



COMMUNITY AND HOUSING DEPARTMENT

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Public Health representation to Planning Application Reference 14/P4361:

Application Number	14/P4361
Site address	Wimbledon Stadium Plough Lane Tooting SW17 0BL
Ward	Wimbledon Park
Development description	PROPOSED DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF A 20,000 SEAT FOOTBALL STADIUM (INITIALLY 11,000 SEAT) WITH HOSPITALITY AND COACH PARKING, PEDESTRIAN STREET, 1,273 SQ M RETAIL UNIT, 1,730 SQ M SQUASH AND FITNESS CLUB, 602 RESIDENTIAL UNITS WITH BASEMENT PARKING, REFUSE STORAGE, 297 CAR PARKING SPACES, CYCLE PARKING, AND ASSOCIATED LANDSCAPING/OPEN SPACE AND SERVICING.

Comments

Public Health understands that the developers plan to demolish the existing buildings, create a new 20,000 seat stadium (initially 11,000) with hospitality and coach parking, 1,273 sq m retail unit, 1,730 sq m squash and fitness club, 602 residential units with basement parking and refuse stores, 297 car parking spaces, cycle parking and associated servicing, and create a new public street and associated public realm.

Public Health advises that the following is taken into account when considering the above planning application:

- The NPPF and Merton’s local planning context takes into account and encourages planning decisions which promote residents’ health and wellbeing.
- The September 2014 validation checklist for the Greyhound Stadium development stated that “In accordance with the Mayor of London’s Draft Social Infrastructure SPG, May 2014, a ‘Rapid’ Health Impact Assessment (to be incorporated in a stand-alone health & wellbeing chapter in the EIA), would be appropriate in this instance.” A limited HIA is included as an Appendix in the Planning Statement, under the headings ‘healthy housing’, ‘active travel’, ‘healthy environment’ and ‘vibrant neighbourhoods’. This is welcome, and a number of wider health and wellbeing implications of the stadium and residential development appear to have been considered e.g. active travel plans for football supporters, a general reduction in number of car spaces and increase in cycle parking, as well as landscaping and pedestrian/cycle routes that link to existing green spaces, etc.
- However, some important aspects such as the broader impact of the development on health and wellbeing, particularly on health inequalities, have not been considered systematically, and others are less than ideal, for instance the proposed number of cycle spaces and disabled parking spaces. The HIA does not fully address the health impact of the development on different groups particularly those not already physically active, set out the likely impact on health inequalities, or adequately address health issues related to social isolation and how the developer plans to mitigate these through design.

Planning context

The aim of the National Planning Policy Framework (2012) is to achieve sustainable development. This means achieving growth whilst ensuring that whilst ensuring the wellbeing of future generations. The NPPF sets out 12 core planning principles which should underpin both plan making and decision taking. One of these core planning principles is to: *“take account of and support local strategies to improve health, social, community and cultural wellbeing, facilities and services for all”*.

Paragraph 171 states that local planning authorities: *“should work with public health leads and health organisations to understand and take account of health status and needs of the local population, including expected future changes, and any information about relevant barriers to improving health and well-being.”*

Policy 3.2 of the London Plan 2011 (p78) part D states that *‘New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help reduce health inequalities’*.

Locally, the Merton Core Strategy Chapter 21 *Open Space, Nature Conservation, Leisure and Culture - Policy 13* sets out that the largest response on any single issue throughout all the LDF consultations came from supporters of Wimbledon AFC wanting a football stadium or a multi-purpose sports complex with new community facilities within the borough. They identified the site of Wimbledon Greyhound Stadium as their choice of location. This is located within a functional flood plain, therefore the site is restricted in the range of uses it can offer. Building on our legacy in sport, Merton Council supports the provision of a sports stadium within the borough.

The Merton Sites & Policies plan sets out the allocated use for this site as: Intensification of sporting activity (D2 Use Class) with supporting enabling development, and with regards to health and wellbeing, highlights that development proposals will need to:

- Incorporate suitable mitigation measures to minimise flood risk for future occupiers
- Facilitate improved accessibility including improving bus infrastructure, walking and cycling facilities; resolve road network capacity, movement and safety concerns.
- Provide an equivalent or enhanced squash and fitness club as part of sporting intensification.
- Identify and deliver the necessary school places, healthcare and other associated infrastructure for any residential aspects of the development.

Public Health comments

In general, we support the vision set out for the proposed development, to redevelop a run down site, to integrate the stadium into the wider Plough Lane development, and to ensure that the stadium facilities will be used to provide a range of activities that will attract all age groups from all sections of the local communities, promote sporting participation, education, social inclusion and health, provide employment, and enable AFC Wimbledon to build close links with local businesses and residents. We are also pleased to note the potential for employment opportunities onsite during building and once the development is completed, for local Merton residents. It is good to see the results from community consultation, and to see support from local schools.

We are pleased to see a HIA included in the documents submitted, although it is relatively limited in depth and the level of ambition is somewhat disappointing, meeting minimum requirements rather than taking the opportunity of such a substantial development for the area to *maximise* health and wellbeing of local residents and reduce health inequalities through innovative approaches.

Summarised in Appendix 1 is some evidence about existing health and wellbeing of residents around this site in Merton (the full Merton Joint Strategic Needs Assessment, JSNA, is available online),¹ and we recommend the developers continue to systematically consider how they plan to mitigate negative consequences and to promote and improve mental and physical health and wellbeing of all residents on the site in the new residential units, of all visitors to the site and of all residents living near the proposed development.

¹ Merton JSNA: <http://www.merton.gov.uk/health-social-care/public-health/jsna.htm>

Specific comments:

Design of residential units and affordable housing:

- We welcome that the size of the proposed units appears to comply with the minimum unit sizes as set out in The London Plan, that the majority of the residential units are dual aspect, that every residential unit is provided with private external space in the form of either a garden, balcony or roof terrace, and that there will be communal amenity and play space.
- We welcome that each residential unit will have its own fully appointed kitchen allowing occupants to cook meals. We also welcome the mention of green walls, but would like to see more consideration of food growing such as edible planting and individual or community allotments in the design.
- Whilst it is positive that the design appears to be Secure by Design compliant, we are concerned by the Design & Access statement that states “all residential amenity spaces are enclosed by secure gates”, as in order to promote health and wellbeing the design should maximise opportunities for social interaction and avoid creating ‘gated communities’.

Affordable housing:

- The proportion of affordable housing is still unclear, and we would like this to be maximised through appropriately worded planning conditions.

Retail space:

- We understand that the development will incorporate creation of A1 (retail) use class, and recommend that health is taken into account in planning decisions such that residents, stadium visitors and employees have access to a full range of health food options and that access to alcohol is limited.
- We very much welcome that the HIA specifically sets out that the scheme will not promote unhealthy eating and will not introduce any class A5 uses.
- We would recommend that a suitably worded condition is used to prohibit use of the A1 retail space for an off license, given the proximity of the stadium and desire to limit antisocial behaviour associated with alcohol. The consultation raised a number of issues, including local concern that there will be an increase in anti-social behaviour on football match days. The developer responded with information about the low level of arrests and banning orders at AFC Wimbledon home games. However, the impact of this development on other antisocial behaviour, and plans to mitigate this were not fully addressed. Data in Appendix 1 highlights the current alcohol-related crime and antisocial behaviour associated with this postcode, concerns from local residents about alcohol-related and antisocial behaviour, as well as broader health and wellbeing indicators. At the very least, this development should have a neutral impact on the levels of alcohol-related incidents and antisocial behaviour, and in the best case scenario, this development has the potential to very positively impact on the broader health and wellbeing of local residents and the wider community, and the developers should show clearly how they plan to do this.

Accessibility and active travel:

- In general, we support the apparent reduction in the number of car parking spaces on the site from 600 to 275, the addition of 22 disability spaces, and the creation of 741 cycle spaces. However, we have concerns about the actual quantities proposed for both the stadium and the residential units:
 - The 22 disability spaces do not appear to meet Lifetime Homes standards which require 10% of residential properties (i.e. at least 60 for this development) to be supported with a blue badge space, giving a shortfall of nearly 40 spaces. This is not considered acceptable by Public Health. We would like to secure appropriate levels of blue badge parking by means of suitably worded planning conditions, in order to meet Lifetime homes standards. This goes for all the relevant Lifetime Homes standards and other planning policy requirements and standards referenced in Merton’s Core Plan. We also note and support TfL’s concerns in their comments on this application that the supply of only 4 disabled spaces for the stadium is low.
 - We note and support TfL’s concerns about the lack of designated cycle parking for the stadium. We also note and support TfL’s concerns about the scarcity of designated cycle parking for the residential units, compared to standards which suggest a minimum of 992 spaces instead of the 685 proposed, a 45% increase. This is not considered acceptable by Public Health. We would like to secure cycle parking for both the stadium and residential units by means of suitably worded planning conditions, in order to encourage cycling to the venue and by residents, to promote active travel for health benefits and to reduce the impact on congestion and air quality from use of cars.

- We note and support TfLs concerns about effectively managing access to/from the site on match days, to mitigate the impact on residents of the new residential units, and other residents in the local area.
- We support the opportunities set out in the Design & Access statement, to increase street trees, to break through the barrier of the industrial area and to better connect the site to the surrounding communities, provide new safe pedestrian across the site, extend and improve the public realm, and create a new network of green spaces. We support any efforts to better link the venue to existing green spaces and cycle routes such as the Wandle Trail and planned Quietways. We would propose that the developers to use the London Cycle Design Standards, and engages with the Council's cycling and active travel plans, and that this is secured by a suitably worded condition.
- In redesigning pedestrian access around the site, we would recommend that a 'whole-street' approach is taken to make streets more inviting for walking and cycling and better for health, using TfLs' 'Indicators of a healthy street environment' tool.²

Squash and fitness club:

- We are pleased to see that as well as providing squash courts, within the proposed new fitness club building there will be a larger dance studio and members' area available for use by the local community, as well as a hydrotherapy and physiotherapy suite which is intended to complement the facilities of the nearby St Georges Hospital.
- The Environmental Statement sets out that the existing facility, Christopher's Squash and Fitness Club is considered a key community asset as it offers a wide range of facilities including a gym, and daily classes for elderly people. We would like to see the new squash court and facilities available to a wide range of local residents, ensuring that it is both physically and financially accessible and that there is proactive outreach from AFC Wimbledon and the Squash & Fitness Club to those who are least likely to be physically active.

Impact on health and wellbeing:

- In the Environmental Statement there is some discussion of socio-economic significance of the proposed development, the likely impact on GPs and healthcare facilities and a short section on Community Health and Wellbeing. This includes the statement that the development will lead to "Increased social cohesion and a healthier local community" yet the focus is very much on sporting intensification, and not the broader impacts of the development on health and wellbeing of the whole population, and on inequalities in health. The AFC Wimbledon community work is certainly an asset to Merton, but we would have expected to see more discussion about how the developers would ensure their plans did not increase health inequalities, by specifically considering the impact of the development on different groups.
- As above, we welcome the inclusion of a HIA as an Appendix in the Planning Statement, although it is relatively limited in depth and ambition and does not address the issue of health inequalities. We would like to see developers not only meeting minimum standards but raising the bar for health and wellbeing of our local communities, in order to maximise healthy life expectancy and reduce health inequalities.

We encourage the developers to ensure links with existing health promoting programmes in the borough including but not limited to: Healthy Catering Commitments, promoting responsible retailing of alcohol and tobacco, active travel, Healthy Workplaces, etc, in order to meet the requirement of the London Plan that states that new developments should not only be designed and constructed but also *managed* in ways that improve health and promote healthy lifestyles to help reduce health inequalities.

The stadium redevelopment presents the potential for a valuable community asset, and we would be keen to engage further with AFC Wimbledon's community and health education work, for instance to encourage community work that promotes health and wellbeing of local residents, particularly opportunities for those who are least likely to be physically active, to support those not in education employment or training, to work with Healthy Schools to get children and families active and healthy, and to promote NHS Health Checks, sensible drinking and smoking cessation to fans and local residents.

Amy Potter
Consultant in Public Health

On behalf of Dr Kay Eilbert, Director of Public Health

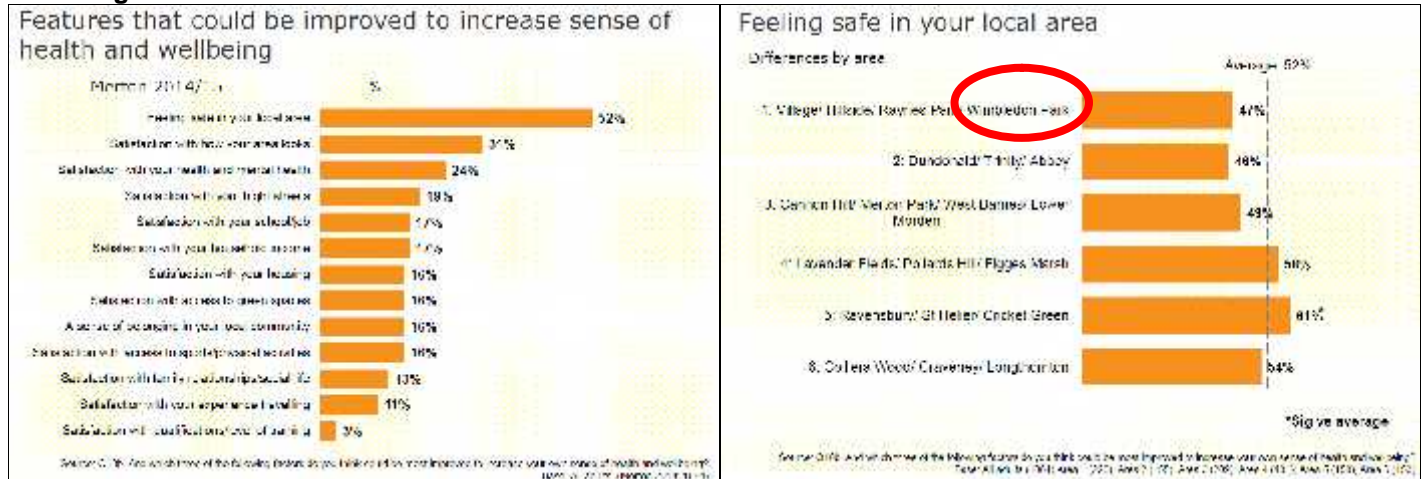
² TfL (2014) Improving the health of Londoners: transport action plan – available online

Appendix 1: Public health data summary for Wimbledon Park ward

Health and wellbeing in Merton

The 2014 Annual Residents Survey highlighted that overall Merton residents remain generally positive about their health and wellbeing, with around 90% reporting that they are satisfied with life, felt happy yesterday and feel that life is worthwhile. Reflecting continuing high levels of concern about crime, 'feeling safe in your local area' is the area that most residents feel needs to be improved to improve their sense of health and wellbeing (52%). Residents in Area 1 (Village / Hillside / Raynes Park / Wimbledon Park) where this development is based were less likely to say that 'feeling safe in your local area' could be improved than the average.

Figure 1: Merton Annual Residents Survey 2014 – features that could be improved to increase sense of health and wellbeing

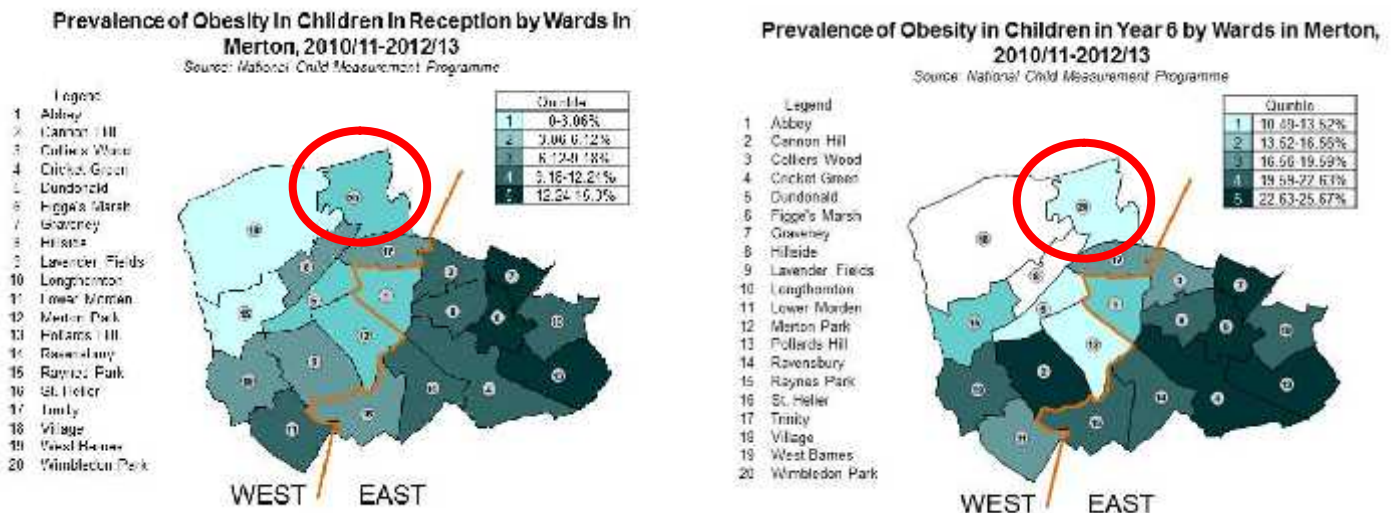


Obesity in Merton

Obesity has become one of the major public health challenges for the 21st century. Obesity is a key risk factor for long term life-limiting conditions such as heart disease and cancer. Tackling the upward trend of obesity in our local population requires coordinated and proactive leadership and action across a range of areas, including the food environment and availability of healthy food choices. In Merton:

- Nearly 1 in 5 five year olds and a third of 11 year olds in Merton are classified as overweight or obese, and the rates of obesity in 11 year olds are increasing. In Wimbledon Park where this development is situated, 4.2% of children in reception are obese, but this triples to 13% by the time children reach Year 6 (aged 11).
- An estimated 1 in 5 adults (aged over 16 years) in Merton are obese, and the highest levels of overweight and obesity are found in the more deprived areas, where nearly 1 in 3 are obese.

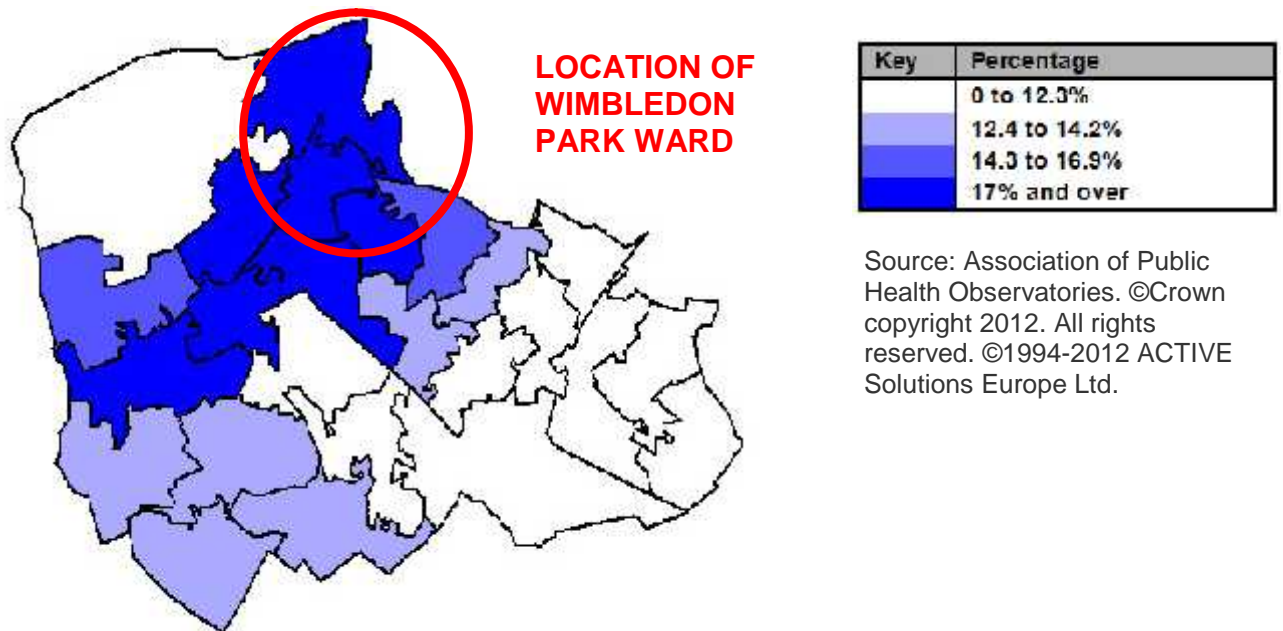
Figure 2: Prevalence of obesity in children in reception (left) and year 6 (right) by ward in Merton



Alcohol in Merton

The estimated prevalence of binge drinking in Merton is 13.8% compared with 14.3% in London and 20.0% nationally (Source: Public Health England (PHE) Local Alcohol Profiles for England (LAPE) 2012). However, this masks differences across the borough (Figure 3). Estimated levels of the adult population drinking at 'increasing risk' (21%) and 'higher risk' (7.2%) are above London average.

Figure 3: Prevalence of risky drinking behaviour by area – percentage of the adult population that binge drink by MSOA, Merton, 2007-08, (modelled estimate).



Source: Association of Public Health Observatories. ©Crown copyright 2012. All rights reserved. ©1994-2012 ACTIVE Solutions Europe Ltd.

Crime and antisocial behaviour in Merton

The 2014 Annual Residents Survey highlighted that residents are concerned about crime, anti-social behaviour and people being drunk and rowdy. In Wimbledon Ward where the proposed development is located, more than a quarter (27%) of residents were very worried or fairly worried about people being drunk and rowdy, and the same proportion worried about antisocial behaviour. See Figures 4 and 5 below.

Figure 4: Merton Annual Residents Survey 2014 - worry about people being drunk and rowdy

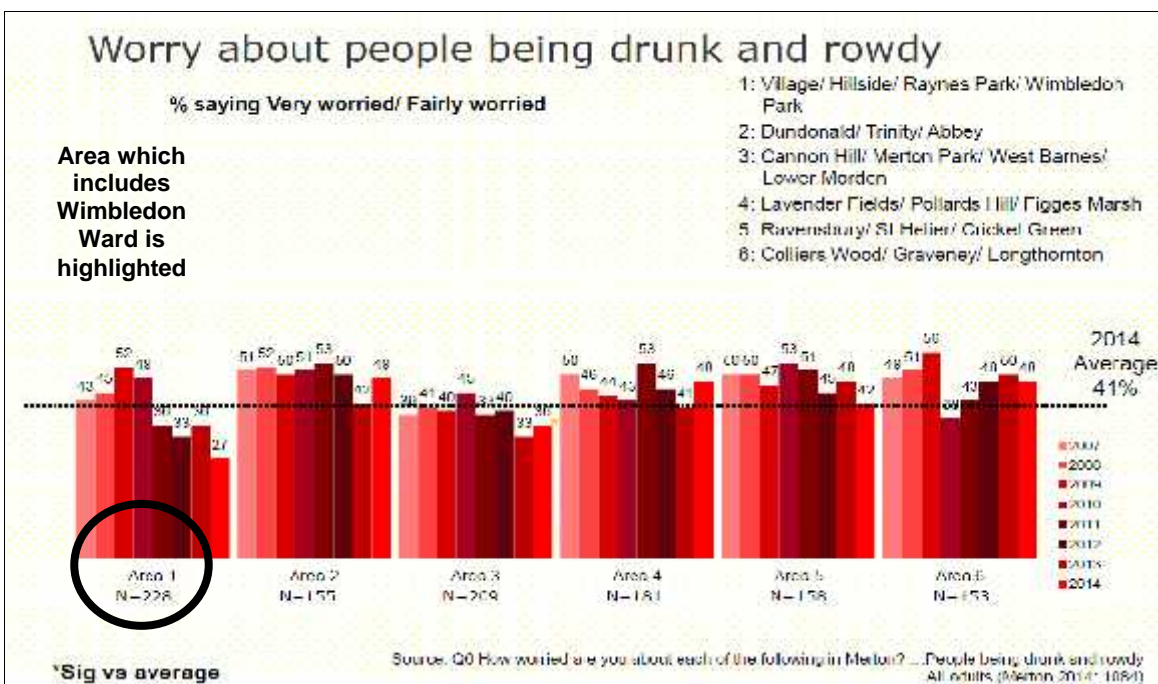
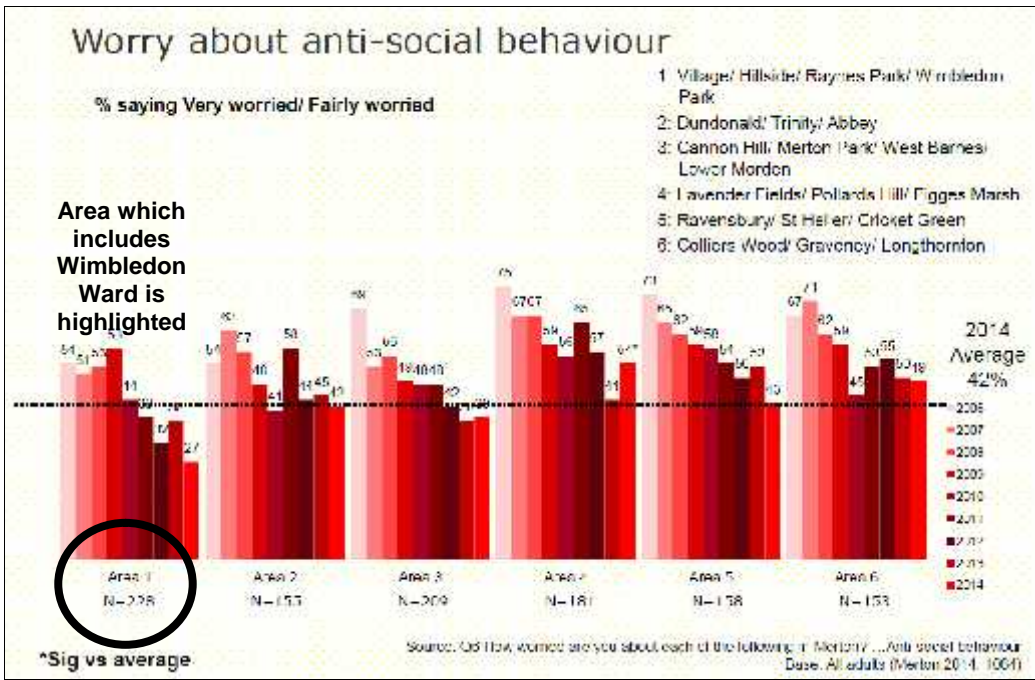
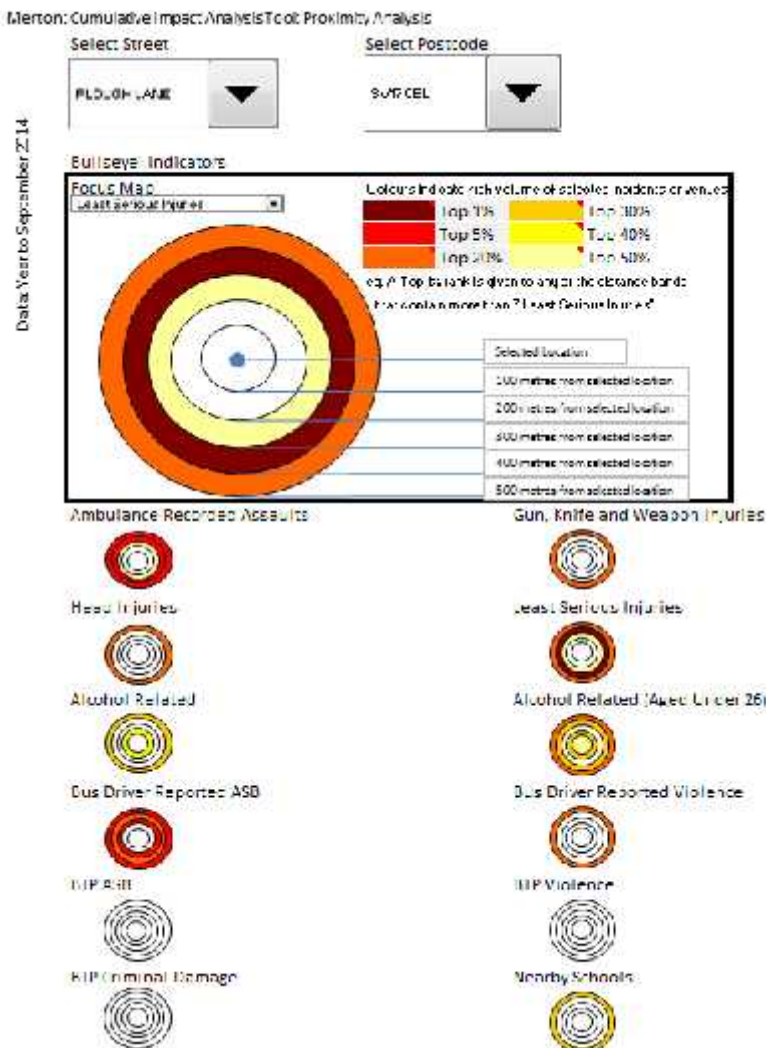


Figure 5: Merton Annual Residents Survey 2014 - worry about antisocial behaviour



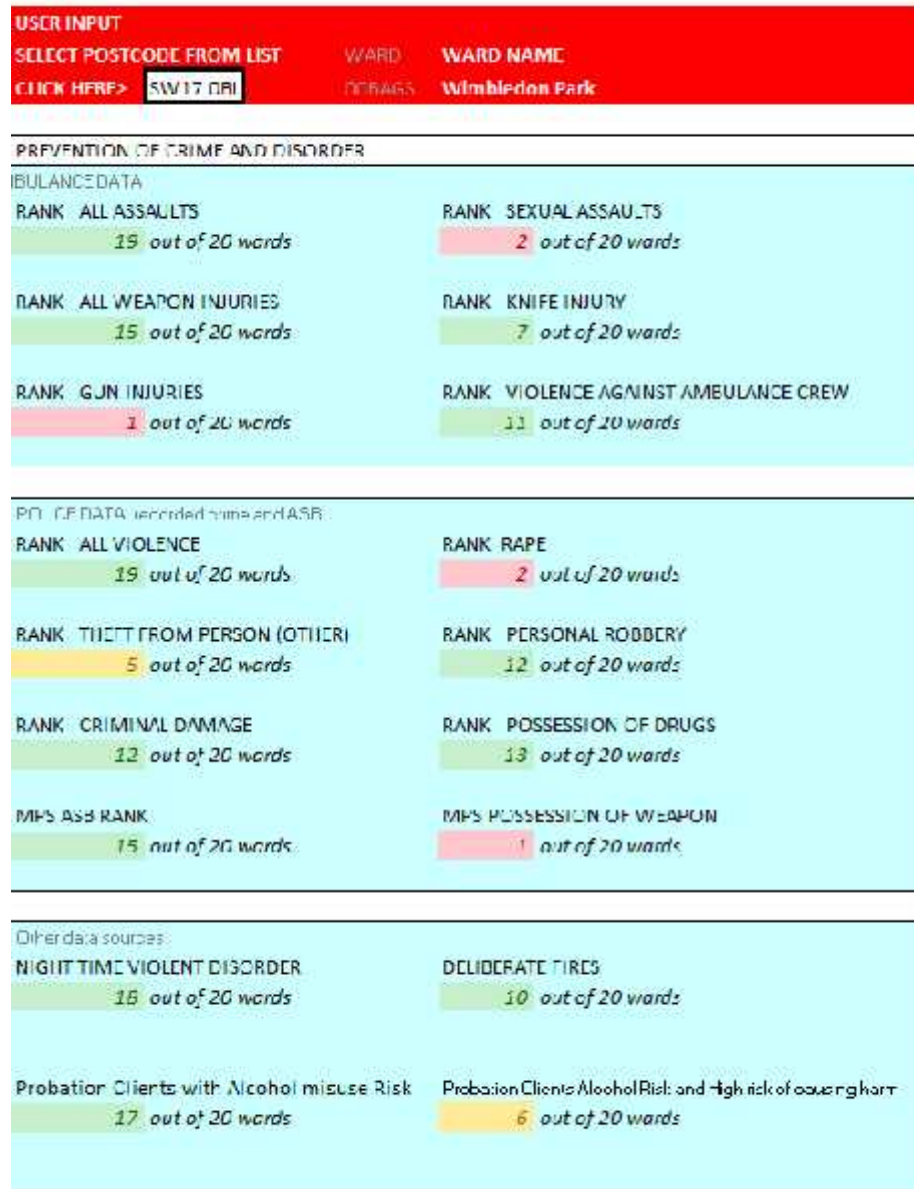
Data from SafeStats for this postcode (Plough Lane, Tooting, SW17 0BL) is set out in Figure 6 below and Figure 7 over the page:

Figure 6: SafeStats bullseye dashboard for Plough Lane, SW17 0BL:



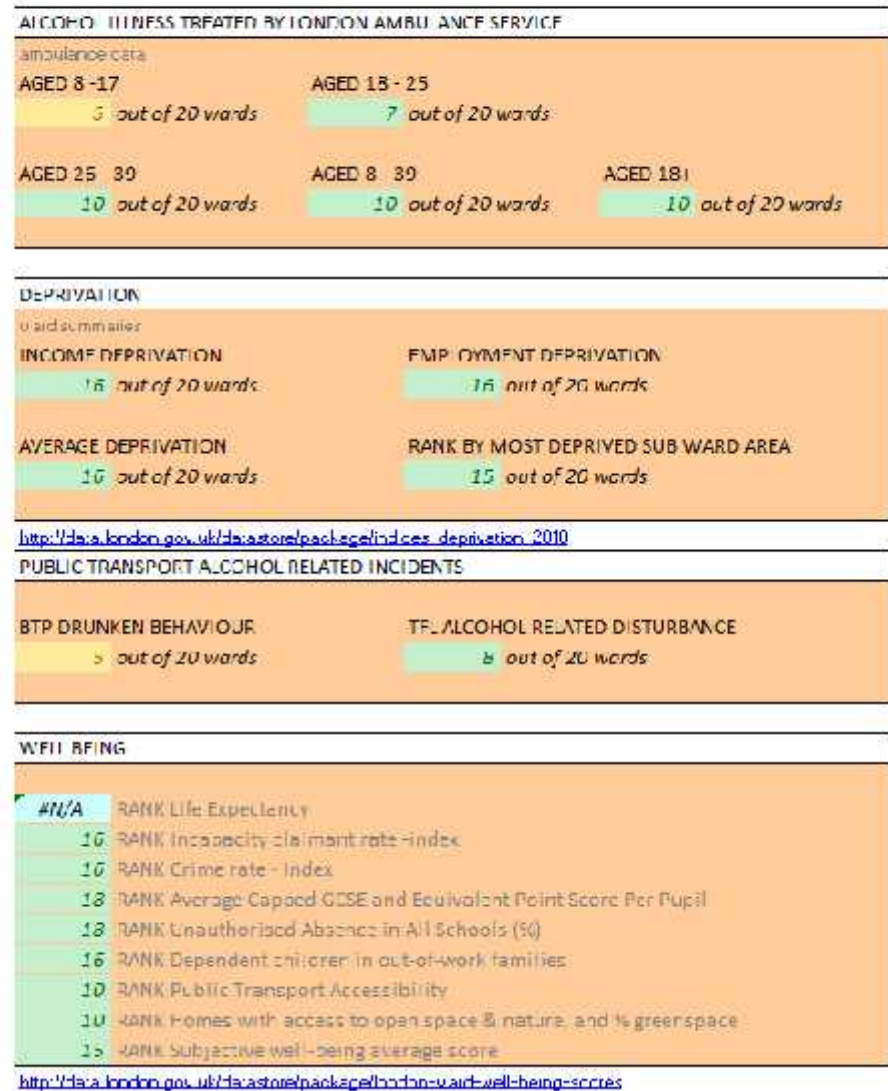
- Data from SafeStats for this postcode (Plough Lane, Tooting, SW17 0BL) shows the following:
- 32 alcohol related incidents within 500m of this postcode in the year to September 2014; 9 of which in those aged under 26 years old.
 - 21 ambulance recorded assaults within 500m of the postcode in the year to September 2014
 - 28 bus driver reported antisocial behaviour incidents within 500m of this postcode in the year to September 2014.
 - Wimbledon Park ward is ranked 2nd out of 20 wards in Merton for sexual assaults and rape, and 1st for gun injuries and possession of a weapon.

Figure 7: SafeStats traffic light dashboard for postcode SW17 0BL:



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MERTON 'Traffic Light Dashboard' to: September 2014



Appendix 2: London Healthy Urban Development Unit (HUDU) Healthy Urban Planning Checklist - key themes:³

Theme	Planning issue	Health and wellbeing issue
1. Healthy housing	<ul style="list-style-type: none"> • Housing design • Accessible housing • Healthy living • Housing mix and affordability 	<ul style="list-style-type: none"> • Lack of living space - overcrowding • Unhealthy living environment - daylight, ventilation, noise • Excess deaths due to cold / overheating • Injuries in the home • Mental illness from social isolation and fear of crime
2. Active travel	<ul style="list-style-type: none"> • Promoting walking and cycling • Safety • Connectivity • Minimising car use 	<ul style="list-style-type: none"> • Physical inactivity, cardiovascular disease and obesity • Road and traffic injuries • Mental illness from social isolation • Noise and air pollution from traffic
3. Healthy environment	<ul style="list-style-type: none"> • Construction • Air quality • Noise • Contaminated land • Open space • Play space • Biodiversity • Local food growing • Flood risk • Overheating 	<ul style="list-style-type: none"> • Disturbance and stress caused by construction activity • Poor air quality - lung and heart disease • Disturbance from noisy activities and uses • Health risks from toxicity of contaminated land • Physical inactivity, cardiovascular disease and obesity • Mental health benefits from access to nature and green space and water • Opportunities for food growing – active lifestyles, healthy diet and tackling food poverty • Excess summer deaths due to overheating
4. Vibrant neighbourhoods	<ul style="list-style-type: none"> • Healthcare services • Education • Access to social infrastructure • Local employment and healthy workplaces • Access to local food shops • Public buildings and spaces 	<ul style="list-style-type: none"> • Access to services and health inequalities • Mental illness and poor self-esteem associated with unemployment and poverty • Limited access to healthy food linked to obesity and related diseases • Poor environment leading to physical inactivity • Ill health exacerbated through isolation, lack of social contact and fear of crime

N.B. see original document for the full set of checklist questions

³ London Healthy Urban Development Unit (2014) Healthy Urban Planning Checklist <http://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2014/04/Healthy-Urban-Planning-Checklist-March-2014.pdf>

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