whilst the principle of using census data is sound, 2011 data was made available a few months ago. A check of this latest data suggests that the public transport distribution seems reasonable. However, the transport assessment assumes a large proportion of car trips (72%) are towards Wandsworth and therefore go east from the site, with only 15% of car trips staying within Merton. However, latest census data suggests that a greater proportion, around 38%, will stay in the borough and therefore will head west. However, it is acknowledged that the site will generate relatively few car trips on a non-match day and therefore we do not consider this a significant issue.

Trip generation for the squash club has been based on a first principles approach, and for the retail unit via the use of TRAVL surveys. This is considered acceptable in both cases.

Consideration has also been given to trip generation associated with the use of the stadium for conferences. However, this only considers vehicle trip generation and an assessment of trips on all modes is needed.

Highways Impact

The assessment of highways impact is based on a number of traffic surveys carried out in July 2012. As the highway impacts of this application will be felt predominantly on borough roads, both Merton and Wandsworth councils should satisfy themselves that highway conditions have not changed significantly in the interim.

No detailed assessment of matchday traffic impact has been carried out as part of the application. Given the number of matchdays each year will be limited, this is consistent with other recent applications for sports stadia. However, the trip generation suggests that a significant number of car trips will be attracted to the area on matchdays, and as discussed further below it will be likely that lane closures will be required to accommodate pedestrian flows. The likely length of these closures will need to be understood as the River Wandle restricts the number of alternative east-west routes in the area, most of which would involve travelling via the TLRN.

A desktop assessment of the impact of non-matchday traffic on the TLRN has been carried out. It is accepted by TfL that this impact is not significant.

However, the transport assessment does acknowledge that more local junctions, including Plough Lane / Durnsford Road / Haydons Road / Gap Road and the junctions of Garratt Lane with Summerstown and Wimbledon Road are currently operating over capacity and that the development would result in an increased level of traffic and congestion. It appears that the potential for highways mitigation is limited, although it has been suggested that the northbound carriageway of Haydons Road could be widened to two lanes through the removal of existing parking bays. You may wish to ensure that the proposed 6m carriageway width can be maintained on Haydons

Road, as it appears it may narrow at the junction with Haydon Park Road, but ultimately the highways impact at these local junctions is an issue for Merton and Wandsworth councils to consider as highway authorities.

However, TfL will be keen to ensure that any suggested proposals do not have an adverse impact upon bus operations and journey time reliability will need to be borne in mind as part of agreeing the detailed design and any changes to signal operations. Equally cycle infrastructure and safety measures should also be considered as part of any future scheme. To date detailed model inputs and outputs have not been submitted, and without these the modelling cannot be properly audited. Flare utilisation should also be checked to ensure that drivers can make use of the lengthened flare proposed as mitigation.

Buses

Adoption of the trip generation methodology for matchdays detailed above results in a high number of bus trips. The worst case is a weekday match under the 20,000 capacity scenario, where 590 spectators are anticipated to use buses stopping on Plough Lane outside the stadium. Only one route serves this stop, the 493, and its terminating point in an eastbound direction is St George's Hospital, a short walk away. As such, the majority of spectators will be arriving from and departing to the west. In addition, the service operates at a frequency of three buses per hour off peak, which would require almost 200 spectators per bus to be accommodated at the end of a match. Although this is clearly unrealistic, TfL would not expect to provide additional buses for events such as these and it is likely that some of these trips allocated to buses would instead be made by underground or rail. This needs to be borne in mind when assessing the impact on these modes.

As acknowledged in the transport assessment and discussed at the pre-application stage, bus routes operating along Garratt Lane, particularly northbound, are currently operating at capacity. The transport assessment makes a number of reasonable assumptions around bus use linked to the proposed residential units, but the anticipated number of bus trips would necessitate a frequency increase on one of the routes that uses Garratt Lane. Because of the nature of these routes, such a frequency increase would result in a requirement for an additional five buses to operate on the route. The cost of these additional buses is £1.25m per year, and given the anticipated construction programme we would seek funding for a three year period, totalling £3.75m.

Rail and Underground

On matchdays, the transport assessment sets out that the greatest impact on rail and underground services will be at Haydons Road and Earlsfield stations. Before discussing this in detail, it should be noted that the assessment carried out appears to be based on trip generation where no changes to parking restrictions are implemented. Should parking restrictions be changed, this is likely to promote mode shift towards rail and underground

and as such an assessment of demand in this scenario should also be carried out. Please also note the comments about matchday bus impact above.

The assessment assumes that up to 2400 spectators will use Haydons Road station (after a midweek match in the 20,000 scenario). Given the low half-hourly frequency of services from Haydons Road at off-peak times, we would question whether this is realistic. Although Haydons Road may be used by spectators living locally, we believe that trips to central London are more likely to use Earlsfield station or London Underground services given the significantly higher frequencies. This is also based on an assumption that spectators will travel on services in both directions on the loop from Haydons Road to reach central London, which would involve some spectators travelling anti-clockwise to Wimbledon before changing onto Waterloo services. However, the majority of these services from Wimbledon to Waterloo will call at Earlsfield, and we feel it is far more likely that passengers travelling this way will walk to Earlsfield rather than waiting for a half-hourly service at Haydons Road and subsequently changing trains. This backs up the point that more people may use Earlsfield than has been assumed.

No assessment has then been carried out of background demand on rail or underground services and whether there is sufficient capacity for additional matchday demand. Should this capacity not be available, queues at stations would last for longer than the hour suggested within the transport assessment. An analysis of this background demand on rail is considered necessary, either through information on loadings that train operators may be able to provide or through surveys of loadings at key times. It is however accepted that underground services are likely to be able to accommodate the anticipated demand based on the data provided.

With regards to management of spectators at stations, the procedures outlined in the LAMP seem reasonable to ensure that spectators can board services safely. However, the three stations where impacts are predicted to be the highest are not operated by TfL and as such we would recommend that the applicant liaises with the Station Facility Owner (SFO – the train operator responsible for management of the stations) to check that, at a high level, a satisfactory crowd management solution can be put in place which does not involve any substantial infrastructure which would require a contribution from the developer. The SFO is South West Trains for Earlsfield and Wimbledon, and Govia Thameslink Railway for Haydons Road. Dependent on the management measures put in place, confirmation from each station's SFO should also be provided that no issues with station capacity (either platforms, gatelines or vertical circulation) will be caused by the proposals.

Non-matchday impacts on rail and underground services are not considered to be significant, with sufficient spare capacity within the network to

accommodate the predicted level of additional trips.

Walking

A Pedestrian Environment Review System (PERS) audit has been carried out of the main pedestrian routes surrounding the site. Whilst a number of routes to rail stations in the area have scored well, the area immediately around the stadium has scored relatively poorly, with links on both Summerstown and Plough Lane receiving an amber rating and Riverside Road a red rating. Nevertheless, it is proposed to make alterations to the layout of both Plough Lane and Riverside Road to provide better pedestrian and cycle facilities, which will help to address some of these concerns. Whilst these interventions are welcome, we would recommend a more comprehensive approach to pedestrian improvements should be taken to address concerns raised through the audit, in particular though improvements to bus stops, rationalisation of street clutter, provision of tactile information and enhancements to lighting and CCTV coverage to improve the sense of personal security. These improvements should also extend to Summerstown given its relatively poor score and proximity to the site. The detailed design of any improvements should also be developed in the context of the agreed street types of the area, following the recommendations of the Roads Task Force. It is understood that the council will shortly be meeting with TfL to categorise its road network, and the introduction of a football stadium in this location is likely to lead to an increase in the area's 'place' function.

A signalised pedestrian crossing is also proposed on Plough Lane, allowing access to the proposed north-south spine road adjacent to the stadium. Whilst this seems sensible to help improve pedestrian conditions, TfL uses a set of justification criteria for the installation of new traffic signals, and we would request that the applicant undertakes an analysis of whether the proposed crossing would meet these. The criteria are attached with this letter.

Analysis of matchday impacts on the surrounding pedestrian network has been undertaken using TfL's Pedestrian Comfort Level (PCL) methodology. At football matches, a certain amount of pedestrian crowding is to be expected, and therefore it is acceptable to treat the area around the stadium as a Transport Interchange for the purposes of this assessment. Nevertheless, this would require the average PCL to be C- or above, and the maximum PCL to be D or above. On a matchday, even with an 11,000 capacity, there would be areas on all five key pedestrian links assessed that would fail to reach these standards, on Plough Lane, Haydons Road, Garratt Lane, Riverside Road and Summerstown.

This analysis suggests, and the transport assessment accepts, that temporary road closures are very likely to be required at the end of matches to be able to accommodate the pedestrian flow associated with the stadium safely. However, this ought to be demonstrated via further PCL analysis

which would need to show how much additional space would be required for the PCL to not exceed D. This will enable TfL and the relevant councils to understand the extent and length of any road closures that may be required, and their subsequent impact on the road and bus network.

Any measures deemed to be necessary would subsequently need to be formalised through the LAMP, which will need to be secured by condition (and potentially in different forms for an 11,000 seat stadium and a 20,000 seat stadium) on any consent. TfL would like to be consulted on the detail of the LAMP prior to approval and adoption.

Cycling

As well as noting the lack of cycle parking provision above, a cycling strategy should be developed with TfL and the councils to design and deliver high quality cycling provision. As part of the proposed mitigation for the development, a 2m cycle lane is proposed adjacent to the northern footway of Plough Lane, linking the site to the Wandle Trail and National Cycle Route 20. This part of the Wandle Trail is part of the emerging proposals for a network of Quietways, and therefore improving connections to it is welcomed. As this route is located on Merton's highway, this is primarily for you to agree with the applicant. However, you may wish to consult the revised London Cycle Design Standards, available at <http://www.tfl.gov.uk/corporate/publications-and-reports/cycling> as well as the Quietways designs, which look to introduce shared space on the footways rather than a dedicated cycle lane. From the drawings submitted it is unclear whether the cycle lane is proposed to accommodate one way or two way flows, but if the latter the standards would suggest that it may need to be wider.

Travel Plans

Specific comments on the LAMP are covered in the modal sections of this letter, above.

The Stadium Management Plan will cover both the LAMP and the Stadium Travel Plan, which is covered briefly. It is accepted that many of the hard measures to encourage use of more sustainable modes are covered by the Transport Assessment and the LAMP. However, little detail on soft measures has been provided. It is accepted that the Stadium Travel Plan will need to be developed in further detail once the constraints around the site are better known, but even at this stage it would be useful to understand the sorts of measures that the club is willing to commit to. We have previously provided a list of measures secured at other stadia, which may be useful as a starting point. However, mode share targets will need to be set out, along with contingency plans should these fail to be reached. These would need to link back to both hard and soft measures, and may take the form of further financial contributions to address issues that may be identified around the site.

Travel Plans for the residential and retail uses have been submitted, and are generally of a good quality. These should be secured through the Section 106 agreement for the site.

Freight

The transport assessment includes an outline Construction Logistics Plan (CLP), which contains a number of welcome measures designed to reduce the number of vehicle movements associated with construction and to ensure the safety of local road users. These include commitments to encourage non-car travel by construction workers, to ensure that all bulk transit traffic is made away from highway peak hours, promotion of more efficient vehicles and promotion of FORS. One further commitment that could be made is, in addition to the use of FORS, commitment to TfL's Standard for Construction Logistics, developed in partnership with the construction industry to reduce risks to vulnerable road users of construction vehicles. The Standard seeks to promote improved driving practices and use of safer vehicles. Signing up to the Standard, alongside FORS helps in part to achieve this. Please see <http://www.tfl.gov.uk/info-for/freight/safety-and-the-environment/managing-risks-wrrr> and <http://www.clocs.org.uk> for more information on this. A condition securing a detailed CLP, including these measures, should be secured on any consent.

The applicant also proposes that a Delivery and Servicing Plan (DSP) is secured by condition on any consent and will include a number of measures designed to make servicing trips to the site more efficient. This is welcomed by TfL.

Planning Obligations

As discussed in further detail above, at this stage the key concern for TfL is that the impacts of the development on bus services are mitigated. Any such mitigation would need to be captured through the Section 106 agreement for the site, as bus capacity is not covered by the Community Infrastructure Levy (CIL). We can provide detailed wording regarding a Sponsored Route Agreement for inclusion within the Section 106 agreement if this is helpful. Further mitigation may also need to be secured dependent on the results of the further rail capacity assessment discussed in more detail earlier in this letter. The Section 106 will also need to secure the LAMP, Travel Plans, CLP, DSP, Car Park Management Plan, Coach Management Plan and potentially provision for alterations to CPZs in both Merton and Wandsworth.

The London Borough of Merton adopted their CIL on the 1st April 2014. Residential development is charged at £220 per square metre and superstores at £100 per square metre. The associated Regulation 123 list identified improvements to Wimbledon station as one of the transport priorities for the CIL charge.

The Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this

date will be liable to pay this CIL. The proposed development is in the London Borough of Merton, where the charging rate is £35 per square metre of chargeable floorspace. Further details on the charge can be found at <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.

I hope the above is useful and please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.

Yours sincerely

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