



## Wandsworth Council

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Our ref: 2015/5456  
Your ref: 14/P4361  
Date: 30th October 2015

Appendix 12 14/P4361 Wimbledon Stadium  
Committee report

Dear Madam

### Wimbledon Greyhound Stadium, Plough Lane, SW17

I write in relation to the amendments and further information submitted in relation to the application at the above mentioned address Merton ref: 14/P4361. In response to the initial consultation Wandsworth responded on 19 February 2015 (our ref: 2014/7397) and raised a number of objections as listed below:

#### Highways and Transport

1. there is a deep concern as to the impact of the development on the local highway and transport system and more information needs to be provided to reassure the Council and local people that the transport system is able to cope adequately with the demand expected to be placed upon it;
2. there is a need to secure the views of Network Rail and South West Trains as to the impacts of this development and any need for local infrastructure or service improvements;
3. where and if Council highway consent may be sought for the development to proceed, such consent cannot be assumed;
4. there is a need for greater clarity as to ownership and consent issues relating to the proposed use of Riverside Road;
5. clarification is required as to the views of the emergency services and St. George's Hospital as to any potential impacts on the development on their operations, including the hospital staff who currently park in the Stadium grounds;
6. greater clarity is required as to the likely need for and locations of off-street parking and coach parking;
7. there is a need to work with both Councils and Transport for London on the matters raised in the GLA/ TfL comments;

8. there should be greater clarity and commitment that the developer would fund future parking surveys, consultations and parking controls pre and post development as considered necessary;
9. there is a need for more work to be undertaken in respect of pedestrian flows to reassure the Council that large numbers of pedestrians can be safely accommodated and a commitment that the developer would fund the improvement of local footways;
10. physical measures and/or travel plan efforts should be investigated to seek to reduce damaging traffic impacts on local roads and junctions;
11. there should be greater involvement of the Council and local stakeholders in the work related to the development of the proposed Stadium Management Plan;
12. the Stadium Management Plan should give particular attention to the resilience of the transport system and the Council requests the involvement in the development of related plans, such as Travel Plans and Construction Management Plans;

#### Mitigation of adjacent industrial area and retail impact assessment

1. appropriate mitigation measures are required for the proposed residential flats to protect the future of the adjacent Strategic Industrial Location (SIL) – an updated Retail Impact Assessment is requested which recognises Earlsfield as a local centre so that the retail impact on Earlsfield can be fully assessed;

#### Flood risk

1. the objections raised by the Environment Agency need to be resolved to ensure the development does not result in increased flood risk.

#### Healthcare

1. there is concern about the impact of the development on local healthcare facilities. The issues raised by NHS England need to be resolved to ensure that the surrounding GP surgeries, health clinics and hospitals can accommodate the additional demand.

#### CIL

1. there is concern that although the application relies extensively on Wandsworth Council's infrastructure there is no mechanism for the Council to receive any CIL from the development.

#### Parks and Leisure Services

In addition, further discussions were continued in relation to issues raised by Parks and Leisure Services in regards to the need for additional playspace within Garratt Park.

Merton Council have stated that the amended application and further information included:

- Addendum information in respect of the Transport Statement
- Addendum information in respect of the Flood Risk Assessment
- Revised Energy and Sustainability statements
- New Accessibility statement covering disabled access to the development
- Updated Statement of Community Involvement

- Updated basement parking plan for residential Block A which now includes a separate parking area of 19 spaces for the proposed Squash club
- Further drawings relating to the proposed wheelchair accessible units
- Design and Access Statement addendums covering the proposed design changes to the East elevation of the stadium to provide more 'animation' on non-match days. This includes opening the facade to allow a cafe with seating to operate.
- The inclusion of a new crèche within the East part of the stadium over ground and first floor to provide more activity at street level and to provide needed child daycare facilities

11 new objections were received which raised the following concerns/points:

- The revised application does not address the issues of:
  - o the scale of the development on the character of the area
  - o Impact on local infrastructure (road, rail, schools, health facilities and social services)
  - o Parking proposed is not acceptable, even if policy compliant, and particularly on match days
  - o 10-storey building is out of character, eyesore, privacy issues
  - o Cumulative impact on local infrastructure of nearby developments needs to be taken into consideration
  - o Management plan for match days is essential
  - o Flood risk
  - o Proving housing mix given the need for family homes
  - o Masterplan does not integrate pedestrian and cycle networks into the development, this should be included in the S106
  - o Ambulances still use adjacent roads
  - o Disturbance during match days
  - o Wimbledon AFC does not need a 20,000 stadium
  - o Merton are not advertising the application information in an accessible way, there should be a summary document for the general public.
  - o Lack of green space in the proposals

2 new in support of the development:

- A small stadium will be a positive addition in the area
- Regeneration of site is welcomed

3 new general comments received:

- Need a pre-commencement materials condition
- Detailed design and materials very important
- A swimming pool would be of more use to the surrounding community than a squash court

Wimbledon Park Resident's Association (Wandsworth issues summarised)

Objections previously raised still stand, and in addition the further points are raised: Flooding issues raised by the EA, the indicative masterplan for the surrounding land illustrates retail use which is not appropriate being an out of centre location and service industries replaced by residential and no improvements to pedestrian links.

## **Comments**

### Highways and transport

#### (1) Impact on local highways and transport

The proposed development is not considered materially different in terms of the quantum of development; the proposal remains an 11,000 capacity stadium (potentially rising to 20,000), 602 residential units, a relocated squash club and a supermarket.

At the time of the Committee's consideration of the original application, no assurances had been given in respect of highways mitigation in Wandsworth. We now understand the proposed section 106 agreement being negotiated between LB Merton and the development includes provision for highways mitigation, expected to include:

- Footway and carriageway renewal in Summerstown and Riverside Road adjoining the site
- Upgrading of local crossing points and tactile paving as necessary
- Moving/relocation of street lighting and utilities, as necessary
- New crossovers into the new accesses and filling in of any redundant crossovers

Council officers have requested a £200,000 contribution for highways amendments around the site. Merton Council has indicated its support for these contributions to be secured by means of the s106.

The applicant considers the amendments to the application will have little to no additional measurable difference in terms of traffic impact. Council officers therefore consider that previous Wandsworth Council concerns about worsening traffic conditions on the local highway network in the area of the mini-roundabouts and their approaches remain valid. An independent road safety audit expresses concern about the highway alignment on the Plough Lane approach to the roundabout with Summerstown, which the applicant's consultant considers warrants no specific action, considering it to be a pre-existing arrangement without an abnormal road safety record. This Council's officers have requested a financial contribution towards area-wide traffic management improvements, in addition to highway improvements abutting the site, but your Council officers have advised that they consider planning permission could not be refused in the absence of an area-wide traffic scheme and no such scheme or contribution is therefore proposed. This is regrettable as it implies that the existing traffic conditions will endure and worsen.

The basement residents' car park has been reduced from 222 spaces to 200 spaces to incorporate 19 parking spaces allocated for squash club visitors (the squash club previously having no allocated parking).

In the original application, the basement residents' only car park was proposed to have a separate entrance and exit onto Summerstown. Now that parking for squash club visitors is allocated in the basement near the car park entrance, it is proposed that this access also allows exit, so that squash club visitors are confined to a small area of the car park

and are prohibited from driving through the entire residents' car park to exit. The result is that, compared with the original application, one entrance and one exit is replaced by one entrance and two exits. Officers consider this change is considered undesirable as it increases the permitted number of turning movements into and out of the development from Summerstown and may increase the risk of conflict with opposing turning movements and with straight-ahead traffic. The applicant's consultants suggested a raised table in Summerstown at the joint entrance/exit to the site and a 20mph limit, in order to help highlight the presence of the entrance and slow vehicles. However, the road safety audit referred to previously concludes that a traffic calming feature in Summerstown could be an unexpected distraction to drivers and have an adverse rather than positive impact on road safety. The applicant's consultants have therefore removed the idea of a traffic calming feature near the site entrance from their thinking. In September this year, Wandsworth Council agreed to consult on a borough wide 20mph limit, excluding classified roads such as Summerstown which is a classified B road.

Conclusion. The commitment to funding improvements to local highways is welcomed. The traffic impact of the development is, however, largely unchanged with local concerns about worsening impacts on local traffic not addressed. Officers consider that, arguably, comments within the road safety audit and the proposed revised access arrangements add to these concerns (see also comments related to coaches below).

#### (2) Consultation of Network Rail and South West trains

Network Rail have advised they have no objections to the proposals. TfL have undertaken a review of limited data available on train loadings and conclude that the data indicates there are no capacity issues on the local train services in relation to expected trip generation from the development. It is expected that current weekday 8-car services and 4-car Saturday services will have been lengthened by the time the development is completed. Many local people will be bemused by the apparent views of the rail industry and TfL, as these views do not represent the day to day experience of local people using local rail services.

#### (3) Council highway consent cannot be assumed

The highway authority would seek to support and not frustrate the delivery of any consented development and would seek to find solutions to any highway problems. The commitment to fund highway amendments in Wandsworth removes the potential problem of the Council intervening to make the highway usable and safe at its own expense. Nevertheless, it remains the case that the highway authority must act in accordance with the relevant highways and traffic management legislation and cannot guarantee highway consent where it may be needed (e.g. for new accesses or highways amendments), which would be subject to separate statutory processes.

#### (4) Ownership and consent issues on Riverside Road

The development is predicated on access via Riverside Road, including for pedestrians and coaches. There was no acknowledgement in the documentation provided with the

original application that Riverside Road was a private road. The ownership of land is not strictly a planning matter but, had the applicants originally mistaken Riverside Road to be a public highway, they are now aware that it is a private road and have investigated its status. Clearly, access arrangements relating to Riverside Road must be resolved.

(5) Consultation of emergency services and St George's hospital

We have received comment that St. George's staff who currently use the stadium car park but have no formal arrangement/agreement to do so. That may be so but there appears to be no interest as to what will become of them when they are displaced from the stadium site. It is also stated that emergency access arrangements for the hospital would be considered as part of the Stadium Management Plan. The Planning Applications Committee considered it undesirable that the views of the emergency services were not known and this appears to still be the case.

(6) Clarity on off-street and coach parking

New information refers to coach drop off occurring in St. Martin's Way, but there are no firm proposals. It is proposed that a parking strategy and a coach management strategy would be secured by condition or s106.

Non-supporter coaches will need access into the site (e.g. players' coaches). Tracking shows that these coaches can gain access into the site from Summerstown and Riverside Road but that the carriageway on the south-west corner of Riverside Road with Summerstown would need to be widened, removing the very narrow footway. While a new, wider footway would be provided, the new footway would be on private land in Merton – in short, a public footway in Wandsworth would be replaced by a private footway in Merton.

Conditions and s106 obligations are usually discharged with the approval of the planning authority. In this case, where matters impact on Wandsworth, Merton would not be the appropriate sole approval body. It is, therefore important that, if planning permission were granted, conditions and s106 obligations are discharged with the appropriate consultation/approval of Wandsworth Council. The potential loss of public footway on the corner of Riverside Road with Summerstown may require highway consent. Public rights of access would need to be protected along the site frontage in Riverside Road and Summerstown but this protection would not be as strong as having an adopted public footway.

(7) TfL and GLA comments to be addressed

Officers advise that a substantial amount of additional work has been undertaken where there are areas of concern but some concerns have not been addressed as outlined in this letter.

(8) Developer commitment to fund parking surveys, consultations and parking controls pre and post development.

Merton has indicated that it supports the Council's ambition for the s106 to make provision for

- Any additional yellow line and controlled parking restrictions around the site required to be in place on commencement of development and/or completion of each phase of development (£5,000);
- Funding to survey the impact of the development on street parking and potential future implementation or extension of controlled parking zones (£100,000)

Officers consider this concern has been addressed, though it may result in additional parking controls having to be implemented that residents would prefer not to have.

(9) Further work needed on pedestrian flows and commitment to fund improvements to local footways

Additional work has been undertaken by the applicants that they conclude demonstrates that the local footways are able to accommodate the expected pedestrian flows from the development. Officers consider this analysis is not altogether convincing, as football supporters are more likely to be walking in groups and pedestrian flows heavily concentrated into short time periods, particularly leaving the stadium. There remains concern that supporters will spill out into the road, leading to traffic delays, potential road safety problems and the possibility of local road closures. The proposed Stadium Management Plan should be secured by condition or s106 and require consultation with Wandsworth.

(10) Physical measures/travel plans needed to reduce impact on local roads and junctions

(11) Greater involvement of Council/local stakeholders in Stadium Management Plan

(12) Stadium Management Plan should consider resilience of transport system, and Council should be involved in travel plans and construction management plans

A draft travel plan and draft stadium management plan were submitted with the original application. While accepting that these plans should be secured by condition or s106 and that they should be living documents, the Council has requested that the s106 agreement references a need for the Council to be consulted in the development and monitoring of these plans. Merton Council has indicated that it would support the Council being consulted on these plans.

Transport conclusion:

It is considered positive that the applicant and Merton agree to the need for highways and parking mitigation in Wandsworth, funded by the applicant. However, concern remains as to the impact of the development on public transport, while there is no change to the expected traffic impacts as previously considered by the Committee, with additional traffic and delays expected in the area of the mini-roundabouts, Blackshaw Road and Summerstown. The amendments to the application and more detailed work that the application has carried out, in terms of access arrangements in Summerstown and

Riverside Road, if anything, adds to officers concerns about traffic impacts. There is also no comment at this stage about any operational impact on St. George's Hospital.

#### Mitigation of adjacent industrial area and retail impact assessment

The impact on Earlsfield has been tested and concludes that there will be no adverse impact on vitality or viability of the local centre. It should also be noted that the retail floorspace is below the 2,500sq m threshold which would trigger the Wandsworth requirement for a Retail Impact Assessment. Officers are therefore in agreement that on the basis of figures given, impact on Earlsfield Local Centre, which would experience the greatest potential impact, is insignificant.

The concerns regarding protecting the adjacent industrial businesses in relation to the new residential units remain.

#### Flood risk

Merton have confirmed that one of the addendums submitted with the application also deals with the now lowered Flood risk at the site as a result of Environment Agency re-modelling. Nevertheless, any further concerns raised by the Environment Agency need to be addressed prior to a decision being reached on this application.

#### Healthcare

NHS England's revised comments stated that the development would generate a population of 1,180. There are 10 GP practices within 1 mile of the development, and the 4 practices within two thirds of a mile would be most affected. The practices are small, over crowded, with above average patient to GP ratios and some are indicated to be 'under target' on floorspaces. It is concluded that the existing GP practices are unable to accommodate the additional demand generated by the proposed development. NHS England has been involved in discussions on providing a new health facility within the proposed development, but it has been concluded this is not viable. Nevertheless, a potential location for a new facility has been identified on the neighbouring Volante site. NHS England have therefore requested an off-site contribution of £402,500 (for construction and fit out) based on the projected demand of new patients from the proposed development.

#### CIL

Concerns remain that Wandsworth will not benefit from any CIL received from the development.

#### Parks and Leisure Services

Since the application was first reported to Planning Applications Committee officers identified a need for the application to contribute to the playspace needs of the 11+ group. A value of £250,000 has been provisionally agreed and would be secured by the S106 agreement to provide play space in Garratt Park.

I hope that you will take on board these continuing concerns of the Wandsworth Council Planning Applications Committee in assessing the application.



Yours faithfully

**Cllr McDermott**

Chairman and on behalf of the Wandsworth Planning Applications Committee

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