

**PLANNING APPLICATIONS COMMITTEE
10 DECEMBER 2015**

Item No:

<u>UPRN</u>	<u>APPLICATION NO.</u>	<u>DATE VALID</u>
	14/P4361	28/11/2014

Address/Site Wimbledon Stadium, Plough Lane, Tooting, SW17 0BL

(Ward) Wimbledon Park

Proposal Proposed demolition of existing buildings and erection of a 20,000 seat football stadium (initially 11,000 seat) with hospitality, crèche, café, and coach parking, pedestrian street, 1,273m² retail unit, 1,730m² squash and fitness club, 602 residential units with basement parking, refuse storage, 200 car parking spaces, 992 cycle parking spaces, and associated landscaping/open space and servicing.

Drawing Nos: 4740-00-001, 4740-00-002, 4740-00-408, 4740-00-409 -, 4740-00-410, 4740-00-411, 4740-00-412, 4740-00-413, 4740-00-414, 4740-00-415, 4740-00-416, 4740-00-417, 4740-00-418, 4740-00-419, 4740-00-420, 4740-00-425, 4740-00-430, 4740-00-431, 4740-00-432, 4740-00-433, 4740-00-434, 4740-00-435, 4740-00-436, 4740-00-437, 4740-00-438, 4740-00-439, 4740-00-440, 4740-00-441, 4740-00-442, 4740-00-443, 4740-00-444, 740-00-445, 4740-00-446, 4740-00-500, 4740-00-501, 4740-00-502, 4740-00-503, 4740-00-504, 4740-00-505, 4740-00-506, 4740-00-700, 4740-00-701, 010 H, 011 F, 012 C, 013 C, 051 B, 052 B, 053 B, 054 B, 055 B, 056 B, 110 D, 111 E, 151 C, 152 C, 153 C, 154 C, 155 C, Design and Access Statement, Design and Access Statement Addendum Update (dated 06.15), Design and Access Statement Revision A (dated 08.15), Applicant Design Response to GLA (dated 06.15), Applicant Design Response to LBM (dated 08.06.15 and 04.09.15) Environmental Statement and Appendices, Environmental Statement Non-Technical Summary, ES Appendix 7 Flood Risk Assessment Addendum (dated 08.04.15), ES Appendix 7 Flood Risk Assessment Addendum Comparison of Environment Agency 2010 and 2015 Modelling Results (dated 02.09.15), Transport Assessment, Transport Statement Addendum Note and Attachments (dated 07.09.15), Transport Statement Update Note (dated 25.06.15), Applicant Energy Strategy Response to GLA and LBM (dated 01.05.15), Revised Energy Strategy (dated 11.03.15), Revised Sustainability Statement (dated 10.03.15), Access and Inclusion Statement (dated 16.03.15), Statement of Community Involvement Addendum (dated 06.15), Revised Health Impact Assessment (dated 14.11.14), Applicant Retail Response to

LBM (dated 20.03.15), and Revised Retail Impact Assessment (dated 14.11.14), 4740_00_453, 4740_00_454, 4740_00_463, 4740_00_551, 4740_00_552, and 4740_00_455

Contact Officer: Sabah Halli (0208 545 3297)

RECOMMENDATION

Permission be **GRANTED** subject to a **S106 legal agreement and conditions**

CHECKLIST INFORMATION

- Heads of Agreement: See section 29 for full heads of terms.
- Is a screening opinion required: No
- Is an Environmental Statement required: Yes
- Has an Environmental Statement been submitted: Yes
- Press notice: Yes
- Site notice: Yes
- Design Review Panel consulted: Yes
- Number of neighbours consulted: 8323
- External consultations: Greater London Authority (GLA), Transport for London (TfL), Environment Agency (EA), Sport England (SE), Department of Communities and Local Government (DCLG), London Borough of Wandsworth Council (LBW), Network Rail, Metropolitan Police, NHS England, Merton CCG, Historic England Greater London Archaeological Advisory Service, British Telecom, National Grid, Natural England, Thames Water, London Power Networks, The Football Association, Wimbledon Society, Wimbledon Park Residents Association, and Haydons Bridge Residents Association
- Conservation Area: No, however adjoins the Coppermill Lane sub-area of the Wandle Valley Conservation Area,
- Public Transport Accessibility Level (PTAL): Level 3 (moderate)/2 (poor) on the TfL Information Database (On a scale of 1a, 1b, and 2-5,6a, 6b where zone 6b has the greatest accessibility).
- Controlled Parking Zone: No

1. INTRODUCTION

- 1.1 The application is being brought to Planning Applications Committee because the application is an Environmental Impact Assessment (EIA) application as defined by Schedule 2 (10 (b)) of the EIA regulations 2011, also due to the number of representations received, and the recommendation to approve the application conflicts with an objection made by Sport England.
- 1.2 Following determination by Members, this major and EIA application is required to be referred to back to the Mayor of London for any direction.

2. SITE AND SURROUNDINGS

- 2.1 The site is 5.1ha in size and is located within the north-east of the borough. The site is entirely within the London Borough of Merton (LBM) however parts of the site to the north and east adjoin the boundary with the London Borough of Wandsworth (LBW).
- 2.2 The site is currently occupied by:
- Wimbledon Greyhound Stadium
 - Christopher's Squash & Fitness Club
 - 94 Summerstown which is vacant on all three floors however a single storey part to the rear of the building operates as a café,
 - The two storey 'Volante Ltd' buildings (46 - 76 Summerstown) which is not part of this planning application, and
 - A 1 – 2 storey building currently occupied by a motorcycle training company (website address is given as 46-76 Summerstown).
- 2.3 A vehicle renting premises (single storey) operates in the stadium car park between the cafe and the motorcycle training company. A vehicle servicing company (single storey) is on the south-west corner of the site accessed from Copper Mill Lane.
- 2.4 Greyhound race days occur weekly on Fridays and Saturdays and the stadium can accommodate up to up to 8,000 spectators. Outside of Greyhound racing, the stadium is used for stock car racing.
- 2.5 The car park area (accommodating approximately 900 cars) is used as ancillary parking for the Greyhound stadium and other site buildings in addition to being used weekly for car boot sales (Wednesdays, Saturdays, and Sundays). The applicant advises that the car park is also informally used for parking by some St Georges hospital staff.
- 2.6 The site is accessed from Plough Lane (B325, in the London Borough of Merton (LBM)) to the south and Summerstown (B235, London Borough of Wandsworth (LBW)) to the east.
- 2.7 Beyond the site, to the east and south are light industrial/commercial units, with residential dwellings beyond. To the north of the site is Riverside Road, a partially private road giving access to the Garratt Business Park (LBW) and Cappagh Recycling Centre (LBW). To the west of the site is a National Grid Sub-station (LBM) accessed from Coppermill Lane (LBM), a road in private ownership. In addition to the commercial units along Summerstown, there are also retail units along Plough Lane and adjacent to the junction between Plough Lane and Summerstown (LBM/LBW).

- 2.8 There is a Public House (The Corner Pin) located at the junction of Riverside Road and Summerstown and which includes habitable accommodation at first floor.
- 2.9 The River Wandle is located 130m west from the site and Lambeth Cemetery is to the south of the site.
- 2.10 There are 5 train / underground stations within a 1.5 mile radius of the site:
- Haydon's Road Station (Overground and approximately 0.5 miles south of the site),
 - Earlsfield Station (Overground and approximately 0.9 miles from the site)
 - Tooting Broadway Station (1 mile east of the site, Northern Line),
 - Wimbledon Park Station (1.1 miles west of the site, District Line), and Wimbledon Station (Overground, District line, and Tramlink, and approximately 1.2 miles from the site).
- 2.11 Local bus number 493 passes the site and a variety of buses can be caught from Garratt Lane (Earlsfield and Tooting Broadway stations) and Wimbledon town centre.

3. DESIGNATIONS AND CONSTRAINTS

- 3.1 The London Borough of Merton Sites and Policies Plan (SPP) was adopted at full Council on the 9th July 2014. The site is allocated within the LBM Sites and Policies Plan (2014) for:
- 'Intensification of sporting activity (D2 Use Class) with supporting enabling development'.*
- 3.2 The SPP allocation states that *'Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation.'*
- 3.3 Within the Merton Core Strategy (2011), the site falls within the Colliers Wood and South Wimbledon Sub-Area (Policy CS1 and within the Wandle Valley sub- area (policy CS5).
- 3.4 The River Wandle is located approximately 130m west of the site and when the application was originally submitted in November 2014 the site was shown to lie entirely within the 1 in 100 year flood extent (Flood Zone 3a) and partially within the 1 in 20 year flood extent (Flood Zone 3b) of the River Wandle functional flood plain (see Appendix 1).
- 3.5 Re-modelled flood levels and extents, as provided and undertaken by the Environment Agency in August (2015) now show the site as still lying within the 1 in 100 year flood extent (flood zone 3a) however the extent, depth and duration of flooding is reduced compared to the previous River Wandle catchment model outputs. The site is now not within the 1 in 20 year flood

extent (Flood Zone 3b) of the River Wandle functional flood plain (see Appendix 2).

- 3.6 A surface water sewer (culvert) of approximately 1370mm diameter is shown passing through east of the site from Plough Lane to Riverside Road. This culvert is owned and maintained as a Thames Water asset.
- 3.7 There are no recorded surface water abstractions within 500m of the site.
- 3.8 Land to the west of the River Wandle is designated as a Local Nature Reserve and is the only recorded designated environmentally sensitive site within 500m of the site (70m from the site).
- 3.9 Following surveys conducted by the applicant, the confirmed ecological receptors within the site are foraging bats, feral pigeon and two mature Willow trees. Of those, only the bat is a protected species.
- 3.10 The southern part of the site has a Public Transport Accessibility Level (PTAL) of 3 (moderate) and northern part of the site has a PTAL rating of 2 (poor).
- 3.11 The site is located adjacent to the Garratt Lane Business Park (LBW) and to the north west of the site within the Garratt Lane Business Park, is the Cappagh recycling site (LBW)
- 3.12 The site is located adjacent to the Copper Mill sub-area of the Wandle Valley Conservation Area, which lies to the north of Plough Lane and to the east of the River Wandle.
- 3.13 The entire site lies within an Archaeological Priority Zone.
- 3.14 The applicant has confirmed that the ownership of Riverside Road beyond circa 40m from its junction with Summerstown is privately owned, however, the site has established rights of way over this private road.
- 3.15 The applicant has confirmed that Coppermill Lane is owned by National Grid but that the applicant has rights of access over it to their site. The parking bays are within the site boundary on the road. The proposed disabled parking spaces for the retail unit and squash and fitness facilities are within the site curtilage, adjacent to Coppermill Lane.
- 3.16 In 2003 the Council declared the borough an Air Quality Management Area (AQMA). Emissions from road traffic have been identified as the major source of pollution in the borough. Air quality in the borough is also affected by pollution generated in neighbouring authorities and across London.

4. CURRENT PROPOSAL

4.1 Summary

4.2 This planning application has been submitted by AFC Wimbledon, Galliard Homes, and Greyhound Racing Association Acquisitions Ltd for the redevelopment of the Wimbledon Greyhound Stadium site to create a new 11, 000 – 20, 000 seat football stadium, 602 residential units, squash and fitness facilities, new retail unit, crèche and café with associated parking and landscaping.

4.3 Floor areas for the proposed uses are shown in the table below:

Land Use	Gross Internal Area (GIA)
Stadium	21,232.4m ²
Residential	74,938m ²
Retail	1,273m ²
Squash and Fitness	1,505m ²
Crèche	350m ²
Café	

4.4 In line with the site’s designation for ‘sporting intensification’, the proposed Stadium and replacement squash facilities would be enabled by the residential and retail elements of the development.

4.5 The total build cost for the stadium to 11,000 capacity is estimated at £21 million, with the club investing £7 million and the remaining £14 million being provided by Galliard through the sale of the residential units and revenue generated by the retail unit and Squash and fitness facilities.

4.6 The applicants have advised that they have signed a Heads of Terms agreement to enable the delivery of this site.

4.7 Proposed Football Stadium

4.8 The proposed Stadium would be constructed with a capacity of 11,000 seats initially and capacity then increasing incrementally as and when required up to a maximum of 20, 000 seats. Any incremental increase in capacity of the stadium above 11,000 seats would be controlled as part of any grant of planning permission through a S106 legal agreement.

4.9 The table below provides a comparison between the proposed stadium with the Club’s existing home ground (Kingsmeadow Stadium, Kingston-upon-Thames):

Use	Kingsmeadow	Plough Lane	
Capacity	4850	11,000	20,000
General hospitality boxes	None (up to 20 hospitality guests)	C1000 capacity incl.	C2000 capacity incl.

	can sit in the Directors box)	internal bar area	internal bar area
Disabled seating	18 (14 under cover) plus 18 carers	105 plus 105 carer/ambulant	156 plus 156 carer/ambulant
Disabled parking	28 (9%)	3 dedicated on site (14%)	7 dedicated on site (11%)
Other parking	Approx 320 shared with adjacent athletics stadium	22 on site plus outside broadcast vehicles.	65 on site plus outside broadcast vehicles
Club shop	32m ²	190m ²	190m ²
Club hospitality and catering	C100 covers in hospitality space plus c500 in internal bars	See above	See above
Club offices	94m ²	54m ²	54m ²
Club community facilities	Single portacabin. c20m ²	111m ²	198m ²
Ancillary facilities (changing rooms, media facilities, storage, WCs, etc)	c540m ²	c1250m ²	C1350m ²
General catering (e.g. food and drink stands, and cafe)	c65m ²	Kitchen 186m ² c25m length concessions	Kitchen 186m ² c50m length concessions
Crèche	N/A	c350m ²	c350m ²

4.10 Uses

- 4.11 The stadium would be the permanent base of AFC Wimbledon and primarily be used to host football matches between AFC Wimbledon and opposing teams. The football season in England is from August to May each year and

generally home games take place once a week. When not in match use, the stadium host community led events.

- 4.12 On non-match days the hospitality suites and seating bowl boxes would be available for conferencing, third party event hire, and community use.
- 4.13 A café and child day care facility are also proposed within the Stadium and these would be open for use by members of the public on non-match days. Access to both would be from east entrance.
- 4.14 Design
- 4.15 The stadium is positioned along an approximate north/south axis, with the western elevation adjoining the National Grid sub-station. This location provides benefits for match playing and spectating in terms of sunlight orientation in addition to being the most unsuitable part of the site for residential development due to the proximity of the sub-station.
- 4.16 The proposed stadium would be 18m in height, 134m in width, 163m in length and of a relatively simple, flat roofed, design with 45m tall 'tooth brush/pylon' style flood lights at each corner.
- 4.17 Adjoining the eastern elevation of the stadium is the proposed North-South street, a publicly accessible pedestrian and cycle thoroughfare connecting Plough Lane to the south, with Riverside Road to the north. To the north and south of stadium are the taller residential blocks B and C positioned to the north and south respectively.
- 4.18 Residential Block A, also taller than the stadium, would be located to the east and adjoining the North-South street. The stadium would not be overly visible from the public realm aside from the main entrance, which is set back 53m from Plough Lane, and the proposed flood lights which would be seen from some distance. It is intended that the flood lighting will identify the general location of the stadium on approach however the principal stadium corner and the widening of the public space to the front would signify to spectators arrival on site.
- 4.19 As part of the phasing of the stadium from its 11,000 seat capacity to a potential 20,000 capacity, parts of the roof and some internal seating would initially be of temporary construction, to be replaced with permanent construction as and when capacity increased. The outer walls of the stadium and other parts of the roof would be of permanent construction.
- 4.20 The stadium's main structure is a mix of steel and concrete. Steel framed roof cantilevers are proposed to support both the permanent, solid, roof sections and the temporary, polycarbonate, sections. Internally, the seating tiers are be supported either on pre-cast concrete sections or laminated steel sections. The seating would initially be a mix of permanent and temporary seating.

- 4.21 A relatively low-key colour palette is proposed for the stadium elevations, with proposed materials being: (high quality), pre-cast, curved concrete columns, high level timber cladding, glass, deep-cell polycarbonate, green 'living' walled bays, and metal panels. The 'living' walls and timber cladding would only be used for the East and North elevations, being the most visible. The west elevation of the stadium, adjoining, the National Grid Sub-Station would be less detailed in design and of concrete and poly-carbonate, and the south elevation would not be visible at all since it adjoins the residential and commercial Block C.
- 4.22 The hospitality area would be located to the south of the stadium and at Phase 1 (11,000 seat capacity), would be built flush with the main stadium building line. At Phase 2 (20,000 capacity), the full extended hospitality block would be cantilevered above the public space below.
- 4.23 The Phase 1 hospitality area would be glazed, providing views out of the southern elevation and the full, extended Phase 2 hospitality block would be clad in glazing and curtain walling, also providing views out to the south but also to the west and east.
- 4.24 An AFC Wimbledon shop for merchandising and ticketing is proposed at the main entrance to the Stadium at the intersection of the Plough Lane entrance and the North-South street.
- 4.25 It is anticipated that the stadium would include a naming signage and although the drawings at present indicate that this would be 'AFC Wimbledon', it may potentially be amended to reflect any future sponsorship of the stadium. No external advertisement panels/hoarding attached the stadium or elsewhere within the site have been proposed however any such advertising would be controlled through conditions attached to any approval.
- 4.26 Access
- 4.27 The stadium would have pedestrian access to the north from Riverside Road, to the south from Plough Lane, and centrally from the North-South street.
- 4.28 It is mentioned earlier in this report, that it has been confirmed that the ownership of Riverside Road beyond circa 40m from its junction with Summerstown is privately owned, however the site has established rights of way over this private road.
- 4.29 All four stands (North, South, East, and West) would have dedicated entrances:
- 4.30 North Stand ('away' team support plus some segregated 'home' support) - Ticket entrances directly into the rear of the stand from Riverside Road and also ticket entry to the north east corner from the North-South street.
- 4.31 East Stand ('home' support stand, including family area) – Ticket entrances directly into the rear of the stand from the North-South street.

- 4.32 South Stand ('home' support) – Ticket entrances at the south east and south west corners of the stadium.
- 4.33 West Stand ('home' support and hospitality) – Ticket entrances at the south west corner of the stadium.
- 4.34 Hospitality suites – Ticket entrances at the south west corner of the stadium adjacent to the junction of Plough Lane and Copper Mill Lane.
- 4.35 Parking and Servicing
- 4.36 Parking and servicing of the stadium would be carried out at basement level, with the vehicular and pedestrian entrance to this off Riverside Road. Vehicles would then exit the basement onto Plough Lane, adjacent to the junction Coppermill Lane. During matches it is proposed that the entrance into the basement be closed a set time prior to the start of a match and a management system is proposed for the basement area, to be operated by the Club, in order to control the entrance and exit of vehicles for safety purposes.
- 4.37 At Phase 1 there will be 21 parking spaces within the basement and beneath the South stand which are allocated to the Club, visiting Club and officials, and of which 3 are disabled parking spaces. At Phase 2 this would increase to 74 car parking spaces of which 3 would be disabled parking spaces.
- 4.38 Disabled parking spaces would be allocated in advance of match days as the Stadium access road would need to be managed ahead of games and closure in place a short time prior to, and during matches.
- 4.39 A set down point has been identified on Plough Lane close to the Stadium, which would be used to set down/pick up disabled supporters and the Club would provide assistance to these supporters with Stewards.
- 4.40 There would be no on-site parking for general spectators.
- 4.41 The Stadium would be fully disabled access compliant and the entire site would be fully accessible to emergency vehicles at all times.
- 4.42 There is a total provision of 156 wheelchair spaces within the Stadium, each of which would have an adjacent companion seat. Within the west and south stands there are also additional seats on the same row which can be used by either companions or general spectators. The viewing areas have been distributed across each stand to ensure there is provision in the 'Home', East, Hospitality and 'Away' stands.
- 4.43 The applicant has advised that in designing the Stadium, the Club has worked with 'Level Playing Field' (LPF), a registered charity in England and Wales, which acts as a campaigning and advisory organisation to its membership and other parties across all sports. LPF provides information on disabled fan

facilities at clubs and stadia, along with football, disability and access reports, guides, good practice documents and general disabled supporter information.

4.44 Cycle Parking

4.45 100 cycle parking spaces are proposed and these are located along North-South street.

4.46 Coach Parking

4.47 There would not be any spectator coach parking at the site. Coach drop-off for spectators is proposed to be at Riverside Road, with coaches then being directed to an off-site location for parking. The exact details of the off-site location would be secured as part of the Stadium Management Plan, itself to be secured through a S106 agreement.

4.48 The Stadium access road has been designed so that it can accommodate large luxury coaches and drop-off facilities are provided adjacent to the west stand. This is to be used by team coaches and VIPs, with the coaches would then parking in an off-site location prior to pick-up at the end of a match. The exact details of the off-site location would be secured as part of the Stadium Management Plan.

4.49 Taxis

4.50 There would not be any Taxi drop-off/pick-up point/s at the site however this would be monitored through relevant Travel Plans attached to any approval and appropriate mitigation installed if needed.

4.51 Depending on crowd attendance, some closure of Plough Lane during match days may be necessary following the end of a match when spectators would be exiting the site however the closures would be for a short time period (time to be subject to agreement with key stakeholders) and would be fully managed. Detailed management arrangements would be documented in the Stadium Management Plan.

4.52 Rail

4.53 The closest stations to the site are Haydons Road, Earlsfield, Tooting Broadway, Wimbledon, and spectators would walk or use public transport from those to the site.

4.54 Buses

4.55 One existing bus route passes the site and more than 10 bus routes can be found along Garratt Lane, Haydon's Road and Wimbledon town centre.

4.56 Refuse and Recycling

4.57 The Stadium general waste and recycling would be stored in a designated storage area within the basement and would be collected by a contractor employed by the Club.

4.58 Residential Development

4.59 The proposed development provides 602 new residential units in 3 buildings (Blocks A, B, and C) and comprises a mixture of 4 bedroom duplexes, 3 bedroom maisonettes (each with private gardens), 2 bedroom units, 1 bedroom units, and a limited number of studios (all with private balconies and /or use of a roof terrace). The density of development of the site would be 590 habitable rooms per hectare (excluding the Stadium footprint).

4.60 Block A is located to the east of the Stadium, running parallel with the North-South Street, and can be accessed from the North South street, Riverside road, and Summerstown. Block B is located to the north of the stadium and is accessed from Riverside Road, and Block C is located to the south of stadium and accessed off Plough Lane, adjacent to the proposed Squash and fitness facility.

4.61 Accommodation schedule:

Block	Studios	1 Bedroom Flats	2 Bedroom Flats and Duplexes	3 Bedroom Flats and Duplexes	4 Bedroom Duplexes	Total
A	11	142	142	94	4	393
B	0	30	36	28	1	95
C	2	40	67	5	0	114
% of Units	2%	35%	41%	21%	1%	100%

4.62 Family accommodation is provided through the 2, 3, and 4 bedroom units, which would equate to 63% of the total residential units.

4.63 Affordable Housing

4.64 60 units are proposed (14 x 1 bed, 20 x 2 bed, 25 x 3 bed, 1 x 4 bed units) within Block B for affordable housing (9.6% of the total residential accommodation). All units are proposed for intermediate sale only. A viability report has been submitted with the application, which has been independently assessed and the conclusions of which are discussed further on in this report in section 21.

4.65 The applicant has been in discussions with a Registered Provider (Notting Hill Housing) during the course of this application and they have expressed an interest in acquiring the proposed units.

4.66 Design

4.67 The 3 residential blocks range in height from 6 – 10 storeys and as per the Stadium, a relatively simple palette is proposed in terms of materials, namely two contrasting colours of brick, vertical slatted timber cladding, glazed curtain walling, Aluminium framed windows and doors, Aluminium louvres, and glass balustrading.

4.68 With Blocks A and B the building forms are rectilinear, running parallel to the stadium. The architectural expression of the building massing forms a series of 'stacking blocks' where the 'spine' blocks which run east-west across the site are taller, with the smaller scale lower blocks running north-south. This concept is further emphasised by the use of two different principal materials for the higher and lower blocks. The 'spine' blocks also vary in height to visually break down the lengthy facade.

4.69 Block C follows the same concept however the 'spine' blocks run north-south.

4.70 In response to the site's location within Flood Zone 3a, the residential element has necessarily been designed as a raised 'podium development' whereby pedestrian (including wheelchair) access is at ground level via stairs, ramps, and lifts, and there is no habitable accommodation located below a height of 2.2m above ground level or the 1 in 100 year climate change flood level.

4.71 The residential blocks have been designed to be Secured by Design compliant and all residential amenity spaces are enclosed by secure gates, and residential entrances would be operated by an intercom entry system.

4.72 Although the Code for Sustainable homes system is not now in operation, the residential blocks have been designed to achieve Code for Sustainable Homes Level 4.

4.73 Internal Accommodation Standards

4.74 The units have been designed to comply with London Plan minimum sizes and 90% of the units are dual aspect or triple aspect. There are no north facing, single aspect, units and there are no more than 8 residential units around a core, in compliance with The London Plan Housing Design Guide.

4.75 Amenity Space and Landscaping

4.76 Block A includes 4 linked private courtyards, Block B includes 1 private courtyard, and Block C includes 2 linked private roof top courtyards, which would provide communal amenity and play space (under 5yrs old) for the residential occupants.

4.77 The courtyard areas would comprise a mixture of hard and soft landscaping with seating and associated lighting.

- 4.78 The proposed North-South street would be a public thoroughfare linking Plough Lane with Riverside Road however the proposed residential blocks and courtyard areas would only be accessible to residents of the development.
- 4.79 All courtyards are fully wheelchair accessible and are at podium level, providing a safe area for refuge/evacuation during a flood event.
- 4.80 Day-to-day, the landscaped areas would also provide storage for surface water run-off during rain events.
- 4.81 Parking
- 4.82 There are 2 residential basement car parks, located beneath Blocks A and B and these would provide 200 parking spaces resulting in a residential car parking level of 0.33 spaces per unit for all 3 blocks.
- 4.83 Block A comprises 167 parking spaces, 19 of which would be accessible spaces in compliance with Part M of the Building Regulations, and 42 of which would also be electric charging spaces and with the capacity to increase to 77 electric charging spaces.
- 4.84 This car park is accessed from Summerstown via two entrances.
- 4.85 Block B comprises 33 spaces, 3 of which would be accessible spaces, 8 electric charging spaces, and with the capacity to increase to 14 charging spaces. Car Club spaces would be provided within the residential basements and would be secured through a S106 legal agreement.
- 4.86 The Block B car park is accessed from Riverside Road.
- 4.87 Cycle Parking
- 4.88 A total of 992 cycle parking spaces would be provided, in compliance with London Plan standards:
- Block A: 672 spaces
Block B: 136 spaces
Block C: 32 spaces
- 4.89 The bicycle stores at basement levels would be accessed via pedestrian lanes included as part of the car park access ramps. At grade, bicycle stores are located near to residential cores and a proportion of the stores are double height space to allow for future expansion with additional bicycle racks.
- 4.90 30 visitor cycle spaces are proposed at street level, to the front of the residential blocks and sheltered by projecting blocks above.
- 4.91 Refuse and Recycling

- 4.92 Refuse and recycling storage for Blocks A and B would be located at basement level and would be brought to street level by management staff at the relevant times for collection by Local Authority waste collection services. Refuse and recycling storage for Block C would be located at ground level and would likewise be brought out by management staff at the relevant times for collection.
- 4.93 Servicing
- 4.94 General servicing, deliveries, and emergency access to the residential units would be via Riverside Road, Summerstown, and Plough Lane, and from within the basements of Blocks A and B. In order to prevent general vehicular access to and along North-South street, retractable bollards are proposed at both ends. These would be controlled by the Stadium management team and residential Concierge for the (infrequent) servicing of the Stadium east façade/concourse and residential maisonettes (deliveries and repairs for example).
- 4.95 The residential Concierge service would be located within Block A at the Plough Lane entrance, and would oversee general maintenance and servicing for the residential parts of the development.
- 4.96 Retail Unit**
- 4.97 A retail unit of 1,273m² floor area is proposed and this would be located within Block C, south of the Stadium. Its main entrance would be located at the intersection between Plough Lane and the proposed North-South Street.
- 4.98 The unit would include a full height glazed shop front facing onto Plough Lane and/or the North-South street and is proposed as a 'convenience' food store to be mainly used by residents of the development and surrounding residents/businesses.
- 4.99 An occupier for the unit has not yet been secured.
- 4.1.1 Parking
- 4.1.2 Two disabled parking spaces would be provided along Copper Mill Lane, within the curtilage of the site, for visitors of the retail unit. No other car parking is proposed for the store. Car driving visitors to the store would be expected to park on Waterside Way, or other locations within the vicinity of the site that facilitate short-term parking
- 4.1.3 Cycle Parking
- 4.1.4 It is proposed to provide 6 cycle parking spaces by the main retail entrance. Shoppers can also access the 100 cycle parking spaces along the adjacent north-south street.
- 4.1.5 Refuse and Recycling

4.1.6 Refuse storage would be located to the rear of the unit at ground level and would be collected by Local Authority waste collection services.

4.1.7 Servicing

4.1.8 General delivery/servicing access would be provided through the Stadium car park at basement level to the rear of the unit. This would be managed in co-ordination with the Stadium management team.

4.1.9 **Squash and Fitness Facilities**

4.1.10 At 1,730m², the facilities would comprise an increase in internal area of 225m² above existing facilities and would include:

- 6 squash courts, including 1 show court with raked seats;
- Gymnasium;
- Physiotherapy and Hydrotherapy suite;
- Dance studio;
- Changing rooms and showers.
- Bar and café;
- Admin office and reception;

4.1.11 The facilities would be located in Block C, between the proposed retail unit and the hospitality element of the Stadium and would be set over ground and basement levels.

4.1.12 The elevations would be primarily glazed, allowing views into the building. The upper part of the squash courts would be visible at street level and internally, the courts would include a viewing balcony. Accommodation at ground level would comprise a reception and cafe whilst the courts and other facilities would be located within the basement.

4.1.13 Although a formal agreement has not yet been signed, it is possible that the replacement squash and fitness facilities may be leased to Christophers Squash and Fitness Club. Christophers Squash and Fitness Club currently leases existing premises at the Greyhound site. The applicant advises that the facilities are also intended to be available for use by St Georges Hospital.

4.1.14 Parking

4.1.15 Nineteen car parking spaces are allocated in a dedicated car park for the squash facilities underneath residential Block A. This would be accessed from Summerstown and includes direct pedestrian access on to North-South street.

4.1.16 Two disabled parking spaces would be provided at Copper Mill Lane. These spaces are intended to be shared with the retail unit.

4.1.17 Cycle Parking

4.1.18 Twenty cycle parking spaces are proposed at street level adjacent to the entrance of the facilities.

4.1.19 Refuse and Recycling

4.1.20 Refuse storage is located at street level and this would be collected by a private contractor.

4.1.21 Phasing

4.1.22 Indicative construction phasing details have been submitted with the application. Subject to planning and other necessary approvals, the Stadium is anticipated to be built to open at 11,000 seat capacity and the residential, retail, and fitness facilities, to be provided over a 36 month period.

4.1.23 Indicative details are as below:

Block A and Football Stadium	Start	End	Total Months
Purchase and Pre-Construction	Month 1	Month 7	7
Site Works	Month 8	Month 19	12
Construction - Football Stadium	Month 20	Month 38	18
Construction – Residential	Month 20	Month 56	36
Sale	Month 46	Month 75	36
Block B			
Construction	Month 20	Month 32	12
Sale	Month 33	Month 39	8
Block C (including retail, and Squash and fitness facilities)			
Construction	Month 32	Month 44	12
Sale	Month 43	Month 52	9

4.1.24 A final phasing plan would form part of a condition attached to any approval.

5. ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

5.1 The proposed development comprises an EIA development and as such an Environmental Impact Assessment (Environmental Statement) is required.

Before determining the application the Council must consider the environmental information contained in the Environmental Statement (ES), including any further information submitted, as well as representations from consultees concerning potential environmental effects of the development.

- 5.2 The ES assesses likely environmental impacts from the development including its construction and operation, including cumulative impacts from other ongoing developments. The ES identifies the existing (baseline) environmental conditions, and the likely environmental impacts (including magnitude, duration, and significance) and also identifies measures to mitigate any adverse impacts. A summary of potential positive and negative residual effects remaining after mitigation measures is also given in the statement.
- 5.3 As mentioned previously in this report, the proposed stadium would initially open at 11, 000 seat capacity (Phase 1), with the potential to increase to a maximum of 20, 000 seat capacity (Phase 2) as and when required. The submitted ES has considered the development on the basis of a 20, 000 seat stadium, i.e. the 'worst case' scenario.
- 5.4 The ES itself does not necessarily consider compliance with planning policies and so planning permission does not have to be granted or refused based on the findings of the ES, however these are material considerations. Where significant adverse effects are found, consideration needs to be given to the mitigation proposed and then ultimately to whether the remaining impact warrants refusal or if such harm is outweighed by other benefits.
- 5.5 The ES submitted contains an analysis of impacts under the following headings and suggests mitigation where necessary:
 - Socio-Economics (see section 12.1 – 12.79 of this report)
 - Hydrology and Flood Risk (see section 22 of this report)
 - Land and Water Quality (see section 22 of this report)
 - Transport and Access (see sections 18.1-18.1.13, 20.1-20.13 of this report)
 - Noise and Vibration (see sections 16.57-16.60, 17.5-17.8, 18.1.318.1.4 of this report)
 - Air Quality(see sections 17.42-17.45 of this report)
 - Townscape and Visual (see sections 13.1 – 14.10 of this report)
 - Daylight and Sunlight (see sections 16.42-16.46, 17.29-17.38 of this report)
 - Heritage Assets (see sections 15.1-51.10 of this report)
 - Residual Effects, Impact Interactions and Summary (considered throughout the body of this report and appropriate mitigation is sought through relevant conditions and S106 legal agreement where considered necessary)
- 5.6 Further information supplementing the FRA within the ES and other application documents were received on the 3rd July, 13th July, 24th July, 8th

September, and 10th September. This information related to flooding, retail impact, health impact, sustainability, access and inclusion, community involvement, design, and transport matters.

- 5.7 Officers are satisfied that the ES, taken together with the further information received, has adequately considered the potential environmental impacts of the development.
- 5.8 An amended Design and Access Statement was received on the 3rd July and 17th August which addressed stadium design issues raised by LBM Officers, GLA, Design Review Panel (DRP), and Sport England. The amended plans comprised the following alterations:
- Amendment to the east elevation of Stadium, adjoining North-South street, through the creation of a café within the concourse for public use on non-match days. The inclusion of shutters would allow this elevation to be opened up and part of the North-South street to be used as seating area for the café.
 - The inclusion of crèche (child day care facility) within the north-east corner of the Stadium, set over ground and first floor levels. This corner would also be opened up by shutters to allow the creation of outdoor play space.
 - Amendment to the design of the ramped access to the amenity courtyards from the intersection of Plough Lane and Summerstown to include the use of feature brickwork.
 - Provision of an additional 100 cycle parking spaces at grade, along North-South street for Stadium visitors and occupiers of the residential development.
 - Addition of feature 'gateway arch' signage for the Stadium on the North-South street to increase the visible presence of the stadium within the public realm and provide a feature entrance to the North-South Street.
 - Addition of 2 wheelchair accessible lifts between Block A and the residential courtyards beyond.
 - Addition of a dedicated parking area for the Squash and fitness facilities within the basement parking area of residential Block A. This provides 19 parking spaces for the facilities, with the stair access directly onto the North-South Street. Accordingly this reduced the residential car parking for Block A from the originally proposed 189 spaces to 167 spaces.
 - Increase in the total number of secure bicycle spaces for the residential units by providing stacker bicycle racks in basement areas. The number of the residential bicycle spaces has increased from 685 to

992. The bicycle stores for Block C and podium level of Block A are retained as standard.

6. BACKGROUND TO THE PROPOSAL

- 6.1 Between 2005-2011 during the preparation of Merton's Core Planning Strategy, the council received a large number of responses from supporters of AFC Wimbledon at various consultations.
- 6.2 Merton's Core Planning Strategy policy 13 *Open space, nature conservation, leisure and culture* (paragraph 21.18) states "*the largest response on any single issue throughout all 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... Building on our legacy in sport, we support the provision of a sports stadium within the borough*"
- 6.3 Merton Site and Policies Plan (2014)
- 6.4 Merton's Sites and Policies Plan (SPP), in addition to the adopted Merton Core Strategy (2011), contains the detailed planning policies to help assess planning applications in Merton. The SPP also allocates sites within the borough for redevelopment between 2014 and 2024.
- 6.5 Merton's Policies Map (formerly known as the Proposals Map) is published alongside the SPP setting out where town centre boundaries, areas of open space and nature conservation, shopping frontages, industrial areas are found in Merton. It also shows sites allocated for specific developments.
- 6.6 Following completion of the required public consultations and Examination in Public (EiP), Merton's Sites and Policies Plan and Policies Map were adopted at Council on the 9th July 2014.
- 6.7 During the SPP Stage 1 "call for sites" consultation between July and September 2011, landowners, developers and other interested parties were invited to suggest sites that may have potential for redevelopment to an alternative use over the next 10 years. Feedback from this consultation and research informed the Stage 2 "preferred options" for the SPP and Proposals Map.
- 6.8 The existing Greyhound Stadium site was submitted to the council in the Stage 1 call for sites in 2011.
- 6.9 The Stage 2, "Planning ahead: draft Sites and Policies Plan and Proposals Map – preferred options", consultation (January-May 2012) gave residents, landowners, community groups and other interested parties the opportunity to comment on the Council's preferred options for 20 detailed planning policies, and approximately 50 sites and land designations (the plans, and people's feedback on them, are available online via

www.merton.gov.uk/sites_policies_stage_2.

- 6.10 Stage2a, additional sites and policies "preferred options continued" (June-July 2012) included a resubmission of the Greyhound Stadium by another party as well as other sites suggested by members of the public and organisations responding to the Stage 2 consultation. The Council also proposed three additional detailed planning policies and some changes to the industrial estate boundaries and potential tram routes.
www.merton.gov.uk/sites_policies_stage2a

- 6.11 The Greyhound Stadium site was allocated at this stage for:

'Intensification of sporting activity (D2 Use Class) with supporting enabling development. Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation.'

- 6.12 The Stage 3, draft sites and policies plan and policies maps (January-February 2013) consultation took place between 16 January and 27 February 2013: www.merton.gov.uk/sites_policies_stage3.

- 6.13 On the 10 July 2013, Merton Council resolved to submit Merton's Sites and Policies Plan to the Secretary of State. The Stage 4, pre-submission consultation, took place between 16 July and 30 August 2013:
www.merton.gov.uk/sites_policies_stage4.

- 6.14 On 02 October 2013, Merton Council submitted the final Sites and Policies Plan Policies Maps and supporting evidence to the Secretary of State. He appointed an independent Planning Inspector, Mr. R. Yuille MSc DipTP MRTPI, to conduct the examination.

6.15 Examination in Public (EiP) hearings: 21-29 January 2014

- 6.16 As part of his examination into the soundness of the Plan, the independent Planning Inspector chaired four days of public hearings between 21-29 January 2014. The matters relating to the Hearings, including the Inspector's agenda and questions, are available via www.merton.gov.uk/examination-sites_and_policies_and_policies_map__

- 6.17 Amongst the main matters considered by the Inspector was whether the sites allocated in the Plan were suitable for their allocated use/s, in particular the Greyhound Stadium. In his Agenda for the EiP the Inspector detailed the following items for discussion with respect to the Greyhound Stadium site:

'(a) Is this site a suitable location for an intensification of sporting activity with supporting enabling development?'

'(b) Support has variously been expressed for providing an enhanced greyhound stadium or a football stadium on the site. On the face of it the allocation in the Plan would allow for either option. It would not be appropriate

at this stage to go into the relative merits of these schemes but it has been suggested that the Plan should include a more explicit reference to seeking to retain a greyhound stadium. Is there any merit in this suggestion?

(c) Is the site suitable for the sort of enabling development (residential/leisure/retail) that has been suggested?

(d) It has been suggested that the site is more suitable for industrial and warehouse development together with leisure facilities and school use. What are the advantages and disadvantages of this approach?

6.18 Public consultation following the EiP: 24 February to 08 April 2014

6.19 Following the EiP the Council consulted on eleven 'Main Modifications' to Merton's Sites and Policies Plan for six weeks from Monday 24 February to 08 April 2014.

6.20 The 'Main Modifications' to the Plan arose during its independent examination, including the public hearings that took place during January 2014.

6.21 The single 'Main Modification' relating to the Greyhound Stadium site was the omission from the proposed site specific policy requirement that:

'This site must be delivered via a site-specific planning brief (Supplementary Planning Document) to ensure the delivery of sporting intensification and six weeks of community consultation on proposals.'

6.22 And the addition of the following requirement to the policy:

'The Council expects applicants to engage with the local community before submitting their applications. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.'

6.23 Planning Inspector's Final Report

6.24 In June 2014 the Council received the final report from the independent Planning Inspector, which confirmed that the 'Main Modifications' proposed by the Council were accepted. The Inspector's full report is attached at Appendix 3 and is available at the bottom of the webpage www.merton.gov.uk/sitesandpoliciesplan. However the Inspector's comments in relation to the Greyhound Stadium site can be summarised as follows:

- This site is allocated in the Plan for the intensification of sporting activity (D2 Use Class) with supporting enabling development. Developments that facilitate more sporting activity may be enabled by more viable uses. In other words the Plan takes a flexible approach to this site and allows for a wide variety of alternative uses.

- Two particular uses, a scheme for a football stadium plus enabling development and a scheme for the retention of a greyhound stadium plus enabling development, were pressed at the Hearings by different parties. However, it was made clear to all parties at those Hearings that it is not the role of the Examination to hear detailed evidence about, or come to a conclusion on, which of these schemes was the more suitable or viable. The purpose of the examination was to establish whether the Plan in general, and the proposals for this site in particular, are sound.
- It was common ground at the Hearings that the site is suitable for the intensification of some form of sporting activity. It has operated as a sports and leisure venue for almost 100 years; there are no more suitable or deliverable sites in the Borough; there is a will to develop the site for such a purpose as evidenced by the two schemes (one providing a football stadium and the other a new Greyhound stadium) mentioned throughout the hearing.
- It is acknowledged in the Plan that the site has constraints with flooding and transportation being given particular mention at the Hearings. As to the suggestion that the Plan should give more detail as to how these constraints should be overcome, it is sufficient for it to state that they must be managed and met rather than specifying how they be managed and met.
- One of the principal points of contention between the promoters of the alternative schemes for the site was whether or not the Plan, which at present would allow for either option, should specify that a greyhound stadium be retained so as not to harm the site's function as a cultural and sporting facility. The Mayor of London's position on this point evolved as the Plan has progressed. In 2012, initial responses from the Mayor's office supported the Council's preferred use. Then in 2013 the Mayor supported the retention of a greyhound stadium where feasible, however, subsequently and shortly before the Hearings he modified his position to say that "...while the retention of a greyhound stadium use at the site would be ideal, the intensification of a sporting use at the site in the form of other financially viable stadium uses, where feasible, would ultimately be acceptable in strategic planning terms." The situation is, therefore, that while the Mayor is variously saying that the retention of a greyhound stadium would be ideal or even that such a stadium should be retained if it is viable, he is not saying that the Plan must specify this. He is acknowledging that other financially viable stadium-uses could be acceptable in strategic planning terms – in other words they could, amongst other things, be consistent with London Plan policy.
- It is not, therefore, considered necessary for the Plan to specify that a Greyhound Stadium should be retained on the site.
- Although the Plan refers to sporting activity on the site being enabled by more viable uses it does not specify their type or scale. This is understandable. While, in the current market, the most likely enabling uses are residential and retail, this could change over time. Moreover, while the Council is clear that it would not support substantial out of centre retail uses on the site it is not possible, without having carried out sequential tests and

impact assessments, to establish the precise nature of the retail development that would be acceptable. Similarly for residential development, the amount that would be acceptable will vary according to the design and layout of particular proposals.

- While the Council acknowledged at the Hearings that industrial and warehouse uses would be suitable, it questioned whether they would be viable. The demand for such uses in the Borough has been low for a number of years, particularly for large sites such as the Greyhound Stadium. While there is a demand for better quality small units the Council considers this would best be met by improving existing sites rather than allocating new ones. Against this background there would be little justification for specifying that the site be allocated for employment uses.

6.25 Appendix 4 contains the SPP 'Site 37' policy and text.

6.26 **Alternative Use of the Site**

6.27 In response to the consultations on the application some residents have raised the issue of the possibility of an alternative use of the site to provide a new school within the borough.

6.28 In 2012 and 2013 the Council commissioned consultants Capita to carry out investigations regarding possible sites for new primary and secondary schools, reviewing over 100 sites in Merton. The two reports are published on the council's website: www.merton.gov.uk/school-planning and www.merton.gov.uk/new_secondary_school_site_options. The research was also used to inform site allocations as part of Merton's Sites and Policies Plan 2014.

6.29 The Wimbledon Greyhound Stadium site was considered as part of more than 100 sites across both reports and neither report considered that the site should be shortlisted for either a new primary or secondary school. Reasons given included its very large size and only a proportion would be needed for a school; its existing usage and size would make it a difficult site to pursue; potentially difficult planning issues.

6.30 The required new secondary school would be a Free School and as such the government's Education Funding Agency is responsible for funding and identifying the site for the new school, though the council may assist, particularly when it has freehold of the land. The sites within the Sites and Policies Plan 2014 and the two Capita reports (2012 and 2013) on potential sites for primary schools and secondary schools in Merton have been given to the government's Education Funding Agency representatives in assisting them with searching for new school sites. This includes the Wimbledon Greyhound Stadium site. The EFA has also carried out its own site searches for schools. The EFA will approach site owners if it wants to buy a site for a new school. It is understood from the council's Children, Schools and Families Department that the EFA has not identified this as a priority site to purchase.

6.31 History of AFC Wimbledon

6.32 Formed in 1889 as the 'Old Centrals', the club became 'Wimbledon Old Centrals' and then 'Wimbledon FC'. Originally located at the now Greyhound stadium site, the Club relocated in 1912 to a new site further along Plough Lane (which is now the Plough Lane residential development). The Club won The FA Amateur Cup in 1963 and were elected to the fourth tier of the Football League in 1977. In 1988 Wimbledon FC won the FA Cup and became founder members of the Premier League, in which they stayed until 2000. In 1990, following the Hillsborough tragedy, the Taylor Report demanded all-seater stadia, which resulted in the club moving to a ground share with Crystal Palace from 1991.

6.33 Reserve team games continued to be played at the Plough Lane site until the end of 2000 when LBM removed a covenant on the land which stated that it must be used for sports purposes. The site was then sold and redeveloped into flats and commercial units. In 2002 an FA Commission allowed the Club's owners to move the legal entity to Milton Keynes, where Wimbledon FC were subsequently renamed the 'Milton Keynes Dons FC'. A new club was founded by fans in 2002 which became the current 'AFC Wimbledon' Club and which is currently based at the 4850 capacity Kingsmeadow Stadium, Kingston upon Thames, where the team ground share with Kingstonian FC. They presently play in the fourth tier of football (League Two).

6.34 The Club's supporter base is drawn from the local region including the London Boroughs of Merton, Wandsworth, Kingston, and Sutton, and others spread more widely around London, southeast England, and the UK. There is also support from outside of the UK.

6.35 The applicant states the proposed Stadium is key to the AFC Wimbledon's aspiration to be more financially sustainable and progressively more successful. The existing grounds in Kingston-upon-Thames, provide limited opportunities for expansion or improvement of facilities to increase revenue or build upon existing community work. Specifically, the reasons given for seeking to relocate from Kingsmeadow stadium are:

- The 4,850 capacity limits income and prevents the club from competing on a similar level with other clubs.
- The site is cramped and with no room for expansion
- Limited match day facilities such as catering, bars, ticketing and club shop
- Lack of capacity for match day corporate hospitality
- Limited space and facilities to generate increased income through non-football activities, such as conferencing and banqueting

- Sightlines from the largest spectator terrace are poor, making it unattractive to new fans and the remainder of the stadium is frequently sold out
- There are no on-site facilities for providing the various community work carried out by the AFC Wimbledon Foundation
- It is not in the borough from which AFC Wimbledon originates, which is not ideal for home spectators

6.36 The Club states that since 2012 it has sought to ensure its financial security and long term prospects through a move to a new stadium, preferably in Merton, which it considers its 'spiritual home' and where additional income from sponsorship, commercial activity, corporate hospitality and enhanced catering facilities, and increased attendances may be achievable. The club considers that in addition to helping secure its future, a new stadium will also provide the following benefits:

- Enable the AFC Wimbledon Foundation to provide a greater range of activities that will attract all age groups from all sections of the local communities
- Provide a development which will promote sport, health, education, employment and training, social enterprise and social inclusion, contributing towards the health and wellbeing of the local community
- Provide an opportunity to redevelop an under-utilised and visually unattractive (Greyhound) Stadium
- Assist in the regeneration of the area through employment created during construction and operational phases and build links with local businesses and residents

6.37 Other locations within Merton were considered for the relocation of AFC Wimbledon aside from the Greyhound Stadium site, however were discounted due to unsuitability of the site to host a stadium and/or unavailability and/or other key factors. A detailed analysis of other sites considered for the proposed development was provided by the applicant during the Examination in Public stage of the Sites and Policies Plan. The 3 sites shortlisted out of 19 possible locations were:

1. Wimbledon Greyhound Stadium
2. Morden Underground Depot
3. Morden Industrial Estate

6.38 The full report by Colliers International Ltd can be viewed at the link below:

[http://www.merton.gov.uk/4_site_37_r086_graa_afcw_appendix_3 -
_colliers_strategic_review_of_stadium_location_options_for_afc_wimbledon.p
df](http://www.merton.gov.uk/4_site_37_r086_graa_afcw_appendix_3_-_colliers_strategic_review_of_stadium_location_options_for_afc_wimbledon.pdf)

6.39 The report advises that the Morden Underground Depot site was discounted because:

1. Cost and complexity of an engineering solution to build over the existing Northern Line sidings is likely to be very high and hence prohibitive (based on a similar scheme at White City whereby the cost was c.75 million to deliver a similar engineering system alone).
2. The site is very important to TfL operations at present.
3. Much wider works would be required between the site developer, Council, and other stakeholders to ensure the project was effectively connected into the existing Morden town centre.
4. The surrounding area is very suburban in character and the project would require a strong design response.

6.40 The Merton Industrial Estate site was discounted because:

1. Significant number of existing and viable businesses and jobs might be put at risk unless an alternative location is available.
2. Sensitivities amongst the local business community and political sensitivities as to what business and jobs under threat might mean for a redevelopment project.
3. The size of development would be likely to be 4 to 8 storeys in height and it is uncertain if this would fit well into the local context. Associated costs of the required basement parking would be high and since this would comprise a major transformational project within the area, a strong master plan approach would be required.
4. Securing vacant possession of the land would be very complex and costly due to multiple land ownership of the site.
5. If an alternate site to decant existing businesses to is achievable this is likely to be complex, costly and sensitive as the London Olympic Park and Emirates Stadium projects have shown. This would be very complex with a large number of individual property deals to be secured.
6. Destroying significant existing land value to create value. Furthermore, there would be significant costs of achieving a cleared site.

6.41 Wimbledon Greyhound Stadium

6.42 The existing Stadium consists of a racing track, 6-8,000 seat brick fronted grandstand, catering facilities, and a surrounding car park. The Stadium is owned and operated by the Greyhound Racing Association and Greyhound racing was first held at the stadium in 1928. It currently operates primarily as

a Greyhound racing track however up until 2005 also held Speedway racing events. It currently still hosts Stock car events and weekly car boot sales.

- 6.43 The applicant advises that Greyhound racing spectatorship has been in steady decline both within London (leading to the closure of the Walthamstow racing track in 2008 and Catford racing track in 2003) and nationally as a whole..
- 6.44 Aside from Wimbledon Greyhound Stadium, there are 3 other Greyhound stadiums in London and Greater London (Crayford, and Sittingbourne, Kent, and Romford, Essex) and nationally there are a further additional 16 stadiums (source: www.bagsracing.com)
- 6.45 The site is currently owned by GRA Ltd, which includes Galliard Homes. The Irish 'National Asset Management Company' (NAMA) holds the loan originally given to GRAA/Galliard Homes Ltd to purchase the site from the Greyhound Racing Association. As part of Merton's Sites and Policies Plan preparation, NAMA wrote to the council confirming this.
- 6.46 In addition to the Stadium there are other buildings within the site in leisure/commercial use on short-term leases (including that of Christophers Squash Club).

6.47 'Volante' site (46-76 Summerstown)

- 6.48 This site is in independent ownership however is part of the adopted SPP proposal 'Site 37' and is therefore subject to the same policy requirements as the redevelopment of the main site. This site currently comprises two, two storey, warehouse buildings and is in light industrial (flooring material supplier) use. This site is not part of this planning application

7. PLANNING HISTORY

7.1 Greyhound Stadium Site

14/P0286 - APPLICATION FOR USE OF CAR PARK FOR CAR BOOT SALES ON WEDNESDAYS BETWEEN 10.30 - 14.30 (REPLACEMENT OF EXTANT TEMPORARY PLANNING PERMISSION 12/P0338 DATED 20/03/2012) – Approved

13/P3662/NEW - PRE-APPLICATION ADVICE FOR THE ERECTION OF A 20,000 SEAT FOOTBALL STADIUM WITH HOSPITALITY AND COACH PARKING, 613 RESIDENTIAL UNITS WITH BASEMENT PARKING, 1000 SQUARE METRE SQUASH AND FITNESS CLUB (WITH 350 PARKING SPACES AND CYCLE STORE) AND 1000 SQUARE METRES RETAIL SPACE.

13/P0512/INVALID - ERECTION OF 20 FOOT PORTAKABIN ON GRAVEL AREA FOR STORAGE – Withdrawn

12/P0338 - APPLICATION FOR REPLACEMENT OF EXTANT PLANNING PERMISSION 10/P0171 FOR USE OF CAR PARK FOR CAR BOOT SALES ON WEDNESDAYS BETWEEN 10.30 - 14.30 – Approved

11/P0822 - ERECTION OF STEEL-FRAMED BUILDING 9M x 7M TO BE USED FOR VEHICLE MOT TESTING AND VEHICLE VALETING. – Approved
– Land adjoining Coppermill Lane

10/P2931 - RETENTION OF 2 x PORTABLE BUILDINGS FOR OFFICE USE.
– Approved

10/P0171 - APPLICATION FOR REPLACEMENT OF EXTANT PLANNING PERMISSION 08/P0231 FOR USE OF CAR PARK FOR CAR BOOT SALES ON WEDNESDAYS BETWEEN 10.30 - 14.30 – Approved

10/P0165 - RENEWAL OF LBM PLANNING PERMISSION 08/P1280, FOR PART USE OF CAR PARK FOR CAR BOOT SALES ON SATURDAYS. BETWEEN THE HOURS OF 7.00 AM - 1.00 PM – Approved

08/P1280 - RENEWAL OF PLANNING PERMISSION LBM REF: 07/P0557, USE OF PART OF CAR PARK FOR CAR BOOT SALES ON SATURDAYS. BETWEEN THE HOURS OF 7.00 AM - 1.00 PM – Approved

08/P0231 - CONTINUED USE OF CAR PARK FOR CAR BOOT SALES ON WEDNESDAYS BETWEEN 10.30 - 14.30 – Approved

07/P0557 - RENEWAL OF PLANNING PERMISSION LBM REF: 04/P2486, USE OF PART OF CAR PARK FOR CAR BOOT SALES ON SATURDAYS. BETWEEN THE HOURS OF 7.00 AM - 1.00 PM – Approved

06/P3004 - RENEWAL OF TEMPORARY PLANNING PERMISSION LBM 05/P1744. USE OF CAR PARK FOR CAR BOOT SALES ON WEDNESDAYS BETWEEN 10.30 - 14.30 – Approved

06/P1971 - RENEWAL AND VARIATION OF HOURS OF PLANNING APPLICATION 05/P1744 FOR TEMPORARY USE OF CAR PARK AT JUNCTION OF SUMMERSTOWN AND RIVERSIDE ROAD FOR A 100 CAR BOOT FAIR ON WEDNESDAYS BETWEEN 9.00AM AND 1.00PM. (PREVIOUSLY 10.30AM TO 3.00PM) – Refused on the following grounds:

1. The proposal will cause an unacceptable increase in morning peak period traffic, leading to added, unacceptable levels of congestion of the existing highway network to the detriment of the users of the highway and the amenity of local residents contrary to policies LU.3 (Transport Impact of New Development) and PE.3 (Pollution and Amenity) of the adopted Merton Unitary Development Plan (October 2003).

06/P1351/NEW - REDEVELOPMENT OF SITE FOR A RESIDENTIAL- LED SCHEME WITH AN ASSOCIATED LEISURE/COMMUNITY FACILITY. –

06/P1029 - CHANGE OF USE FROM CLASS B1 TO CLASS A5 (TAKE-AWAY) AND ERECTION OF EXTERNAL KITCHEN EXTRACTION SYSTEM INCLUDING DUCTING – Approved – 94 Summerstown

05/P1744 - USE OF CAR PARK FOR CAR BOOT SALES ON WEDNESDAYS BETWEEN 10.30 - 15.00 – Approved

04/P2486 - RENEWAL OF PLANNING PERMISSION LBM REF: 03/P0861, USE OF PART OF CAR PARK FOR CAR BOOT SALES ON SATURDAYS. – Approved

03/P1911 - CHANGE OF USE FROM MOTORCYCLE SCHOOL AND REPAIRS TO A CAR RENTAL USE AND ERECTION OF A 1.8 METRE HIGH PALISADE FENCE. –Approved – 94 Summerstown

03/P1334 - APPLICATION FOR A CERTIFICATE OF LAWFULNESS FOR THE EXISTING USE OF PART OF THE SITE AS A MINI CAB BUSINESS IN CONNECTION WITH THE STADIUM. – Certificate issued

03/P0861 - USE OF PART OF CAR PARK FOR CAR BOOT SALES ON SATURDAYS. – Approved

02/P0597 - USE OF LAND FOR GREYHOUND RACING (THREE EVENINGS A WEEK) AND FOR STOCK CAR RACING EVERY SUNDAY FROM JANUARY TO THE END OF MAY AND EVERY SUNDAY FROM SEPTEMBER TO THE END OF DECEMBER. – Certificate issued

02/P0369 - CHANGE OF USE OF STORE/WORKSHOP BUILDING TO OFFICES/RECEPTION AREA, FOR USE IN CONNECTION WITH THE ADJOINING CAR HIRE USE, WITH ALTERATIONS TO THE FRONT ELEVATION – Approved

01/P2041 - RETENTION OF PART OF CAR PARK FOR A 200 STALL SATURDAY CAR BOOT FAIR. – Refused, on the following grounds:

1. The use proposed would lead to an unacceptable increase in problems of highway congestion at a time when highway movements in and around Plough Lane are likely to be significantly constrained, contrary to Policy M43 of the Adopted Unitary Development Plan (April 96) and Policy LU3 of the Revised Unitary Development Plan Second Deposit Draft (October 2000).

84/S/1504 - OUTLINE APPLICATION FOR ERECTION OF A SUPERSTORE WITH 600 PARKING SPACES AND INDOOR SPORTS FACILITIES UNDERNEATH THE STADIUM – Refused

7.2 Volante Site, 46 – 76 Summerstown

14/P4188/NEW - APPLICATION FOR A PRE APPLICATION ADVICE FOR THE DEMOLITION OF THE EXISTING BUILDINGS AND THE ERECTION

OF 98-112 RESIDENTIAL UNITS ABOVE THE GROUND FLOOR WHICH
WILL PROVIDE A MIX OF USES – 46 – 76 Summerstown, Tooting

8. PRE-APPLICATION PROCESS AND CONSULTATION

- 8.1 The applicant made a formal pre-application submission in November 2013 in respect of the proposed redevelopment of the site to provide a 11, 000 – 20, 000 football stadium for AFC Wimbledon, replacement squash and fitness facilities, retail unit, and approximately 600 residential units with associated parking and landscaping.
- 8.2 The purpose of the pre-application process is to provide pre-application advice to assist in the preparation of an application and establish key issues and procedural requirements, and comments are made without prejudice to the formal consideration of any planning application.
- 8.3 The pre-application meetings held identified the main issues to be considered, including the siting and design and of the proposed stadium, the density and scale of the enabling housing and retail development, transport and parking, flooding, community benefits, affordable housing and housing quality, infrastructure, and impacts on surrounding residents and businesses.
- 8.4 The pre-application scheme was presented at the Council's Design Review Panel (DRP) in May 2014.
- 8.5 LBW Officers were consulted on the pre-application submission.
- 8.6 The applicant also submitted the pre-application scheme to the Environment Agency (EA), the Greater London Authority (GLA), and Transport for London (TfL) for comment and received detailed feedback from each.
- 8.7 Community consultation**
- 8.8 In addition to the four stages of public consultation covering more than nine months between 2012 and 2014 associated with the site's allocation in Merton's Sites and Policies Plan 2014, in tandem with the formal pre-application submission, and as required by with the SPP policy allocation, the applicant also carried out an extensive course of public consultation comprising the following:
- Pre-application discussions with Ward Members.
 - Contact made with several individuals and community groups to offer further information and make them aware that the applicants were prepared to meet with them to discuss the proposals
 - 120 consultation leaflets posted to borough wide stakeholder groups including local schools.

- A preview event organised for members of local resident associations and stakeholder groups (also Ward Members) held on the evenings of 26th June and 1st July from 6pm to 8.30pm at Wimbledon Park Hall, 170 Arthur Road. Invites for this event were sent to all local groups including: Christophers Squash & Fitness Club, Wimbledon Park Residents Association, Wimbledon East Hillside Residents Association, Haydons Bridge Residents Association, Wimbledon Society, Wimbledon Community Association, Wimbledon Civic Forum, Wandsworth Historical Society, Wandle Trust, Wandle Heritage, Sustainable Merton, Merton Chamber of Commerce, and Love Wimbledon.
- Advertisement of the June exhibition in a catchment area agreed with LBM Officers, including walking routes from the closest local rail and underground stations.
- 18,000 invitation leaflets distributed providing a brief description of the scheme and providing various contact details for further information.
- All properties in LBM within a distance of 1100 metres and up to 2100 metres of the site given a freepost leaflet, in addition to all properties in LBW within a distance of 600 metres and up to 1700 metres from the site.

8.9 Members of the public were invited make comments on the proposed scheme by using a freepost reply slip attached to the exhibition invitation leaflet, at the exhibitions, or through a consultation website (<http://www.redevelopingploughlane.co.uk/>).

8.10 A Statement of Community Involvement providing further details of community consultation carried out by the applicant has been submitted with the application.

8.11 Environmental Impact Assessment

8.12 The pre-application submission included a scoping request from the applicants and the Council issued a formal Scoping Opinion on the applicant's Scoping Report (dated July 2014) on the 19th September 2014.

8.13 Planning Performance Agreement

8.14 Given the tight deadline for any approved stadium to be built and operational by, prior to the submission of the formal planning application, the Council and applicant signed a Planning Performance Agreement (PPA) on the 27th November 2014. The purpose of which was to ensure that the application was dealt with as expeditiously as possible by both the Council, and applicants in responding to requests for further information from the Council. A PPA is however, without prejudice, and does not bind the Council to issuing a favourable determination.

9. CONSULTATION

9.1 The proposed development constitutes a Major application, and Environmental Impact Assessment Application as defined by Schedule 2 (10 (b)) of the Environmental Impact Assessment Regulations 2011.

9.2 Initial Consultation (11th December 2014 – 18th February 2015)

9.3 The application has been advertised as a Major application and EIA application by site notices adjoining the site and in the vicinity of the site, press notices (Wimbledon, Tooting, and Earlsfield Guardian newspapers), letters of consultation to statutory consultees, and adjoining and surrounding properties in both Merton and Wandsworth Boroughs (approximately 8400 letters in total), and advertised on the LBM and LBW websites.

9.4 Copies of the Environmental Statement and other application documents were made available at the LBM Civic Centre, LBW Civic Centre, Morden, Wimbledon, Tooting, and Earlsfield libraries, in addition to online through the Council's website.

9.5 Due to the scale and complexity of the proposed development and the application having been submitted shortly before the Christmas holiday, the Council extended the initial consultation period from the statutory 21 days to a total of 49 days, running from the 11th December 2014 – 18th February 2015 and representations were accepted after this date also.

9.6 Two public forums were held in Wandsworth and Merton boroughs (2nd and 11th February 2015 respectively) where the applicants were invited to make a presentation to attending members of the public about the proposed scheme and to then provide responses to any questions asked.

The existence of the application including details of the forums were advertised on both LBM and LBW websites and on other community-based websites.

9.7 The application has been referred to the Mayor under the provisions of the Mayor of London Order (2008).

9.8 A copy of the application and further information received have been sent to the Secretary of State under the provisions of Schedule 16 of the EIA Regulations (2011).

9.9 2nd Consultation (12th September 2015 – 8th October 2015)

9.10 Following the receipt of further information from the applicant in response to comments received at the first consultation, a second public consultation was carried out on the 12th September until the 8th October on this new information. As with the first consultation, letters were delivered to LBM and LBW residents, site notices were posted adjoining the site and in the vicinity of the site, press notices posted in the Wimbledon, Earlsfield, and Tooting

Guardian newspapers, notice posted within the LBM website home page and within the specific Planning home page and the further information added to the website. The further information was also made available at LBM and LBW Civic centres and the Tooting, Morden, Wimbledon and Earlsfield libraries.

9.11 The statutory 21 days was given for consultees to comment on the further information.

9.12 Representations Received

9.13 There has been much interest in the application due to the scale of the proposal, Club fan base, and wide public consultation both at pre-application and application stages. Over 20,000 responses have received from individuals as well as many amenity societies. Responses have been received from nearby residents as well as supporters of the Club; the latter including many local residents but also people from the wider region, other parts of the UK, and overseas.

9.14 Given the large number of representations it is not possible to quote every submission in detail however a summary below provides details of the main issues raised for and against the proposals by individuals and residents' groups/amenity societies.

9.15 Responses from statutory authorities and other bodies are also detailed separately below.

9.16 The number of representations received for or against a proposal (if any) is a not a determining factor when making a decision however the range of topics raised and the geographic origin of responses may be useful to consider. In addition to a summary of the individual responses, a summary of the postcode origin of representations is also provided further below.

9.17 **Objections** – 704 individual responses objecting to the proposal were received as a result of the first public consultation and up until the second consultation.

9.18 **Objections** - 181 objections were received following the second public consultation.

9.19 Objections received have been overwhelmingly from nearby areas of Tooting (SW17) and Earlsfield (SW18), and Wimbledon (SW19), and with 177 of the total objections being outside of those areas.

9.20 **Support** - 4,853 individual responses in support of the proposal were received as a result of the first public consultation and up until the second consultation.

9.21 **Support** - 245 letters of support were received following the second public consultation.

9.22 Support letters received have been overwhelmingly from nearby areas of Tooting (SW17) and Earlsfield (SW18), and Wimbledon (SW19), and with 3564 of the total support being outside of those areas.

9.23 In addition to the individual representations in support of the application, a petition of 14,476 signatures in support of the application was received from People for the Ethical Treatment of Animals (PETA) and on the following grounds:

- Support for the proposed move of AFC Wimbledon (and its thousands of fans) back to its original site.
- The redevelopment will be positive for local sport, and as part of the planning application AFC Wimbledon will also be building residential units, a fitness club and creating public space which would result in positive regeneration for the area and local families.
- Greyhound racing is declining in attendance and stadiums are closing nationwide.
- Greyhound racing involves mistreatment of Greyhounds during and after their racing lives and exacerbates the number of homeless animals (non- Planning matter).

9.24 **Objection** - The table below summarises the number of individual objections by postcode areas with SW17, SW18, and SW19 being the postcode areas immediately surrounding the site.

9.25 1st Consultation (November 2014)

SW17	SW18	SW19	Other UK
163	72	312	155

9.26 2nd Consultation (September 2015)

SW17	SW18	SW19	Other UK
54	33	87	7

9.27 **Support** - The table below summarises the number of individual **support** representations by post codes areas.

9.28 1st Consultation (November 2014)

SW17 (Tooting)	SW18 (Earlsfield)	SW19 (Wimbledon)	Other UK	International
225	234	856	3212	326
			In addition to a 14, 476	

			signature petition from P.E.T.A	
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9.29 2nd Consultation (September 2015)

SW17 (Tooting)	SW18 (Earlsfield)	SW19 (Wimbledon)	Other UK	International
43	28	150	24	0

9.30 **1st Consultation - Summary of grounds of objections:**

- Lack of education and health provision
- Parking and traffic issues being made worse
- Flood risk
- The site has been left to decay and regeneration is need however this is not the right scheme
- Too much housing, stadium should be of mixed use and smaller, should include school and transport needs improving
- Work by AFC in the community is noted and supported however much of the support for the scheme is form people not living in the area and who would not be affected by it or abroad
- Why can't club expand where it is located now?
- Sentimental support for AFC Wimbledon should not be taken into account
- The benefits quoted by the supporters are very vague and would result from any development at that site
- The stadium seems to only provide facilities for the club and not for the wider community
- Several small businesses will be lost such as thriving weekly market. An alternative site should be provided for the market as part of any approval
- Loss of parking for essential workers at the St Georges hospital and would put pressure on NHS staff, St Georges site, and neighbouring roads. The developers should provide alternative parking
- The design of the housing is poor – bland and ugly and not in keeping with the surrounding areas Victorian terraced streets and low rise commercial spaces
- The site should be used to bring something of architectural significance rather than set of poorly ventilated and small apartments which look like every other blocks built by big house developers
- The height of the buildings is excessive and out of keeping with the area and will be blight on skyline
- Loss of privacy to adjoining properties from tall blocks
- Density of development too high
- The site in Flood Zone 3b (the functional floodplain) and would create significant increased risk to surrounding area
- Noise pollution from the stadium use
- Light pollution from flood lights
- Light pollution from tall residential blocks
- Increased pedestrian traffic on match days

- Litter from large crowds
- Antisocial behaviour and crime
- Adjoining roads not equipped to deal with increase in car and other vehicular journeys generated by all parts of the development
- Not enough buses
- Trains are overcrowded already
- No parking capacity locally
- Increase in potential for accidents along adjoining roads
- If approved there needs to be match day restrictions in surrounding areas to limit parking to residents and private visitors only at no additional cost to residents either at weekends or evenings.
- Safety risk to children from additional traffic
- Risk of delays to ambulances as that area is already full to capacity most days
- Propose cycle parking is commended but there needs to also be proper cycle lanes for safety
- What provisions will be made for Alston Road and Fountain road, most likely will be pedestrian cut through on match days
- It would be better for the greyhound stadium to stay because it is one of the last remaining ones in London and has been part of the community for a long time
- AFC Wimbledon is being used as a Trojan Horse to get through an unsuitable development
- Only 220 parking spaces for 660 homes
- No healthcare provision or schools/day care
- The original Plough Lane site was suitable for a non-league club
- The applicant has failed to demonstrate that the proposed development will not increase off site flood risk and that there will be no loss of flood plain storage
- The developers have not demonstrated that their proposals pass the sequential and exceptional tests to show that there are no other alternatives with lower flood risk for the development
- Traffic surveys outdated and taken during school holidays and Olympics when traffic lighter and therefore does not reflect true traffic conditions
- Retail should not be there given the poor transport links
- The development should have been designed to keep some of the existing businesses
- There are utilities issues in that area
- Impact of Springfield Hospital development as well
- Impacts on the ecology of the River Wandle
- How would emergency services get around on match days?
- No mention of affordable housing figure
- Quiet character of Earlsfield will change
- What provision is there for construction impacts?
- 11000 stadium may be acceptable but 20,000 too many people
- Parking insufficient as reality is that most households have at least one car
- Franche Court Road, Aldren Road, and Burmester Road should be access only streets with cameras to issue fines to those using the streets as cut through

- AFC cannot vouch for behaviour of away fans
- Stated use of local cemeteries as amenity space is disingenuous
- Times have changed since Wimbledon FC have been in Wimbledon, there is a larger population and much more burden on the roads
- Gap Road should be residents only parking, pay and display, or a mix.
- Transport Assessment under represents existing problems with bus etc congestion
- Haydons Road and Gap Road constantly gridlocked with traffic
- Wimbledon Doctors' surgeries, dentists, and St Georges Hospital already over capacity
- The site should be used for a new school, playing fields, sports facility
- Football spectators are not the sort of traffic which will help regenerate Haydons Road parade
- A new retail unit is not needed
- Football as a sport is already over provided for
- Greyhound racing should be preserved
- Garratt Lane and surrounding roads will be no-go areas during match days preventing residents from carrying out normal activities
- There is no plan to improve/increase tube/rail services
- The Council Tax the Council will receive should be spent on a new school
- The existing Plough Lane/Haydons Road intersection is completely ineffectual and has created worse traffic jams than before. Any approval should contain a redesign and redevelopment of this intersection and nearby intersections which cause gridlock
- Impact on GPs and health care facilities
- Noise levels of stadium, not all properties have double-glazing so the sound from matches will be significant
- Who will ensure the proposed landscaping and public realm works are done? The Plough development was meant to be well landscaped and looks awful
- Matchday parking especially on Saturday is concern
- Little to no engagement by the developer with Garratt Lane business park
- Parking, school place, and GP places are insufficient at present and this scheme will make it worse
- Lack of consultation with residents
- Noise and air pollution
- Tooting, Haydons Road, and Wimbledon Park stations are running at full capacity during peak times
- The site will have huge energy demand and which the current grid will struggle to provide
- Impact on local wildlife and historical importance
- No coach parking to be provided which will block up streets and local streets are not large enough to cope with such large vehicles
- Lack of stadium car parking on site

9.31 1st Consultation - Summary of grounds of support:

- Wimbledon is AFCs home historically and spiritually and should go home

- Provision of several hundred new homes where there is a shortage
- Regeneration of local area and would help with transport and infrastructure regeneration where there is low investment
- Other stadiums have regenerated the areas they are in
- The success and progression of the club depends on this new facility
- Leisure and commercial opportunities both on site and in surrounding area
- The club does a significant amount of community and youth work
- Football has changed in terms of hooligans and antisocial behaviour however in any case, Wimbledon AFC does not suffer from these problems since it is more of a family club
- The existing greyhound stadium is running at a loss
- Dwindling popularity of dog racing
- Wimbledon AFC will add to Merton's sporting legacy with the All England Lawn Tennis club
- Wimbledon is bland and homogenous and this will be an interesting development
- Wimbledon has lost its heart with ordinary working class moving on and being replaced by generic and rootless rich. AFC Wimbledon is a family and community club with responsible core values and would put some soul back into the borough
- Management of stadiums and crowds has well advanced now with issues being dealt with very well/quickly
- Most people will use public transport to get to stadium
- Massive boost to local and town centre economies e.g. restaurants
- The proposal will facilitate upgrades to local transport which would otherwise not happen
- NHS facilities in the squash club are a bonus
- Betting online is more popular than betting at stadium
- Most parking in the area is residents only so the situation will not be worse
- AFC could easily become an academy to promote more youth football
- Greyhound stadium promotes gambling and this is not a positive image for Merton
- Many jobs will be created through the development
- The proposal will include an element of affordable housing
- Merton should be proud to host a football club
- Greyhound racing is cruel
- Football has a much wider age range and appeal
- Building a stadium on the site proposed is good foresight
- There is adequate rail provision in the area
- Many fans come by coach
- The matches are well policed
- Football appeals to all ages and genders and abilities
- Objectors have been vague about their own surveys and the times and dates they were taken
- If flood protection measures can't even be built into new development, we might as well give up
- Transport issues can be overcome
- Coaching and educating local children
- Crossrail 2 will improve transport links also

- The development will increase local homeowners' property values
- Complies with policy in terms of 'sporting intensification'
- Ticket availability should be retained for local supporters first to ensure it remains a local club
- The Sunday market should be re-provided somewhere else
- Money spent locally by supporters
- It will encourage young people to do more sport

9.32 2nd Consultation – Further comments raised in objection:

- Still object to the proposals
- The 1.2m proposed to be given to TfL to mitigate the impact of weekday peak time bus services is significantly smaller than the 3.73m that TfL originally suggested would be necessary. A higher level of financial support is needed to overcome peak overcrowding on buses at present.
- The lack of reduction in numbers of proposed flats means a significant negative impact on traffic along Garratt Lane.
- Providing extra buses misses the point the adjoining and nearby roads are already gridlocked at peak times.
- No assessment of the tube services from Tooting.
- Inadequate assessment of rail capacity to and from Earlsfield station.
- The proposed 6-10 storey towers are still too high.
- The revised plans and additional information do not overcome the previous issues raised.
- The application should be referred to the Mayor to due to its scale and because the majority of the impacts from it would affect an adjoining borough.

9.33 2nd Consultation – Further comments raised in support:

- Still support the application
- Design changes are positive and will enhance the benefit of the stadium to the local community
- The additional information and design changes address the concerns raised regarding flooding and transport
- The bus contributions will be especially useful
- Childcare facilities for the occupants of the apartments is a very welcome improvement as is opening up the east stand for cafeteria area
- The recent consultation and extensive submission including the additional information and analysis on a range of topics including flood risk, transport and design, plus the addition to enliven the pedestrian street which runs north to south across the site, opening up the east stand for a cafeteria area along with the inclusion of a child care facility
- The detailed Flood Risk Assessment concludes that there would be no loss in floodplain storage
- More cycle racks is a positive change and the information regarding public transport will encourage fewer cars and traffic on match days
- The revised information from the Environment Agency is positive
- The child care facilities would be a community asset

9.34 Responses from Statutory Bodies (1st Consultation)

9.34.1 National Planning Casework Unit (Secretary of State) - No Comments.

9.34.2 Greater London Authority (GLA) (dated 4/2/15) - See Appendix 5

9.34.3 Transport for London (TfL) (dated 14/1/15) – See Appendix 6

9.34.4 LB Wandsworth (dated 19/2/15) -

At the first consultation in February 2015 the London Borough of Wandsworth raises the following issues with Merton Council to be addressed:

- 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;
- 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;
- Where and if Council highway consent may be sought for the development to proceed, such consent cannot be assumed;
- There is a need for greater clarity as to ownership and consent issues relating to the proposed use of Riverside Road;
- 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;
- Greater clarity is required as to the likely need for and locations of off-street parking and coach parking;
- There is a need to work with both Councils and Transport for London on the matters raised in the GLA/ TfL comments;
- 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;
- 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;

- Physical measures and/or travel plan efforts should be investigated to seek to reduce damaging traffic impacts on local roads and junctions;
- There should be greater involvement of the Council and local stakeholders in the work related to the development of the proposed Stadium Management Plan;
- 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;
- 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;
- The objections raised by the Environment Agency need to be resolved to ensure the development does not result in increased flood risk.
- 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.
- 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.

9.34.5 Environment Agency (dated 21/1/15)

The site is in the highest risk flood zone and redevelopment of this site must be carefully designed and located.

We have reviewed the Environmental Statement Volume 2 – Appendices by Peter Brett Associates dated October 2014, ref 21533-008 and **object** to this application. We require additional information to demonstrate how the proposed development will not increase flood risk on site or to surrounding areas.

The proposal requires updating to demonstrate compliance with national planning policy, adequate flood plain compensation and a satisfactory surface water drainage strategy.

Please find attached detailed advice and guidance:

Section 1 – Technical advice and guidance
Section 2 – Planning policy

We are keen to continue discussing flood risk management for the redevelopment of this key site. We hope our response is helpful, if you have any questions or require additional information please let me know. If you are minded to grant planning permission despite our objection please contact us to discuss this.

Section 1 – Technical Advice and Guidance

The proposal as submitted has failed to meet the requirements of the second part of the flood risk Exception Test and we recommend that planning permission be refused on this basis for the following reasons:

The Technical Guide to the National Planning Policy Framework (NPPF) requires the Exception Test to be applied in the circumstances shown in tables 1 and 3.

Paragraph 102 of the NPPF makes clear that both elements of the Test must be passed for development to be permitted. Part 2 of the Test requires the applicant to demonstrate in a site specific flood risk assessment that the development will be safe, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.

The application site lies in within Flood Zones 3b and 3a defined by the NPPF as having a high probability of flooding. Development is only appropriate in these areas following application of the Sequential Test and where the Exception Test has been applied in full and has been passed. In this instance the submitted flood risk assessment (FRA) fails to:

1. demonstrate sufficient flood storage compensation is available
2. demonstrate surface water can be managed
3. demonstrate no increase flood risk in the surrounding area
4. address the opportunities presented by this development for reducing flood risk for example

As highlighted in our objection above the proposal has currently failed to demonstrate adequate flood plain compensation and a satisfactory surface water drainage strategy.

Flood Plain compensation

The proposal intends to offset the flood storage volume lost due to development in voids below the units which is considered flood mitigation as opposed to compensation. The methodology for appropriately demonstrating suitable mitigation to ensure there is no increase in offsite flood risk was

agreed in principle during pre-application discussions with the Merton Local Planning Authority and the Environment Agency due to the site specific nature of the site and its location away from the river's edge.

There is discrepancy with the figures in the compensation tables provided. It appears from these calculations that the entire stadium including existing floodable areas have been considered to be un-floodable. From previous liaison with the applicant's flood risk consultant it was agreed that the existing open area of the stadium were to be considered floodable within the flood compensation calculations. With this in mind the assumption within the flood compensation table would mean that the calculations need to be revised to reflect this. Once this has been done the applicant/consultant should also provide a plan drawing and at least two sections across the site showing the corresponding banding of compensation levels.

Voids

The scheme intends to use voids in order to ensure that there is no loss in flood storage or affect to flood flow route. However the proposal does not intend to incorporate voids along the boundary of 46-78 Summerstown Road. Upon further consideration voids would be required along this boundary as the lack of voids is likely to increase the flooding on the adjacent site. This could lead to an alteration in the existing flood mechanism which allows for water to flow freely from the site into Summerstown Road through a third party land. With this in mind the incorporation of voids along this section of the site boundary would be necessary to ensure that flood levels on this site would not increase as the flood flow route would be impeded.

Surface water drainage

The current proposed surface water drainage scheme contains a number of elements which we require further clarification on. As the Lead Local Flood Authority the London Borough of Merton have lead responsibility for managing the risk of flooding from surface water.

The Flood Risk Assessment by Peter Brett Associates sets out the drainage principles for the site. This has then been split into two drainage schemes, one for the stadium and another for the mixed use elements including the open space (Appendix E:SWDS & Drainage Survey). These have been undertaken by two different contractors. It is currently not clear from the level of information provided in the drainage schemes whether they would be able to meet the requirements set out within the FRA.

Residential and retail

The residential and retail areas drainage scheme by Price and Myers (February 2014, REF 22445 Rev P3) aims to achieve a restricted runoff rate from all new blocks of 5l/s/ha per block with an unrestricted discharge rate from landscaped areas of 168l/s/ha.

It is stated that the runoff water from the blocks will be attenuated within the podium deck. However no information has been provided demonstrating how this will be achieved. The FRA refers to the Price and Myers Drawing No. 22445-D02-P3 contain within the drainage report. This simply shows the outline of the building and does not provide detail of the tanks/cellular storage. In order to demonstrate this we will require dimensions/calculations demonstrating the required volumes of storage in each block has been provided.

We also have concerns with the high unrestricted discharged rate to the new culvert. Currently no evidence has been provided to demonstrate how the system would function. This should be considered taking into account upsteam flow.

In section 5.5.4 the FRA states that the proposed development will include permeable areas consisting of planting, permeable gravel and green roofs but states that these have been excluded from these drainage calculations simply stating that they are expected to provide additional attention. We recommend that the benefits of these features be investigated and added to the calculations.

Stadium Drainage

The Stadium drainage scheme has been carried out by Momentum Structural Engineers (Drainage Strategy; AFC Wimbledon Foul and Surface Water Drainage Strategy, dated May, 2014, Ref: 1785).

The scheme contains limited information on how the site drainage will work, instead assuming that tanks and pumps (due to the site level) will be required. The proposal intends to use the following methods:

- Gutters & Downpipes direct to attenuation tank.
- Pitch Drainage – attenuation provided within structure of pitch – crate system or granular layer or separate tank
- External areas & concourse etc.- conventional piped to attenuation tank

No details of existing attenuation/pumping have been seen at this stage. The subsequent proposal is therefore based on a totally assumed scenario. Although the proposal is for a discharge rate of 4.84 l/s/ha some assumption has been made regarding the drainage that impacts the retail and residential part of the site.

While this element of the scheme is seeking outline permission the level of information submitted is not considered sufficient as they have so far not demonstrated that the storage required to achieve the 4.84 l/s/h is possible. This could have an effect on wider scheme. We require further detail on the storage volume and location of the tanks in order to demonstrate the surface water drainage is acceptable.

Diverted Thames Water Sewer

The allocation for this site states Thames Water have assessed the water/wastewater capacity locally and have identified that there may be insufficient water supply and/or wastewater capacity to service new development on this site. In accordance with Policy DM F2, applicants should discuss with Thames Water how capacity will be provided.

The proposal involves the diversion of the main Thames Water sewer. The new alignment contains a number of sharp bends which could affect the flow of water. Drawing 22445-D02 P3 shows a 90° bend which could result in a backwater effect as flow around the sharp corner slows down. Overall this will increase water levels in the pipe and have an effect on the drainage system upstream of the bend. We are also concerned with the size of the proposed pipe of 1.0 metres in diameter when the existing culvert is 1.37 metre x 0.75metre. As has already been indicated within the FRA this area currently suffers from surface water flooding, we would therefore not expect the reduction of the sewer size and capacity.

Further to this we have had no confirmation that the diversion and size of pipe is acceptable from the sewage undertaker (Thames Water). Given the reduction in sewer capacity and the problems with surface water flooding in the area we recommend that you contact them to ascertain the acceptability of this approach.

Section 4.2 of the FRA states that safe access and egress is not achievable and instead relies on advance warning measures and refuge. Section 4.3 states that the development proposals will be supported by a Flood Warning and Evacuation Plan and that this has been agreed in principle with the London Borough of Merton's emergency planners.

This is contained within the Environmental Statement Volume 2 – Appendices as Appendix F Evacuation Plan. The acceptability of this approach should be confirmed with the London Borough of Merton's emergency planners.

The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

We would wish to highlight that any occupants of the site should register with the Environment Agency's flood warning service, 'FloodLine', so that they may prepare themselves in case of a flood event. This can be done by calling 0345 988 1188 to register.

Section 2: Planning Policy

The current proposal is contrary to Merton's local planning policy CS 16 - Flood Risk Management

We will:

- a. Work with the Environment Agency, landowners and developers, based on the findings of the most recent Strategic Flood Risk Assessment and other plans, to manage and reduce flood risk from all sources of flooding;
- b. Apply the sequential and exception tests to avoid inappropriate development in relation to flood risk;
- c. Implement sustainable drainage systems (SUDs) across the borough and work towards effective management of surface water flooding;
- d. Fully engage in flood risk emergency planning including the pre, during and post phases of flooding event;
- e. Propose ensure the implementation of measures to mitigate flood risk across the borough that are effective, viable, attractive and enhance the public realm and ensure that any residual risk can be safely managed.

Merton Core Strategy – July 2011

Functional Flood Plain

The site mostly falls with the 1 in 20 year flood extent which has been defined in Merton's Strategic Flood Risk Assessment (SFRA) as Functional Floodplain (Flood Zone 3b).

Table 1: Flood Zones of the National Planning Practice Guidance (NPPG) states that:

'Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency.'

Table 2: Flood Risk Vulnerability Classification of the NPPG sets out the vulnerability classification for different type of development. In this case residential development (more vulnerable) is considered to be the most vulnerable use on site.

Table 3: Flood risk vulnerability and flood zone 'compatibility' sets out appropriate uses within each flood zone. Water compatible and essential infrastructure (subject to the sequential test) are appropriate uses in flood zone 3b.

The new football stadium could be seen as a replacement unit within the existing use class, however the new residential, leisure and retail elements could be considered to be an increase in vulnerability. This was highlighted by the Environment Agency during the Sites and Policies consultation process as not being in line with national and local policy. The importance of the site for sports intensification and for the strategic delivery of housing within the borough was deemed to have wider benefits which outweighed the Flood Zone designation. The enabling development was deemed as an instrumental factor because without this the development of the site was not considered possible.

Merton Council acknowledged the site's location in the functional floodplain and set out the requirement for the development within the issues section of the allocation stating

'The site and its surrounds are within the functional floodplain of the River Wandle (Flood Zone 3b). The majority of the site is within a critical drainage area for surface water flooding. Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional floodplain and with the critical drainage area to minimise flood risk for future occupiers and the potential for water pollution from the site. A flood risk assessment should also consider the treatment of the non-main rivers that pass through the site and incorporate sustainable drainage systems into development proposals.'

The site was allocated in Merton Sites and Policies Plan for the intensification of sporting activity (D2 Use Class) with supporting enabling development. The inspector acknowledged in his report on the examination into Merton Sites and Policies Local Plan that flooding is a constraint. The inspector did not consider the potential of residential use reason to find the allocation unsound and stated that the amount would be acceptable according to the design and layout of particular proposals.

We therefore do not consider it appropriate to object on inappropriate development in line with the NPPF given the enabling uses were considered and not found unsound by a planning inspector.

Sequential test

The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding.

The sequential test was carried out as part of the site allocations process and no other suitable site for sporting intensification with enabling growth has been identified. The council therefore consider the site to have passed the sequential test.

9.34.6 Historic England (formerly English Heritage) (dated 23/12/14)

Thank you for your recent consultation to English Heritage GLAAS, I think the submitted Desk Based Assessment in the Environmental Statement Chapter 14 (by CgMs dated 2012), does pretty much answer my enquiry to you dated 23rd December. It is just that I would be grateful to see a final version of the desk based assessment. I have just copied you into an email to the applicant's archaeologists, CgMs, to see if they did revise the archaeological

desk based assessment – as it seemed in late 2013 in their communications to me that there was very much a plan to do this!

The Wimbledon Greyhound Stadium site is within an Archaeological Priority Area (APA) relating to the River Wandle and the multi-phase occupation and usage of the floodplain of the River Wandle across the Borough. There is the potential for buried palaeoenvironmental alluvial sequences and peats, these deposits can have the potential for good survival of organic archaeological remains. Additionally, there is some evidence for later prehistoric activity locally, in the form of pottery and funerary urns found near the Copper Mills (just immediately to the southwest of the site). Additionally, evaluation at 80 Plough Lane in 2002 found slight evidence for potential Roman settlement nearby.

The early Ordnance Survey maps (1865-1916) show that the historic watercress beds which once stood on the northern part of the site were fed from an inlet from the River Wandle, which meandered approximately north to south across the western edge of the site. The origin of this watercourse, which makes the majority of the site almost a natural island, is current unknown. This unusual hydrological advantage may possibly have made the site favoured for early occupation and usage. Therefore, the potential for the site to contain buried heritage assets of prehistoric and potentially Roman date is actually unknown at this time. Evidence of later mills and other related riverside industries may also be present.

In early consultations with the applicant's agents English Heritage advised that understanding the prehistoric and later potential of this site depends on identification and desk-based modelling of the nature of the subsurface topography within the site. We explored with the applicant options for gaining further information on this predetermination, but the weight of evidence suggested that the results could not practically be achieved at this stage and that the works would probably have to be undertaken by condition.

Although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition or conditions on any future consent will provide an acceptable safeguard. I therefore recommend a condition to require a three-stage process of archaeological investigation comprising: first, archaeological monitoring of any development geotechnical works enhanced by a programme of geoarchaeological investigation (borehole survey) to help understand the formation and use of the site and inform the evaluation trenching layout; secondly, archaeological evaluation (trial trenching) to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. If archaeological monitoring of geotechnical pits and boreholes can take place earlier in the development programme this could be a very beneficial and cost-effective means of establishing the potential for archaeological remains to survive.

The wording of the Condition could be as follows:

Reason *Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with Section 12 of the NPPF*

Condition A) *No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme archaeological investigation in accordance with a written scheme which has been submitted by the applicant and approved by the local planning authority in writing and a report on those works has been submitted to the local planning authority.*

B) *If heritage assets of archaeological interest are identified by the investigations under Part A, then before development, other than demolition to existing ground level, commences the applicant (or their heirs and successors in title) shall secured the implementation of a programme of archaeological investigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing.*

C) *No development or demolition shall take place other that in accordance with the Written Scheme of Investigation approved under Part (B).*

D) *The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (B), and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.*

Informative *Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines. They must be approved by the planning authority before any on-site development related activity occurs.*

I would be grateful to see a final version of the desk based assessment, I have just copied you into an email to the applicant's archaeologists, CgMs, to see if they did revise the archaeological desk based assessment – as it seemed in late 2013 there was a plan to do this?

Please note that a Desk Based Analysis was submitted by the applicant and the following comments were made by English Heritage:

I have just read through the updated DBA submitted by CGMS and dated May 2014 (attached) and this is a more comprehensive document and sets out in Section 6.4 the basics of the advice from this office. I am happy to recommend it to the Borough as an acceptable stage of assessment for this site.

Can I please state for the record, however, that I do not concur with the statements in section 4.8.2 and 6.5 or other comments with regard to the perceived significance of potential archaeological deposits on this site. The

status, value and significance of any deposits are currently unknown and it is simply not possible to classify them at this stage. Without any evidence one cannot state that potential is low or that nationally important remains will not be present! However, I am happy to accept the research content of the DBA and the recommendations in 6.4, in order to progress the application without any further delay.

Please accept the revised Desk-Based Assessment (with the comments I mentioned) and add this single condition to any consent, as shown below:

Reason Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with Section 12 of the NPPF

Condition A) No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme archaeological investigation in accordance with a written scheme which has been submitted by the applicant and approved by the local planning authority in writing and a report on those works has been submitted to the local planning authority.

B) If heritage assets of archaeological interest are identified by the investigations under Part A, then before development, other than demolition to existing ground level, commences the applicant (or their heirs and successors in title) shall secured the implementation of a programme of archaeological investigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing.

C) No development or demolition shall take place other than in accordance with the Written Scheme of Investigation approved under Part (B).

D) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (B), and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines. They must be approved by the planning authority before any on-site development related activity occurs.

9.34.7 Natural England (dated 22/12/14)

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The Wildlife and Countryside Act 1981 (as amended) The Conservation of Habitats and Species Regulations 2010 (as amended)

Natural England's comments in relation to this application are provided in the following sections.

Statutory nature conservation sites – no objection.

Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.

Protected species

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence may be granted.

Local sites

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.

Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This

is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that *'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'*. Section 40(3) of the same Act also states that *'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'*.

Landscape enhancements

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

Impact Risk Zones for Sites of Special Scientific Interest

Natural England has recently published a set of mapped Impact Risk Zones (IRZs) for Sites of Special Scientific Interest (SSSIs). This helpful GIS tool can be used by LPAs and developers to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated. Further information and guidance on how to access and use the IRZs is available on the Natural England website.

9.34.8 Thames Water (dated 29/1/15)

Waste Comments

Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the

decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the options available at this site.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised

to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Thames Water - Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Thames Water recommend the following informative be attached to any planning permission: There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

The proposed culvert diversion looks acceptable to Thames Water, subject to a full technical review. The applicant is required to submit a Section 185 Diversion application indicating a proposed diversion route for the sewer. Once the application has been received, a decision as to how best handle the diversion will be made.

9.34.9 NHS England (dated 6/2/15)

Thank you for the opportunity to comment on the above planning application.

It is noted that a Health Impact Assessment (HIA) is included with the Planning Statement. However, it only provides a statement of how the development would meet selected policy requirements and standards rather than a comprehensive assessment of the impacts and details of proposed mitigation. It appears that the HUDU Healthy Urban Planning Checklist has

been used. However, not all of the issues in the checklist have been addressed.

The Environmental Statement (paragraph 6.4.35) refers to 11 GP surgeries within 1 mile of the development site. The statement refers to “the majority are currently accepting new patients”. It would appear that this information is taken from NHS Choices without consultation with NHS England or Merton CCG or Wandsworth CCG . Paragraph 6.7.64 refers to consultation with NHS South West London – an organisation that no longer exists.

We do not accept the conclusion that “existing and planned healthcare facilities were (are) sufficient to meet demand from the development at the site”. The fact that GP practices are accepting new patients should not be used to assume that they can accommodate the additional demand. We do not accept the GP ratio / population assumptions and calculations used.

Whilst the statement refers to “13 hospitals and health clinics located within 4 miles of the Proposed Development” it does not assess the impact on community care and hospital services.

There are 8 GP practices approx. within 1km of the development site – 3 practices in Merton and 5 in Wandsworth. Access to 2 GP practices in Merton to the east of the site is constrained by the rail corridor. Notwithstanding the Football Club’s continued commitment to community activities including health promotion, we consider that the impact on local healthcare services from an additional estimated 1,491 new residents is significant and should be acknowledged and addressed.

We understand that as Merton’s Community Infrastructure Levy is in place that a payment could contribute to additional healthcare provision to mitigate the impact of the development. Furthermore, we would welcome further discussions to explore the possibility of using the planned 1,000 sq.m. retail unit as healthcare space.

9.34.10 NHS England (dated 19/3/15)

When undertaking an assessment of the impact on healthcare services a developer / agent should contact NHSE and the CCG to obtain up to date information and agree on a methodology to be used and not rely on information from NHS Choices. The fact that a GP practice is 'accepting new patients' should not be used to indicate that it has surplus capacity to absorb the additional demand. The assessment should also look at the impact on secondary healthcare services. The HUDU model could be used to assess the demand and indicative cost impacts of providing new healthcare space.

With regard to the HIA, we were commenting that the 2 page 'Health Impact Assessment' attached as Appendix 1 to the Planning Statement was not a HIA, but rather a statement of how policy compliant the scheme is. If the HUDU checklist was used by Savills then we would expect to see the completed checklist with the documentation.

9.34.11 NHS England (dated 14/8/15)

These comments replace our previous response (by email) dated 6 February 2015.

The Wimbledon Stadium planning application proposes a new football stadium, retail and leisure uses and 602 residential units. The applicant's Environmental Statement calculates that the development would generate 1,491 additional residents by 2017 using an average household size from GLA population projections.

The GLA's Population Yield Calculator (September 2014) uses 2011 Census data for sample output areas comprising completed residential developments. This is considered a more appropriate method to calculate the likely population yield. Using the proposed housing mix breakdown referred to in paragraph 2.23 of the revised Health Impact Assessment, the calculator estimates a population yield of 1,180 residents. It is assumed that the scheme will provide 10% affordable housing (60 units), subject to the conclusion of viability discussions with the Council, as stated in paragraph 2.24 of the revised HIA.

There are 10 GP practices within 1 mile of the development sites within Merton and Wandsworth. It is considered that four GP practices within two thirds of a mile will be particularly affected by the development proposals. These practices are relatively small and overcrowded, typically operating in residential areas with little or no opportunity to expand their premises. Two of the premises are branch surgeries with restricted opening hours. All the practices have above average WTE GP to patient ratios (Merton CCG - 1709 patients per FTE GP and Wandsworth CCG - 1480 patients per FTE GP). For practices where a GIA floorspace figure is available, they are considered 'under target' according to DH guidance (Health Building Note 11-01).

Therefore, existing GP practices are unable to accommodate the additional demand generated by the proposals. To accommodate the additional demand and to enable existing GP practices to relocate to modern premises, NHS organisations wish to deliver a new health facility in this location.

NHS organisations have been involved in discussions regarding the provision of a health facility either as part of the Wimbledon Stadium scheme or on the neighbouring Volante site, on Summerstown. It is considered that a health facility cannot be accommodated effectively within the proposed layout and design of the Stadium proposals and its inclusion would raise viability concerns for the scheme as a whole.

NHS organisations have had positive discussions regarding the inclusion of a health facility as part of the proposals on the adjoining Volante site and it is envisaged that a health facility of a sufficient size and specification will be included as part of the planning application.

To mitigate the healthcare impact of the Wimbledon Stadium scheme, NHS organisations seek an off-site financial contribution in lieu of on-site provision which would be used to contribute towards the capital costs of the new facility. This approach is endorsed in the draft Planning Obligations SPD (October 2014) which refers to s106 planning obligations being sought for site-specific infrastructure, including health projects not on the Strategic Infrastructure List and not intended to be funded by CIL (paragraph 70), subject to the statutory tests set out in CIL Regulation 122.

Using NHS England's space and cost calculators based on Department of Health guidance (Health Building Note 11-01), a projected demand of 1,180 patients would generate a space requirement of 101m² which would translate into an in lieu financial contribution of £402,500, which reflects the capital cost of construction and fit-out of the space.

9.34.12 Sport England (dated 18.12.14)

The site is not considered to form part of, or constitute a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184), therefore Sport England has considered this a non-statutory consultation.

The proposed development involves the 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, 1,271 sqm retail unit, 1,730 sqm 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.

Erection of a 20,000 seat football stadium (initially 11,000 seat) with hospitality and coach parking, pedestrian street, 1,273 sqm retail unit and 1,730 sqm squash and fitness club

Sport England has assessed this aspect of the application in the light of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives'. A copy of which can be found at:

http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf

The statement details Sport England's three objectives in its involvement in planning matters;

1) To prevent the loss of sports facilities and land along with access to natural resources used for sport.

2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable.

3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

It is considered that this aspect of the proposed development is consistent with policy objective 3.

Although an existing squash facility is to be lost on the development site, a new squash and fitness facility is proposed, including the following facilities:

- 6 squash courts
- Including 1 show court with raked seats
- Gymnasium
- Physiotherapy and Hydrotherapy suite
- Dance studio
- Bar and café
- Admin office and reception
- Changing rooms and showers

As part of the consultation on this planning application, Sport England consulted The FA and they stated:

1. 'The FA and London FA are fully supportive of the stadium development plans at Plough Lane, AFC Wimbledon as it will increase capacity and drive up attendances at matches, enhance the fans match day experience whilst improving the financial stability of the club all of which are consistent with the goals of the FA Strategic Plan 2011 – 2015.
2. AFC Wimbledon are a Football League Club (League Two) affiliated to the London FA. They are a supporter own club playing out of Kingsmeadow Stadium in Kingston and currently shares its ground with Kingstonian FC a step 3 national league pyramid club (Isthmian League Prem).
3. London FA have a positive working relationship with AFC Wimbledon Foundation including a number community programmes that help to deliver against the FA National Game Strategy. A report on the work of the community team for 2013 is attached below. It is recognised that the stability and success achieved at the senior level directly supports the wider benefits of the game as demonstrated by the AFC Wimbledon Foundation.
4. The application references compliant with stadium design – A guide to Safety at Sports Grounds (known as the Green Guide) and the need to secure the Sports Ground Safety Authority Licence.'

This being the case, Sport England **offers its support** to this aspect of the proposed development.

602 residential units with basement parking, refuse storage, 297 car parking spaces, cycle parking and associated landscaping/open space and servicing

Although a squash and fitness facility is proposed, no further sports facilities are currently proposed as part of the proposed development.

Sport England has assessed this aspect of the proposed development against its adopted planning policy objectives. The focus of these objectives is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to meet the needs of local communities. The occupiers of any new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should be required to contribute towards meeting the demand they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facility Strategy, Playing Pitch Strategy or other relevant needs assessment.

This requirement is supported by the Governments National Planning Policy Framework, which states:

“Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. (Principle 12 is) that planning should:

Take account of and support local strategies to improve health, social, and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” [Paragraph 17]

“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments...*
- *Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.” [Paragraph 70]*

The population of the proposed development is 1,505 (based on the national average occupancy rate of 2.5 people per dwelling). This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. In accordance with Circular 05/05, Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

You may be aware that Sport England’s Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC indicates that a population of 1,505 will generate a demand for 0.08 swimming pools (£283,497), 0.11 sports halls (£343,733), 0.01 indoor bowls centres (£25,269) and 0.05 artificial turf pitches (£51,632 3G or £45,506 Sand).

Furthermore, the requirement for natural turf playing pitch provision arising from the proposed population should be considered.

Securing planning obligations towards the provision of indoor and outdoor sports facilities would be supported by Merton's LDF Core Planning Strategy (2011) policies CS11 (Infrastructure) and CS13 (Open space, nature conservation, leisure and culture).

In light of the above, Sport England wishes to **object** to this aspect of the proposed development.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

If you would like any further information or advice please contact the undersigned at the address below.

9.34.12 Sport England (dated 24/04/15)

Further to Sport England's consultation response dated 18th December, a number of issues have been raised by England Squash and Christopher's Squash and Fitness Club which are currently outstanding. As discussed within the meeting between Sport England, Christopher's Squash and Fitness Club, Merton Council and the applicant dated 16th April 2015, the following issues remain outstanding and therefore need to be addressed:

- Provision of a new squash facility: It has been confirmed that it is only currently proposed to provide the squash facility to shell and core by the developer. However, this facility needs to be fully provided in order for it to constitute an adequate replacement for the existing facility on the site. Applicant to understand the difference in cost and the Council and applicant to discuss if the viability of the scheme can pay for this. The delivery of the squash facility would need to be secured via a Section 106 Agreement
- Temporary accommodation for the users of the existing squash and fitness club during development
- Use of the proposed squash facility: Confirmation of if use by Christopher's Squash and Fitness Club of the proposed squash facility will be secured and if this use will be formally secured through a community use agreement
- Car parking provision: If adequate replacement car parking will be provided for use by squash facility users

Sport England would assess the potential loss of the existing squash facility aspect of the application in the light of Sport England's Land Use Planning

Policy Statement 'Planning for Sport Aims and Objectives'. A copy of which can be found at:

http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf

The statement details Sport England's three objectives in its involvement in planning matters;

- 1) To prevent the loss of sports facilities and land along with access to natural resources used for sport.
- 2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable.
- 3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

If the above issues are not resolved, Sport England may consider that the squash and fitness club aspect of this proposal is not consistent with the above policy.

Sport England will be happy to review its current position of objecting to this application once further information has been provided by the applicant.

If the Council are minded to determine this application prior to the conclusion of our current discussions with the applicant and the resolution of the issues relating to the adequate provision of the replacement squash facility, please could you let me know and Sport England will provide a further response to clarify our position.

9.34.13 Sport England (dated 18/06/15)

Thank you for forwarding the position of the Council. Perhaps some clarity is needed on the position of the Council, as separate from the position of the local planning authority as the source of the Council's position as set in your email below has not been stated.

Notwithstanding that, paragraph 74 of the NPPF is very clear in its wording. It is also true that paragraph 74 applies equally irrespective of ownership or tenure. Para 74 states:

74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*

- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

The application involves the loss of an existing operational sports facility. As such, and in order to comply with paragraph 74 of the NPPF, the facility must be replaced by one which **equivalent or better provision in terms of quantity and quality.**

As such, unless a replacement squash/fitness facility of equivalent or better provision in terms of quantity and quality is provided, the development does not comply with the National Planning Policy Framework. In that regard, the offer to provide a 'shell and core' only is not considered sufficient to meet the requirements of Para 74 of the NPPF.

Sport England has sought to obtain costings for the internal fit out of a replacement facility. The total area of the replacement facility appears to be in the order of 1740m² across three floors and it is currently predicted that a cost to fit this out would be in the order of £900k excluding fees and VAT with a construction period in the order of 12 weeks. This would include the squash courts plus show court, fitness gym (not equipment), studio, reception, club room etc. In order to comply with national policy, the development must meet these costs in full.

As you rightly state, the Council has an interest in making facilities publically available and therefore the imposition of a community Use Agreement would achieve this and is very common place in the planning system. As with all Community Use Agreements/ Schemes, they are tailored to the circumstances, which would be no different in this case and there is no stipulation that facilities should be made available free of charge.

Sport England is supportive of a new Wimbledon Stadium and raises no objection to this aspect of the scheme. Sport England is therefore concerned the Council appears unwilling to deliver an adequate replacement facility, and thus potentially placing the wider scheme at risk of not complying with national planning policy. Sport England's position is entirely consistent with upholding national planning policy and the local planning authority must have regard to paragraph 74 in its determination of this application.

If the position of the Council as set out below is its final position, then Sport England would invite the local planning authority to now determine the application as it sees fit. Albeit, and for clarity, please note that Sport England's position remains one of formal objection due to the loss of the existing squash facility without adequate replacement contrary to paragraph 74 of the NPPF.

Sport England would be grateful if you would advise us of the outcome of the application by sending a copy of the decision notice.

9.34.14 Sport England (dated 29.09.15)

Sport England has no further comment to make in relation to the above development and comments contained within our consultation responses dated 18th December 2014, 24th April 2015 and 18th June 2015 still apply. However, if Merton Council requires any specific comments in relation to different aspects of the current planning application, please do not hesitate to contact me.

9.35 Responses from Non-Statutory bodies (1st Consultation):

9.35.1 National Grid (dated 12/1/15)

National Grid Electricity Transmission Plc (NGET) does not have an objection to the above application however we do have a couple of concerns with the application that we would like to raise.

Firstly NGET's Wimbledon substation is located in close proximity to the West of the proposed football stadium / residential development. National Grid assets such as substations can produce audible noise, which needs to be taken into account for any development close to our sites.

Substation noise is in the main produced by transformers, shunt reactors and quadrature boosters. These assets are usually in constant service and have fairly constant sound power. The noise that they produce is highly tonal, with a large component at 100Hz, although higher frequency harmonic components such as 200Hz and 400Hz are also usually present.

The impact of transformer noise is likely to be most noticeable in the night time hours when other noise sources are reduced and typical ambient noise levels are at their lowest. This is also when people are trying to sleep.

Substations also contain switchgear, which generally operates infrequently, and is usually heard as a dull thud or bang. At some sites, switchgear may operate more regularly (several times a day).

Existing substation noise levels are also dependant on plant items currently installed. There may be future installations of equipment which could increase noise levels, and these future plans should be included in any assessments undertaken. National Grid can provide more information on site specific equipment, typical sound power and likely operating regimes.

National Grid's (Wimbledon) substation contains electricity transmission equipment which operates continuously, i.e. 24 hours a day,. In addition some equipment is only required for operation at night. Noise from this equipment can be highly tonal and special attention should be given in the design of any proposed development to the sound attenuation of low frequency tonal noise. Residential rooms should face away from the substation and the design criteria for bedrooms and residential rooms should consider the audibility of low frequency tones, principally 100Hz, 200Hz and harmonics. Consideration should also be given to window openings, balconies the location and usage of amenity areas and gardens. It should be noted that the retrospective

mitigation of existing substation equipment to reduce noise at source is often impossible or difficult to achieve and is often of limited effectiveness.

Secondly, National Grid is concerned with the increase in traffic that will be produced on match days and in particular the increase in parking around our substation site. Due to the substation being a critical part of the national transmission system National Grid will require access to the site at all times and therefore parking around the site would not be acceptable if it were to block access to the substation.

9.35.2 Network Rail (dated 23/1/15)

A number of stations are located in the surrounding area of the proposed development site. After reviewing the information provided and discussing the proposal with relevant colleagues within Network Rail I can confirm that Network Rail has no objection to the proposed development.

I would be very grateful if Network Rail could be again consulted if there are any amendments to the proposed application which would result in a significant increase in usage of railway stations as a result of the proposed development. Network Rail may need to reassess the impact of the proposed development on the usage of stations and improvements may be required.

9.35.3 Govia Thameslink (dated 2/3/15)

Currently, Haydons Road is staffed Monday to Friday from 0700 to 1000, so staff presence is extremely limited during the week and non-existent on weekends. The train frequency is 2 trains per hour in each direction:

- Wimbledon then all stations to Sutton and then back to London-Luton
- London then all stations to St Albans or Luton.

There is no plan to change the staffing level or the train frequency. That means that during football game, a special crowd management team would have to be brought to Haydons Road station to ensure we operate safely. This can be organised but needless to say that this will require a lot of preparation as this kind of events are never easy to manage. We will also need to ensure we run 8 car trains during games (we operate a number of 4 car trains on weekends) and increase our cleaning regime. All these changes will obviously have an impact on our operating costs.

Some funding will be expected to be made available to pay for the extra resources required to operate the station safely.

9.35.4 Southwest Trains (dated 9/3/15)

There are 16 trains leaving London and 16 trains travelling into London for Wimbledon and Earlsfield.

The breakdown of trains leaving from the London direction is as follows:

- Waterloo To Dorking via Epsom x2
- Waterloo via Richmond and Kingston(Rounder) x2
- Waterloo to Hampton Court x2
- Waterloo to Guilford via Cobham x2
- Waterloo to Shepperton x2
- Waterloo to Guilford via Epsom x2
- Waterloo to Chessington x2
- Waterloo to Woking x2

As an average a train with 8 carriages can hold up 800 passengers. Some of the above trains may be 4 carriages at weekends

Earlsfield is a busy commuter station Monday -Friday and is not as busy on the weekends.

Wimbledon is a busy station every day of the week and has the underground and tram links

British Transport Police and have no objections

From a Safety and crowd management perspective there are no objections

9.35.6 Metropolitan Police – Designing out Crime Officer (dated 7/1/15)

I met with Claire Haywood and Alina Bontos from Sheppard Robson, the residential unit architects, Derek Wilson of Wilson Owens Owens the architect for the stadium, Hugh Orchard-Lisle planning consultant from Savills, and Andrew Williams of Vault Advisory on 23rd October 2014. There we addressed the concerns raised in the previous report and discussed Secured by Design incorporation into the development.

I have passed this planning referral to my colleagues in Counter Terrorism Safety Advising and Events Planning departments who may respond separately. Having given due consideration to the security and safety features, I have a few comments regarding the application. This is further to my letter dated 11th march2014 for the pre-planning application 13/P3662/NEW consultation.

The statistics below were obtained from www.Met.Police.uk crime mapping. The crime trends in the location of the site for November 2014 are detailed in table 1below. The figures are the number of crimes (count) and the crime rate which is the number of crimes per 1,000 head of population which gives an easy comparison between areas that have very different population numbers.

Table 1 showing crime figure trends for November 2014

AREA	COUNT	RATE
MPS	60911	7.46

Merton Borough	1122	5.62
Wimbledon Park Ward	39	3.48
Sub ward (3475)	12	4.78

Merton borough and Wimbledon Park ward are considered average crime rate areas, and have lower crime rates compared to the MPS.

The development contains both residential and commercial, each element should meet the appropriate SBD requirements, which can be found in the design guides on the SBD web site (www.SecuredbyDesign.com)

I have every confidence that if the developers seek to achieve full SBD accreditation for this project that by working together we can ensure compliance.

Public Realm

The elevation drawings of the residential units show area containing undercrofts; these have the potential to provide shelter for groups of youths who can potentially be the cause of antisocial behaviour or for homeless/rough sleepers to inhabit. The design of these areas should eliminate the chance of this occurring, and there should be a clear management policy to combat this including the use of CCTV cameras.

These comments and recommendations are made in consideration of The National Planning Policy Framework (NPPF); The National Planning Practice guidance (NPPG); Safer Places especially the seven attributes of sustainable communities and Secured by Design guides.

9.35.7 Merton Clinical Commissioning Group (dated 18/215)

We would expect that the stadium provides an innovative way of ensuring the local population can be more active and that it is used as a focal point to ensure the public are given active healthy living messages.

We would also expect that a health impact assessment is completed to ensure there will be not a detrimental effect to our population.

9.35.8 St Georges Hospital, Tooting (dated 3/6/15)

We are a very large local public sector employer and would have expected to be consulted re key worker accommodation. I assume that because we happen to be in Wandsworth, a few hundred metres outside Merton, this didn't happen.

Page 50 of the applicant's Planning Statement statement explicitly refers to St George's Hospital, again I'm not aware of any discussions about this. We have squash court / hydrotherapy / sports injury facilities on site and are currently considering how to redevelop them; a conversation would be of interest.

As you state, the location / number of GP premises is an NHS England responsibility; however we provide a range of community based healthcare facilities as well and may be interested in space in the new development, presumably this would be helpful in terms of the health needs issues.

9.35.9 Design Review Panel (DRP), *Pre-Application* (28/05/14)

The stadium seems hidden and understated. It lacks drama when the nature of football is that it is very much an 'event'. This low-key approach also extends to the architecture – the stadium is hidden behind the housing. It was suggested that there could be a far more substantial pedestrian space on the Plough Lane frontage for spectators to meet, before and after the game, which would also allow the stadium itself to be fully in public view.

The architecture seemed of good quality – just not bold enough – the media/camera image of the stadium is also important and needs to be considered. It was felt that the hospitality part of the stadium could work better – one shouldn't ignore this 'sub-station' elevation. The massing is uniform, but could be used better to frame the main entrance – the same is true for the housing.

The north-south road doesn't seem to lead anywhere. Although it is quite well defined is narrow as well as long. There are also potential issues here with separation between the housing and spectators. There was some concern about where the spectators are supposed to go – how do they move to-from the street to the stadium and will it be clear to them what routes to use and is there enough space for them to disperse without causing undue disturbance?

The massing of the housing is the same across the site – it should be more responsive to the different surroundings. It also fails to successfully address Plough Lane with a clear and strong frontage – there is no sense of integrity as a street. There is scope to reassess the way housing is distributed across the site. It is unclear how the housing connects in with the wider area and creates a quality public realm – issues that are also apparent at Wembley.

There is a lot of single aspect housing – some with very poor outlooks. A redistribution of the housing could help address this issue. Single aspect flats should be avoided wherever possible. High quality housing needs to be used to improve and repair the harsh and unpleasant character of the area. Overall the Panel felt that it was a reasonable start but certain key areas needed rethinking or much further development.

(Officer comment: Please see section 13 for details of amendments to the scheme in response to DRP comments)

VERDICT: **AMBER**

9.35.10 All England Lawn Tennis Club (AELTC) (dated 11/1/15)

The AELTC supports the application by AFC Wimbledon to return to Plough Lane.

9.35.11 Love Wimbledon Business Improvement District (dated 2/215)

Express support for the application. Wimbledon's businesses will benefit from the additional footfall as passengers will use the main train station as a meeting point and one of the main transport hubs.

Bringing AFC Wimbledon back to the borough will undoubtedly bring additional strength to the Wimbledon brand and also present a further marketing opportunity for the town to have our own local football team playing locally once more. At a time when high streets generally are suffering from declining footfall this will help to promote Wimbledon as a vibrant town centre.

9.35.12 Wimbledon Society (dated 11/1/15)

FLOODING ISSUES

The site is shown as being primarily in high risk flood zone 3B, with the remainder being in zone 3A.

The London Plan says that "development (has to) remain safe and operational in flood conditions" (policy 5.12Ca); and that "we have to expect increased flood risk on all of London's tributary rivers" (5.56).

From the NPPF Planning Practice Guidance Flood Zone and Flood Risk Tables we see that: Zone 3A land has a "high probability of river flooding": Zone 3B is classed as "the functional floodplain", and "comprises land where water has to be stored in times of flood". It also says that these flood zones "do not take account of the possible impacts of climate change, and consequent changes in future probability of flooding" (table 1). And in Table 2 we see that "Dwellings" are classed as a "More Vulnerable" landuse. And in Table 3 we see **that Dwellings are not "compatible" with flood zone 3B, and its "development should not be permitted"**.

The Local Plan says that (para 8.9) "it will be necessary to develop sites within medium to high flood risk zones, subject to meeting the requirements of the NPPF's sequential and exceptions test".

As the majority of this site is flood plain (3B), where flood water has to be stored: and that the NPPF Guidance says that housing is not compatible with the 3B flood zoning: and that the Local Plan criteria therefore cannot meet (or over-ride) the NPPF guidance, the provision of any housing on this development site would be clearly against policy, **and should not be accepted.**

Marooning people in the high flats until flood water subsides, with a malfunctioning sewerage disposal system that has presumably been surcharged, and with their low level car parking full of floodwater, is a most

unattractive proposition and emphasises the point above that the provision of housing on this site should not be accepted.

Wimbledon Society - transport comments

The PTAL public transport rating of this area is very low at Level 2. Policy DMT1c says that "development will be expected to enhance walking routes". Policy DMT2 say that "development ... (should) ... not adversely impact on the road or public transport networks, ... or (cause) congestion".

The pedestrian "crush" space available at the entrance to the Stadium for the large spectator crowd is completely inadequate. Looking at the layout drawings and the submitted pictorial views from Plough Lane, perhaps a couple of hundred people could be accommodated in the small paved area at the approach to the Stadium. For a shopping arcade, perhaps, such a space could be adequate.

But for the 20,000 sometimes volatile spectators leaving the event, such a small space would be swamped and unable to cope.

The result would be that they would spill out into Plough Lane, which has only one lane in each direction, cause disruption, perhaps accidents, again contrary to Policy.

The pavements leading to the four local rail stations are not currently adequate for large scale crowds. The policy (DMT1c) requirement for the enhancement of walking routes is therefore not met.

Three of the local stations have very limited capacity, and Wimbledon station when dealing with comparable crowds during the Tennis fortnight has in place some major additional transport support facilities. There do not appear to be any such intentions as part of the proposed Stadium application, so policy DMT2 is not met.

Locating a 20,000 capacity crowd in an area so poorly accessible to public transport is therefore not in accord with Policy. And the walking routes to the four possible rail stations remain quite inadequate for the expected numbers.

Wimbledon Society – Parking comments

Policy DMT3 says that "the level of residential and non-residential parking and servicing(in new developments should) ... minimize its impact on local amenity and road network".

But vehicle parking for the spectators is not adequately provided for on site, and the implication is that the roads in the wider area would be surcharged with this additional parking, to the detriment of both local residents and local businesses. This will be the case in both Merton and Wandsworth Boroughs.

Additionally, the amount of car parking provided for residents is less than half of the expected need. It also does not conform to the London Plan Policy

DMT3A which says that “development should provide the level of car parking required to serve the site taking into account its accessibility by public transport (PTAL) and local circumstances”.

On this site, the PTAL level is very low, with poor public transport. The local circumstances are such that residents would not easily be able to find enough kerbside parking locally. Policy DMT3Bii says that “Permit free development will be expected to benefit from good access to public transport, generally PTAL 4 and above”. Thus permit-free criteria cannot be met, the area being only PTAL 2 rated.

So again, parking provision is poor and contrary to Policy.

Wimbledon Society – Design comments

The scale and height of the proposed blocks, ranging from 6 to 10 storeys is far too massive and high for this locality, and would appear as over-bearing and over-development.

The London Plan says that “taking into account local context and character..... development should ...(be)...within the density range shown in Table 3.2 (and) development proposals which compromise this policy should be resisted” (Policy 3.4).

Also, “where (public transport) connectivity and capacity are limited, density should be at the lower end of the range” (para 3.39).

The Table shows that the sustainable residential quality density for an urban area with a 2 – 3 rated 3 PTAL area would expect to be between 200 and 450 habitable rooms per hectare, with the 2 rated zone at the lower end of that range. The proposed housing blocks appear to be significantly above this figure, so do not conform to Density Policy.

There are also too many smaller households, contrary to the policy that these “should be focused on areas with good public transport accessibility (as measured by PTAL’s” (3.29).

Setting aside the point that housing is not in any case appropriate on this site, a number of design and layout issues must be raised.

Whether housing could ever be acceptable in such close proximity to the noise and crowd behaviour issues of a large Stadium seem highly problematic. There is the apparent sharing of the North-South access route between quiet residents and noisy spectators, contrary to Policy DMD1E which seeks “a clear distinction between public and private space”.

There is the limited outlook from flats (some single aspect) to the 5+ storey high rear wall of the Stadium directly in front of them (and being only 15m away from it) contrary to DMD2Av. The access to some flats being via storey-height staircases approached from the Stadium’s north-south road, which prevents their occupation by the semi-ambulant.

There are some unlit internal access corridors: Outlook from the northern-facing flats is unappealing, being of industrial and waste transfer operations: Play facilities for the residents is minimal (Policy DMD2A4): the requirement for additional facilities e.g. schools is not dealt with. With basement development throughout, the roof top “landscaping” and planting would presumably be embryonic (Policy DMD2Ax): Social housing numbers and locations appear to be undecided.

Wimbledon Society - Summary

The NPPF says that “ Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise” (Paragraph 2 et al).

This is an application which fails to meet established Development Plan policies in a number of important respects, and therefore is fundamentally flawed.

It fails to provide adequately for the transport requirements of such a Stadium, and would cause both congestion and parking stress in the local road system.

A very large amount of housing is proposed, yet housing use is precluded on this type of vulnerable flood plain site. Moreover, importantly, housing is also precluded from this type of site by the NPPF.

The massing and scale is highly unsatisfactory, and the detailed design does not sufficiently resolve the inevitable tensions between the different uses and activities on the site. The Society has argued in the past that this is a site that should continue to provide a significant amount of Leisure activity, but this scheme is not as it stands the way forward.

9.35.13 Wimbledon Park Residents Association – (Object) (dated 25/1/15)

The objections on flooding and transport have been prepared with the advice of one the UK's leading planning consultants, RPS. Wimbledon Park Ward in Merton is the ward most affected by this development and as a result we request a meeting with the planners of Merton to discuss our objection and come to a common understanding of how National Planning Guidance applies to this application. The objection consists of five documents whose titles we list below together with some of their main points. However, to properly understand our objection, the accompanying documents to this letter, which contain many important technical details, should be read.

1. Flood Risk The development does not satisfy National Planning Guidelines on flooding as:

{1.1} The National Planning Guidelines were revised in March 2014 and they make it very clear that residential housing is not permitted in a 3b flood plain regardless of whether it is developed or undeveloped land. This change

supersedes an important part of the DM F1 policy in Merton's Sites and Policies document. {

1.2} The developers have not put forward a permitted flood storage plan as basements are not permitted in a 3b flood plain.

{1.3} Even if we assume that the site is a 3a flood zone, which it is not, the developers have not shown that their plans pass the sequential test as they have not applied this test to the residential housing which the most vulnerable element. They also have proposed no reason of substance why the development should pass the exception test.

{1.4} The flooding calculations of the developers are confusing and not given in sufficient detail. As a result they have failed to convincingly demonstrate that their flood storage mechanism increases the flood storage capacity on the site. They have made no attempt to show that flooding will not increase off the site.

{1.5} The plans do not appear to have the agreement, or the support, of the Environment Agency 2. Transport We list below some of the inadequacies of the developer's Transport Assessment and as a result we consider that the traffic and pedestrian impact has been grossly understated and that its conclusions are inaccurate.

{2.1} Contrary to TFL's Guidance, the Transport Assessment relies on traffic survey data collected from the 12 July to the 18 July 2012. This was the period just prior to the 2012 London Olympics when some school holidays had begun. Therefore the data cannot be considered representative of normal traffic conditions and consequently the transport modelling is invalid.

{2.2} The Transport Assessment and Environmental Statement assumes that all supporters arriving and departing by public transport will travel directly to and from the stadium rather than visit local bars and restaurants during peak shopping/leisure times. As a result, the Applicants have not correctly assessed the potential impact of 20,000 additional football supporters on Wimbledon, Earlsfield and Tooting centres or local residential streets.

{2.3} The Planning Application does not provide any car parking for football supporters within the development. Instead, it relies on 5,544 spaces which they claim to have identified on residential streets within walking distance of the stadium. The existence of so many free parking spaces does not agree with the common experience of many local residents. We believe that the effect of supporters travelling around in search of these spaces will lead to considerable inconvenience for local residents and businesses and will breach Merton's policy DMC1.

{2.4} The Applicants have not undertaken any survey, or provided any existing data, to identify the current normal passenger numbers on local public transport infrastructure or pavements serving the proposed development. Without this data, the Applicants have not identified the full impact of the

proposed development and whether the infrastructure needs to be upgraded to cope with this additional demand placed on it by 20,000 supporters and 1,491 new residents.

{2.5} The Environment Statement and Transport Assessment have ignored the impact of implementing their proposed 30 minute road closures. They also do not appear to have undertaken their Traffic Modelling using appropriate software that takes account of factors such as queuing across multiple junctions and pedestrian flows. Instead, their modelling assesses individual junctions on a standalone basis which is unrealistic and ignores TFL's advice obtained at the scoping stage. 3

Wimbledon Park - Heritage

{3.1} The Wimbledon Greyhound Stadium has had a long history of racing in Wimbledon, which along with lawn tennis, is a key element of Wimbledon's renowned sporting heritage at local, regional, national and international levels.

{3.2} In terms of cultural heritage, the end of Greyhound racing in Wimbledon and in Greater London would be a considerable loss, both to Wimbledon and the capital.

{3.3} Wimbledon FC played on a separate site west of the current greyhound stadium, where a housing development now stands. The new club, AFC Wimbledon, has never played in Merton.

{3.4} Only a minority of AFC Wimbledon supporters live in the Merton with the substantial majority of supporters travelling into the proposed Plough Lane Stadium by train or car from outside. The homes of the supporters would appear to be equally well clustered around AFC Wimbledon's current home at Kingsmeadow.

Wimbledon Park - Community

{4.1} While AFC Wimbledon do carry out some activities that benefit the community there is no reason to suppose that these would cease if they remained at their current home.

{4.2} Although the Applicants agree that their development would lead to additional demand for GPs and school places, they do not wish to make provision for either.

{4.3} As detailed above, the developers proposal to make extensive use of local residential streets for parking will cause considerable inconvenience to local residents and businesses.

{4.4} The community benefits of the development were assessed in the application and were found to be only of minor benefit, except for the provision of residential housing, which is forbidden on a 3b flood plain.

5. Consultation

{5.1} The developers have carried out minimal consultation and we are not aware of any aspect of their plans that have changed as a result of our objections.

{5.2} The questions asked by the consultants 'Your Shout' were largely irrelevant to the proposed development. The developers have ignored the results of the only statistically valid survey which was carried out by the Wimbledon Park Residents Association.

The Wimbledon Park Residents Association objection also included 5 documents relating to flooding, transport, heritage, community, and consultation and these can be viewed at Appendix 7.

9.35.14 Wimbledon Park Residents Association (Support) (dated 15/1/15)

We, along with other members of the WPRA, whole heartedly support and endorse the application by AFC Wimbledon as detailed in 14/P4361.

It is right that AFC Wimbledon should return to their borough home. The AFC Wimbledon club have progressed from the ninth tier of the English football to a strong position in League Two. This is no mean feat to have achieved in such a short time.

The time and effort that AFC Wimbledon provide in their support of the young aspiring footballers in the borough, the support they give to the handicapped youth in the borough and the provision of facilities to other activities that they support in the borough is to be applauded. These activities provide help and guidance to many young people both fit and handicapped. It is commendable. Their presence is necessary within the borough.

The stadium facilities that this application plans to provide will not only improve and enhance the existing area, it will give added value to the community. It will provide much needed housing. It can help boost the economy of the borough. The proposed services as to be provided within the said application will offer good facilities to the local community.

The technical questions addressing the flood plain aspect and the transport facilities can be answered after analysis and dealt with in an acceptable manner. I do not see these matters as being in any way obstructive to the AFC Wimbledon application and proposal.

The new development and facilities that AFC Wimbledon will offer to the community is admirable and consistent with the LBM stated requirements for sport provision within the borough.

I wish to state that the view and opposition to the application, as made by certain WPRA committee members are not representative of my view, nor of other members of the WPRA. The representation being prepared by people

under the WPRA **banner** is not supported by myself, my wife or other members of the WPRA.

There are many, many football matches played throughout our nation every week. Do we read reports of vandalism and rampaging football supporters taking to the streets and causing havoc amongst the local commercial businesses and local residents? Do we read in the press that shops and commercial premises have to be 'boarded up'? Do we read in the press that bars and restaurants are besieged and damaged by football supporters? Do we read that areas around football stadiums have become blighted? What roads will have to be closed around Plough Lane?

If there are such things happening, I would wish to be informed. I cannot foresee these so called acts of disturbance ever occurring within the borough on AFC Wimbledon match days, why should, or would they?? They do not occur where AFC Wimbledon are presently playing their home matches!!!

I have visited the area in Kingston upon Thames where AFC Wimbledon currently play their home games. I visited the local shops, food outlets and spoke with their proprietors and the local residents. When I asked if they had any problems from people attending the AFC Wimbledon home games over the last twelve years, the emphatic answer was NO and all added that they would be sorry to see AFC Wimbledon leave. This was obviously the answer proffered by the proprietors of the shops and food outlets because of the business they could lose.

There are WPRA members who support the AFC Wimbledon application. Therefore the representation made by certain WPRA members is not the view of all the members and in no way is fully representative of all WPRA members.

The existing Greyhound Stadium area is in desperate need of redevelopment, as we all know. The AFC Wimbledon proposal is exciting and renders a healthy & promising future both for the club, their supporters and the people of the borough.

I believe there are almost 13,000 signatures on a petition to bring AFC Wimbledon back to the borough.

I fully endorse what AFC Wimbledon are proposing for the development of this site, especially the 600+ new homes.

Objections raised by local residents are based on scaremongering, nebulous and incorrect assumptions and statements being canvassed by certain individuals.

Why?? I find these objections difficult to understand.

Take a look at all the other football clubs within the London area and ask if there are any problems occurring at their home matches. Look in particular at

the redevelopment of the area in Islington that is now home to Arsenal FC and review the later development of their old stadium, which is now a residential housing complex. It provides much needed homes in Islington, did the Islington Council object to this new housing?

Also, the transport facilities available for the new Arsenal FC stadium are not at all adequate. This is expressed time & time again. However, it did not stop the development of a 60,000 seat stadium.

Compared to the AFC Wimbledon initial development for 11,000 seats, pales into insignificance.

19.35.15 Wimbledon East Hillside Residents Association (WHERA) (dated 2/2/15)

Change of use to Residential

- Approval of this application will set a dangerous precedent, inviting other landowners in the area to change from light industrial to residential. Plough Lane and environs must be around 100 acres, and all of it is ripe for regeneration. We estimate if the entire area were to convert to residential, it could mean around 10,000 new homes in the area. Consider the impact of that on Transportation, Schools, NHS and the Environment. At Elephant & Castle or the Olympic Park, for example, one can see how a Master Plan is designed - in full and open consultation with stakeholders; from there a sustainable and exciting building programme is carefully crafted by London's top architects and urban planners.
- Merton Council appears to be approaching Plough Lane as a 'one off', apparently blind that others are already looking into redevelopment of their holdings. In January 2015 **Volante** conducted a consultation, proposing to convert their small warehouse plot into 100 flats. Should the Stadium application proceed today, the Council will be unable to refuse Volante change of use, and others will swiftly follow, without a proper Regeneration Plan for the whole area.
- We are concerned that the applicant's proposal for 602 homes may be increased, should this application be approved. Recalling Atkinson Morley, when 'developers couldn't afford the plans as proposed', planners were compelled to approve even greater density than initially approved. We fear this will happen on this site.
- Galliard is one of London's most prominent house builders. They have built thousands of homes in run down sites such as Plough Lane, and they are probably already exploring additional development possibilities there.

WEHRA Environmental

- The proposed Stadium and housing are proposed for a class 3b Wandle Valley flood plain. The application provides no confidence the applicant understands how much mitigation is required, for structures with very deep,

intrusive foundations. Each and every metre of earth dug out and replaced with concrete means ground water will be moved to adjoining land. What happens in Springtime during increasingly heavy rainfall, and throughout the year when the Wandle regularly floods? Sewers all over Wimbledon could suffer a knock on effect from this development.

- The design has virtually no green space. As proposed, it would attract a dramatic increase in pollution levels, without inclusion of dozens of carbon-reducing trees and shrubs and an innovative transport policy to counter the counter carbon increase.
- The Carbon Footprint of entire proposal has not been properly considered. Pollution levels are already significant; this will raise it to an unacceptable level and set a deadly precedent for this massive area. There will be a tremendous increase in risk of water pollution, with too much proposed to be drawn on Thames Water supply to area, and not enough - nor flood-proof mechanisms to remove waste water (foul and grey), to deal with Wandle River flooding and rainwater run off. The risk of drinking water pollution will increase - not just in to new homes but to all existing homeowners and businesses in the area.
- The proposal doesn't include on-site composting facilities, food waste management systems, on-site recycling shuts (and method for ensuring high compliance), rainwater and other grey water collection (e.g. Shower/bathwater), storage and usage programmes to tend green spaces and reduce total water consumption levels (grey water for toilets/washing machines/external taps, Stadium turf watering system, etc).
- While it appears the applicant seems to be trying to convince the Environment Agency that the Stadium is just about acceptable, he is a long way off from designing innovative, sustainable and FLOOD-FRIENDLY housing for some of London's most vulnerable land.

WEHRA Traffic flow/Transportation Master Plan

- Transport proposals are misleading, appear naïve and do not reflect the true impact on additional traffic, with this application.
- The Government has amended future master transport plans, to include pedestrian and cycle route. Given the known importance of walking/running/cycling for wellbeing of ageing population (NHS funding crunch), where are the widened footpaths, cycle routes, jogging paths for new residents?
- Merton Council really must set this application aside until a professional Transportation Master Plan be developed, including the full regeneration of Plough Lane and an estimation of how Crossrail 2 will fit in.
- Parking exists for local people. The Stadium proposal assumes it will require no additional parking, which is incorrect. The parking amenity current

residents enjoy will be removed forever, causing them a loss of enjoyment of their own homes.

- Any large, new stadium or venue in London must rightly aim for **100% public transportation** for visiting fans. Where is that in the proposal; has Merton learned nothing from the hugely successful 2012 Olympics?
- We're told the Football stadium = used once a week. Rugby = used once a week. What other stadium use will happen on weekdays weekends and evenings? What are traffic/noise/policing needs going to be during these periods and what compensation will local people be offered, to offset this great loss of amenity?

The Distributor roads are too small to accommodate more vehicles, and the road need to be widened or alternatives offered to reduce volume. The roads in our neighbourhood: Leopold, Woodside, Alexandra, Parkwood, Rostrevor, Springfield, Alexandra and Gap Roads all have heavy traffic now, and there is no capacity for additional volume.

Inadequate Infrastructure

- Information in the application confirms the area already has a limited, ageing infrastructure designed for light industry, and with the addition of anything residential, will exceed capacity on every front. Rather than jerry-rigging water, power, gas, roads, footpaths etc. we urge Merton Council to prepare a full REGENERATION PROPOSAL.
- Amenities required for thousands of new residents (no appreciation that schools, surgeries, corner shops, jogging paths, quiet green spaces for well-being of new residents etc).

Politics over Propriety

- Local people were told at a Wimbledon Community Forum last year that the Stadium will be built on Plough Lane and it will be for football. Local homeowners and stakeholders have not taken part in an exploration of the many possibilities for the whole of Future Plough Lane; instead we have a *fait accompli* that may or may not be the best choice for this site. In any case we have little confidence in this application, with its' long list of flaws.
- Merton Regeneration and Sustainability Manager appears to be urging Merton Planning Officers to find ways **through** the hurdles; surely the right approach is to seek to have the applicant **CLEAR THE HURDLES** carefully established by the **London Plan, TfL and the Environment Agency**.

In summary, we understand that With Future Comes Change, and we are happy to embrace changes to our area that are thoughtfully developed and well executed. There is always some give and take in the process; sadly with this application, there is all TAKE and little GIVE. As Wimbledon residents, we want the highest-possible SUSTAINABLE specification, a future-proof transportation master plan, and due consideration for the flood

plains this Stadium would be sited within. We want a professional, future-focussed Regeneration Plan for the Plough Lane Industrial Area. It has been said many times that Wimbledon is the Beating Heart of Merton. If we kill off Wimbledon Town/Station with this initial 'football-mad' proposal, we kill off the heart of the Borough. We all deserve better, not just for Future Wimbledon, but for Future London.

The proposal as submitted is NOT SUSTAINABLE. We urge the applicant to withdraw his application and re-group.

9.35.16 South Park Estates Residents Association (dated 17/1/15)

It should be noted that SPERA some years ago objected to a similar but less intensive application when Wimbledon FC and developer partners were turned down for planning permission at this site. Although the possibility of this application was raised at our AGM in October 2014 our committee and members had insufficient detail to fully consult our members. The time allowed for the statutory consultation process has been hampered by Christmas and New Year being within this time frame and so we are pleased that on your website you have now extended this until 2 February. That should allow more of them to write in following a public meeting staged on 15 January by Wimbledon Park Residents Association (WPRA).

Although we are aware that some of our members (mainly those who are keen AFC Wimbledon supporters) support this application and will no doubt be writing in on their own account, there is considerable concern expressed by many of our members about this application and the implications for the area in which our residents' association is located. We are adjacent to Haydons Road which meets Plough Lane at the junction with Gap Road. Haydons Road Station is one that is used regularly by our members and so we are all very aware of the limitations on public transport in this area.

Those that have lived in our area for long enough remember when Wimbledon FC played matches at their former ground (now converted into numerous flats) and there were problems mainly relating to supporters of visiting teams. Match day congestion on roads including Haydons Road, parking problems in our residential streets and minor vandalism and damage to residents' vehicles. This was bad enough in our area but clearly will be far worse in residential areas located even closer to the Greyhound Stadium. Our streets are all part of a CPZ but as this zone only operates between 8.30 and 18.30 hours on Mondays to Saturdays we will be vulnerable to home and away supporters using our streets as a free car park when matches fall outside these times. Looking at the planning application there is inadequate provision of coach drop and pick up facilities and only a token allocation of car parking spaces with the property developer preferring profit by adding in more flats.

Certainly we would expect to see more information about how AFC Wimbledon and the developer hope to overcome such difficulties by the provision of improved transport links. This can only be achieved with the

cooperation of Transport for London (TFL) by use of buses to Tooting Broadway on the Northern Line or to other overground stations on match days. Additional trains may be required as at Haydons Road as there are only two trains per hour in each direction. The letter dated 14 January from TFL confirms that the planning applicants and Merton Council are at an early stage with any negotiations with TFL. Indeed TFL have pointed out that they would need to charge £3.75 million to increase the frequency of buses in Garratt Lane especially northbound for a three year period. They point out that no assessment has been carried out on background rail or underground services and they have suggested that the overground rail operators of local stations are contacted directly.

Arsenal when they moved into the Emirates Stadium paid considerable sums of money to TFL for improved transport links but from what we read in the press their fans often have to walk considerable distances because of station closures to avoid congestion on match days. It is our view that there are many aspects of this application that have not been fully thought through and at a minimum any decision should be deferred until full information is available to make an informed decision.

The TFL letter also recommends the removal of CPZ parking bays in Haydons Road to improve traffic flow on match days. It is clear that this application will have consequences for our area as residents in Haydons Road that currently use these spaces will look for other places to park within their zone and this will exacerbate existing parking problems for residents. More detail is required.

The second part of our objection is the number of flats that are included in this planning application. Potentially over 600 new homes and nearly 1500 new residents. There are no schools in the immediate area within Merton as the area near the Greyhound Stadium includes a large element of edge of town retail such as car showrooms, flooring warehouses and DIY. Whilst it may be possible for some of the additional children to be accommodated in schools in Wandsworth (such as Smallwood Primary School) it is more likely (given the London wide shortage of primary school places) that further pressure will be put on existing schools in Merton. All of the schools in our area have been expanded with most having doubled in size. Clearly if this and other high density developments take place we will need more school places and to achieve this a new school.

It is the understanding of our committee that developers are expected to make significant contributions to the provision of local schools and again we see no detailed information that covers this aspect. There is an oblique reference to this in the letter from TFL. Will the applicants be required to pay the Community Infrastructure Levy and what contribution will they be asked to make?

Will any contribution be used to provide a new school in the North East of Merton?

We do hope that with such a large and complex application that planners and councillors take more time to look at the detail before coming to any decision.

9.35.17 Queens Road Residents Group (dated 14/1/15)

We wish to object to the proposed football stadium development on the following basis:

1. The size of the stadium and potential 20, 000 capacity is too great for the location and will cause disruption to the surrounding area with so many football fans.
2. The proposed parking of 297 spaces is for residents of the development, we presume, and so fan arriving by car will cause disruption to us all trying to find a parking space. Car parking should be provided on site, not on neighbourhood roads.
3. The site and area is already overcrowded without this development, in terms of traffic movement in Haydons Road and Plough Lane etc.
4. Fans should have dedicated coach/bus service from Wimbledon and Wimbledon Park Station on match days.
5. The stadium should be retained for existing uses.

9.35.18 Raynes Park and West Barnes Residents Association (dated 2/2/15)

Raynes Park and West Barnes Residents Association object to the applications on the following grounds:

1 **High density.** The arguments against such a development are exactly the same as those of our Association to the housing development proposed on the Rainbow Estate, namely too many, too high and out of keeping with the surroundings areas, and without the necessary infrastructure to support it

2 **Impact of the increase in traffic.** In that it falls outside the TfL guidelines. We understand that the traffic survey on which the proposal is based was undertaken during summer school holidays and just prior to the 2012 Olympics and therefore the findings are misleading.

3 **Flood risk.** The flood risk on site, at its highest has not been taken into account, nor has he proposed flood water storage capacity demonstrated that it will work to protect adjacent residential properties.

Everyone with a heart would wish to see AFC Wimbledon (the Wimbledon Dons) return to the borough from Kings Meadow, Kingston. Obviously this has to be funded – but surely there is another way!

9.35.19 Priory Church of England Primary School Governing Body, Queens Road (dated 14/1/15)

All of us involved in education and in the care of children are extremely concerned that the plans make no mention of increased school or nursery places to accommodate the children who might move into the new flats. There is already pressure on school places, which this development can only increase. It is our understanding that any major development involves a community infrastructure levy, and we believe that the Council should consider school provision as a condition of granting planning consent to this development.

9.35.20 Volante Ltd, 46 – 76 Summerstown, Tooting (dated 28/1/15)

Volante Limited are the owners and occupiers of 46-76 Summerstown which adjoins the Greyhound Stadium site. Volante Limited has been and continues to be very supportive of the return of AFC Wimbledon to Plough Lane. As adjacent neighbours Volante Limited are therefore very supportive of the planning application for the proposed new stadium and associated development. The proposals for the site will provide a significant number of planning benefits and we therefore hope that the application will be processed and approved as quickly as possible. Volante Limited very much welcomes the statement made in the design and access statement which says that the planning application will ensure that 'the current application facilitates the redevelopment of the Volante Land'.

We can confirm that Volante Limited are bringing forward their own proposals for the development of their site to facilitate the relocation of the business to a larger premises locally and we expect an application will be submitted in the coming weeks. These proposals have been formulated to work with those put forward for the stadium site and associated development. However, in order for the proposals to dovetail together and work in planning terms we would like to comment on a specific aspect of the stadium proposals.

We note and welcome that the scheme has, in the main, been designed to sensitively respond to the Volante Limited site and not to prejudice its development potential. However bedrooms are proposed in the north facing elevation on Volante Limited's southern boundary overlooking the site as per the attached plan. We do not object to the principle of glazing within this elevation but this should not prejudice the development proposals for the Volante Limited site in respect of either daylight and sunlight or overlooking. In respect of overlooking, this could be resolved by providing obscured glazing. We would therefore request that this is noted within the assessment of the application and a condition added that these windows on this elevation will have obscure glazing.

9.35.21 Christophers Squash Club – (dated 8/2/15)

As the president, I am writing on behalf of Christophers Squash and Fitness Club that has been located on the stadium site since 1972. We not only provide squash and fitness facilities and have one of the strongest squash clubs in the county – as measured by the number of teams and the leagues in

which they play – we also provide a range of other sport and fitness activities that provides access and participation by a wide variety of local people – with 99% of our users living or working in the boroughs of Merton and Wandsworth.

We have upwards of 70,000 person visits a year enabling people of all ages; of mixed abilities/disabilities and of all ethnicities who live in the area to exercise and engage in sports and fitness activity. At a time when the health of the nation is a key national and local policy concern – with reducing numbers of people remaining active into adulthood – we think the facilities we offer to the local community should form part of the plans for the site and we thank the council for recognising the contribution we make by including the provision of a squash and fitness centre in the future development.

We support the Council’s preferred use for the Wimbledon Stadium to be for a continuation of Planning Use Class D2 and the intensification of sporting activity. This, inter alia, includes an “...area for indoor or outdoor sports and recreations” and we believe that the continuation of Christophers Squash and Fitness Club on the Wimbledon Stadium site is an essential pre-condition for the development of the site as we are the only option that actually intensifies the **active** participation of people in sport – given that watching football is a rather passive activity for the vast majority of users who will be spectators!

We recognise that the physical structure of the existing club could not remain with the development of the site – this would both restrict potential future use and the physical structure of the building has no redeeming features by which it should be protected and hence we support the new development and the modernisation it will bring.

However, Christophers Squash and Fitness Club is far more than a squash club and is used by local people for activities such as dance classes (25 ballet, tap and street dance classes all for children), gymnasium use and martial arts. But the facilities are also used for weddings celebrations and funeral wakes as well as the provision of daily classes for elderly people – making it a community asset for many local residents. In addition we also have a fully qualified physiotherapist/nurse providing sports injury clinic and treatment for other, quasi-medical purposes.

We also actively encourage subsidised use by schools from both Merton and Wandsworth as part of their Physical education lessons. These have included Emmanuel, Elliot, Ernest Bevin, Burntwood and Graveney – all of whom use the squash courts and gym – and further opportunities could be made available given the right level of resources and facility.

Based on recent figures, we estimate the annual use of the facilities to be as follows:

Squash	30,000 users
Gymnasium	15,000
Dance	10,000

Fitness and other classes	10,000
Visits (Guests, social use)	3,000
Physiotherapy	2,500
Keep fit (elderly people)	1,500
Social events	1,000
School use	1,000
Martial Arts	500
Courses (e.g. Stringing)	100

In all, we estimate that the club was used nearly 75,000 times in the past year providing a significant contribution to an active community and it is an integral part of keeping the Merton and Wandsworth population active and fit with the considerable benefits this brings not just to individuals but also the health and social care economy by reducing the demand on service provision.

However, our single concern with the current proposal concerns parking. As a sports and fitness club we actively discourage the use of motorised vehicles and we are supportive of both local and central government policy objectives to substantially reduce the use of the car. After all, our goal is to make people fit and healthy! But the practical realities are that we would not be able to operate a viable business without the allocation of a limited number of parking spaces. Whilst we have not worked on a mathematical model, we believe that an allocation of about 20 would be the minimum to meet our requirements

Our dance classes are attended mainly by girls (over 90%) and the vast majority are of primary and junior school age with a very large number brought by their parents from across both Merton and Wandsworth in motor cars for safety as well as convenience. We also have teams arriving for squash matches from all over Surrey on 4 nights of every week of the year, given we are one of the best clubs in the area and in the country. Teams just could and would not come to the club – with all their kit – if there was nowhere to park.

We do not think we would be able to develop a successful business to provide facilities for local people without access to some parking whilst recognising we will do all we can to keep the use of cars to a minimum. Consequentially, we would like this concern to be considered by the council when the planning application reaches the Planning Committee.

9.35.22 Garratt Business Park BID Ltd – (dated 15/1/15)

I am writing on behalf of Garratt Business Park which is an area of industrial units including artists and film studios. We are a business improvement district and are adjacent to the development in Riverside Road and I believe the nearest buildings to the development.

Sadly we are in the borough of Wandsworth and many of the units have not been notified of this application despite an assurance that letters were delivered. The timing of the application and the lack of adequate notification in December has reduced the time for the unit holders to review all of the

documents and submit any objections when this application was brought to their attention.

While we acknowledge that the correct development of the site would be good for the area we strongly object to the current proposals due to the impact it will have on our businesses. In our opinion inadequate provision has been made regarding vehicular access, public transport, parking and the increase in risk of local flooding.

Access to the estate as severely affected when traffic started parking regularly in Summerstown approximately 2 years ago. The effect of approximately 5 or 6 cars parking legally in Summerstown severely hampered access to our industrial estate and caused tailbacks into Plough Lane. This also hampered ambulances trying to access St George's Hospital and I personally witnessed on more than occasion ambulances trapped and unable to make their way through the traffic for several minutes. We made representations to Wandsworth Council and fortunately after a study and consultation they agreed parking control was needed and double yellow lines were installed. Having seen the problems a minor change to the flow of traffic caused I dread to think what a major influx of traffic and pedestrians travelling to and from a football stadium and 600 residential units have on the roads and public transport locally. I also believe the traffic study for this planning application was carried out during school holidays when the traffic in London is significantly lower than normal and does not represent an accurate assessment.

We also have serious concerns on the effect this development will have on the risk of flooding on our estate. Many of the businesses have had increased premiums after some of them were flooded a couple of years ago and we do not believe sufficient provision has been made to ensure the risk of flooding has not increased. The stadium application is in a high risk flood zone.

As the roads on Garratt Business Park are private are not adopted we have no power to control unauthorised parking on the estate. The existing infrastructure is barely able to cope with the traffic and parking associated with the businesses on the estate, we also have automated gates that are locked during evenings and weekends outside of normal business hours and we have experienced these being damaged by people parking inside the estate during working hours only to return later and find their vehicles have been locked inside. We cannot see how the amount of people travelling to the site won't increase this problem significantly. It is also my understanding that staff from St George's hospital currently park in the stadium car park and the displacement of these vehicles will use any spare parking in the vicinity. Looking at the plans it appears that there are proposed entrances onto Riverside Road. Traffic and pedestrians leaving the development will be mixing with heavy lorries and commercial vehicles at great and unnecessary risk to all. If the development is granted access into Riverside Road then we feel that Riverside road between the junction of St Martins Way and Summerstown should be closed with an emergency fire access barrier to keep the tow areas segregated.

We are aware that this is an important site but there are over 60 businesses operating within the adjacent industrial estate and they provide employment for several hundred people. Please take seriously their concerns for the effects that the current proposal would have on their livelihoods.

9.35.23 Wimbledon Art Studios, Garratt Business Park (dated 5/1/15)

Who are we?

Our studios are World leaders in the provision of creative space for artist and have a considerable international reputation. Without cost to Wandsworth Council, we tick many boxes for them and they know us well. We have 250 art studios in a complex in the Garratt Business Park, abutting the proposed development, from which 300 artists run small creative business.

Why we object to the above planning application?

The Wimbledon Art Studios Committee is elected by and represents all 300 artists/small businesses within our premises. We wish to object for the following reasons:

Access to our premises is extremely important to our professional community. Our artists heavily rely upon round 10,000 visitors/buyers coming to our shows each year and generating many hundred thousand's pounds of sales. If the road system means the public struggle to come, much of our member's income will disappear.

The proposed development promises to **swamp the local road system causing serious congestion**, particularly **Summerstown and Riverside Road**, both of which are very narrow and already struggle to cope with current traffic levels. We know, if the development gets planning consent without a serious re-think of the traffic implication, buyers will simply refuse to visit our studios and a major asset to the local and broader community will die.

Parking is already in very short supply in the local area. 602 new homes represents a lot of additional cars and looking at the new site plan there doesn't appear to be remotely enough parking for them. Add to this, the 20,000 football fans and the **current lack of public transport**, mayhem is to only possible result. Cars will be parked recklessly in desperation causing further **traffic difficulties along Summerstown and Riverside Road** and huge inconvenience to local businesses, present residents, as well as ourselves.

Further problems will occur as fan's and possibly the residents seek places to park within the Garratt Business Park. Our premises are in Riverside Yard which is the first group of buildings they will encounter. During normal daytime working hours and until 2pm on Saturday's plus up to 11pm and all weekend during our major art shows the estate's security gates are open and unmanned. With the development's lack of parking provision, there would be

such a fundamental shortage of parking around the site, people will definitely risk parking in the specially provided spaces adjoining our studios. This zone is for our visitor customers as well as allowing our artists to load/unload their own vehicles which is a constant need. After hours, the metal security gates close and would inevitably imprison offending cars. We believe regularly their owners will **cause damage** to the expensive gates as they attempt to break out of Garratt Business Park and potentially in tempers **attack our premises**.

9.35.24 Sustainable Merton (dated 19/1/15)

We would welcome the return of AFC Wimbledon to playing in Merton adding to the area's sense of place and community. If this development does go ahead, it presents an excellent opportunity to put sustainability at the heart of a major development, making it fit for the 21st century and an asset to the community.

Therefore we ask that the following features are included to lower the costs for residents and businesses, build in the right infrastructure for modern living, support sustainable transport and improve general wellbeing. Designing in these features right from the start mean they don't cost much to include and there is a better result.

Sustainable Merton - Features that lower the cost of living

1. Where possible, buildings should be built as a 'fully insulated box' to a grade exceeding the present building code, to ensure minimum costs for heating/cooling. Consider building to Passivhaus standards as this would mean that central heating/cooling systems are not needed, thus offsetting any additional building costs and creating more living space.
2. Put solar water heating panels on roof areas to provide hot water.
3. Put solar PV panels on roof areas to generate electricity.
4. Is there a nearby source of free heat? e.g. from industrial processes. If not, consider a low carbon-fuelled combined heat and power unit to provide electricity and district heating.
5. Appliance sharing e.g. vacuums, washer/dryers, carpet steam cleaner, ladders, outdoor furniture)

Sustainable Merton - Build in resource management infrastructure

6. Large and state-of-the-art recycling facilities (e.g. recycling chutes in each floor, to send mixed recycling to a receptacle in basement)
7. Each new building and each separate unit kitted out to facilitate 85% recycling of waste (for example, built in spaces in all rooms/flats with tubs for all recycling)
8. Rainwater harvesting from roofs into tanks on upper floors to supply toilets and the remainder into an underground tank, to ensure future health of trees and shrubs
9. Sustainable Drainage System standards to take account of water quantity, quality and amenity issues, so that water drainage is managed properly. This

is not yet a requirement by Merton Council but developments should adhere to this standard now.

Sustainable Merton - Enable sustainable transport

10. Loads of bike storage for building/users. A large number of bike storage/parking facilities – secure and covered
11. Safe mini-bus/vehicular drop off point
12. Space for car sharing vehicles on a road outside flats, for use of residents and neighbours.

Sustainable Merton - Improving wellbeing

13. Surround the development with carbon-reducing trees and shrubbery, kept vibrant via a maintenance contract. Landscape designer employed to plant bird and bee friendly trees and low-maintenance shrubs
14. Positive space and shelter for outdoor smoking (a civilised area, ideally not right on the main road; include ash trays – with maintenance contract)
15. Small-scale community space(s) for hire by local people for various community needs, e.g. toy exchange, toddler groups, support groups etc.
16. Provision of gardens, including community growing areas and a living roof, where feasible.
17. Provision of swift boxes – hollow tiles on high buildings to provide a nesting site for swifts. (There has been a big decline in swift populations in many areas. Just imagine the delight of having swifts swooping over the stadium!)

9.35.24 Southfields Academy (dated 12/1/15)

I am writing in full support of the application for AFC Wimbledon to build a football ground on the site of the Greyhound stadium in Plough Lane.

Southfields Academy will be one of the nearest secondary schools to the new football ground and I look forward to working with AFC Wimbledon when the club does return home. AFC Wimbledon already carries out some community work with my school and I look forward to this greatly increasing in the near future. I see the proposed football ground as being a real community asset and one that will benefit the young people in the surrounding area. Unfortunately greyhound racing does not offer the same opportunities for young people to take part in sporting activities that a community centred football club can.

I also feel that the regeneration of the area will lead to increased economic activity that will benefit the young people of both Merton and Wandsworth. The current site offers very few employment opportunities so I would welcome the new jobs that will come with the building project and once the stadium has been completed.

9.35.25 Wandsworth School Games (dated 30/1/15)

I am writing on behalf of the Wandsworth School Games based at Southfields Academy in Wandsworth to support the planning application for a new a community stadium in Plough Lane submitted by AFC Wimbledon. The Wandsworth School Games is part of the Government backed School Games programme which aims to increase competitive sporting opportunities for all children in schools.

Southfields Academy has had a responsibility for facilitating, promoting and providing P.E and School Sport in Wandsworth schools since 2000. As a specialised Sports College and host for the School Sport Partnership under the previous Government and now as the host school for the School Games, it has developed an excellent reputation with schools, local sporting agencies and importantly local sports clubs.

Each year we provide over 100 posting competitions for schools and their young people in Wandsworth. We are pleased to say that these events are very well attended by schools and in 2014 every one of the 74 schools in the borough participated in at least one of our sporting competitions.

The School Games has a very limited budget to run the programme and relies heavily on working in partnership with local sports club and organisations in the community to provide high quality events. We have recently been working in partnership with the AFC Wimbledon Foundation to provide footballing opportunities for girls and young women in the borough. In June 2015, we are hosting the first AFC Wimbledon Football tournament for girls in Wandsworth and Merton schools.

The development of a new football stadium in local proximity to Southfields Academy and many other Wandsworth Schools will provide more schools the opportunity to work with AFC Wimbledon Football Foundation. This will in turn, lead to a desperately needed increase in the number of physical activity opportunities for young people in our schools.

Since the demise of Wimbledon FC, there has been a huge gap in the provision of footballing opportunities in the Tooting and Earlsfield area and the schools are crying out for support from experts in both sport and wellbeing activities.

AFC Wimbledon Foundation already operates a highly regarded Football in the Community Programme providing interventions to combat issues such as physical inactivity, social inclusion and developing mentoring programmes for young people. Should the club move to new ground in Plough Lane, the Wandsworth School games would work closely with the club to ensure that the local schools and residents would benefit from these programmes. Therefore, I am writing to support AFC Wimbledon's application for a football stadium in Plough Lane.

9.35.26 Siobhain McDonagh MP (dated 15/1/15)

I am writing to support the application.

When Wimbledon football club moved to Selhurst Park in 1991 it was a sad loss to the borough and a betrayal of many loyal fans.

AFC Wimbledon have established themselves as a truly community based club dedicated to developing young people. Their return to the borough would boost the local economy in Merton by revitalising a neglected part of the borough.

It would also mean that their coaching and education scheme would benefit young people in the borough and enable AFC to extend its award winning community schemes.

Returning to a base close to their roots will also secure the future of Wimbledon Football Club.

9.35.27 Rt Hon Sadiq Khan MP, Shadow Justice Secretary & Lord Chancellor and Shadow Minister for London (dated 20/1/15)

On behalf of my constituents I would like to raise a number of concerns with the above application. I understand that the decision will be made by Merton Council, however I am raising concerns on behalf of Wandsworth residents, living in my constituency, who will be affected by these proposals.

Whilst local residents are broadly supportive of the decision to regenerate the site, many of my constituents have contacted me to raise their concerns with the impact a proposed development of this scale will have on the surrounding area. I have set out their concerns below:

1. Impact on transport services

Local residents are concerned that transport in the area, including Earlsfield, Wimbledon and Tooting Stations, are already operating at high capacity, and there are worries that they would be unable to cope with an influx of initially 11,000, and then 20,000 visitors on match days. This would be a particular problem for weekday evening matches, when trains to the area are already packed with passengers returning home. There are also concerns that an extra 1,500 residents in the area would place strain on the services at peak times when commuters are travelling to and from work. I would urge Merton Council to work with Wandsworth Council to examine ways in which capacity in the area could be increased, including increasing the number of buses on nearby routes and increasing the number of carriages on trains at Earlsfield Station, so the impact on current service users can be limited. Further concerns have also been raised regarding football fans travelling to Tooting Broadway station on match days. Discussions need to be had with Wandsworth Council and Transport for London as to what plans will be put in place to manage the walking route to the ground, in terms of litter collection and managing anti-social behaviour.

2. Traffic and parking

There are concerns with the extra numbers of cars the football stadium will bring to the area, both in terms of traffic and parking. Residents have raised concerns that it could cause gridlock on match days, as Garratt Lane and Plough Lane are already extremely busy roads. Moreover, there are concerns that as the current plans do not include parking provision for fans, other than VIPs and club officials, the problem with limited parking in the area will only be exacerbated if these plans are approved. People also feel that the applicants have underestimated the number of supporters who will travel by car, and I would ask that both councils look into this, and perhaps consider match day parking restrictions on residential roads. It is important to reassure local residents that traffic and parking in the area have been sufficiently investigated in advance, and measures are taken to address local concerns. There are further concerns with the amount of parking provided for the residential properties, and I would be grateful if the council could also review this matter. Merton may also be aware that in 2012 the redevelopment of Springfield Hospital, with the addition of hundreds of residential properties, was approved by the Secretary of State, and the work is due to begin over the next few years. Any decision on traffic in the area must be made with this upcoming redevelopment in mind.

3. Risk of flooding

Another issue concerning local residents is the risk of flooding at the site. I understand there is a high risk of flooding in the area, and there are fears that should this development go ahead, the risk would be increased. It is essential for in depth assessments to be carried out into the risk of flooding, before any decision is made.

4. Earlsfield 'village'

Over recent years the local community has seen Earlsfield transform; with new restaurants, pubs, bars and shops opening up and huge improvements in those establishments already in the area. Local residents tell me that they are very happy with the '**village feel**' they have acquired and are worried that should this planning application be approved it would have a negative impact on this. Local families are also concerned by the potential increase in anti-social behaviour and are seeking reassurance that match days will be adequately policed

5. Strain on local services

There is already a strain on local services in the area, including shops and GP practices. Moreover, only last year there was a huge shortage of school places for Earlsfield families, and this is an issue that will only be exacerbated by the building of 600 new residential properties. Both Merton and Wandsworth Councils must be satisfied that there are adequate plans in place to address these shortages, particularly for local schools, and ensure that all local residents have access to the services they need.

The community are also clear that they would like to see any development on the site be fully accessible to the local community. Can the council ensure that any approved plans will fully utilise the space for benefit of the local community? I also understand that should this development be approved, it

will provide a significant community infrastructure levy. I would urge Merton to share this with Wandsworth Council so that the money can be spent in Tooting and Earlsfield to help these areas provide the extra services needed.

I have read the submissions already provided by my constituents, many of which I was copied into, and all demonstrate numerous concerns with these proposals. I would urge you to take these into consideration when deciding this planning application.

I would also urge the council to continue to work closely with Wandsworth Council, councillors in both Tooting and Earlsfield wards, and myself, to make sure the needs and concerns of Wandsworth residents continue to play a major part in the redevelopment of this site.

9.35.28 Jenny Jones, Baroness of Moulsecoombe, Green Party Member of the London Assembly (dated 31/3/15)

In principle, I support the proposals submitted by AFC Wimbledon for a new stadium at Plough Lane on the site of Wimbledon Greyhound Stadium. The proposals involve the demolition of the existing buildings on site and redevelopment to provide a 20,000 seat football stadium for AFC Wimbledon, which would initially be constructed to 11,000 seat capacity. It will also comprise 602 residential units.

However, I have a number of significant concerns which need to be addressed prior to the proposal going ahead. The proposals as they stand will have a detrimental impact on local congestion and air pollution, and the lack of information about the social housing provision, which I would expect to be made available from the outset, is unacceptable.

I have set out my concerns below and offered a number of solutions:

Jenny Jones response: Transport of match days

The transport impact assessment appears to have been carried out on the high car/low public transport scenario, predicting in excess of 1,200 cars to park in a broad sweep around the stadium arising from full capacity stadium of 11,000, rising to more than 2,000 cars in respect of a 20,000 capacity stadium. Clearly, this will cause both unacceptable levels of local congestion and air pollution.

It is anticipated that the number of bus trips on match days in the 20,000 capacity scenario is unlikely to be accommodated on the local bus network (and with TfL not providing additional scheduled bus services for events at sports stadia), the greatest impacts on public transport from travelling spectators predicted at Earlsfield Rail station (and to a lesser extent Haydons Road) and Tooting Broadway and Wimbledon Underground stations. On the basis that spectators walk from the respective stations, approximately 20 minutes, the site is 'highly accessible'.

- **Recommendation 1:** Travel plans need to be revisited and oriented towards a presumption in favour of a high public transport scenario with visiting supporters walking from nearby Rail and Underground stations.
- **Recommendation 2:** To avoid local congestion and pollution, spectators should be discouraged from private car use on match days. Therefore no provisions of special off-site car parking should be provided.

The main roads around the proposed stadium have little capacity to accommodate additional traffic without additional significant congestion. St George's hospital, which is one of the largest teaching hospitals in the UK with a major Accident and Emergency unit is located less than 1km away on Blackshaw Road which also acts as a bus termination has limited road capacity.

Question 1: What are the anticipated traffic impacts on St George's hospital, on ambulance response times and road access to A&E?

Even with the lower 11, 000 capacity stadium footways around the stadium would be unacceptably crowded.

- **Recommendation 3:** To avoid unacceptable crowding, a retention strategy needs to be in place in order to spread the departure of spectators.

A total of 73 car parking spaces are proposed for the club with four for blue badge use and no on site car park spaces for spectators.

- **Recommendation 4:** In line with the Mayor of London's 'London Plan' policy 6.13D, 1 in 5 parking spaces should provide an electrical charging point to encourage the uptake of electrical vehicles.

Jenny Jones response: Coach Parking on match days

No specific coach parking is provided on site, with coaches proposed to set down in the narrow Riverside Road next to the proposed new stadium, and then move to an off-site location nearby on industrial land.

- **Recommendation 5:** A clearer understanding of the local congestion impact of caches setting down in Riverside Road is required. If impacts are significant, it would be more appropriate for spectators to walk from off-site coach locations.

Jenny Jones response Cycle Parking

It appears that no stadium cycle parking is proposed. This is completely unacceptable.

- **Recommendation 6:** In line with the Mayor's Transport Strategy target of 5 per cent of journeys being done by bike an equivalent provision of secure cycling parking spaces should be provided.

Jenny Jones response Housing

Affordable and social housing provision

It is unacceptable that the applicant has not set out the affordable/social housing provision of the proposed 602 residential units.

- **Recommendation 7:** At the very least, 40% of on-site units are affordable in line with Merton's Core Planning Strategy (2011) and with 70% of that for social rent.

Residential car parking provision

For the 602 residential units 222 car parking basement spaces proposed at a ratio of 0.37 spaces per unit. Of the sixty wheelchair accessible units 22 will be provided with a car parking space.

Recommendation 8: Apart from disabled accessible spaces, parking provision is still excessive and should be reduced.

Recommendation 9: Car club parking spaces should be provided.

Recommendation 10: In line with the Mayor of London's 'London Plan' policy 6.13D, 1 in 5 parking spaces should provide an electrical charging point to encourage the uptake of electric vehicles.

School places and GP provision

No provision for the additional school places and GP provision generated by the development appears to have been addressed.

Recommendation 11: To set out how this provision will be accommodated.

I have set out a number of significant concerns about the proposal, which I would expect to be rectified prior to any works going ahead. However I should like to re-iterate and emphasize my support for the AFC Wimbledon proposal for a new stadium in Plough Lane.

9.35.29 Merton Green Party (dated 12/1/15)

We note that the Planning Statement says in paragraph 4.36 that an element of affordable housing will be provided, the amount to be negotiated. Policy CS 8 in the council's core planning strategy sets a borough-wide affordable housing target of 40%. We have not seen any further details of what the applicant proposes in the published documents. We assume the applicant will provide a viability assessment and that the Council will commission its own evaluation of this. We ask that both the applicant's assessment and that commissioned by the council be made public, so that others with an interest can see the evidence on this vital issue. We draw the Council's attention to the fact that their colleagues in

Islington are currently consulting on plans to make such assessments public*. We believe that other councils such as Greenwich and Hackney intend to follow suit. There is widespread concern about the use of viability assessments by developers to limit or avoid meeting their obligations to provide much needed affordable housing.

*http://www.islington.gov.uk/services/planning/planningpol/pol_supplement/Pages/Development-Viability-Discussion-Paper-and-Questionnaire.aspx

9.35.30 Councillors Critchard, Daley, and Johnson (Tooting ward, Wandsworth)
(dated 31/1/15)

We have been speaking to local residents who have raised concerns about the development. We'd like to make sure that Merton Council is aware of our concerns, as we are sure that measures can be put in place to mitigate any adverse effects of the development.

These comments on the application are from all three Tooting Ward Councillors.

1) Transport

Local people are worried that the new development of 602 homes will significantly add to traffic and public transport pressures in the area. What measures will be put in place to improve local transport on a day-to-day basis?

People are also very concerned about matchday travel - especially the pedestrian route from Tooting Broadway station. They want to know how this will be managed; whether the tube station can cope with large crowds; what will happen on the walking route to the ground; extra litter and possible anti-social behaviour of fans. What will be done to help this?

The transport plans include road improvements to encourage fans to travel to the ground by bicycle (around 200 fans per match) but the plans do not show 200 public bike parking spaces. Where will cyclists be able to park their bikes?

Away fans are likely to travel by coach to the match. What provision has been made for the coaches to drop off and collect fans; and to park during the match?

2) Community infrastructure

The new development includes 602 homes. What provision has been made for school places and GP surgeries? The nearest local primary school is Smallwood School in Tooting Ward but there is no spare school capacity locally. How can Merton help with this?

The development will provide a large community infrastructure levy. If Merton gave some of this to Tooting then it could be used within the area - first to provide extra infrastructure, such as school provision; and secondly as part of a neighbourhood CIL to provide benefits to local people. Please can Merton

consider this carefully - especially as Tooting residents feel they could be disadvantaged by a development in a neighbouring borough?

9.35.31 Nottingham Forest Football Club (received 29/2/15)

Nottingham Forest Football Club support the application.

Working in the Commercial Department at Nottingham Forest Football Club I have the positive impact that a football league stadium can have on the local community.

I am sure that you have had thousands of fans expressing their support and how they would use the stadium and I, for one, would like to add my name to that list.

The positive impact on the local community that AFC Wimbledon would bring now that they are Sky Bet \football League 2 team should definitely be taken into account.

Moreover, promotion to League 1, the Championship and the Premier League would make even greater difference. I attach a copy of the government's findings from the impact of Premier League football where they discovered that 125 extra people were employed as a direct result of Swansea FC's promotion to the Premier League and an additional 295 full-time equivalent jobs were created due to the increased economic activity .

The study also predicted that "spending by visitors to Swansea matches was around £8.13 million per season, leading, after deductions, to an initial injection to the Welsh economy of £4.72 million".

9.35.32 True Volunteer Foundation (dated 14/1/15) Appendix 8

9.35.33 Ocado Ltd (dated 27/1/15)

Ocado Retail Limited is the tenant of two plots at Weir Road and our leases end in 2026. The sites form of Ocado's "hub and spoke" distrubition network. The hub is the central distribution warehouse facility located in Htfield, Hertfordshire and and the spoke are local distrucbition centres throughout England such as at our sites in Wimbledon.

The Ocado spoke at Wimbledon recieves grovery deliveries from the hub in temperature controlled lortties and a fllet of vans then deliver the customers' orders in the locality. This amounts to approximately 2, 662 vechile movements in and out of our site per week, being 204 HGV and 2, 458 Spitner Van movements. Each of these deliveries is time cirtical and it is therefore imperative that we can assess and leave our sites within the minimum of distrupction as we operate seven days a week and employ over 300 staff who also travel to and from the sites.

Planning Proposals

We are concerned about the following aspects of the proposed development on our sites and the potential for disruption to our business:

- Increased traffic flows at the junction of Durnsford Road and Plough Lane.
- The imposition of parking restrictions within Weir Road and the restriction on off road parking for Ocado staff.
- Restrictions due to matches or special events and the impact on staff accessing the Ocado site.
- Additional traffic and debris on the road may cause traffic jams or delays in the vicinity.
- The construction works may cause potential damage to power/data cables which run to the Ocado site.
- Construction dust and vibration may adversely affect the operation of the equipment and the freshness of food stored at the Ocado spoke and is approximately 500m from the application site.

Should consent be granted for the application we would request that conditions be imposed that protect our amenity and require a Construction Method Statement and Traffic Management Plan to be approved by the Council and implemented, which address the above points.

9.35.34 People for the Ethical Treatment of Animals (P.E.T.A) (Includes a petition of 14, 476 signatures) (received 30/1/15)

Greyhound racing results in ill treatment of Greyhounds and exacerbates the numbers of homeless animals.

The closure of Greyhound stadiums is a national trend as a result of dwindling attendance, a sign that the British public isn't interested in watching dogs being exploited for a bet.

Merton Council can choose to support the move of AFC Wimbledon (and its thousands of fans) back to its original site, which would be great for local sport. According to the planning application, AFC Wimbledon would also build residential units and a fitness club and create public space which would result in a positive change for the area and local families.

9.36 Internal Responses (1st Consultation):

9.36.1 Merton Planning Policy (Retail) Officer –

These are the retail, commercial leisure and employment comments for the redevelopment of the Wimbledon Greyhound Stadium, which includes the development of 1,273 sqm of convenience retail floorspace.

Employment Comments:

In accordance with *Policy 4.12: Improving Opportunities for All of the London Plan (2011)* and *Future Alterations to the London Plan (2013)*, the **applicants would need to submit an Employment Strategy** demonstrating how the development will provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use. As stated in the justification text, other opportunities includes applicants procuring local companies in the supply-chain and may include offering local residents apprenticeships or work experience to improve skills.

We do recognise the applicants highlighting in their planning statement that they do undertake charitable work; however this would fail to meet the Local Plan policy.

The applicants have two choices to fulfil this policy, either they:

- meet this policy themselves and show to the council how they intend to fulfil this planning policy. This will then be inputted into a legal agreement or a condition placed on the planning decision to ensure that the applicants will fulfil the requirements of this policy, or
- work with Merton's Economic Development Team to meet this policy. If this is the applicants preferred choice, please contact Joyce Ogunade (Employment and Skills Officer, tel: 0208 545 4847, email: joyce.ogunade@merton.gov.uk) and Eric Osei (Business Growth Officer, tel: 0208 545 3232, email: eric.osei@merton.gov.uk)

Either way, the applicants will need to inform the council, through an Employment Strategy, how they intend to meet this policy.

Council officer - Leisure Comments:

We do recognise that the provision of hospitality floorspace comes hand in hand with these sporting developments; however there is part of the development that will be available for public hire for functions etc. We would like to know how much floorspace will be available for public use. Depending on the scale and size of the floorspace proposed to be available for public hire and should the proposal be considered to be within the D2 Use Class by council officers, the applicants may need to submit a Leisure Impact Assessment. This will only be required if the floorspace available for public hire is over 2,500 sqm.

Council officer - Retail Comments:

As this proposal is for the development of convenience retail out-of-centre. In accordance with *Policy CS7: Centres of the Core Strategy and Policy DMR2: Development of town centre type uses outside town centres*, the applicants would need to submit a sequential test and retail impact assessment. A 'Retail Impact Assessment' report, which includes a sequential test and an impact assessment, was submitted as supporting information with this planning

application. Though we welcome the submission of this documents, we have the following concerns with the data provided:

Retail Impact Assessment:

- The impact assessment was based on the information contained in Merton's Retail and Town Centre Capacity Study 2011 (retail study). Though we do recommend for applicants to use Merton's retail study as a starting point for retail impact assessments, we did indicate that this should be updated with the most recent available data. For instance since 2011:
 - **Newly completed, committed and planning public and private investment has occurred in Merton.** This document fails to show how these changes were incorporated into this retail impact assessment. To be helpful, we have undertaken this exercise for the applicants. We have identified all newly completed, committed and planning public and private investment in the catchment area (Wimbledon town centre, Arthur Road, Colliers Wood and surrounding area) over the last four years. This data should then be used to update the existing and committed retail offer in Merton. This information is attached. The applicants should then use this information in the retail impact assessment and demonstrate to us how it was used.
 - **Population figures have changed.** The retail study used projections from the 2001 Census to 2010 and GLA projections from 2010 to 2016 (2010). The 2011 Census is now available and this data should be used instead.
 - **The expenditure estimates has changed.** The retail study adopted Experian's local expenditure estimates for a 2009 base year and projections as at 2010. Experian now provides 2011 base year data and updated projections dated September 2013. However there may be more up-to-date information available than this.

The applicant's retail impact assessment should be updated with this most recent available data.

- The results of the impact assessment are misleading. For instance:
 - The ' **turnover density**' used for 'other centres and foodstores' in the impact assessment is assumed at £4,500 (footnoted in *Table 2: Anticipated Trade Diversion Scenario A and B of the retail assessment*) is actually significantly lower than that assumed in Merton's retail study (*Table 1A- Convenience Shopping Facilities in LB of Merton – Benchmark Turnover (2009 prices)*) of the retail study). It is currently unclear as to whether this turnover density is used for all 'LB Merton Centres', 'Other Out of Centre Stores', 'LB Wandsworth Centres' and 'Other Stores'. Therefore we suggest that the applicant gets more up-to-date information on density turnover benchmark prices for 2014 for each of the national retailers that operate in the areas covered by the retail impact assessment

(if 2014 data is not available, data for 2013 will suffice). The applicants should then use this information in the retail impact assessment and demonstrate to us how it was used. All of the average densities for each national retailer and the figures used in the retail impact assessment should be set out clearly in an Appendix to the main report (e.g. like Table 1a of Merton's retail study). This information should be clearly referenced.

- The **gross to net ratio** of 65% used in the retail assessment is very low for a convenience store. The only national retailer that uses a gross to net ratio of near to 65% is Waitrose and it has been explained to Merton previously the exceptional reasons why this gross to net ratio is used by this retailer. Whereas the gross to net ratio used by other retailers is 82-85% and for discount stores it is generally 90%. As the retailer is unknown, we would suggest for the applicant to use a gross to net ratio of 85% in their assessment. This would ensure that all potential retail occupants' impacts are covered.
- In paragraph 6.21, the **sales density figures** of £6,000 and £10,000 per sqm were used for the new proposed store. We suggest that the applicant completes an analysis comparing these figures to the density turnover benchmark prices of retailers for 2014 and to demonstrate and justify why these figures are appropriate to use for this retail impact assessment. Again, this analysis should be appended to the main report and all data used should be clearly referenced.
- The **estimated trade diversion** to the proposal, provided in Table 2 and 3, needs to be explained and clearly justified. It is not clear whether the estimated trade diversion figures relate to diversion of trade from residents inside or outside of the borough. To note, the study should show both. Moreover, the study should indicate clearly the % of shopping diversion from residents outside the study area that currently shop in town centres included in this retail impact assessment but are likely to shop at the new facility when it opens. In future updates to this study, this analysis would need to be clearly explained, justified and referenced. Please use Merton's retail study as a starting point and update this with the most recent available data.
- Table 2 and 3 shows that the impact of this proposal has been assessed for 2014 and 2019. It is not explained clearly in the retail impact assessment when it is **expected for this development to be built and opened and when the applicants will expect for trading patterns to be fully settled and built** (this is usually two years after the store has been built and opened). This should be clearly explained in future iterations of this document and the retail impact assessment should be updated accordingly.

Sequential test:

- *Paragraph 1.19 of Appendix 3: Sequential Assessment* indicates that more than 3 sites were included in the sequential test for Wimbledon town centre. It would be useful if the applicants **detailed all of the sites that were initially assessed but not included in the report and explain why these sites**

were discounted. This is required to demonstrate that a thorough review of sites in all relevant town centres and edge-of-centre locations (Wimbledon town centre, Arthur Road, Colliers Wood and suitable surrounding areas) were considered by the applicants.

- The applicants **should include all the allocated sites in Merton's Sites and Policies Plan** and show in the document how these sites (in Wimbledon, Colliers Wood and Arthur Road or near these centres) were discounted in their sequential analysis, for instance the P4 site in Wimbledon, Wimbledon Community Centre for instance. Furthermore, the applicants should look at the websites of the following estate agents or contact them to identify any other sites that may not be vacant but which are up for lease/ to be sold and show how these sites were discounted in their sequential analysis. For instance, Andrew Scott Robertson, BNP Paribas, Cough Lewis, Jones Lang La Salle, Kingleigh Folkard & Hayward, Lambert Smith Hampton and Sites Harold Williams should at least be contacted. Some sites are also advertised on the following property websites such as the Estates Gazette, Rightmove.co.uk and Propertysales. com. To note this list is not exhaustive. All of these sites should be assessed against their availability, suitability and viability.
- In addition to the sites above, the applicants should contact the Centre Court Manager Suzy Wood (Tel: 020 8944 4382, email: suzy.wood@eu.jll.com) to identify Centre Court Shopping Centre floorspace that should be included in this report. Even if the applicants discounted the sites that are suggested, this information should be provided in the report.

Sequential test and Impact Assessment:

- Colliers Wood has been excluded from both the sequential test and impact assessment. *Table A2.2: Potential future changes to town centres of the Future Alterations to the London Plan (2013)*, indicates clearly that there is intention for Colliers Wood to be designated as a District Centre in future. For this reason, Colliers Wood falls into the category of committed and planning public or private investment. As such, the applicants should include Colliers Wood in both their sequential and impact assessment. For the sequential analysis, we are aware of a number of vacant sites in the area which should be included in the sequential test such as the former Currys site for instance. Also, all of the allocated sites in the Sites and Policies Plan should be included in the sequential test analysis.
- We have spoken to officers at Wandsworth Council who confirmed that:
 - Southfields local centre should be included in the retail impact assessment. Also, since 2012 when the Wandsworth retail study was completed, 'newly completed, committed and planned public and private investment' has occurred since and these should be included in the retail impact assessment. Please use the following link to access this information:
http://www.wandsworth.gov.uk/downloads/file/10071/non_residential_development_report_2013-14

- Wandsworth town centre and Southfields local centre should be included in the sequential test. Furthermore, allocated sites in Wandsworth's adopted (2012) and proposed (2014) Site Allocation documents should be included in the sequential analysis, please use the following links to access these documents:
http://www.wandsworth.gov.uk/info/1004/planning_policy/1347/local_plan_review and
http://www.wandsworth.gov.uk/info/1004/planning_policy/1366/local_plan.

If the council is still not happy with the data and information provided in future versions of the sequential test and retail impact assessment, in accordance with the Local Plan, we may seek independent assessment of the information submitted and the applicant would need to pay these costs.

(Officer comment: see section 12.67 of this report where the above comments have been addressed)

9.36.2 Merton Environmental Health Officer -

Further to your consultation in relation to the above planning application and having considered the information submitted, should you be minded to approve the application then I would recommend planning conditions in respect of the following:

- 1) Noise levels from any new plant/machinery associated with each separate commercial unit.
- 2) Noise levels from any mechanical ventilation and heat recovery/combined heat and power, air source heat pumps, lift gear associated with the development.
- 3) Delivery times to each of the commercial units associated with the development shall not be undertaken outside of the hours.
- 4) A scheme for protecting residents from noise.
- 5) Details of the measures to control odour from all mechanical systems serving an individual food premises.
- 6) Any amplified voice/music associated with the use of the stadium for football matches, except in an emergency, shall not be audible at the boundary for residential premises.
- 7) Details of any external lighting, associated with new development
- 8) An investigation and risk assessment, with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site.

- 9) A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared.
- 10) Any approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development.
- 11) A verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.
- 12) In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority.
- 13) Prior to the occupation of the development the applicant shall have provided written evidence to the local planning authority that electro-magnetic radiation emissions from the adjacent sub station do not exceed ICNIRP (international commission on non-ionizing radiation protection) guidance levels of 100 microteslas and 5 kilovolts per metre.
- 14) No development shall take place until a Demolition **and** Construction Method Statement has been submitted to, and approved in writing by, the local planning authority..

9.36.3 Merton Public Health Consultant – See Appendix 9

(Officer comment: See section 24.44 where the Officer's comments have been addressed)

9.36.4 Merton Head of Contacts and School Organisation – See Appendix 10

(Officer comment: See section 24.25 where the Officer's comments have been addressed)

9.36.5 Merton Council Climate Change Officer -

The applicant has demonstrated policy compliance in respect to Climate Change and sustainability, however there are few areas where improvements should be made.

It is clear from the energy statement provided that the development incorporates standard housing types developed to meet Part L 2013. This results in a very poor level of emissions reductions delivered through energy efficiency (building fabric) measures in respect to the residential units (0.4%). We would expect developers to pay closer attention to the potential to achieve additional carbon savings through improvements to building fabric.

The weakest element of the application is the energy efficiency (building fabric) of the residential units. We would expect developments designed

according to the Mayors Energy Hierarchy to achieve at least 3 credits under ENE2 and we recommend that that developers target 5 credits within Ene 2. However from looking at that specified U-values included in the application I would have expected some credits to have been achieved under Ene 2 which leads me to believe that the Ene 2 score has not been correctly assessed at the stage. I would like to seek clarification on fabric efficiency of the domestic units in order to ascertain the reason for such a low Ene 2 score.

Additionally I would like clarification if the CO2 savings delivered through communal heating and community CHP within the residential units (referred to in para 4.7 and 4.8 of the Energy Strategy) have been included as contributing towards emissions delivered through energy efficiency improvements.

I would like an explanation of the calculation methodology used estimate the carbon savings delivered from the renewables to be implemented across the site and clarification of the emissions factors used. Carbon savings expected to be delivered from the installed PV systems appear to have been overestimated in para 7.1.6. An annual renewable energy output of 95,529kWh/yr would reduce emissions by 42.5 tonnes a year using current grid energy emissions factors of 0.44548 kg CO2/kWh (carbon trust figure).

Additionally I would recommend that the energy strategy for the residential development includes Mechanical Ventilation and Heat Recovery be incorporated into all residential units. This is because at present the energy strategy relies on passive ventilation in order to prevent overheating. However, windows must remained closed during match fixtures in order to ensure that noise pollution levels are kept to acceptable levels in residential units adjacent to the stadium. The use of passive ventilation therefore creates a danger of overheating/unacceptable noise pollution levels on hot days during home match fixtures. To prevent this MVHR should be included in the energy strategy for all residential units. Additionally it would be good to see the number of credits targeted under Hea 2 sound insulation increased from 3 to 4 to provide additional protection for residents against sound pollution.

(Officer comment: see section 23 where the Officer's comments have been addressed)

9.36.6 Merton Council Tree and Landscape Officer –

Page 57 – View 01 includes the Weeping Willow trees which have been removed.

The proposed tree planting across the stadium is comprised of a specified selection of 4 tree species. Whilst this may be an acceptable approach to the public realm planting (for others to comment on), this is not considered an ideal approach for the courtyard areas. The courtyard areas should include a wider range of tree species to create a greater range of all year round interest for the residents. Trees that produce flowers/berried or spring or autumn leaf colour interest should be included in this scheme. I have located 4 locations

where at least one tree should be planted that provided a special interest focal point. I would suggest consideration is given to Persian Ironwood; Clerodendrum Trichotomum; Eurymus Europaes 'Red Cascade'; or Malus 'Profusion';

There is one other location where an extra tree can be planted.

The hard surfaced areas along Plough Lane are extremely spacious and there is an area that is capable of supporting 6 extra trees without affecting/hindering the usage of those areas. The proposed 3 trees could be doubled to give a stronger and greener impression in this location. Further along the wide stretch of footway, there are 3 locations where a more bold statement tree, such as a London Plane tree, could be planted. There is plenty of width so the paving and foliage of the trees will counter the heat island effect of so much hard surfacing. The shade provided by the canopy of these trees likely to be appreciated by the public in the summer months. In this location, these trees are capable of growing their full maximum potential without the need for any pruning measures.

The tree pits and structural Tree root cells shown in Section A-A on page 89, appear to be very small, but may be purely indicative of the approach to be taken. This is the correct approach in paved areas. This approach should continue to be taken with regards to the extra trees suggested.

The planting masterplan shown on page 89 distinguishes between three types of approaches to the type of tree and plant to be used. As the applicant is using the term 'Public Realm Planting', it should be clarified whether those areas are intended to be adopted by the Council. If so, then it is essential that our Greenspaces Team is fully involved in this proposal to ensure the best approach to the species of trees and method of planting (and future maintenance) is secured by design and a S106 agreement.

(Officer comment: see section 14 where the Officer's comments have been addressed)

9.36.7 Merton Leisure and Culture Greenspaces Manager -

A key point highlighted here by the Tree and Landscape Officer is around the adoption of the trees (and other green spaces), including those adjacent to the highway. Our views on the trees and landscaping choices and planting specifications may be significantly affected if there is an expectation that the Council will be adopting the highways and managing and paying for some of the upkeep of the green infrastructure within the public realm areas. Which, if any? And at what annual maintenance contribution? And for how long?

All too often trees and landscape schemes are already in a state of steep decline at the point of handover to the local authority where this occurs and we should be under no obligation to accept such.

(Officer comment: see section 14 where the Officer's comments have been addressed)

9.36.8 Merton Flood Risk Management Engineer -

Further to review of the Wimbledon Stadium application and supporting documentation including the PBA Flood Risk Assessment (dated 9th October 2014 ref: 21533-020) and appendices Price Myers Below Ground Drainage report (dated Feb 2014 ref: 22445), Momentum Foul and Surface Water Drainage Strategy (dated 23rd May 2014 ref:1785) and the PBA Flood Warning and Plan, Merton Council as Lead Local Flood Authority (LLFA) has the following comments:

The comments below are informed by national, regional and local policies and guidance; and guidance from government advisory bodies, namely the Environment Agency.

Flood Risk

Sequential Test:

The purpose of the Sequential Test is to ensure that a sequential approach is followed to steer new development to areas with the lowest probability of flooding, where possible. The flood zones, which are published by the Environment Agency and defined in Merton's Strategic Flood Risk Assessment provides the basis for applying the Sequential Test.

The aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

The application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds. According to the information available, all forms of flooding should be treated consistently with river flooding in mapping probability and assessing vulnerability to apply the sequential approach across all flood zones.

Sequential test comments:

1. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower

- probability of flooding. The site is identified within the Sites and Policies Plan was allocated for sports intensification (use D2 Class) with enabling development in July 2014. This is the only site identified within the sites and policies plan which is considered to be appropriate and suitable for this use.
2. The council considers that the sequential test was explored, examined and passed for Site 37 (Wimbledon Greyhound Stadium) via the Local Plan (otherwise the site could not have been allocated).

Background to the application of the Sequential Test for this Site:

In October 2013, the council submitted Merton's *Sites and Policies Plan* to the Secretary of State, recommending the allocation of Site 37 based on all the evidence and consultation over the previous 3 years. Please find details here:

http://www.merton.gov.uk/sp4.23_site_allocations_-_deliverability_assessments.pdf

(please note that the information regarding Site 37 appears on page 195).

In January 2014, as part of the inspector's examination into the *Sites and Policies Plan*, the planning inspector chaired a hearing and held a specific session to examine Site 37, Wimbledon Greyhound Stadium on Wednesday 22 January 2014. All of the relevant information on the examination hearings, including details of the hearing held on Site 37 22 Jan 2014, can be found via this webpage:

www.merton.gov.uk/examination-sites_and_policies_and_policies_map

Prior to the hearing, the inspector specifically asked the council: Site 37. Wimbledon Greyhound Stadium.

- (i) *Is this site a suitable location for an intensification of sporting activity with supporting enabling development?*

The council's statement presented to the examination and sent by the Programme Officer to all participants, demonstrates that the council considered that the sequential test was passed, and includes the sequential test evidence base (Colliers CRE) report as an appendix. Please see the following link:

http://www.merton.gov.uk/7._merton_council_matter_7.pdf (see paragraph 7.1.8 onwards)

In February and March 2014, following the hearing, the council consulted on the proposed changes to the Plan for six weeks. All responses were sent to the Planning Inspector as part of his examination of the Plan. It is therefore reasonable to conclude that neither the Planning Inspector nor other participants disagreed with the council's statement on the sequential test for Site 37 Wimbledon Greyhound Stadium or it would have been raised either at the examination hearings or during the six-week post hearing consultation.

In June 2014, the planning inspector sent his report to the council, which found the Plan sound, subject to 11 major modifications (including ones on

the flood risk policy and on Site 37). The report does not raise the Site 37 sequential test as inspector's reports will only summarise issues where the inspector or other parties have disagreed with the council, not list all the areas of agreement.

On 09 July 2014, Merton Council adopted Merton's Sites and Policies Plan, allocating the Wimbledon Greyhound Stadium site. In summary, it is the council's view that the sequential test has been passed in accordance with the NPPF and NPPG. The council explicitly clarified this position regarding the application of the sequential test publicly in the pre-examination Hearing Statements (on Main Matter 7,) and it was not raised as an issue of debate or disagreement by either the inspector or any other participants during the Hearings or in the six-week consultation after the hearings.

Exception Test:

Para 102 of the NPPG states if, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:

1. it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
2. a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Both elements of the test will have to be passed for development to be allocated or permitted.

Exception Test comments:

1. There is evidence provided within the Flood Risk Assessment and supporting planning application documents of the wider sustainability (social, environmental and economical) benefits of the development to the community from the proposals which meets part 1 of the Exception Test as outlined in Para 102 of the NPPG.
2. The Exception test was also explored for Site 37 via the examination and the council allocated the site on the basis that it can be passed by complying with Para 102 of the NPPG. However, whether this planning application has ultimately passed the Exception Test (part 2) or not, is subject to an acceptable site-specific flood risk assessment and the supporting information presented with the application meets the requirements of the NPPF and NPPG.
3. Part 2 of the Exception can only be passed should the comments raised below on the site specific flood risk assessment and drainage strategies be achieved for this application.

Site-specific Flood Risk Assessment (FRA)

We have held extensive pre-application discussions with the developer and the Environment Agency for this application and have made it clear what our requirements are with regards flood risk and surface water drainage for the site. Further to review of the site specific FRA, we do not find the report acceptable as it currently stands for the following reasons:

1. The Flood Risk Assessment states in section 2.3 that the topographic levels across the site are in the order of 8.4m – 9.4m AOD. While it is accepted that 8.4m is a nominal min ground level, it should be noted that existing minimum ground levels in the stadium site are in the order 8.3m AOD as shown on the topographic survey undertaken. As the existing hydraulic modelling shows that this area may be liable to flooding, flood depths should be updated accordingly in the FRA and levels taken into account in the floodplain compensation calculation.
2. There appears to be some discrepancies within the floodplain compensation calculations and further clarity is required to appropriately demonstrate the losses and gains in net storage volume on a level for level basis. We accept that the Environment Agency has accepted that the stadium stands are assumed to be 'non-floodable', however, it is unclear if the central stadium area is accounted for as being floodable. Sections and plans should be submitted to show footprint of the areas being accounted for in these calculations, for ease of reference/understanding. In addition, the development plans show the proposed pitch finished floor level as being 9.1m AOD. This is somewhat higher than the current central area of the existing stadium and below 9.1m AOD would normally be solid infill, hence this should result in a loss of storage below this level. Currently the calculations show gains in storage at levels above 8.9m AOD.
3. The FRA notes that half croft basements will be liable to river flooding in the 1 in 100 year climate change event. As the basements will not be free draining and will be reliant on pumps to remove the water, please can evidence be provided of how this water will be removed and whether it will be acceptable to Thames Water or the Environment Agency, if this water will be discharged back to adopted sewer or main river.
4. While the FRA states that safe access and egress to and from the site, including the residential units cannot be afforded in the 1 in 100 year climate change event, we would normally require flood hazard to be shown/mapped on the access routes (map) to be classified in accordance with the 'flood risks to people (FD2321/TR2)' approach. This information should inform and be appended to the Flood Warning and Evacuation Plan (FWEP) and appended map (Fig A4).

Flood Warning and Evacuation Plan (FWEP)

We generally welcome the submission of the Flood Warning and Evacuation Plan (initial issue, dated October 2014). We have some comments on the FWEP which we require to be addressed/amended as follows, before we are able to agree this document:

1. Regarding section 5.2, 'Residential Under-croft Car Park'. Whilst this section advises residents to remove cars and that the flood warden will monitor and assess the situation, we are of the view that, as each event will be individual and in some events flooding could occur very shortly after the warning, that each situation should be decided by a dynamic risk assessment process. This should be based on the information available at the time, the response rate of the river or surface water, the flood warning lead time and the number of vehicles and availability of staff on the day. The management company should make it clear to all site users of when it will no longer be safe to remove vehicles (possibly nothing under 4 hours if the car park is full and response is rapid etc.) and the action they will take i.e. lower the car park security shutter. (Note: Will a drill or test be undertaken to assess how long it will take to evacuate the car park?). Understanding this risk is essential to any decision.
2. It should be clear that the flood wardens decision is based on risk assessment and advice from the EA or Emergency Services and that their decision is final. The management company should have clear guidelines developed for flood wardens and residents to this affect.
3. There may need to be more than 1 assigned flood warden considering the number of users/occupants of the site. Will this be a 24 hour on-call arrangement/service and how will this be covered during absence? Who will provide costs for the warden and pay for training?
4. The published tel. number for the EA Floodline service is 0345 988 1188. Please amend throughout the FWEP accordingly.
5. The Local Authority MASCOT telephone emergency out of hours number is 0208 274 5940.
6. Please also include the NCP car park at Southside in Wandsworth. Fig. A2.
7. The Merton 'preparing for emergencies' document and websites links are, in places, out of date and require updating. Please discuss this with our emergency planner.
8. Please include a glossary in the FWEP.

Surface Water Drainage Strategy (SWDS)

We note that two surface water drainage strategies (SWDS) have been submitted for the site, by Price & Myers (residential and retail element) and Momentum Structural Engineers (proposed stadium). We are concerned that there are several outstanding matters which need to be addressed in both of these surface water drainage strategies. In summary, our comments on both surface water drainage strategies are:

1. We are concerned that the proposed diversion of the Thames Water surface water sewer includes a 90 degree bend which maybe prone to blockage. We have not been made aware or seen any evidence of any discussions or agreements regarding this diversion with Thames Water and whether this is

acceptable to Thames Water and we require this information to be submitted. It is unclear how this work will be sequenced and how existing connections to the existing sewer will be made on this new alignment and if this is possible with appropriate gradients (for self cleansing velocities).

2. While the two surface water drainage strategies are addressing two separate parts of the site i.e. the residential/retail and the proposed stadium, the strategies make assumptions with regard to each respective elements. For example, the Price and Myers report on the residential and retail components of the application assumes that the stadium area is attenuated (in the existing scenario) to greenfield runoff rates for the 100 year event, as 12.6l/sec. This is highly unlikely and does not reflect the worse case position. While it is acceptable that two reports are submitted, we strongly advise that the reports should be co-ordinated where possible and produced in accordance with the findings contained within each report. At present there is no linkages made between the reports and due to the nature of site and any drainage scheme, both the residential/retail and the stadium must work together, particularly as they both propose to discharge the diverted surface water sewer.
3. There is a substantial area of the site (0.76ha) which is proposed have an unrestricted discharge and we are of the view, considering the high risk of surface water flooding to the site and surrounding area, that the proposed strategies could improve upon the current 65% betterment in proposed discharge rates (in the 1% CC event), by providing attenuation volumes which are closer to greenfield rates. There appears to be no justification made as to why this can not be achieved in line with The Mayor's: Sustainable design and construction SPG 2014.
4. We are of the view that the strategies for the site should provide a more sustainable form of SuDS mix on the site which utilises above ground storage where possible. For example SuDS such as, tree pits, green roofs, filter drains; swales, etc should be considered and accounted for within the strategies or reasons given as to why these aren't appropriate for this scheme. There is minimal reference to the use of SuDS within the drainage strategies and FRA; this is not in line with council policy CS16 of Merton's Core Planning Strategy or DM F2 of Merton's Sites and Policies Plan . Attenuation tanks may also silt up over time and will have a maintenance liability.
5. The drainage strategy should detail who will be responsible for the long term maintenance and adoption of the surface water drainage system and confirmation that this has been agreed with the organisation responsible
6. It is unclear in the Price & Myers report how the proposed attenuation tanks will sit within the residential/retail structures at or below podium level and no detail or sections are provided showing the location or position of the tanks. We require clarity on this issue in order to appropriately demonstrate this viable, including accurate drawings (sections and floor plans)to demonstrate the size and location of the attenuation tanks within the structure.
7. Gravity drainage should be optimised across the site and it is concerning that a significant proportion of the site will be reliant on pumped systems. There is no consideration of the unsustainable nature of these pumped systems which may be liable to pump failure.

(Officer comment: see section 22 where the Officer's comments have been addressed)

9.36.9 Merton Council Waste and Refuse Services -

Page 94 Transport doc 12.3.1 mentions residential waste will be brought to the refuse vehicles by golf cart or similar. We do not offer a timed collection. For collection from flats waste should be presented in a euro bin and adequately stored ready for collection and proper access to collect provided for a refuse collection vehicle 26 ton and for crew to access bins within store and access for bin to be brought to vehicle for emptying. We normally deliver this service between 14:00 and 22:00.

For commercial waste assuming we are contracted to collect, it states access will be provided via car park this will be fine as long as there is proper access for a 26 ton refuse collection vehicle and for crew to access bins and bring to the vehicle. This service is delivered between 06:00 and 14:00 for residual waste and between 14:00 and 22:00 for dry recycling.

The plans do not indicate any estimates of waste to be generated by the Stadium. However, the environment statement commits to 95% of the waste generated will be recycled.

The waste collection points are to be located within the stadium, but there is no indication of what this provision will entail i.e. will it be for both refuse and recycling? What capacity will there be for each waste stream?

The 602 residential units do not have provision for food waste containment. L.B. Merton collects three streams of waste on a weekly basis – refuse, co-mingled dry recycling and food waste.

It is not clear where the waste collection points are and the specification and access for the collection vehicles. For example it states; storage containers for waste will be at the basement of the residential properties, close to the staircase.

There are plans for litter bins. L.B. Merton would prefer to see dual litter and recycling bins, which would be appropriate for a development such as this.

(Officer comment; See section 19 where the Officer's comments have been addressed)

9.36.10 LBM Ecology Officer (dated 01/15) – (Appendix 11)

9.37 Responses from Statutory Bodies (2nd Consultation)

9.37.1 Natural England (dated 17/9/15)

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 22 December 2014. The advice

provided in our previous response applies equally to this additional information although we made no objection to the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

9.37.2 Historic England (dated 12/10/15)

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter. The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.

The Wimbledon Greyhound Stadium site is within an Archaeological Priority Area (APA) relating to the River Wandle and it is correct to say that there is little physical evidence of prehistoric activity. However, the APA was designated by the London Borough of Merton because of the multi-phase occupation and usage of the floodplain of the River Wandle across the Borough and there is the potential for buried palaeoenvironmental alluvial sequences and peats, these deposits can have the potential for good survival of organic archaeological remains. Additionally, there is some evidence for later prehistoric activity locally, in the form of pottery and funerary urns found near the Copper Mills (just immediately to the southwest of the site). Additionally, evaluation at 80 Plough Lane in 2002 found slight evidence for potential Roman settlement nearby.

The early Ordnance Survey maps (1865-1916) show that the historic watercress beds which once stood on the northern part of the site were fed from an inlet from the River Wandle, which meandered approximately north to south across the western edge of the site. The origin of this watercourse, which makes the majority of the site almost a natural island, is currently unknown. This unusual hydrological advantage may possibly have made the site favoured for early occupation and usage. Therefore, the potential for the site to contain buried heritage assets of prehistoric and potentially Roman date is actually unknown at this time. Evidence of later mills and other related riverside industries may also be present.

In early consultations with the applicant's agents I advised that understanding the prehistoric and later potential of this site depends on identification and

desk-based modelling of the nature of the subsurface topography within the site. We explored options for gaining further information on this predetermination, but the weight of evidence suggested that the results could not practically be achieved at that stage.

Although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition or conditions on any future consent will provide an acceptable safeguard. I envisage, a condition will therefore be recommended to require a three-stage process of archaeological investigation comprising: first, archaeological monitoring of any development geotechnical works enhanced by a programme of geoarchaeological investigation (borehole survey) to help understand the formation and use of the site and inform the evaluation trenching layout; secondly, archaeological evaluation (trial trenching) to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. If archaeological monitoring of geotechnical pits and boreholes can take place earlier in the development programme this could be a very beneficial and cost-effective means of establishing the potential for archaeological remains to survive.

The applicant has submitted a desk based assessment in support of this application, by CGMS and dated May 2014. I am happy to recommend this document to the Borough as an acceptable stage of assessment for this site.

Can I please state for the record, however, that I do not concur with the statements in section 4.8.2 and 6.5 or other comments with regard to the perceived significance of potential archaeological deposits on this site. The status, value and significance of any deposits is currently unknown and it is simply not possible to classify them at this stage. Without any evidence one cannot state that potential is low or that nationally important remains will not be present! However, I am happy to accept the research content of the DBA and the recommendations in 6.4, in order to progress the application without any further delay.

Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a twostage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. The archaeological interest should therefore be conserved by attaching a condition as follows:

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no

demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative: Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

Archaeological monitoring of geotechnical pits and boreholes can provide a cost-effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a deskbased assessment or field evaluation.

Geoarchaeology Coring

Geoarchaeology is the application of earth science principles and techniques to the understanding of the archaeological record. Coring involves boreholes drilled into the buried deposits to record (and sample) their characteristics, extent and depth. It can assist in identifying buried landforms and deposits of archaeological interest, usually by using the results in deposit models. Coring is often undertaken when the deposits of interest are too deep for conventional digging, or when large areas need to be mapped. It is only rarely used in isolation usually forming part of either an archaeological evaluation to inform a planning decision or the excavation of a threatened heritage asset.

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (predetermination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Refer to Science Advisor

In preparing a written scheme for this site, the applicant's archaeologist should consult Historic England's Regional Science Advisor.

9.37.3 TfL (dated 1/10/15)

Following on from the transport meeting was held back in August and the subsequent Transport Assessment Addendum dated September (2015) TfL has the following comments to make.

For the purpose of completeness, TfL would respond to the points raised in the TA Addendum as follows:

- **Blue badge spaces during a match event:** TfL satisfied that blue badge parking is being provided in accordance with the guidance for Accessible Stadia. No specific London Plan standards for this land-use exist. The applicant has proposed to provide an area on Plough Lane where mobility impaired people should be dropped off and TfL would be supportive of this, subject to no issues being raised as part of the Stage one Safety Audit. It is unclear if this is likely to take place pre or post committee, but either way, TfL would recommend that an indicative location for this drop-off is marked on the plans. The applicant also confirmed that on occasions where the match was not being broadcast live some additional blue-badge parking was likely to be available on the land allocated for broadcasting/ press vehicles to the north-west of the site. This would be supported by TfL and could potentially form a condition of approval.
- **Squash club car parking-** No additional comments from TfL
- **Cycle parking for spectators-** TfL's view is that ideally there should be as close to 200 cycle parking spaces provided for spectators as possible based on the mode share figures presented in the TA. The constraints of providing this number of spaces on site is however acknowledged and therefore in this instance, TfL have no objections with regards to what is currently being proposed. The uptake of these spaces will however need to be monitored through the travel plan and additional spaces provided should they be needed. A potential location for these additional spaces has been identified (Smallwood primary School) and whilst not ideal, it is considered acceptable

in the absence of anywhere better. Cycle parking will also need to be reviewed as part of the updated TA for the 20,000 seat stadium.

- **Rail background demand-** Concern had previously been raised by TfL over potential capacity issues on the rail network and at local stations to accommodate the peak demands generated by the Stadium. The two train operators have confirmed that they haven't identified any issues and this is acceptable to TfL. One outstanding issue related to Haydons Road rail station does however remain, where the train operator has noted that the station is currently closed at the weekend and would require a staff member to be present were it to be opened. No requests for funding were made to facilitate this, but TfL would recommend that this is confirmed in order to prevent any issues at a later date. TfL also made a comment in relation to this in its response to the draft s106 agreement. An updated transport assessment is required prior to stadium enhancements above the initial 11,000 capacity stadium, and further mitigations measures, such as measures to facilitate the operation of Haydon's Road rail station on match days can be secured as an outcome of this process, under a recommended head of term to the S.106 agreement.
- **Taxis-** agree that no dedicated facilities are required and that any potential issues can be dealt with post planning.
- **Residential cycle parking-** Cycle parking is now being proposed in accordance with London Plan standards which is supported. TfL would recommend that a condition requiring this number of spaces is attached to any planning consent along with the precise form this parking will take so the design of the cycle parking can be dealt with post planning.
- **Buses-** A contribution of £1.2m has been secured towards bus capacity enhancements, and reference to this should be included in the s106 Heads of Terms within the committee report. TfL has provided comments on the wording of this obligation in the draft s106 and would welcome the opportunity to provide further comments on future iterations.
- **Pedestrian comfort analysis-** TfL is satisfied with the analysis which has been undertaken for the 11,000 seat Stadium and the improvements which have been proposed as a result e.g. the closure of Summerstown post event to mitigate undesirable levels of overcrowding. The impacts for the 20,000 capacity scenario were much more significant and will require further analysis. To this end there is a requirement for a further TA to be submitted for any significant expansion of the Stadium beyond the initial 11,000 capacity. The applicants consultants have come back and suggested that the trigger for this TA to be a capacity of 15,000 and 20,000. This seems reasonable to TfL and would recommend that requirement is secured either by condition or through the s106 agreement. For the avoidance of doubt however, whilst TfL would be satisfied for a small increase in capacity above the initial 11,000 seats to take place without the submission of a further TA, TfL would wish to avoid small, incremental increases in the number of seats available which may cumulatively have an impact. As a result TfL considers the above trigger

should be for the Stadium to go from 11,000 to 15,000 and then from 15,000 to 20,000. Small increases within these ranges may be permitted without the need for a full TA and so the wording of the S.106 should allow for this scenario. Officers consider that the thresholds of 15,000 and 19,000 to be suitable to trigger the submission of a further TA prior to works commencing that would result in those thresholds being reached, given they equate to the same level of increase above the 11,000 capacity scenario.

- **Sensitivity analysis-** No further comments. Impacts of increased capacity stadium will be considered in the future
- **Operation of local highway network/ mitigation-** No further comments.
- **Management of stadium west access road-** No further comments.
- **Management of nursery/ child care and café in the east stand-** No further comments.
- **Riverside Road Ownership and Access-** No further comments.
- **Layout of Plough Lane and pedestrian access from Waterside Way-** No further comments.
- **Walking Route to Garratt Park-** No further comments.
- No reference to travel plans have been provided but TfL would recommend that a residential and a spectator travel plan are secured through the S106 agreement. Similarly there should be a condition requiring the future provision of construction logistics plans and delivery and servicing plans.

In summary TfL is now satisfied that the transport issues it raised have been satisfactorily addressed for this stage in the process, subject to suitably worded planning conditions and planning obligations. TfL has commented separately on the initial draft of the s106 which was circulated and would welcome the opportunity to comment further on future iterations. TfL would also welcome the opportunity to review your draft committee report prior to the case being determined in order to confirm that its previous concerns have been suitably addressed by the use of conditions and in the Section 106 Heads of Terms. This should hopefully ensure that there are no outstanding concerns when the application is referred back to the Mayor at Stage 2.

9.37.4 GLA – (dated 28/10/15)

I have now had time to review the consultation material and have the following officer-level comments in relation to the issues raised at stage one for your consideration. I understand that my TfL colleagues have been corresponding directly so I haven't included those issues to avoid duplication.

Affordable Housing

GLA officers are still awaiting further information on the proposed affordable housing offer and await further information from the Council. Therefore those comments made within the GLA stage one report ref D&P/3130b/01 are still relevant. At this stage it is not yet possible to determine whether this application accords with London Plan policy 3.12.

Housing

As requested, the applicant has provided an assessment of the residential units against the Mayors baseline and good practice standards demonstrating general compliance with the baseline standards. This is welcomed.

Urban design – north south route

The alterations to the eastern stadium elevation are considered to be a positive improvement that will go some way to addressing those design concerns raised at stage one. The introduction of the new non-match related uses, including a creche and the open area at the centre of the route has the potential to change the character of this space on non-match days by drawing activity along the length of this important primary route and will help create a street-level environment more comparable to that of an average London street.

Inclusive design

The applicant has provided a detailed access statement which sets out how the squash club will be designed with reference to good practice design guidance provided by Sport England's Accessible Sports Facilities. In addition, the applicant has confirmed that it is working closely with Level Playing Fields with regards to all aspects of the accessibility of the stadium and related activities which is also welcomed. These include the location of wheelchair positions, easy access seating, amenity seating, sightlines, pick up/drop off, blue badge parking, routes to and from the stadium and inside the stadium including the platform lift, toilets, concessions, ticketing. It is noted that the platform lifts originally proposed are potentially being replaced with a standard lift and that elevated seating positions will be provided which is welcomed in line with previous comments.

The applicant has provided amended layouts for the wheelchair acceptable units addressing those concerns raised at the original consultation stage which is welcomed. Furthermore, while the use of switchback ramps to access the residential courtyards is not favourable, given the flood risk constraints posed on the site and the inclusion of lifts, they are ultimately accepted. The consideration of means of escape for disabled people is also welcomed and should form part of an updated Flood Evacuation Plan.

The inclusion of accessible seating is welcomed.

The Council should secure appropriate planning conditions to ensure that those measures set out within the access statement are built through to the final proposal.

Sustainable development/energy

Please note that some of the comments below have already been issued to the Council under the cover of my previous email dated 2 July 2015. As set out below, all energy issues raised at the initial consultation stage have been satisfactorily resolved through the submission of further information.

Modelling

It has since been clarified that Part L 2013 has been used for the modelling assessment and sample SAP and BRUKL sheets have been provided. This is welcomed and no further information is required regarding this issue. In addition, the a dynamic overheating analysis of a number of sample dwellings using CIBSE TM52 has also since been undertaken. The results outlined demonstrate that the dwellings meet the CIBSE criteria and therefore no further information is required.

Decentralised energy

With regards to decentralised energy opportunities it is understood that further discussions with the Council's energy officer and nearby site owners have been carried out. However, it has been determined that it is not feasible to establish a connection due to the distances involved. This is accepted in this instance and no further information is required.

Site heat network

In response to the Mayor's stage one comments, the applicant has provided a breakdown of the loads for each building use. The retail units account for less than 1% of the total heat demand and therefore the standalone approach for the retail units is accepted in this instance due to the relatively low loads involved. The applicant should consider providing capped pipes to the retail units to allow flexibility with the final end user.

The applicant has also provided further information on the heating requirements of the stadium. The heating demand of the stadium is significant (18% of the total site), however, the applicant has stated that demand is limited to 30 days per year and in five hour time slots and therefore connection to a site wide network would result in significant oversizing or underutilised plant. However, the applicant has committed to engaging with an ESCO at the detailed design stage and will require that the ESCO investigate connection of the stadium to the heat network. The applicant has also committed to installing pipework from the energy centre to the stadium to allow for a future heat connection. This is welcomed and the measures outlined address the original concerns.

In addition to the above, the applicant has provided further information regarding the running hours of the CHP to support the savings claimed. This is welcomed and no further information is required.

Representations made directly to the GLA and the Mayor

More generally, for your information, we have also received a lot of concern from local residents regarding match day road closures, how this development will coincide with Crossrail 2 work and how congestion and access to the hospital will be maintained (in addition to general traffic concerns). Also, there

has been some correspondence regarding the need to provide a school in the area and the site selection process and I would welcome some further information/background on this issue.

9.37.5 GLA (dated 01/12/15)

GLA officers have now had time to review all the latest flood risk information issued by LB Merton, the Environment Agency and the updated FRA (addendum) from the applicant and officer's now provide the following updated comments for the Council's consideration.

The Environment Agency has since confirmed that the latest flood risk modelling reclassifies the site as being within Flood Zone 3a (with small portions being within Flood Zone 2), as opposed to Flood Zone 3b, which the original GLA consultation response was based on. It is also noted that the latest modelling has reduced the peak flood levels for the 1 in 100 climate change event and given that the proposed flood mitigation, such as the height of floor levels and podium deck have not been altered, it is considered that the revised scheme has increased flood resilience.

In light of this reclassification, the flood risk of the site has been reduced. Development of more vulnerable uses (including residential) on Flood Zone 3a can be acceptable provided the Exceptions Test can be met. Therefore the GLA's previous concerns regarding development on flood zone 3b can be lifted. The applicant's FRA and subsequent addendum documentation indicates that the Exceptions Test can be passed and it is also noted that the latest consultation response from the Environment Agency to the Council (dated 24 November 2015) confirms that based on the latest information from the applicant it can withdraw its objection, subject to a number of conditions being secured to mitigate residual flood risk.

In light of the above, it is considered that the proposed development can be designed in an appropriate way given the flood risk at the site and as such is in general accordance with London Plan Policy 5.12. The proposals regarding attenuation and management of surface water have already been considered to meet London Plan Policy 5.13.

9.37.6 Environment Agency (dated 24/11/15)

Thank you for consulting us on the revised application. Based on the Flood Risk Assessment – Addendum Peter Brett Associates LLP dated April 2015 and the Technical Note by Peter Brett Associates LLP Note No: TN14A, dated 2nd September 2015 we are satisfied that development has addressed the following points raised in our previous objection.

- demonstrate sufficient flood storage compensation is available
- demonstrate surface water can be managed sustainably without increasing offsite flood risk
- demonstrate no increase in flood risk from all sources in the surrounding area

- address the opportunities presented by this development for reducing flood risk for example through the increase in flood storage

We are therefore in the position to remove our objection to the proposed development, subject to the following conditions in section 1 of this response being included on the planning permission.

Section 2: Detailed Comments

Flood Storage compensation

The applicant has demonstrated the proposed scheme will not result in a loss of flood storage in sections 4.1, 4.2 and Appendix B of the FRA Addendum, supported by the Technical Note No. TN14A by Peter Bretts Associates.

The original assessment and the subsequent mitigation measures proposed are based on the 2010 modelling of the River Wandle. The applicant has taken into account the latest modelling for the River Wandle to assess its implication on the development and the proposed mitigation measures. The comparison between the 2010 and 2015 modelling has been included in the Technical Note No. TN14A, and this shows a decrease in flood levels across the site. However, the applicant is still proposing to use the mitigation measures based on the initial assessment, and we accept this approach as conservative. After further consideration on the physical nature of the local circumstances, we remove our objection point on openings (previously referred to as voids). This is covered in Section 4.2.2 of the FRA Addendum. We are satisfied that the applicant has used the correct flood risk information to inform their assessment.

We are satisfied with the applicant's assumption regarding existing non-floodable footprint on site. This is based on specific levels provided by a site survey. It was agreed in meeting between the Environment Agency and Peter Brett Associates that the stadium stands was deemed to be non-floodable. This has been confirmed following a discussion with the applicant as noted in Section 4.1 of the FRA Addendum.

Surface water flood risk

In our previous response we requested further information on the surface water drainage for the site. On 15 April 2015, the responsibility for giving advice on major planning applications for surface water flood risk transferred from us to Lead Local Flood Authorities (LLFA's). We understand the London Borough of Merton is satisfied with the surface water drainage details submitted and intend to secure the implementation of proposed surface water drainage scheme by way of planning condition.

River Wandle Modelling and Merton's Strategic Flood Risk Assessment

The Strategic Flood Risk Assessment (SFRA) for the London Borough of Merton was first prepared in 2008, using the 2008 Wandle Flood Risk

Mapping Study. The London Borough of Merton is going through the process of updating their SFRA using the latest River Wandle modelling which was completed by us in May 2015.

We have provided the latest modelling outputs to the London Borough of Merton to support their assessment, and we have been in discussion with them about their definition of the functional floodplain in accordance with Paragraph 15 in the Planning Practice Guidance which states that “Local planning authorities should identify areas of functional floodplain in their Strategic Flood Risk Assessments in discussion with the Environment Agency and the Lead Local Flood Authority. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. However, land which would naturally flood with an annual probability of 1 in 20 (5%) or greater in any year, or is designed to flood (such as a flood attenuation scheme) in an extreme (0.1% annual probability) flood, should provide a starting point for consideration and discussions to identify the functional floodplain.

The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. Areas which would naturally flood, but which are prevented from doing so by existing defences and infrastructure or solid buildings, will not normally be identified as functional floodplain.”

The updated modelling has resulted in a smaller outline of the defended 1 in 20 year annual probability flood event and shows the site to now fall outside of this flood outline. The modelling information is publicly available by request from our Customer and Engagement Team at kslenquires@environment-agency.gov.uk

The London Borough of Merton have now published their Level 1 SFRA Maps online which show their final definition of functional floodplain for the borough. These maps are based on the latest River Wandle modelling and the defended 1 in 20 flood outline has been used to define functional floodplain.

Therefore, the site now falls outside of the functional floodplain (Flood Zone 3b). The site is now shown as falling within Flood Zone 3a.

Wandle Model briefing note

We will shortly be providing a briefing note which set out the changes in flood risk to the site which have resulted from the new River Wandle Model. We ask that you make this available to any parties that have an interest in the site to help inform their understanding of flood risk.

Planning Policy

Functional Floodplain

As stated above the London Borough of Merton has amended their Functional Flood Plain based on the latest River Wandle modelling. The site is now shown to fall with the flood zone 3a. Table 3: Flood risk vulnerability and flood zone 'compatibility of the Planning Practice Guidance states that more vulnerable development is only deemed as appropriate in flood zone 3a subject to the passing of the exceptions test.

Sequential Test

The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding. The Environment Agency is not responsible for the undertaking of the sequential test.

It is our understanding that the London Borough of Merton consider that the sequential test was carried out as part of the site allocations process and no other suitable site for sporting intensification with enabling growth has been identified.

If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:

Exceptions test

The National Planning Policy Framework states that for the Exception Test to be passed:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

The Environment Agency are responsible for assessing second part of the Exception test. We consider that the applicant has address part two of the Exception test through the submitted information.

LB Wandsworth (dated 30/10/15) – Appendix 12

9.37.7 Network Rail (dated 29/9/15)

After reviewing the information provided in relation to the above planning application, Network Rail has no objection or further observations to make.

9.37.8. Sport England (dated 9/10/15)

Further to confirmation provided by the Council and that provided by Christophers Squash and Fitness Club, Sport England can confirm that it is happy with the level of car parking provision now proposed. This will need to be secured either via planning condition or Section 106 Agreement.

Please see Sport England's response dated 29th September for Sport England's current formal consultation response.

9.38 **Responses from Non-Statutory Bodies (2nd Consultation:**

9.38.1 Christophers Squash and Fitness Club (dated 8/10/15)

We welcome the opportunity to respond once again to the latest consultation on the development of the Stadium in Plough Lane. As a squash and fitness facility we have been on the site since 1972 and, as a not-for-profit organisation, we offer a vast range of community facilities to the local community including the use of 7 squash courts.

Despite far from having the best facilities we still have upwards of 70,000 person visits a year and it's possible that we have the strongest squash club - in terms of team squash – in the whole country and we believe this is a key asset that the council and its community cannot afford to lose and yet, despite one positive improvement in this latest submission, we believe that the plans for the site will not only see the demise of the club, but we also do not believe the plans meet the planning brief as set out by the council in its Sites and Policies Development Plan in 2012 as it impacts upon the squash and fitness club.

However, we would first like to welcome the proposal in the September revised plans to provide the club with 19 parking spaces – without which we also do not think a club like ours could be viable given the vast quantity of teams we have arriving from all over Surrey and London with immense regularity. Our major and substantive concern, however, still remains.

In relation to the squash and fitness facilities, the council's own original brief stated, quite clearly, the expectations of any developer. It stated that:

A squash and fitness club exists on the site. Proposals should include the provision for an equivalent or enhanced squash and fitness club as part of sporting intensification.

As a consequence, the current consortium submitting a planning application and a major 'competitor' proposing a greyhound track consulted with members of our club and developed plans for this 'replacement provision'. These detailed plans were not only shared with us, but were shared in all the

community consultation meetings where diagrams and plans were made available for all to see and these showed a newly developed squash and fitness centre. All people present were told, quite explicitly, that a new club would be provided for the local community. We do not consider that it would be the intention of any party to provide misleading information, but if a full club is not re-provisioned along the lines of the original plans submitted, it will very much look like this has been the case and the local community will have been informed incorrectly.

Obviously we reserve our right to contest the current application if the facility is not 're-provided' but we would hope that as a consequence of this submission further consideration will be given by both the council and the developer to amend the plans accordingly.

9.38.2 Wimbledon Society (dated 12/10/15) – See Appendix 13

9.38.3 Wimbledon E Hillside Residents Association (dated 06/10/15)

Our Association represents 800 households over ten roads just to the NW of the Plough Lane site. This responds to new information and amendments submitted in support of the above application.

In our view, the additional information and amendments submitted with this application does not improve it, nor make it more sustainable or acceptable. You may know we recently learned that both Crossrail2 and TfL had NO IDEA Merton Council is forcing through a 20,000 seat stadium at the same time as the Wimbledon link to Crossrail2. (Having attended the recent **Wimbledon Community Forum**, it was local people who informed them of the Council Leader's ambitions.)

The Council and Crossrail/TfL must make decisions on the scope, timing and location of Crossrail2, then, and only then should the Council explore 'sports options' and residential development and gentrification of Plough Lane (listed in the London Plan as an essential industrial corridor serving central London), and indeed any/all options for the Future of Wimbledon Town.

Should the Planning Officer choose to ignore the views of thousands of local residents and approve the application, we would insist on a 100% CAR FREE Transportation Programme for the Stadium and also for the occupants of the 602 flats (specifically: include a blanket Section 106 prohibiting any Owners, Residents, Visitor or Business Permits in any part of this entire development programme). Without these types of conditions, the proposal is entirely unacceptable.

WEHRA Issues with the Stadium Application

WHERA - Change of use to Residential

- Approval of this application will set a dangerous precedent, inviting other landowners in the area to change from light industrial to residential. Plough

Lane and environs must be around 100 acres, and all of it is ripe for regeneration. We estimate if the entire area were to convert to residential, it could mean around 10,000 new homes in the area. Consider the impact of that on Transportation, Schools, NHS and the Environment. At Elephant & Castle or the Olympic Park, for example, one can see how a Master Plan is designed - in full and open consultation with stakeholders; from there a sustainable and exciting building programme is carefully crafted by London's top architects and urban planners.

- Merton Council appears to be approaching Plough Lane as a 'one off', apparently blind that others are already looking into redevelopment of their holdings. In January 2015 **Volante** conducted a consultation, proposing to convert their small warehouse plot into 100 flats. Should the Stadium application proceed today, the Council will be unable to refuse Volante change of use, and others will swiftly follow, without a proper Regeneration Plan for the whole area.
- We are concerned that the applicant's proposal for 602 homes may be increased, should this application be approved. Recalling Atkinson Morley, when 'developers couldn't afford the plans as proposed', planners were compelled to approve even greater density than initially approved. We fear this will happen on this site.
- Galliard is one of London's most prominent house builders. They have built thousands of homes in run down sites such as Plough Lane, and they are probably already exploring additional development possibilities there.

WHERA - Environmental

- The proposed Stadium and housing are proposed for a class 3b Wandle Valley flood plain. The application provides no confidence the applicant understands how much mitigation is required, for structures with very deep, intrusive foundations. Each and every metre of earth dug out and replaced with concrete means ground water will be moved to adjoining land. What happens in Springtime during increasingly heavy rainfall, and throughout the year when the Wandle regularly floods? Sewers all over Wimbledon could suffer a knock on effect from this development.
- The design has virtually no green space. As proposed, it would attract a dramatic increase in pollution levels, without inclusion of dozens of carbon-reducing trees and shrubs and an innovative transport policy to counter the counter carbon increase.
- The Carbon Footprint of entire proposal has not been properly considered. Pollution levels are already significant; this will raise it to an unacceptable level and set a deadly precedent for this massive area. There will be a tremendous increase in risk of water pollution, with too much proposed to be drawn on Thames Water supply to area, and not enough - nor flood-proof mechanisms to remove waste water (foul and grey), to deal with Wandle River flooding and rainwater run off. The risk of drinking water pollution will

increase - not just in to new homes but to all existing homeowners and businesses in the area.

- The proposal doesn't include on-site composting facilities, food waste management systems, on-site recycling shuts (and method for ensuring high compliance), rainwater and other grey water collection (e.g. Shower/bathwater), storage and usage programmes to tend green spaces and reduce total water consumption levels (grey water for toilets/washing machines/external taps, Stadium turf watering system, etc).
- While it appears the applicant seems to be trying to convince the Environment Agency that the Stadium is just about acceptable, he is a long way off from designing innovative, sustainable and FLOOD-FRIENDLY housing for some of London's most vulnerable land.

WHERA - Traffic flow/Transportation Master Plan

- Transport proposals are misleading, appear naïve and do not reflect the true impact on additional traffic, with this application.
- The Government has amended future master transport plans, to include pedestrian and cycle route. Given the known importance of walking/running/cycling for wellbeing of ageing population (NHS funding crunch), where are the widened footpaths, cycle routes, jogging paths for new residents?
- Merton Council really must set this application aside until a professional Transportation Master Plan be developed, including the full regeneration of Plough Lane and an estimation of how Crossrail 2 will fit in.
- Parking exists for local people. The Stadium proposal assumes it will require no additional parking, which is incorrect. The parking amenity current residents enjoy will be removed forever, causing them a loss of enjoyment of their own homes.
- Any large, new stadium or venue in London must rightly aim for **100% public transportation** for visiting fans. Where is that in the proposal; has Merton learned nothing from the hugely successful 2012 Olympics?
- We're told the Football stadium = used once a week. Rugby = used once a week. What other stadium use will happen on weekdays weekends and evenings? What are traffic/noise/policing needs going to be during these periods and what compensation will local people be offered, to offset this great loss of amenity?

The Distributor roads are too small to accommodate more vehicles, and the road need to be widened or alternatives offered to reduce volume. The roads in our neighbourhood: Leopold, Woodside, Alexandra, Parkwood, Rostrevor, Springfield, Alexandra and Gap Roads all have heavy traffic now, and there is no capacity for additional volume.

WHERA - Inadequate Infrastructure

- Information in the application confirms the area already has a limited, ageing infrastructure designed for light industry, and with the addition of anything residential, will exceed capacity on every front. Rather than jerry-rigging water, power, gas, roads, footpaths etc. we urge Merton Council to prepare a full REGENERATION PROPOSAL.
- Amenities required for thousands of new residents (no appreciation that schools, surgeries, corner shops, jogging paths, quiet green spaces for well-being of new residents etc).

WHERA - Politics over Propriety

- Local people were told at a Wimbledon Community Forum last year that the Stadium will be built on Plough Lane and it will be for football. Local homeowners and stakeholders have not taken part in an exploration of the many possibilities for the whole of Future Plough Lane; instead we have a *fait accompli* that may or may not be the best choice for this site. In any case we have little confidence in this application, with its' long list of flaws.
- Merton Regeneration and Sustainability Manager appears to be urging Merton Planning Officers to find ways **through** the hurdles; surely the right approach is to seek to have the applicant **CLEAR THE HURDLES** carefully established by the **London Plan**, **TfL** and the **Environment Agency**.

In summary, we understand that With Future Comes Change, and we are happy to embrace changes to our area that are thoughtfully developed and well executed. There is always some give and take in the process; sadly with this application, there is all TAKE and little GIVE. As Wimbledon residents, we want the highest-possible SUSTAINABLE specification, a future-proof transportation master plan, and due consideration for the flood plains this Stadium would be sited within. We want a professional, future-focussed Regeneration Plan for the Plough Lane Industrial Area. It has been said many times that Wimbledon is the Beating Heart of Merton. If we kill off Wimbledon Town/Station with this initial 'football-mad' proposal, we kill off the heart of the Borough. We all deserve better, not just for Future Wimbledon, but for Future London.

The proposal as submitted is NOT SUSTAINABLE. We urge the applicant to withdraw his application and re-group.

9.38.4 Wimbledon Park Residents Association (dated 9/10/15) – See Appendix 14

9.38.65 Councillor Charles A Lescott – (Earlsfield ward, Wandsworth) (dated 8/10/15)

I wish to write on behalf of the residents of Earlsfield ward, Wandsworth about the revised plans for Wimbledon Stadium. A lot of concerns have been raised with me about the problems surrounding transport and parking, both during development and on match days once finished. The roads in the area

experience high levels of congestion which the plan refers to but fails to address these as the applicants don't expect anybody to travel to matches by car. I think this is irresponsible and misleading. Particularly as it talks about measures to deal with parking on match days. Access to St Georges Hospital is a major worry as well.

There remain concerns about flooding which may affect the homes on the development as well as the wider area, school provision and other services which will impact Earlsfield more than any part of Merton.

Since raising residents concerns at the Wandsworth Planning Committee I don't think enough has been done to address them in the revised plans.

Residents do not object to development full stop but feel that the applicants have not come up with an adequate plan to address their concerns.

9.38.4 Merton Green Party (dated 15/10/15)

Further to our comment of the 12th September, we have seen a report in the Wimbledon Guardian of 15 October that only 10% of the homes will be affordable. Given the Council's 40% target, this strengthens our argument that applicant's viability assessment and that commissioned by the Council be made public so that others with an interest can see the evidence on this vital issue.

9.38.5 Garratt Business Park (dated 8/10/15)

I wish to object to the revised application for Wimbledon Stadium on the basis

- The current traffic flow in the vicinity of the stadium exceeds capacity, the development scheme has a negative impact on local and especially Wandsworth highways and possibly Riverside Road and there are no obvious solutions or deliverable improvements that will be made to mitigate impact
- It is possible that local road closures will be necessary to Match days which will significantly hamper local business
- The local parking capacity is already oversubscribed and no extra provision has been proposed; the scheme will bring more residents into the area plus visitors for whom parking has not been made available, there is no provision to offer new parking provision for this displaced (i.e. the St Georges' staff) on the current Stadium site on a regular daily basis and no proposals made to extend the M-F parking restrictions on Summerstown to weekend and evening match days/times
- There has been no serious acknowledgement of potentially security risks to the privately owned Garratt Business Park and no proposals made to mitigate these risks

9.38.6 Southfields Academy (dated 8/10/15)

I am writing to continue to express my full support for the application for AFC Wimbledon to build a football ground on the site of the greyhound stadium in Plough Lane.

Southfields Academy has recently entered a partnership with AFC Wimbledon to deliver football courses for local children in the school holidays. We are also hosting football and sports sessions for disabled children using Southfields Academy facilities and AFC Wimbledon coaches. I value this partnership and I am exploring options with AFC Wimbledon in other areas. I would expect the new stadium to bring further opportunities for joint ventures with us and primary schools in the local area.

I also feel that the regeneration of the area will lead to increased economic activity that will benefit the young people of both Merton and Wandsworth. The current site offers very few employment opportunities so I would welcome the new jobs that will come with the building project and once the stadium has been completed.

9.39 Internal Responses (2nd Consultation)

9.39.1 Merton Climate Change Officer –

Following several discussions, clarifications and amendments to the proposed Energy Strategy for the proposed stadium at Plough Lane I can recommend the development for approval as it has demonstrate compliance with the regional and local sustainability targets and policies. The applicant has submitted evidence to demonstrate that there is a low risk of overheating associated with this units not equipped with Mechanical Heat Ventilation and recovery. Clarifications and correction have confirmed that some mistakes were initially made whilst calculating the fabric efficiency levels within the development. The applicant has provided evidence to demonstrate that they are in correspondence with other potential development sites that could be connected to the proposed site wide Combined Heat and Power (CHP) Network. Information from the councils heat mapping study was shared with the applicant in order to assist in the identification of external sites that might be suitable for connection to the site wide CHP network.

Provided that the applicant commits to developing the site in accordance with the energy strategy provided I recommend that the application is approved. This would include adhering to the sustainable design and construction standards and achieving the levels targeted within the energy strategy.

9.39.2 Merton Planning Policy (Education, Open Space, and Biodiversity) Officer -

Further comments to those sent in January 2015 with regards to the above application and planning policy matters concerning education, health, open space, biodiversity, play space and sporting facilities.

Education

1. No additional comments.

Health

2. In accordance with London Plan policy 3.17 and the Mayor's Social Infrastructure SPG (May 2015), the applicant has submitted a Health Impact Assessment (HIA).
3. I note the Public Health officer's (May 2015) qualified acceptance of the HIA and the August 2015 comments from NHS England, which refer to existing pressures at local GP surgeries, their inability to expand and the need for the provision of a new GP surgery on the neighbouring 'Volante' site.
4. Merton's Strategic Community Infrastructure (CIL Regulation 123) List only refers the Mitcham Local Care Centre. A financial contribution that would meet the tests within CIL Regulation 122, i.e. "...*fairly and reasonably related in scale and kind to the development*", could in this stance provide suitable mitigation.
5. With the above planning obligation, the proposals would generally be in accordance with planning policies that seek to ensure that new development enhances local health and wellbeing.

Open space

6. No additional comments.

Biodiversity

7. No additional comments.

Play Space

8. In my previous comments I referred to the route to the park via St. Martin's Way but from the subsequent survey that has been carried out by the transport consultants, it has transpired that pedestrian improvements and signage directing users via Summerstown and Garret Lane would be preferred.

8. For the proposals to meet the policy requirements with regards to play space for children of 5 years and older, a planning obligation should be secured that would ensure sufficient funding for:

- Pedestrian improvements and signage from the site to Garratt Park,
- to fund a study identifying the need for improved play facilities in Garratt Park, and
- a pro rata contribution for the facilities identified in the aforementioned study.

Sporting facilities

10. I note Sport England's comments sent 18 June 2015 but I am of the opinion that the proposals do meet the relevant second bullet point test in paragraph 74 of the NPPF:

74. *Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*
 - *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*

- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
 - *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*
11. The replacement sports facilities should be viewed as a whole, i.e. the new football stadium with squash, dance & fitness facility with dedicated car and cycle parking. The proposals constitute *better provision in terms of quantity and quality*, than the existing facilities.
12. I don't think a community use/access agreement would in this instance pass the statutory test in CIL Reg 122(2)(a) "*necessary to make the development acceptable in planning terms*".

9.39.3 Merton Flood Risk Management Engineer

The London Borough of Merton as Lead Local Flood Authority (LLFA) is now able to remove our previous objection to this development subject to the following conditions and further to review of the revised application and latest information submitted including the Flood Risk Assessment – Addendum Peter Brett Associates LLP (dated April 2015) and the Technical Note by Peter Brett Associates LLP Note No: TN14A, (dated 2nd September 2015).

We note that the FRA Addendum includes revised surface water drainage strategies produced by Price Myers and Momentum for both the Stadium and for the residential and retail uses across the site and we are satisfied that these revised reports address our previous comments. The surface water drainage strategies demonstrate that the post development site runoff will be reduced by 75% compared to existing runoff rates, which is a significant improvement on the present scenario and poor drainage regime that exists on the site today. The proposed diversion of the Thames Water surface water sewer will be subject to approval and consent by Thames Water.

Based on the most up to date River Wandle modelling undertaken by the Environment Agency, the site is now located in Flood Zone 3a and is now not shown to be within the Functional Floodplain (Flood Zone 3b). The most up to date Environment Agency flood risk mapping is included in the Technical Note by Peter Brett Associates LLP Note No: TN14A, (dated 2nd September 2015), which forms part of the application documents submitted in September 2015. The London Borough of Merton have also published the new flood risk maps on the LB Merton website as part of the update to the boroughs Strategic Flood Risk Assessment and this includes the revision to the Flood Zone 3b flood outlines.

We advise that the following flood risk and drainage conditions are placed on any application granted:

Non-Standard Condition:

The development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment (FRA) by Peter Brett Associates LLP dated October 2014, supported by the Flood Risk Assessment – Addendum by Peter Brett Associates LLP dated April 2015 and the Technical Note No. TN14A by Peter Brett Associates LLP dated 2nd September 2015. The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of flooding to the proposed development and future users, and ensure flood risk does not increase offsite in accordance with Merton's policies CS16, DM F1 and DMF2 and the London Plan policies 5.12, 5.13.

Non-Standard Condition:

The development hereby permitted shall not be occupied until such time as a floodplain compensation scheme is implemented which ensures that the flood risk is not increased, as detailed in Section 4.4 of the submitted FRA and supported by Section 4.1, Section 4.2 and Appendix B of the submitted FRA Addendum. The implemented scheme shall include flood openings (voids) and these voids must be maintained and remain operational for the lifetime of the development. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of river flooding to the proposed development and future users, and ensure flood risk does not increase offsite in accordance with Merton's policies CS16, DM F1 and the London Plan policy 5.12.

Non-Standard Condition: The development hereby permitted by this planning permission shall ensure that finished floor levels for all residential units shall be set no lower than 300mm above the 1 in 100 year plus climate change flood level (in metres above Ordnance Datum) as detailed in Section 4.1 of the submitted Flood Risk Assessment and Addendum. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of flooding to the proposed development and future users in accordance with Merton's policies CS16, DM F1 and the London Plan policy 5.12.

Non-Standard Condition:

The development hereby permitted shall not be occupied until such time as a Flood Warning and Evacuation plan and procedure is implemented and

agreed in writing to the satisfaction of the Local Planning Authority. The Flood Warning and Evacuation Plan shall be implemented in accordance with the submitted document included within Appendix D of the FRA Addendum by Peter Brett Associates (FWEP Issue 2, Ref:21533_020 dated March 2015) and the procedures contained within the plan shall be reviewed annually for the lifetime of the development. Consultation of the plan shall take place with the Local Planning Authority and Emergency Services.

Reason: To reduce the risk of flooding to the proposed development and future users in accordance with Merton's CS16 and policy DM F1 and the London Plan policy 5.12.

Non-Standard Condition: No development approved by this permission shall be commenced until a detailed scheme for the provision of surface and foul water drainage has been implemented in accordance with details that have been submitted to and approved in writing by the local planning authority and in consultation with Thames Water. The final drainage scheme shall be designed in accordance with the details submitted in the Flood Risk Assessment – Addendum by Peter Brett Associates LLP dated April 2015, including the Price and Myers Surface Water Drainage Strategy (Re-issue Civil Engineer's Statement – Below Ground Drainage (Rev P6 – For Planning)) and the Momentum Structural Engineer's Drainage Strategy Addendum (AFC Wimbledon Foul and Surface Water Drainage Strategy – Addendum (13th Feb 2015, Ref: 1785)).

The drainage scheme will dispose of surface water by means of a sustainable drainage system (SuDS) to sewer at the agreed restricted rate in accordance with drainage hierarchy contained within the London Plan Policy (5.12, 5.13 and SPG) and the advice contained within the National SuDS Standards. Where a sustainable drainage scheme is to be provided, the submitted details shall:

- i. provide information about the design storm period and intensity, the method employed to delay (attenuate) and control the rate of surface water discharged from the site at a maximum rate of 180.19l/s for the 1 in 100 year climate change event. Appropriate measures must be taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation; and
- iii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.

Reason: To reduce the risk of surface and foul water flooding to the proposed development and future users, and ensure surface water and foul flood risk does not increase offsite in accordance with Merton's policies CS16, DMF2 and the London Plan policy 5.13.

9.39.4 FutureMerton Urban Design Team

URBAN DESIGN COMMENTS

The comments below refer to the urban design and placemaking aspects of the Wimbledon Stadium proposals and have been developed collaboratively by urban design specialists in the futureMerton team.

Wider Context

The Wimbledon Stadium site is located in a harsh urban environment with no over-riding local vernacular or neighbourhood characteristics in which to draw from. The area is, at present, characterised by industrial and retail shed buildings and car dealerships whose impact on townscape is negative or neutral at best. The site also borders a significant electricity sub-station which is a constraint in terms of creating routes through the site as well as articulating active frontages on the western edge of the site.

The proposal to redevelop Wimbledon Stadium with the addition of residential, commercial units and a football stadium is a significant investment in an otherwise overlooked part of the borough. There are clear benefits in terms of intensifying development, adding vitality to the local economy, provision of new routes through the site and the opportunity for the development to be a catalyst in creating a new style and character for the wider neighbourhood.

The scale and density of the scheme is not insignificant, but has been discussed at pre-application stage and there is an understanding that the quantum of the development is essential to delivering the regeneration of the site. Given the site's wider context; the overall approach to the development is sound. There are details which will be essential to ensuring the scheme is of the highest quality which are highlighted in the suite of planning conditions attached the PAC report.

Layout

Every effort has been made to connect the site into the surrounding street network, however the constraints of the site, particularly to the west have limited the ability to fully integrate the new development. The provision of the new north-south street provides a central spine to the development and connects Plough Lane to Summerstown/Garrett Lane. The new route provides access to the stadium and new housing as well as providing a more attractive alternative route for pedestrians and cyclists.

The residential frontage on the north-south street includes stepped entrances (1/2 storey up from the street; mimicking the form of many Victorian and Georgian London streets) which enhances overlooking and natural surveillance of the street. Regular doors onto the street provide a good level of animation which is essential for the public realm to feel more like a street and less like an access corridor. The height difference also increases the amount of defensible space between the public realm and residential dwellings; which will be an advantage on event days.

The stadium is set out on-site with the main stand to the west. This is to optimise the spectator experience for home fans and the media (with sun setting in the west, TV cameras have to face east)

The location of the stadium to the west of the site also provides a welcome barrier between the residential element of the scheme and the Plough Lane electricity sub-station. The layout of the scheme successfully ensures that the stadium and enabling development (residential, retail and squash club) are well integrated and provides definition to the Plough Lane frontage (which is lacking in how the current greyhound stadium sits isolated from any other buildings)

Residential Quality

The residential quality of the scheme overall appears to be of a good standard and has been well thought through by the architects. The scheme has been designed in accordance with the London Plan Residential SPG with particular attention paid to the number of apartments per core, and minimising as far as possible, the number of single aspect units.

The use of a range of brick is welcomed (a lesson learned from nearby rendered developments) which adds a robustness and sense of permanency to the residential scheme. As with any major development of this size, the brick detailing is critical and would benefit from further refinement (to add character to each block and avoid a monotonous approach to the elevations) which can be achieved via planning conditions in respect to materials.

Architecture & Appearance

The residential development is, by necessity a high density apartment scheme; whilst uncommon in Merton, it's a typology seen across London, particularly along the Thames from Wandsworth to Woolwich. The basic form includes parking and servicing at semi-basement level with residential above. The residential development is arranged around a series of courtyard blocks. This creates a series of smaller squares, which help to break down the mass and increases the enclosure and feeling of ownership and community around each courtyard. Ground floor units have their own private garden space within the courtyard and upper floor apartments have balconies overlooking the courtyard spaces. There is a planning condition relating to the detailing of the Plough Lane / Summerstown landscaped corner which would benefit from better articulation of the gable ends at ground level and a rationalisation of the landscaped ramp access.

The architectural approach to the scheme is the simple and uncluttered 'new London vernacular' which emphasises the use of brick and echoes the form of many of London's Georgian terraces; utilising a regularised grid of windows on street elevations; limiting the use of unnecessary decorative add-ons. Planning conditions have been drafted relating to the final choice of materials, window and balcony finishes to ensure an elegant approach to the final product. We'd also recommend that, should the developer change their

architects, that the original architects have sign off, in dialogue with Merton Council, over any design changes to the scheme.

Height and Scale

The massing of the overall scheme relates broadly to the scale of the adjacent stadium. The north-south blocks are lower than the taller 9 storey east-west blocks. This orientation maximises the daylight and sunlight in the courtyard blocks. The choice of brick facing also delineates between the taller blocks and the lower blocks; creating the impression that these elements are different buildings in a street scene, adding visual interest.

Active Frontages

Animation of the public realm is essential in a major scheme of this nature. The applicant has made good progress in ensuring that there are regular residential entrances and cores located on all street facing elevations. The stadium itself now presents a more active frontage to the north-south street incorporating a café, crèche and club store. The main retail unit onto Plough Lane should also provide an active frontage to the new Plough Lane plaza. To ensure that all street frontages remain active, we recommend planning conditions to ensure that retail doors and windows remain visually connected to the public realm and are not, in future, covered by window displays and advertising.

Public Realm

The development provides new routes and spaces as well as improvements to the existing road network which are considered in the transport comments and will be dealt with under s278.

As well as the active frontage considerations, new public spaces need to be well designed in terms of materials, lighting, security, street trees, other landscaping, wayfinding signage and gateway markers (eg: AFC Wimbledon gateway arches) Whilst we accept that the proposed north – south street and plazas are at concept stage, we strongly recommend that detailed public realm designs are submitted under planning conditions prior to the occupation of the site.

CONCLUSION:

FutureMerton urban design team have been involved in the strategic planning and design of this site; from the site designation in Merton's Local Plan, through to pre-application and detailed planning.

The site is heavily compromised by its surroundings but provides the opportunity to establish a new character and urban form for the North Wimbledon area. Stadiums add many benefits to the local economy and identity of a place. The closest comparator to this stadium in terms of scale is Oval Cricket Ground; which has sat within a dense residential neighbourhood for

many years. The AFC Wimbledon proposals seek to mimic these characteristics by introducing a traditional pallet of materials and network of streets and spaces through the site. The stadium itself has its own identity and, as best as a stadium can, provides active frontages onto the north south street and hospitality entrances on CopperMill Lane.

The fine tapered floodlights (referred to as the toothbrushes at pre-app stage), will be a visible element; perhaps the most visible/iconic part of the stadium from Plough Lane entrance plaza. The south-eastern corner of the stadium is where, architecturally, some drama should be introduced into the street scene utilising the floodlights and stadium signage. As officers, we have reservations about the proposed AFC Arches. We recognise the benefits in marking the threshold of the site and emphasising the gate-way to the stadium; but feel that the arches are clumsy in their design and may hamper emergency vehicle access. We'd recommend a planning condition to refine the detailed design of this small element of the scheme.

The scheme has also been reviewed by Merton's Design Review Panel on 28th May 2014; from which refinements to the detailed design and layout of the development have been made.

In terms of urban design and site layout; the architects have responded well to the numerous site constraints and have presented a well-designed, mature architectural approach to the scheme. We have no objection to the scheme and recommend approval (with detailed planning conditions)

10. POLICY CONTEXT

10.1 Local Policy

10.2 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the statutory development plan in force for the borough is the Merton Core Planning Strategy (2011), the South London Waste Plan 2012 Merton Sites and Policies Plan and Policies Map (2014) and the London Plan (with 2015 further alterations). The following documents are also material policy considerations:

Local Development Scheme (2014),
Statement of Community Involvement (2006),
Sustainability Appraisal (Core Strategy, 2010, and Sites and Policies Plan, 2013),
Supplementary Planning Documents,
Annual Monitoring Report (2013-14)
Sustainable Transport Strategy and Local Implementation Plan (LIP2) (2011-31)

10.3 Regional Policy

10.4 London Plan (Consolidated with minor alterations since 2011: Revised early minor alterations to the London Plan published October 2013, and further alterations to the London Plan published March 2015)

10.5 Other GLA Policy Documents

Mayor's A Sporting Future for London
Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Providing for Children and Young People's Play and Informal Recreation SPG
Accessible London: achieving an inclusive environment SPG
Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy
Transport Strategy;

10.6 National Policy

Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives'

The National Planning Policy Framework (2012)

National Planning Practice Guidance

Environmental Impact Assessment Regulations (2011)

11. PLANNING CONSIDERATIONS

11.1 The application is a major development, which is the subject of an Environmental Impact Assessment, and which has been guided by its SPP allocation for '*Intensification of sporting activity (D2 Use Class) with supporting enabling development. Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation.*'

11.2 It is not the place for this report to consider or debate the merits of the allocation of the site for 'sporting intensification with enabling uses' since this has been done in detail during the public consultations and Examination in Public of the now adopted Sites and Policies Plan. This report will consider only the acceptability in Planning terms of the proposed development, with relevant weight given to the policy designation of the site.

11.3 Members should also note that whilst at various times during and after the Sites and Policies Plan Examination in Public there was publicity of an alternative proposal for the site comprising the retention of a Greyhound stadium on site with enabling uses, there has been no pre-application submission in respect of such a scheme nor is there a planning application for this. As such, Members should determine this application on the information before them and on its own merits.

11.4 This report will discuss the key planning considerations in turn.

Principle of Development
Urban Design
Landscaping
Conservation and Archaeology
Standard of Residential Accommodation
Residential Amenity
Development Operation and Transport
Refuse and Recycling
Inclusive Access
Secured by Design and Security
Hydrology and Flooding
Sustainability
Social Infrastructure
'Volante' (46-76 Summerstown)Site

12. PRINCIPLE OF DEVELOPMENT

12.1 Principle of the Loss of the Existing Greyhound Stadium

12.2 The site is bounded by commercial and light industrial units in addition to some office, retail, and food uses. It is located between two designated industrial areas within Merton's Core Strategy (land to the south) and Wandsworth's Core Strategy (land to the north).

12.3 The existing Greyhound stadium has been operating since 1928 and with its associated parking is the main use of the site. The Stadium has hosted stock car racing and the car park is used 3 times a week for car boot sales. The applicant advises that the car parking area is also used as informal parking for staff of nearby St Georges Hospital, Tooting.

12.4 As noted by the Planning Inspector during the Sites and Policies Plan EIP, the Mayor of London's position on the retention of a Greyhound stadium within the site as part of any redevelopment evolved as the Plan progressed. In 2012, initial responses from the Mayor's office supported the Council's preferred use of the site, which did not require retention of the Greyhound stadium. Then in 2013 the Mayor supported the retention of a Greyhound stadium where feasible. However, subsequently and shortly before the Hearings he modified his position to say that:

12.5 *'Based on further discussions with the Council, the landowners and further information regarding the aspirations for the site, the Mayor is of the view that while the retention of a greyhound stadium use at the site would be ideal, the intensification of a sporting use at the site in the form of other financially viable stadia uses, where feasible, would ultimately be acceptable in strategic planning terms. The delivery of a sports-led mixed-use redevelopment, which has regard to London Plan policy on retail and town centre development (Policy 4.7) and that supports London's cultural, sport and entertainment provision (Policy 4.6) would be considered to be in accordance with London Plan policy.'*

- 12.6 The adopted Sites and Policies Plan allocation for the sites accepts the loss of the existing Greyhound stadium as part of any proposed redevelopment and there are no other Local Plan policies which seek to specifically protect use of the site for Greyhound racing.
- 12.7 The London Plan also does not specifically protect greyhound racing as a sport or cultural provision and neither is there any such protection of it in the NPPF.
- 12.8 The proposals will provide sporting intensification at the site through the provision of a professional sporting venue and improved Squash club and fitness facilities, which will be enabled by the provision of new homes and small scale retail development.
- 12.9 As such, it is considered that the loss of the existing Greyhound stadium as part of any redevelopment of the site is acceptable in principle.
- 12.10 Loss of the existing employment uses on site**
- 12.11 The London Plan designates Wimbledon as a major town centre with medium future growth potential, driven by moderate levels of demand for retail, leisure or office floor space with physical and public transport capacity to accommodate it.
- 12.12 Within the Core Strategy, Wimbledon is designated as a ‘Major Centre’ and is the only settlement within the borough with that designation.
- 12.13 The Core Strategy sets out the spatial vision for the area and a key priority is to “*support local community life through education and employment opportunities, cultural and sporting assets, community services, healthcare, recreational activities and other infrastructure that meets local needs.*”. Paragraph 4.24 of the Core Strategy identifies the Eastern half of the Borough (including the surrounds of the Wimbledon Stadium) as an area that is characterised by problems relating to poor economic prospects, lower educational attainment and lower incomes. Paragraphs 4.25 and 4.26 of the Core Strategy recognise that regeneration is required to address these “pockets of deprivation” and improve the poor public realm.
- 12.14 Wimbledon Stadium is identified as Site Proposal 37 in the Sites and Policies Plan, which sits alongside the Core Strategy. The Council’s preferred use of the Site 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.*”
- 12.15 The aim of national, regional, and local policy is to retain employment uses where possible. There is some employment on site at present including jobs associated with activities within the greyhound stadium, the squash and fitness club (which will be replaced) and some small commercial activities within the car park. In this instance the terms of the lease agreements for the businesses on site are such that they can be served notice to vacate the site

at any time i.e. the site owners could clear site irrespective of whether any permission for its redevelopment exists. Whilst the requirement for the relocation of existing businesses within the site is unfortunate, it is considered that any redevelopment of the site would provide an opportunity for a much higher level of employment to be generated than existing.

- 12.16 It is considered that the economic impacts of the project can be split into two broad categories: those generated by the construction phase which will tend to be temporary and those generated by the operation phase which will tend to be long-term.
- 12.17 Both the construction and operational phases will have direct and indirect impacts on employment. Direct impacts will be the creation of employment within the site as a result of the development's construction and operation and indirect employment will that which is linked to those phases but which may be located elsewhere within/outside of LBM or LBW e.g. suppliers for contractors/businesses directly involved in the development. Of importance is also the indirect employment to be created a result of the spending in the locality by residents of the new dwellings. In line with Merton's Sites and Policies Plan 2014 policy DM. E4 *local employment opportunities*, applicants will be required to submit an employment strategy before construction commences to demonstrate how opportunities for local residents and businesses to apply for employment and other opportunities during the construction of the development and the resultant end use.
- 12.18 Given the scale of the proposed development, the potential economic uplift to the immediate and nearby areas as a result of the proposed development is therefore likely to be substantial.
- 12.19 Garratt Business Park and Summerstown Industrial Estate are located adjacent to the stadium car park along Riverside Road and Summerstown. These comprise of a number of small and medium sized businesses offering a wide range of goods and services including a large group of art studios, a photographic studio and bakery. These also provide some other commercial uses such as car servicing.
- 12.20 Whilst the Greyhound stadium, ancillary parking (plus car boots sales), and smaller commercial units would be lost as part of the proposal, the Squash and fitness facility would be re-provided as part of the new development. The occupier of the replacement Squash and fitness facility has not yet been determined however the existing occupiers, Christophers Squash Club, have expressed an interest in leasing the facilities and have made arrangements in the meantime to decant to alternative premises during the construction period.
- 12.21 The table below summarises the existing AFC Wimbledon staff numbers and projected staff numbers (11, 000 and 20, 000 capacity)

Positions	Existing Number of Employees	Proposed Number of Employees	Proposed Number of Employees
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		(11,000 capacity)	(20,000 capacity)
Football staff	34	35-39	45
Bar, Admin, and other part-time staff	56	64-71	91
Community Football Scheme & Youth Development Programme Coaches	38	44-48	62
Total	128	143-159	198

12.22 Whilst the exact quantity of jobs to be created by the operation of the residential, retail, and Squash and fitness facilities is unknown as yet, they would contribute towards creating a higher level of employment at the site than at present.

12.23 Impact on Adjoining Employment Sites

12.24 The site is located beside protected industrial land in Merton and Wandsworth although the site itself has not been designated for industrial uses. Merton's Strategic Industrial Location (SIL), as defined in the London Plan, at Plough Lane lies to the south of the site and designated industrial land at Garratt Business Park (LBW) lies to the north.

12.25 The site itself lies completely within Merton and within the Merton area, to the west and south, is bounded by a National Grid sub-station, Plough Lane and commercial units beyond, which are part of a retail park. To the east and north of the site, and within LBW, are Summerstown Road and the commercial units along it and Riverside Road, which provides access to Garratt Business Park (including a Cappagh Waste recycling site).

12.26 LBW has not made Officers aware of any proposals to redevelop Garratt Business Park. In their consultation response LBW raised concerns regarding the impact of the proposed development on the functioning of Garratt Business Park and the Cappagh waste facility. The applicants have addressed this through the site layout whereby the sensitive residential units are located as far away from the business park as much possible and as far as possible are orientated to face away from it. Improvements will also be made to Riverside Way which will benefit not only the development but improve the quality of access to and from the business park by its users. Access to the Stadium would also be controlled through a Stadium Management Plan to limit the impact on the business park on match days.

12.27 Volante site, 47 – 76 Summerstown, Tooting

12.28 Also part of the 'Site 37' in Merton's Sites and Policies Plan 2014 but in separate ownership and not part of this planning application is the Volante site and this is currently in light industrial use as a flooring supplier. This would remain unaffected by the proposed development as it has been designed around this site and future redevelopment of it. Any application for redevelopment of the Volante site would likewise need to be designed in response to the Stadium development.

12.29 **Kingsmeadow Stadium**

12.30 This stadium is subject of a sale to another football club, dependent on the outcome of this current application. AFC Wimbledon cannot complete a sale of the Kingsmeadow stadium unless permission is granted for the proposed development.

12.31 The continued usage of Kingsmeadow stadium by another football club following any departure of AFC Wimbledon would help to ensure its sporting and employment use.

12.32 **Conclusion**

12.33 The loss of the existing businesses from the site is regrettable however the proposed development is in accordance with its policy allocation and due to its scale would generate a significant level of employment during its construction phase in particular. Once operational, the development would also result in a high level of local spending.

12.34 There also exists a significant opportunity with the proposed development to create local employment from the construction and operational phases, encompassing apprenticeship level posts through to skilled level positions. Such an approach is encouraged by local policy. As such, should the application be approved, it is recommended that a condition be attached requiring the applicants to submit to the Council, for approval in writing, a dedicated employment strategy which includes a commitment to source an appropriate percentage of apprentice and skilled labour from within Merton and Wandsworth boroughs. Should there not be an adequate level of particular skills within these boroughs, the applicants could then source this from outside of Merton and Wandsworth.

12.35 It is not considered that the proposed development would jeopardise the Merton SIL or adjacent Wandsworth SIL. Access to the SIL would remain as existing. When matches are being held, the SIL would not be in operation and any Stadium Management Plan would include provisions for the management of Riverside Road prior to and after matches. The proposed development would include improvements to both Riverside Road and the junction between it and Summerstown, which would benefit both the site and Garratt Business Park.

12.36 **Principle of a New Football Stadium**

12.37 The principle of a new sporting facility at the site has been discussed in detail in section 6, and it is considered that this element of the development is acceptable in policy terms subject to other material considerations discussed further on in this report.

12.38 Sport England have been consulted on the application and have confirmed that the site is not considered to form part of, or constitute a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184), and therefore Sport England considered this as a non statutory consultation.

12.39 The Football Association (FA) has been consulted on this application and as part of Sport England's consultation with them on the application, the FA have stated:

1. 'The FA and London FA are fully supportive of the stadium development plans at Plough Lane, AFC Wimbledon as it will increase capacity and drive up attendances at matches, enhance the fans match day experience whilst improving the financial stability of the club all of which are consistent with the goals of the FA Strategic Plan 2011 – 2015.
2. AFC Wimbledon are a Football League Club (League Two) affiliated to the London FA. They are a supporter owned club playing out of Kingsmeadow Stadium in Kingston and currently shares its ground with Kingstonian FC a step 3 national league pyramid club (Isthmian League Prem).
3. London FA have a positive working relationship with AFC Wimbledon Foundation including a number community programmes that help to deliver against the FA National Game Strategy. A report on the work of the community team for 2013 is attached below. It is recognised that the stability and success achieved at the senior level directly supports the wider benefits of the game as demonstrated by the AFC Wimbledon Foundation.
4. The application references compliance with stadium design – A guide to Safety at Sports Grounds (known as the Green Guide) and the need to secure the Sports Ground Safety Authority Licence.'

12.40 On this basis, Sport England has offered its support to this aspect of the proposed development.

12.41 Sporting Facilities and Need

12.42 The proposed development would provide a 11, 000 - 20, 000 seater football stadium to be used by AFC Wimbledon for matches and activities associated with their community work, in addition to a replacement Squash and fitness facility of 1,730m² of floor space. The Squash and fitness facility would include:

- 6 squash courts
- Including 1 show court with raked seats
- Gymnasium
- Physiotherapy and Hydrotherapy suite
- Dance studio
- Bar and café
- Admin and reception area
- Changing rooms and showers

- 12.43 The applicant has advised that they would anticipate St Georges Hospital making use of the facilities also.
- 12.44 19 parking spaces are provided within the basement parking area underneath Block A specifically for the Squash and fitness facilities and which could only be accessed by patrons. 20 cycle parking spaces are also provided.
- 12.45 The SPP allocation for the site requires any redevelopment to be for '*sporting intensification with enabling development*' and which must include re-provision of Squash and fitness facilities. In this instance the sporting intensification is provided through the Stadium and replacement Squash and fitness facility.
- 12.46 There has been no defined 'need' within the borough for a Football stadium since the original Wimbledon Dons football club vacated the site in 1991, relocated to Milton Keynes, and thereafter rebranded as the 'Milton Keynes Dons'. The proposed football Stadium therefore is a reflection of the desire of the AFC Wimbledon Club to return to the borough as its 'spiritual home'. The principle of a proposed football stadium is considered acceptable in policy terms subject to other material considerations.
- 12.47 There is no defined 'need' for an additional Squash or fitness facility within the borough and a search shows that the borough appears to be well provided for in terms racquet sports. However the "issues" section of Site 37 allocation in Merton's Sites and Policies Plan states that proposals should include the provision for an equivalent or enhanced squash and fitness club as part of sporting intensification.
- 12.48 The existing facilities are leased to Christophers Squash and Fitness Club and are located within a two storey building adjoining the Greyhound stadium. Existing facilities comprise:
- Squash courts
 - Gym with cardiovascular and resistance equipment, and free weights section.
 - Personal trainers
 - Daytime Studio classes for the 3-16 year age group, including Ballet, Tap and Street Jazz.
 - Flexibility, toning and strengthening classes for the less mobile/elderly

- Fitness Studio classes suitable for all levels of fitness such as high energy Circuit Training, Pilates, Martial Arts and various Aerobics sessions.
- Physiotherapist.
- Sports Injury & Rehabilitation (Including Osteopathy and sports massage).

- 12.49 Access to these facilities is through Membership of the club only and with different membership prices for different activities.
- 12.50 Although a final occupier of the new squash and fitness facilities has not been determined yet, Christophers Club has expressed an interest in leasing the site. The Council (and Sport England) would support the facilities being run by Christophers given their previous association with the site however the Council cannot legally bind the applicant to leasing the facilities to them since it is a commercial decision and outside of the remit of Planning. The final occupier of the facilities is not a Planning consideration, only that the building is provided for the final occupier and that they are occupied and ready for use by completion of the relevant phase of development.
- 12.51 Sport England are supportive of the proposed Squash and fitness facilities and in addition to supporting the lease of the building to Christophers Club, Sport England have requested that it be subject to a Community Use Agreement (CUA) to ensure that there is an element of 'community'/non-member use of the facilities. Officers do not consider that this is reasonable since the existing Squash club is not subject to such an agreement and although is registered charity, it is run as a commercial business with member only facilities. Imposing a CUA on the facilities would detrimentally harm its viability since the hours of community/non-member use could be at peak times and could deter an occupier from taking the facilities, putting the deliverability of the facilities in jeopardy.
- 12.52 Sport England have also requested that the replacement facilities are fitted out above shell and core level to ensure the facilities are delivered.
- 12.53 Officers consider that the requirement through a S106 legal agreement for the facilities to be provided fitted out is sufficient to guarantee delivery of the facilities and with restrictions placed on the occupation level of the residential units until this occurs. This ensures that the facilities are provided and that the commercial decision of who leases them is left with the applicant, as it should be, and that there is an incentive for this to be completed as a priority because there would be a restriction on residential unit occupation and therefore no income to the developer until this has occurred.
- 12.54 **Wider sporting provision**
- 12.55 It is an aim of national, regional, and local planning policy that adequate opportunities for sporting and leisure exist within boroughs and that they are as easily accessible as possible for all regardless of age or mobility.
- 12.56 It has already been established that the proposed development would not result in a loss of sporting facilities but rather an increase in sporting offer

through the proposed Football stadium and replacement Squash and fitness facility.

12.57 602 units are proposed which would equate to 1,505 occupants (based on the national average occupancy rate of 2.5 people per dwelling). This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. Sport England seeks to ensure that the development meets any new sports facility needs arising as a result of the development.

12.58 Sport England's Sports Facilities Calculator (SFC) has been used by them to provide an indication of the likely demand that would be generated by this development for certain facility types. The SFC indicates that a population of 1,505 would generate a demand for 0.08 swimming pools (£283,497), 0.11 sports halls (£343,733), 0.01 indoor bowls centres (£25,269) and 0.05 artificial turf pitches (£51,632 3G or £45,506 Sand). This financial contribution towards existing off-site leisure facilities would be covered by Merton Community Infrastructure Levy (CIL).

12.59 The table below lists the Council operated leisure centres and commercial gyms within 2 miles of the site:

Leisure Centre/Gym	Walking Distance from Site
The Robert Lowe Sports Centre, Blackshawe Road, SW17	0.6 miles
Tooting Leisure Centre, Greaves Place, SW17	0.7 miles
Virgin Active, North Road, SW19	0.8 miles
Wimbledon Leisure Centre, Latimer Road, SW19	1.1 miles
Nuffield Health Fitness, The Broadway, SW19	1.3 miles
Yorkys Gym, Charlmont Road, SW17	1.3 miles
Wandle Leisure Centre, Mapleton Road, SW18	1.8 miles

12.60 The table below summarises the parks and recreation grounds within 2 miles of the site:

Park/Recreation Ground	Walking Distance from Site
Garratt Park, SW18	400m
Wandle Meadow Nature Park, SW19	0.7miles
Haydons Road Recreation Ground, SW19	0.9miles
South Park Gardens, SW19	1.1miles
Durnsford Road Recreation Ground, SW19	1.2miles
Wimbledon Park, SW19	1.4miles

12.61 Principle of new housing

- 12.62 The need for new homes in London is well documented and the provision of new residential accommodation is supported by national, regional, and local planning policy.
- 12.63 The NPPF seeks to significantly boost the supply of housing and paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 12.64 The requirement for additional homes is a key priority of the London Plan and the recently published Further Alterations to the London Plan (FALP) seeks to significantly increase the ten year minimum housing target across London from 322,100 to 423,887 (in the period from 2015 to 2025), and this equates to an associated increase in the annual monitoring target across London to 42,389. The minimum ten year target for Merton has also increased by more than 30% to 4,107, with a minimum annual monitoring target of 411 homes per year.
- 12.65 At a local level, Core Strategy policy CS6 relates to Wimbledon Town Centre and the surrounding area and states that the quality of the neighbourhoods within the sub-area will be conserved and enhanced, and incremental development which respects the character and heritage assets within the area will be supported.
- 12.66 Policy CS9 supports the provision of well-designed housing located to create socially mixed and sustainable neighbourhoods, including the redevelopment of poor quality existing housing and will not support proposals that result in a net loss of residential units, or net loss of affordable housing units. This policy also seeks to deliver indicative 500-600 units within the Wimbledon sub-area over the period 2011- 2026.

12.67 Policy CS8 supports the borough wide affordable housing target of 40% which is equivalent to the numerical target of 1,920 affordable homes in Merton for the period 2011-2026.

12.68 The site is allocated within the SPP for '*sporting intensification with enabling uses*', which can include residential use subject to other material considerations. The proposed residential use has been demonstrated through a viability assessment as being vital to enable the development of the proposed stadium and 'sporting intensification' offer of the site and aside from flooding/surface water matters (discussed in more detail further on this report), there are not considered to be any conditions within or adjoining the site which would make a residential use unsuitable.

12.69 Furthermore, the delivery of new residential units at this site, and in a mix of unit sizes, will assist in the delivery of a mixed and balanced community in a sustainable location and this element of the proposal and is considered to be in accordance with the objectives of the NPPF, London Plan targets, and LBM policy.

12.70 Principle of retail use

12.71 A 1,730m² retail unit is proposed within Block C and whilst the occupier is unknown at present, it is envisaged that it will most likely be a food retailer. The application site is in an out of town centre location and national, regional, and local policy generally considers retail uses should be located within main town centres in order to ensure their viability and vitality.

12.72 The NPPF advises that Local Planning Authorities (LPAs) should apply a 'sequential test' to planning applications for main town centre uses that are not in an existing town centre and are not in accordance with an up-to-date Local Plan. LPAs should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. The NPPF also advises that when considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre and that applicants and LPAs should demonstrate flexibility on issues such as format and scale.

12.73 The NPPF advises that when assessing applications for retail, leisure and office development outside of town centres, LPAs should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (which is 280m² in Merton and 2,500 m² in Wandsworth). This should include assessment of:

- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to

five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

- 12.74 The NPPF advises that where an application fails to satisfy the 'sequential test' or is likely to have significant adverse impact on one or more of the above factors, it should be refused.
- 12.75 The applicant has carried out a 'sequential test' in respect of the proposed retail unit, including assessment of sites in Merton and Wandsworth.
- 12.76 The results of the sequential test demonstrate that there are no suitable alternative sites of an adequate size to accommodate the retail unit and furthermore, that it is not appropriate to separate the retail element from the rest of proposal as this would not meet the needs of the proposed residential population. In order to deliver a successful and sustainable mixed use scheme of this scale, it is essential that the 'day to day' retail needs of residents can be met locally.
- 12.77 In accordance with guidance, the submitted Retail Impact Assessment has also analysed the potential impact of the retail floor space on existing, committed, and planned public and private investment on allocated sites within centres including Wimbledon, Tooting, and Earlsfield town and any potential impact on the vitality and viability of these centres. The assessment concludes that due to the scale and intended role of the retail floor space, it will not have a significant adverse impact on the allocated sites and furthermore that it will not have a large enough retail draw as to have a significant adverse economic impact on any of the defined centres within LBM or LBW.
- 12.78 It is considered that the proposed retail unit has been justified in terms a sequential test and that it would not compromise the viability of existing or proposed retail facilities in the locality. Should this application be approved, it is recommended that the retail floorspace proposed by the applicant and which formed the basis of the impact assessment be secured by a planning condition. The proposed retail unit would also create an estimated 51 full time employment positions at the application site, which will help to reduce unemployment levels within both LBM and LBW.
- 12.79 A proposed AFC Wimbledon shop is also proposed however since this would only sell tickets for matches and Club merchandise, it is not considered this would have any impact on the viability or vitality of nearby centres within LBM or LBW.

12.80 Conclusion

- 12.81 The proposed stadium, retail, squash and fitness, and residential uses of the site are acceptable in policy terms subject to other material considerations, discussed below.

13. URBAN DESIGN

- 13.1 The development would result in the replacement of the existing Greyhound stadium, Squash and fitness club, 2-3 storey commercial buildings and large car park with a proposed new Football stadium, Squash and fitness club, retail unit, and 3 new residential blocks with associated landscaping and public open space. The Stadium would be 18m in height with 4 x 45m high 'tooth brush' style flood lights and the residential buildings would provide 602 units and range between 6 and 10 storeys in height. The proposed development would provide a new public pedestrian connection between Riverside Road and Plough Lane ('North-South' street) with new street tree planting along this route and along Plough Lane, Summerstown, and Riverside Road. These street trees would not be adopted by the Council and would be maintained by the site managers.
- 13.2 The density of the scheme based on the site area but excluding the stadium is 590 habitable rooms per hectare. This is higher than the density range as outlined in the London Plan however, the supporting text of Policy 3.4 of the London Plan which seeks to optimise housing potential, also states *that "It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6)"*.
- 13.3 Officers consider that the density of the scheme is acceptable in principle subject to overall design and other material considerations and this view is shared by the GLA in their comments on the application.
- 13.4 The proposed development would result in a significant change in the character of the site with the introduction of a new Stadium, mixed-use, and residential buildings. Any redevelopment of the site has the potential to transform the current poor quality appearance of site into that of a much higher quality and influence future development within the vicinity and therefore overall design is fundamentally important.
- 13.5 The design of the proposed development has been discussed at pre-application stage where it was set out by both Officers and the GLA that in order for a scheme of this scale and density to be acceptable its design would need to be of an outstanding quality. There were common issues raised at pre-application stage by Officers, the DRP, and the GLA, and these were:
- The large amount of what appeared to be 'dead frontage'. Greater detail needed at street frontage level for the whole site, all the way from Copper Mill Lane around to the north of Summerstown Road and also including the North-South route so it can be properly assessed as to how this currently addresses the street and influences the character of the area.
 - Further work required to enhance the position of Stadium entrance and draw attention to it. The entrance will not be visible from the west as it will

be hidden behind residential blocks and aside from the flood lights there is no indication that there is a stadium within the site.

- The public space in front of the Stadium entrance is not well defined in terms of what its role – is it a public space? The route to the entrance? Or the access to the new pedestrian route?
- The east elevation of the Stadium alongside the North South street is essentially a single 'dead frontage' elevation and the view out from the residential units will be of a blank wall/green wall. This elevation needs more animation and particularly due to the narrow width of the adjoining North - South street.
- The south east corner at the corner of Summerstown Road and Plough Lane, with the ramped access requires work. This is the first view of the site when entering the borough from Wandsworth and, from the (limited) detail provided, it currently appears as though the view would be of a flank wall and some landscaped ramps. Can some design features be added to the flank walls? Materials? This corner should make more of a statement.
- The D&A Statement references promoting green and pedestrian links between the north and south – Streatham Cemetery and Garratt Park. However there appears to be no proposals to improve pedestrian crossings of Plough Lane or make this route visually obvious. As per Policy and other comments, a review needs to be carried out to the nearest park and thought given as to how this route can be improved.
- This area will effectively become a 'local centre' and the quality of the public realm must be improved as a result. What features will be added? Is there any scope for some public art pieces for example?

13.6 These comments have been addressed during the course of application through further discussions with Officers and the GLA.

13.7 Members are asked to note that LBW have not objected to the proposed scheme on design grounds and are supportive of the proposed heights of the residential element.

13.8 Site Context

13.9 As noted earlier in this report, the site is somewhat run down and sits within an area of mixed character. Immediately adjoining the site to the west is a National Grid sub-station along Coppermill Lane, which itself is a mixture of commercial uses and a terrace of residential properties. To the south of the site is Plough Lane with mostly commercial uses (car sales, retail park, petrol filling station) and the 5 - 7 storey Plough Lane residential development at the junction with Durnsford Road. To the west of the site is Summerstown road, with mostly 2 storey commercial/light industrial buildings and traditional residential terraces beyond, and to the north is Riverside Road which

accesses Garratt Business Park. At the junction of Riverside Road and Summerstown is the Corner Pin public house. Beyond the commercial areas bordering the site are residential roads with mainly terraced properties.

13.10 Site Master Plan

- 13.11 Aside from the requirement for any redevelopment of the site to include 'sporting intensification' and replacement Squash and fitness facilities the SPP allocation is not prescriptive in terms of the form any redevelopment should take. It was determined at an early stage of the SPP consultation and adoption process that the site would not be subject to its own specific Design Brief. This allows any redevelopment a greater freedom and ability to adapt to/overcome any site constraints but also to potentially be more creative in terms of design. The site adjoins the Coppermill Lane sub-area of the Wandle Conservation Area however does not lie within a conservation area and there are no nearby Listed buildings. This too allows more freedom in design terms.
- 13.12 Given the size of the site and potential number of different uses, a 'masterplan' approach is needed in order to provide a cohesive re-development. Such a masterplan would necessarily need to take into account the adjoining parcel of land comprising the Volante site and possible future redevelopment there.
- 13.13 The applicant considered different options for a masterplan at an early stage of the design process. A selection of these options are shown in the Design and Access statement (pages 34 - 35) and the reasons why they were discounted in favour of the proposed scheme.
- 13.14 The submitted masterplan effectively divides the sites into two halves: Stadium, retail unit, squash and fitness facility, and residential (Blocks C and B), and residential Block A. Block A is separated from the Stadium and Blocks B and C by the proposed North-South street, a completely publicly accessible street and which would provide the main pedestrian access through the site from Plough Lane to the south and to Riverside road to the north. The purpose of the street is to provide access through the site, access to the Stadium, but also to break down what could otherwise be a large and impermeable block of development.
- 13.15 Due to the location of the Volante site, there is no similar public access way running east to west from North-South street through to Summerstown however should the Volante site come forward for development, there may be a possibility to provide such an access/'cut through' to Summerstown.
- 13.16 The proposed stadium is 18m in height and the residential blocks range in height from 6 – 10 storeys. Only two small parts of the development are 10 storeys in height and they are within Block A towards the centre of the site and Block B, to the north of the site and adjoining the Garratt Business Park.

13.17 Further accesses into the site are from Riverside Road, Plough Lane, and Summerstown junctions with both.

13.18 The main building frontages/facades of the development are as follows:

1. Entrance to the North-South street/Stadium entrance.

This principal Stadium corner and the widening of the public space in front signifies the arrival on the site and is a focal point of the masterplan.

North-South street (Stadium and Residential frontage). The stadium facade incorporates turnstile openings and opening parts of the façade to reveal a coffee shop with indoor and outdoor seating on non-match days. This elevation also provides the entrance to an on-site child day care facility which would include indoor and outdoor play space.

2. Residential entrances located along North-South street.

These provide animation and natural surveillance along this public route. There are also gated accesses to the residential courtyards from here.

3. Street facing residential frontages along Plough Lane, Summerstown, and Riverside Road.

These reflect the design of the residential frontages of the North-South street and incorporate glazed entrances and openings to the residential courtyards beyond. Where there are no ground level entrances, detailing in the form of louvres, glazing, and timber panelling are proposed to provide animation and visual interest.

4. Corner frontage at the junction between Plough Lane and Summerstown.

This is a key corner of the development and focal point of the site on approach from Tooting, and this is recognised by the set back and design of the buildings and proposed landscaping.

5. Stadium hospitality, Squash and fitness facility, and retail frontage.

This frontage provides pedestrian entrances for the squash club, retail unit, residential units and stadium hospitality area. The frontage provides an identity for each building function which would be further emphasised by any displays within the façades. Above the retail unit are the residential units of Block C, which surround the private landscaped podium at first floor level.

13.19 The site is subject to a number of constraints comprising fluvial and surface water flooding risks, the adjoining National Grid sub-station, adjoining Garratt

Business, Park, and constrained surrounding road network and it is considered that the overall masterplan has responded well to these constraints. Whilst it is the focus of the development, the Stadium is not located in the most prominent position within the site, with only the south west (main entrance) corner being visible from Plough Lane and the west elevation along Coppermill Lane. This is regrettable and a point which was raised at pre-application stage by Officers, the DRP, and the GLA however given the adjoining sub-station and business park there appears to be little alternative other than for the Stadium to be located in the proposed position so that the more sensitive residential uses could be located as far as possible from the sub-station and business park. The Stadium will still however be a very visible landmark to the site due to its proposed 45m high 'toothbrush' style flood lights. The residential blocks, varying in height from 6 – 10 storeys will also provide a new landmark for the wider area in addition to the existing Plough Lane development of 6 – 8 storey high blocks.

13.20 The 4 courtyards running parallel to the North-South Street will punctuate the development and provide welcome landscaping.. The courtyards are all linked and so provide an alternative parallel north-south route through the site to residents.

13.21 The masterplan has also considered the wider context around the site, in providing new pedestrian and cycling routes, and a network of green space. Plough Lane is historically significant as the location of the original Wimbledon Stadium and siting the main stadium entrance, hospitality entrance, retail unit, and Squash club along Plough Lane provides not only references this but helps provide an active main frontage to the development.

13.22 As with any development, much rests on the quality of materials, finishes, and landscaping used in ensuring its long lasting contribution to an area and these would be subject to final approval by the LPA.

13.23 'Volante' Site, 46-76 Summerstown

13.24 The masterplan for the site has been designed to allow for the possibility of the potential future redevelopment of the Volante site.

13.25 Design Assessment

13.26 The GLA in their comments advise that the London Plan Design SPG considers that to varying degrees, large sites, including many Opportunity and Intensification Areas, can define their own setting. The better the quality of the existing built environment and the more legible the setting of areas surrounding the site, the larger the site needs to be to define its own setting. The SPG states that as a broad generality, sites over two hectares usually have the potential to define their own setting and that this setting needs to accord with the location of the site including distance to town centres and other infrastructure, and with the local and strategic objectives for the area. The SPG states that there is an importance of encouraging pedestrian movement to and from surrounding communities and that this permeability

should reflect desire lines, especially those associated with efficient access to public transport, retail, community and other facilities which in turn supports 'place shaping' to which local communities can relate. Such sites need to support the principle of creating 'walkable neighbourhoods'

13.27 The site area is 5.1 hectares and as such has the capacity to define its own setting and influence future development in the locality, meaning the standard of design must be high, particularly given the density of enabling residential development proposed.

13.28 The Stadium

13.29 The applicant advises that the height and massing of the stadium has been determined by the setting out of the pitch, the generation of spectator sightlines, and the space available on plan as the spectator sightlines need to step up and back in increments. This has resulted in stadium seating bowl that is low rise and on three sides consistent in height. The pitch dimensions have been set out to meet the FIFA standard requirement of a 105m length and 68m width. The run-off area surrounding the pitch is 4m which is above the minimum recommended run-off distance of 2.75m.

13.30 The applicant advises that the orientation of the stadium reflects the orientation of the sun at different times and to optimise goalkeeper and home stand sight lines. The stadium has been positioned along an approximate north/south axis to provide this optimum orientation. This also places the length of the stadium along the boundary adjacent to the National Grid sub-station along Coppermill Lane, which is also the most unsuitable area of the site for residential use. The proposed North-South street separates the Stadium and residential Block A but allows a public thoroughfare from Plough Lane to Riverside Road and Summerstown through the site. On match days this street allows access and exit from the Stadium also.

13.31 The design of the stadium itself follows a relatively standard rectangular 'box' design, with little architectural detailing to provide more interest to the design. This reflects the Club's relatively lower position in the League table and lower available funding, since Stadiums of grander designs are typically those of Premier League and higher earning clubs such as Arsenal or Manchester United. Given the (necessary) location of the stadium where it is within the site, the most prominent feature is the 45m tall 'toothbrush' style flood lights which would be visible at some distance from the site. The Stadium itself would not be overly visible until close approach to the site from Plough Lane or along Coppermill Lane.

13.32 The massing of the stands and roof has been designed to create an intimate and atmospheric stadium however this also has the effect of a low roofline and overall height (approx. 17m). The applicant advises that the leading edge of the roof is too low to install leading edge floodlighting hence the 4'pylon' flood lights proposed. There is no objection to the proposed method of floodlighting and should the application be approved, the Stadium Management Plan/Event Management Plan would control the times of usage

of the flood lighting in the interests of the amenities of the adjoining residential uses.

13.33 Following pre-application advice from Officers, the DRP, and the GLA and comments made from LBM Officers and the GLA during the course of this application, the following amendments have been made to the stadium design, focusing on the East elevation adjoining North-South street, which has always been problematic from a design point of view:

- Replacement of fixed panels to East elevation with opening panels to open out the concourse and provide a new café with outdoor seating area.
- Creation of new child day care facility with entrance and outdoor play space on North-South street.
- Addition of new entrance gate feature at Plough Lane entrance with AFC lettering.
- Use of distinctive feature brickwork for the ramped access to Block A at the Plough Lane/Summertown junction.
- Installation of feature 'gateway' arches at both ends of the North-South street

13.34 It is considered that these amendments have satisfactorily addressed comments made in respect of the detailing and lack of animation of the East elevation and have also resulted in a dedicated space for a child day care facility. The proposed café would be open for use on non-match days and in conjunction with the day care facility, would provide a greater level of activity along North-South street.

13.35 It is proposed that there would be a Club shop at the junction of the Plough Lane entrance and the North-South street and this would be open outside of match days. This would provide a further presence and activity on the North-South street.

13.36 The west elevation of the Stadium runs along Coppermill Lane and would not be overly visible from the public realm. This elevation borders a national grid electrical sub-station and beyond this the River Wandle, light industrial units, and warehousing. There are only distant views of this elevation from the public realm and as such the palette is very different from those elevations which face onto public and residential spaces. As a result the materials are more utilitarian and respond to the character of Coppermill Lane. Whilst it is considered that the proposed design and detailing is acceptable in principle, high quality and durable materials must be used.

13.37 Should the application be approved, a condition can be attached requiring details of all materials to be submitted to the LPA for approval prior to development commencing.

13.38 The south elevation of the stadium would not be visible since it directly adjoins the residential and commercial Block C.

13.39 The full hospitality floor space would not be built out until the 20,000 capacity phase was implemented and if/when this occurs, the area would be provide a more prominent indication of the stadium of along Plough Lane. It would comprise a simple rectangular block clad in curtain walling with high areas of glazing providing views in and out. This block would be cantilevered above a public space, forming the entrance to the hospitality area, South stand, the West stand. Concrete columns would support the cantilevered hospitality block above.

13.40 The amount of hospitality floor space is much lower for the 11, 000 phase and as such the hospitality area would be much less prominent. However, given the level of activity along this Plough Lane frontage from the proposed retail unit, Squash and fitness facility, residential block entrance, and AFC Club shop, this is considered acceptable. The Council would also not wish to see the full hospitality block built out and remaining unused.

13.41 Residential

13.42 There are three residential buildings in the scheme:

Building A: The main part of the residential development to the east of the North-South street, and providing 393 residential units.

Building B: To the north of the Stadium and providing 95 residential units.

Building C: To the south of the stadium, and providing 114 residential units. This residential building is located above the retail unit and Squash and fitness facility.

13.43 The residential blocks range from 6 – 10 storeys in height, with the tallest blocks being located centrally within the site and adjoining the Garratt Business Park. The bulk and massing of the residential buildings has been developed to maximise development of the site, particularly since the residential element is contributing towards financially enabling the stadium, but also in response to the constraints of the site. The site is bounded most immediately by buildings that are 2-3 storeys in height however beyond these are the 6 – 8 storey Plough Lane residential development and 15 storey residential blocks of Hazlehurst Road and Blackshaw Road. As such, in height terms there is a precedent in the locality for the proposed height and massing. Furthermore, since the immediate area is mostly commercial, it is considered that there is more freedom to explore higher building heights and densities.

13.44 Of the residential height, the GLA have commented that whilst a development of up to nine/ten storeys in height on this site is significantly taller than the contextual height of the area, given the scale of the stadium, this does not

present any strategic concern. Nonetheless, for any development of this scale and prominence to be acceptable its design needs to be of an outstanding quality. It is considered for the reasons below that the proposed development is of such a quality and that the proposed scale, massing, and density is acceptable in this location.

- 13.45 As indicated in the submitted Design and Access statement, a number of masterplan options for the site were considered and which included tall oval feature buildings with rectilinear residential buildings, and lower rise structures however with more buildings. These options were partly discounted because of the consequent reduction in amenity space.
- 13.46 In terms of typology, Blocks A and B face the North-South street and are clustered around private courtyard spaces. The building forms are rectilinear, running parallel to the stadium and comprise a series of 'stacking blocks'. The 'spine' blocks which run east-west across the site are taller, with smaller lower blocks running north-south. This concept is enhanced by the proposed use of two different principal materials to the higher and lower blocks. The height of the lower blocks facing the North-South street is consistent to create a unified streetscape. The 'spine' blocks vary in height to break down the lengthy facade.
- 13.47 The bases of the lower buildings are recessed, in order to create visual similarity between the buildings and form a distinct lower level to the residential buildings. The recessed bases are vertically subdivided into double height maisonettes, and glazed entrances to the residential buildings. The recessed bases are also broken up by routes into the residential courtyards with views beyond.
- 13.48 Block A is purposely set at a higher level than the North-South street and includes small front garden spaces to the ground/first floor maisonettes, providing defensible space between the public route and private residential units. The stepped entrances to the maisonettes on the ground floor would provide important levels of activity and animation critical to making this route feel safe and well used but are also part of the podium design of the development in response to the site's flood risk categorisation.
- 13.49 Balconies are grouped into vertical strips, with the windows recessed and with the proposed Timber cladding provide additional detailing to the elevations and visual interest.
- 13.50 Although facing onto Plough Lane, the same design principles have been applied to Block C.
- 13.51 So as to reduce areas of 'dead frontage', and expanses of louvres serving the basement parking below, there is a high level of glazing at ground level and louvres are minimised as far as possible. The Plough Lane frontage is the main façade to the development there are no servicing entrances or refuse stores located along this entrance. Indeed, refuse stores for the development as a whole are located at basement level or at grade but not in public view.

- 13.52 The street frontages of the residential blocks are punctuated with glazed residential core entrances along their lengths and walls bearing no openings are punctuated with areas of textured brickwork, avoiding expanses of blank walls.
- 13.53 In terms of materials for the residential blocks, they are proposed to be of a high quality and to be co-ordinated with the facade materials proposed for the football Stadium. The design intent is that the residential buildings and Stadium appear as one cohesive masterplan. The proposed materials for the residential buildings are predominantly brick and vertical slatted timber, with different shades of brick being used to provide further detailing. Should the application be approved, a condition would be attached requiring details of materials and finished to be submitted to the LPA for approval prior to development commencing.
- 13.54 Retail Unit and Squash and Fitness Facilities
- 13.55 The Retail Unit and Squash Club are designed as an integrated element within Block C. Both are accessible from street level along Plough Lane and include large areas of full height glazing to allow views into the units. The retail unit would be prohibited by a condition on any approval from infilling large areas of the shop front with advertising panels in the interests of the appearance of the development.
- 13.56 In design terms both are considered acceptable and contribute to the high quality appearance of the development.
- 13.57 Impacts on the character of the site itself
- 13.58 The site at present is a mixture of 2 – 3 storey buildings which have been added over time on an ad hoc basis and with parking areas in between. The buildings and parking areas are run down in appearance and the site is subject to a large amount of litter following the car boot sales in particular. The boundary treatments mostly comprise wire mesh fencing approximately 2m in height and with a number of aged advertisements attached to them.
- 13.59 In aesthetic terms the redevelopment of the site would be a vast improvement on the existing situation and would provide a cohesive management of the site in terms of up keep (e.g. rubbish and litter collection and general maintenance).
- 13.60 Impacts on the Character of the Surrounding areas
- 13.61 The scheme proposes residential blocks varying in height from 6 to 10 storeys; given the location of the site it is not considered that the design of the scheme would impact on or have any significance on the wider area of LBM or LBW. The site is surrounded immediately by 2-3 storey buildings however within 0.5m both within LBM and LBW are the tall 6-8 storey residential blocks

of the existing Plough residential development and 15 storey high residential blocks of Hazlehurst Road and Blackshaw Road.

- 13.62 As such, whilst the proposed building heights of this development would appear high in the immediate surrounds, it would be set within the context of other tall buildings.
- 13.63 The GLA have commented that given the largely industrial context of the site, it is critical that the proposal is based on a comprehensive understanding of how the wider area is likely to change and how the proposed scheme does not compromise this. Without this wider understanding the scheme is at risk of becoming a segregated high density enclave surrounded by hostile and unfriendly industrial streets which is a significant concern. In response to this the applicant has submitted an indicative masterplan for the wider area concentrating on the adjoining potential areas for development, and shows how they may be brought forward in the future to include a number of uses such as residential and retail. This indicative masterplan also includes new green spaces and pedestrian/bicycle routes.
- 13.64 Although none of the adjoining commercial sites are allocated for mixed use and/or residential use at present, it is not inconceivable that some may come forward in the future for such a use, such as the Volante site, and the character of the area will change further then. The redevelopment of the Greyhound site may well be the catalyst for future redevelopment of this area and it is considered that in design terms, this development would be a positive precedent.

14. LANDSCAPING

- 14.1 The existing site is completely built over and somewhat run down in appearance. There is no vegetation aside from two Willow trees within the site and street trees located along Plough Lane and Summerstown. As such, the proposed development presents a significant opportunity to both enhance the appearance of the site through natural means and to increase biodiversity within the site.
- 14.2 The application proposes a scheme of high quality hard and soft landscaping, which is reflected in the indicative landscaping details submitted. The final details would be subject to formal approval through a condition attached to any approval.
- 14.3 There are 7 main residential areas of landscaping within the site, comprising the 7 landscaped amenity spaces for use by occupants of the development, in addition to 1 area of landscaping at the Plough Lane and Summerstown junction. Also proposed, are trees to the front of the maisonettes along the North – South street and bordering the site along Plough Lane and Summerstown.

- 14.4 Green roofs are proposed as part of the development's sustainability technologies but would also contribute towards 'greening' the development more in general terms and providing potential habitats for birds and insects.
- 14.5 In terms of hard landscaping, a simple design and materials palette is proposed for the residential communal areas and public areas and any street furniture contained within them. Materials have been indicated which would subtly differentiate between the main publicly accessible areas and the communal residential areas. For example, differing grey paving of varying materials is proposed for the public areas whereas softer, sand toned, resin bonded gravel is proposed for residential amenity areas and with low level (under lit) seating and low level timber planters. Timber decked areas are also proposed within the residential courtyards which would lend themselves to use or for seating.
- 14.6 The residential courtyard areas, as per the development as a whole, have been designed to be fully wheel chair accessible and the landscaped areas include low gradient undulations that would allow use as child play space.
- 14.7 Lighting is a key element of the proposal and details of indicative lighting have been submitted with the application. The Stadium flood lights would be a prominent landmark at any time given their height however other lighting proposed comprises of street lights, bollard lights, up lighters to trees, recessed brick lights to some walls, under lighting to some benches, hand rail lights, lighting to litter bins, and cycle stands.
- 14.8 No public art is proposed as part of the development however this could be requested as part of any overall landscape masterplan.
- 14.9 The landscaped courtyards and main public realm areas (the Plough Lane frontage, the junction of the site between Plough Lane and Summerstown, and Summerstown frontage) play a central role in the development for amenity and aesthetic reasons and so it is particularly important that the final approved details are adequately maintained.
- 14.10 Members are asked to note that any new street trees would not be adopted by the Council and would be maintained by the site managers. Any condition added to an approval requiring full details of all proposed hard and soft landscaping would also require that the approved landscaping is permanently retained and maintained as such.

15. CONSERVATION AND ARCHAEOLOGY

- 15.1 The site lies within the Wandle Valley Archaeological Priority Area, as defined by LBM, which covers the adjoining Copper Mill Lane area. The site also adjoins the Wandle Valley Conservation Area, which includes the Copper Mill Lane sub-area and covers a small separate area to the north of Plough Lane, isolated from main Wandle Valley Conservation Area. This area includes a small terrace of former mill workers cottages, built at the turn of the Century,

the surviving factory building at the end of Copper Mill Lane, and the site of a present car dealership fronting Plough Lane.

15.2 Designated and Non-Designated Heritage Assets

- 15.3 The NPPG defines 'Designated Heritage Assets' as '*A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation*'.
- 15.4 The NPPG defines '*Non Designated Heritage Assets*' as '*Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'*'.
- 15.5 There are 4 Listed Buildings within a 500 m radius of the Site, comprising the Church of St Mary, Lodge to St Clement Danes Almshouses, St Clement Danes Holborn Estate Almshouses and Chapel, and Smallwood Junior and Infants School, all of which are Grade II Listed. The closest of these is the Church of St Mary located approximately 150m east of the study site. These assets have been assessed within the submitted ES, which concludes that the setting of these buildings would not be affected by the proposed development. The Listed buildings lie within LBW and LBW have not objected to the proposals on the basis of any harm to their setting from the proposed development.
- 15.6 There are no designated or non-designated heritage assets within the Site and the only designated heritage asset within the site vicinity is the Sub-Area 1 – Coppermill Lane Conservation Area.
- 15.7 The closest non-designated heritage asset to the site is the Old Copper Mill, which is Locally Listed and lies approximately 150m to the southwest of the site. The submitted Heritage Assessment has indicated that the setting of this building would not be affected by the proposed development. The closest part of the development to the Old Coppermill would be the Stadium (west elevations) and Block C and these would be located 90m and 120m away and at heights of 18m and 29m respectively. The Old Coppermill is not overly visible from Plough Lane, the nearest main road, and is only properly visible on approach from Coppermill Lane or through the adjoining car dealership. As such, its location relative to the site, means that the development would not harm its setting or obscure any main/key views of the Old Coppermill building.
- 15.8 The NPPG states that '*There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.*'

- 15.9 Policies CS14 (Design) and DMD4 (Managing Heritage Assets) require development to be designed in order to respect, reinforce and enhance the local character of the area in which it is located and to contribute to Merton's sense of place and identity.
- 15.10 The applicants advise that a 'desk-top' archaeological investigation of the site has been carried out (site inspection, an examination of published and unpublished material and charting of historic land-use through a mapping exercise) and this concludes that the site has a limited/moderate archaeological potential for the Post Medieval period and a generally low/limited archaeological potential for all other periods. The past development of the site, namely the construction of the Stadium between 1913 and 1935, is also likely to have had a widespread severe archaeological impact.
- 15.11 In their consultation response regarding the application, Historic England (H.E) (formerly English Heritage) advise that:

'There is the potential for buried palaeoenvironmental alluvial sequences and peats, these deposits can have the potential for good survival of organic archaeological remains. Additionally, there is some evidence for later prehistoric activity locally, in the form of pottery and funerary urns found near the Copper Mills (just immediately to the southwest of the site). Additionally, evaluation at 80 Plough Lane in 2002 found slight evidence for potential Roman settlement nearby.'

The early Ordnance Survey maps (1865-1916) show that the historic watercress beds which once stood on the northern part of the site were fed from an inlet from the River Wandle, which meandered approximately north to south across the western edge of the site. The origin of this watercourse, which makes the majority of the site almost a natural island, is current unknown. This unusual hydrological advantage may possibly have made the site favoured for early occupation and usage. Therefore, the potential for the site to contain buried heritage assets of prehistoric and potentially Roman date is actually unknown at this time. Evidence of later mills and other related riverside industries may also be present.'

- 15.12 In early consultations with the applicants, H.E advised that understanding the prehistoric and later potential of this site would depend on identification and desk-based modelling of the nature of the subsurface topography within the site. The applicant has submitted a desk-based assessment, which has been considered by H.E, and they advise that a condition or conditions on any future consent would provide an acceptable safeguard. H.E has recommended that conditions in respect of archaeological investigation, archaeological evaluation, and archaeological monitoring be added to any approval.

16. STANDARD OF RESIDENTIAL ACCOMMODATION

- 16.1 London Plan policies 3.5, 3.6, 3.7, 3.8, CS policy CS 14, and SPP policies DM D1 and DM D2 seek to ensure that new residential development is of a high

standard of design both internally and externally and provides accommodation capable of adaptation for an ageing population and for those with disabilities, whilst offering a mix of unit size reflective of local need.

16.2 Density

- 16.3 The London Plan includes a density matrix (Table 3.2) as one part of a wider policy to optimise development on sites in different settings, with different levels of public transport and accommodating homes of different sizes. The density ranges within the table are sufficiently wide to accommodate the wide range of policy considerations which must be taken into account when optimising development at a particular location. Development at densities outside these ranges will still be considered however require particularly clear demonstration of exceptional circumstances. Exceptionally, higher or lower densities on individual developments may be acceptable where these can be clearly and robustly justified by local circumstances
- 16.4 Given the characteristics of the site, the public transport accessibility level (PTAL) of 2/3, and its urban location, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest a residential density of between 200 to 450 habitable rooms per hectare (hr/ha) for this development. The applicant has provided a residential density figure of 590 hr/ha, excluding the stadium footprint. Following GLA comments, the applicant has clarified that the method used to calculate this figure has been based on net residential area, in accordance with guidance in London Plan paragraphs 3.30 and 3.31 in support of London Plan Policy 3.4, and paragraph 1.3.47 of the Mayor's Housing SPG (2012).
- 16.5 The density ranges recommended in Table 3.2 of the London Plan are not meant to be applied mechanistically and PTAL alone is not an appropriate measurement to inform residential density. In accordance with paragraph 1.3.41 of the Mayor's Housing SPG, in order to be acceptable, any development will need to be of the highest standards of design, and provide high quality residential accommodation that is well designed, and delivers an appropriate mix of units, with sufficient play and amenity space.
- 16.6 In overcoming comments made by Officers, the DRP, and GLA at pre-application stage and during the course of this application, it is considered that the proposed residential quality is of a high enough standard to justify the higher density proposed in this medium PTAL location. Improvements have been made to the design of the East stadium elevation, facing the residential units across North-South street at Block A to improve animation of that façade and increase activity along the spine route. It has also been demonstrated that the proposed development would fit in as part of any future redevelopment of the surrounding area, with the applicants submitting a hypothetical Masterplan of how the surrounding sites may be redeveloped given their site characteristics and existing uses. It has also been demonstrated that the requisite number and mix of units would be fully wheelchair accessible and adaptable. Following the GLA's comments the applicant has supported the requested density calculation by a robust

justification of the proposed residential density against the principles set out in London Plan Policy 3.4 and paragraph 1.3.41 of the Mayor’s Housing SPG.

- 16.7 The applicant advises that the density of 590 habitable rooms per hectare is higher than the density range as outlined in the London Plan, however PTAL is also considered a blunt tool in measuring public accessibility. The applicant draws attention to the supporting text of Policy 3.4 of the London Plan, which seeks to optimise housing potential, also states that *“It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6).”*
- 16.8 The applicant also considers that the design of the scheme has been carefully considered and that density should not be used as a sole indicator. They consider that the residential element sits comfortably within the site and is of a high design quality.
- 16.9 In their most recent comments on the application, the GLA has noted that as requested, the applicant has provided an assessment of the residential units against the Mayor’s baseline and good practice standards demonstrating general compliance with the baseline standards and that this is welcome. The GLA have no objections to the proposed density or standard of residential accommodation proposed.

16.10 Mix

16.11 The accommodation mix of the proposed 602 residential units is as follows:

Unit Type	Total No. Units	% Units
Studio	13	2
1 Bed	212	35
2 Bed	245	41
3 Bed	127	21
4 Bed	5	1
Total	602	100

- 16.12 London Plan Policy 3.8, together with the Mayor’s Housing SPG seeks to promote housing choice and seek a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. Family sized accommodation is taken in the London Plan and LBM policy to include any units of two bedrooms or more. In this instance, this would equate to 377 of the proposed units (63%) of the providing family sized accommodation.
- 16.13 Of the total 602 units, 60 would be for affordable housing (intermediate sales), to be managed by a Registered Provider. Affordable housing provision is discussed further on this in report in section 24.

16.14 Unit Size and Layout

- 16.15 Of the units proposed, 90% are dual aspect and none of the single aspect units are north facing. Whilst it is regrettable that there are some single aspect units, it is unavoidable given the site constraints and scale of development required to enable the 'sporting intensification' required by the SPP site allocation.
- 16.16 In general terms, the residential units are considered to be well laid out internally and the main residential cores are broken up into smaller cores with their own entrance lobbies with lifts and stair accesses from the top floors down to the basement level car park/refuse and recycling storage areas.
- 16.17 The main entrances to each of the cores are from the main public access ways of Plough Lane, Summerstown, Riverside Road, and the proposed North South Street, in addition to rear entrances from the landscaped courtyard areas.
- 16.18 The arrangement of the residential units has been defined to maximise views from living areas to the residential courtyards, and not towards the east façade of the stadium. The balconies of the residential units in Block A, facing the Stadium, are orientated along the North-South street, and not towards the stadium wall.
- 16.19 The accommodation schedule included within the Design and Access Statement demonstrates that all units comply with relevant minimum space standards as set out in Table 3.3 of the London Plan.

16.20 Inclusive Access

- 16.21 Following comments made by the GLA in their Stage 1 report, the applicant has appointed 'Access=Design' as access consultants in respect of the residential, retail, Squash and fitness facility, and public realm aspects of the development. In respect of accessibility to/from and within the Stadium, the applicant has confirmed that the Club are working with 'Level Playing Field', which acts as a campaigning and advisory organisation to its membership and other parties across all sports in respect of disabled facilities and access at clubs and stadia.
- 16.22 The Access and Inclusion statement submitted by the applicant demonstrates that the issues raised by the GLA have been addressed for all aspects of the proposed development and that relevant policies and regulations in respect of access would be complied with. The statement also confirms that all residential units have been designed to an equal standard with no differentiation between affordable and market value, quality, or size.

16.23 Wheelchair Adaptable Units

- 16.24 10% of units across unit mix and type have been designed so that they are 'wheelchair adaptable', which has been achieved by providing adequate spatial and structural provision so that easy adaptation is possible.
- 16.25 Many of these units are 3 bedroom duplex units which have their own private entrances from ground or podium levels, which include lifts. Other units are accessed via a number of communal entrances and all communal entrances will have flush thresholds and would be accessible for wheelchair users.
- 16.26 In their most recent comments on the application, the GLA has noted that the applicant has provided a detailed access statement which sets out how the squash club will be designed with reference to good practice design guidance provided by Sport England's Accessible Sports Facilities. In addition, the applicant has confirmed that it is working closely with Level Playing Fields with regards to all aspects of the accessibility of the stadium and related activities which is also welcomed. These include the location of wheelchair positions, easy access seating, amenity seating, sightlines, pick up/drop off, blue badge parking, routes to and from the stadium and inside the stadium including the platform lift, toilets, concessions, ticketing. It is noted that the platform lifts originally proposed are potentially being replaced with a standard lift and that elevated seating positions will be provided which the GLA welcomes, in line with their previous comments.
- 16.27 The applicant has provided amended layouts for the wheelchair acceptable units addressing concerns previously raised by the GLA at the original consultation stage and which is welcomed. Furthermore, while the use of switchback ramps to access the residential courtyards is not favourable to the GLA, given the flood risk constraints posed on the site and the inclusion of lifts, they are ultimately accepted. The consideration of means of escape for disabled people is also welcomed and the GLA have advised, should form part of an updated Flood Evacuation Plan.
- 16.28 The inclusion of accessible seating is welcomed by the GLA and they have requested that the Council should secure appropriate planning conditions to ensure that those measures set out within the access statement are built through to the final proposal.
- 16.29 General Accessibility
- 16.30 All common areas and dwelling units have been designed with reference to Building Regulations Part M guidance for dwellings and the Lifetime Homes Standards. This includes level access, 800mm clear opening door widths for main entrance doors, internal communal door opening widths of 800mm+ clear and suitable circulation space is provided to refuse storage areas for wheelchair users and other disabled persons. Access to refuse disposal is located at basement level and accessible by lift. The entrances would be level and flush and the door openings no less than 800mm to meet good practice guidance.

- 16.31 Resident mailboxes would be set at a range of heights with a proportion located within a height of 700mm and 1250mm which falls within reach range for standing and seated users.
- 16.32 All residential entrances would be secured with an intercom system, and access to the courtyards is via secured gates. Given the size of the development and proposed uses, there would be an on-site Concierge located to the front of the development and in a prominent location.
- 16.33 The interior finishes will be designed to contrast between surfaces to assist Those with visual impairments orientate themselves within the spaces, to meet current good practice guidance and building regulation requirements.
- 16.34 Communal amenity spaces have similarly been designed to be accessible to all and hard surfacing will be used which would not impede wheelchair use or be problematic for ambulant disabled persons or those with visual impairments.
- 16.35 It is however recognised that some assistance for refuse disposal may still be required for disabled residents and as such, it is considered that the required Refuse and Recycling Strategy and Car Parking Management Plans provide details in respect of this.
- 16.36 Vertical Circulation
- 16.37 The scheme has been designed with stair and accessible lift access to all residential levels and stairs will have risers of an appropriate depth and handrails at both sides.
- 16.38 Lifts installed will of a size to meet Lifetime Homes and other good practice access guidance, including tactile and contrasting call buttons, visual and voice announcement, support rail to available walls, non-reflective materials and an alarm intercom system suitable for persons with hearing impairments.
- 16.39 Car Parking
- 16.40 Of the sixty wheelchair accessible units within the development none will be specifically provided with a car parking space. This is noted as being London Plan compliant however, Lifetime Homes standards require that one parking bay should be provided for every wheelchair accessible or easily adaptable home and therefore this provision does not comply with the standard. Given that total residential parking for the scheme would be 190 spaces, a provision of 60 parking spaces for disabled users would be disproportionate and may not reflect actual take up of residential units by those with a disability. As such, should the application be approved, it is considered that a condition should be added to any approval requiring a Car Parking Management Plan be submitted to the LPA for approval and which details how 'Blue Badge' disabled and non-disabled parking spaces will be allocated and managed, and continuously monitored to ensure disabled residents are allocated a parking space if needed. A similar Car Parking Management Strategy is

recommended be required of the Stadium. The retail unit and Squash and fitness facility will be provided with 2 disabled spaces to be shared, in compliance with London Plan standards.

16.41 Daylight, Outlook, and Privacy

- 16.42 This is a high density residential scheme intended to financially enable the proposed football Stadium and as with schemes of this density, normal separation distances between new dwellings cannot always be achieved. A degree of flexibility is required for large scale schemes such as this and which are located within constrained sites. The residential elements are particularly constrained by the proposed Stadium itself which uses almost half of the site area, meaning that the enabling development must necessarily be built higher. The requirement for certain levels of private and open amenity spaces places further pressures on the design of residential schemes however in this instance it is considered that the units have been designed with internal layouts and orientations which allow for acceptable levels of daylight/sunlight and good outlooks and levels of privacy between units.
- 16.43 All of the proposed units are dual aspect aside from 13 units within Block A however these are not north facing. Therefore, whilst single aspect units would not normally be supported, the very low number of single aspect units as a proportion of the whole development in addition to the fact that they are not north facing, is considered to be acceptable in this instance.
- 16.44 In terms of outlook, the main vistas for the residential blocks are the Stadium and North-South street, Plough Lane and the retail park/commercial buildings opposite, Summerstown, Riverside Road, the New Stadium Road, and the two storey buildings of the Volante site. The Volante site is likely to come forward for redevelopment and it is not considered that a redevelopment of that site of similar height to the proposal here would compromise the outlook, daylight/sunlight, or privacy of the occupiers of the units proposed here or of any potential redevelopment. There is approximately 11m between the nearest window in Block D of Block A and the site boundary of the Volante site and at the 2nd to 5th floors of the proposed development, there is approximately 4.5 metres between the nearest windows in Block E of Block A and the site boundary of the Volante site. At other floors of the proposed development, the distance is approximately 8-9m.
- 16.45 There are units within the rear of Block C which overlook commercial units within the adjoining Garratt Business Park however these are only 1-2 storeys high and the closest units within Block C are located 10m away.
- 16.46 In terms of privacy, there will obviously be an element of overlooking between units located within/near internal corners of the residential blocks, however this is not considered to be of a level sufficient to warrant a refusal of the application. As above, the proportion of units in these locations are a small proportion of the overall units proposed. The majority of units do not directly overlook other units. The proposed balconies have also been recessed to

further reduce overlooking and enable their use for a higher proportion of the year when weather is inclement.

16.47 Private Amenity Space

16.48 The applicant has confirmed that the private amenity space provided for each unit is in compliance with London Plan and Core Strategy requirements as a minimum. Units are provided with balconies and/or terraces and the ground floor maisonettes are provided with rear gardens.

16.49 Children's Play Space

16.50 It was agreed during pre-application discussions that the child yield calculator for the Mayor's Play and Informal Recreation SPG (2012) will be used for this application. Using the methodology in Appendix 2 of the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG (2012), the applicant has calculated an expected child yield for the development of 69 children, which generates a play space requirement of 688m². Of the 69 children expected to live within the development, 39 of them are estimated to be aged under 5 years old and therefore at least 390m² of play space should be provided as door-stop play. It is proposed that the development would provide 900m² of door-stop play within the individual residential courtyards of the development, which have been designed as multifunctional spaces, and to cater for children under 5 years of age. This is acceptable and further details would be secured through a condition attached to any approval.

16.51 The expected child yield of 5-11 and 12+ year olds would be 20 and 10 respectively. Given the constrained site and enabling role of the residential development, there is not the opportunity to provide more open space than is currently proposed however there is a recreation ground within 400m walking distance of the site (Garratt Park, LBW).

16.52 Garratt Park is the nearest park which is most likely to be used by children residing on this site. The shortest actual walking distance between the northern boundary of the site, via St. Martin's Way and Maskell Road, to the nearest entrance gate to the park is approximately 270m.

16.53 It is proposed to mitigate for the lack of on-site play space for 5-11 and 12+ year olds with a proportional financial contribution to LBW for off-site enhancement/improvement works to Garratt Park. This approach has been accepted by LBW who have agreed to carry out an audit of park usage to ascertain potential for improvement/enhancements. A maximum figure for the financial contribution has already been discussed and supported by LBW and the applicant, including the method for LBW to claim the agreed sum, and this would be part of a S106 legal agreement.

16.54 In terms of access to the Garratt Park, concerns were raised at pre-application stage and during the course of this application by officers regarding the quality of access to Garratt Park from the site since the quickest route would involve walking through a light industrial area. It was requested

that an audit be carried by the applicant of an alternative route identifying any potential areas for improvements such as improved signage or pedestrian kerb improvements. This has been carried out however given that the land/highways through which users of the park would need to travel is owned by LBW, the applicant would not be able to carry out any improvement works themselves and it would instead be carried out by LBW using part of the financial contribution to be made for improvements to signage to Garratt Park.

16.55 In terms of quality of on-site play space for under 5-year olds, the applicant has responded to concerns raised by the GLA regarding insufficient information provided in terms of the design and functioning of these spaces. The details provided are considered acceptable however a condition should be added to any approval requiring exact details of the design and locations of the play space areas to be submitted to the LPA for approval prior to development commencing to so as to ensure that the full quantum of play space is provided.

16.56 Noise

16.57 The site is bounded by the main roads of Plough Lane and Summerstown and the lesser used roads of Riverside Road and Coppermill Lane. Beyond these are predominantly commercial units with residential dwellings beyond. The main sources of noise to the proposed residential parts of the development would be traffic from adjoining roads and noise generated from the Stadium on match days.

16.58 It is common for there to be residential uses adjoining busy roads and near to/adjoining commercial uses and it is now also common for new Stadium developments to be enabled by and/or include residential development. With the appropriate sound-proofing and/or use of Mechanical Heat Ventilation, it is possible for the amenities of occupants of residential dwellings in close proximity to Stadiums not to be unduly compromised.

16.59 The applicant has confirmed that noise levels in habitable rooms are expected to be at a level where conversation can be carried out with windows closed. Football matches will rarely finish after 11pm however a S106 legal agreement would require a detailed Stadium Management Plan be submitted which includes an Event Management Plan covering the use of any public address system and flood lights. Conditions should also be added in respect of the opening hours of the hospitality parts of the stadium since the residential units of Block C would directly adjoin these.

16.60 A Noise Management Plan would also be required by condition in order to ensure that appropriate controls existed to minimise any likely noise impact from servicing of the Stadium, Squash and fitness facility, and retail unit. This would include controls on hours of delivery for example. A condition can also be added to any approval in respect of sound-proofing of the Stadium and hospitality areas, retail unit, and Squash and fitness facility to ensure there is no undue impact on the occupiers of the units within Block C.

16.61 Conclusion

16.62 Taking into consideration the SPP policy requirements of any redevelopment of this site and the site constraints, the proposed development is considered to provide residential dwellings of a high internal standard and which comply with the relevant baseline and good practice standards set out within the Mayor's Housing SPG.

17. **RESIDENTIAL AMENITY**

17.1 London Plan policies 7.6 and 7.7, CS policy 14, and SPP policy DM D2 seek to ensure new developments do not unacceptably impact on the amenities of the occupiers of any adjoining and nearby surrounding properties.

17.2 The likely impacts on amenity which would result from the proposed redevelopment of the site would be those relating to noise and vibration, outlook, and daylight/sunlight.

17.3 The surrounding uses are predominantly industrial in nature and the nearest residential properties are located to the west along Coppermill Lane and Plough Lane, approximately 25m from the site, Plough Lane to the east, approximately 215m from the site, Garratt Lane to the east and approximately 70-140m from the site, Keble Street to the east and approximately 55-90m from the site, and Wimbledon Road to the east and approximately 40 metres away from the boundary of the site, and Maskell Road to the East and approximately 145m from the site.

17.4 **Noise and Vibration**

17.5 The geographical impact of noise generated by the proposed development is considered to be most in the immediate areas of Summerstown, Plough Lane, Copper Mill Road and Riverside Road, at residential dwellings adjacent to the site boundaries as well as properties within the development.

17.6 The main sources of noise from the development would occur from site clearance and construction of the development and operational noise from the Stadium, retail, squash and fitness facility, and residential element.

17.7 Site Clearance and Construction

17.8 Noise generated from these phases is likely to be considerable however can be reduced with adequate mitigation. Construction hours would be limited by condition on any approval and a detailed Construction Environmental Management Plan (CEMP) would be required to be submitted to the LPA for approval prior to any work commencing. Mitigation measures included with the CEMP would be those such as:

- Assessment of construction noise mitigation to be undertaken when a principal contractor has been appointed at each stage and detailed method statements and the construction programme are available.

- Considerate working hours for excessively noisy activities.
- Ensuring the use of quiet working methods, the most suitable plant, and reasonable hours of working for noisy operations, where reasonably practicable.
- Locating noisy plant and equipment as far away from dwellings as reasonably possible and where practical, carry out loading and unloading in these areas.
- Screening plant to reduce noise which cannot be reduced by increasing the distance between the source and the affected properties (i.e. by installing noisy plant and equipment behind large site buildings).
- Orienting plant that is known to emit noise strongly in one direction so that the noise is directed away from nearby dwellings where possible,

17.9 Stadium

- 17.10 Residents in LBM and LBW have raised concerns regarding increased noise and disturbance from the Stadium part of the development. Whilst this is inevitable to a certain degree, the adjacent uses are industrial, and the generated noise on match days is unlikely to detrimentally impact on the nearest existing residential dwellings given their siting and distance from the Stadium. The properties most likely to be affected by the Stadium use are those built as part of the proposed development and this is discussed in section 16 of this report.
- 17.11 The Stadium design is also such that the low roofs would create a more intimate atmosphere for spectators but also would serve to dull spectator noise. It should also be noted that the Stadium would only be used for matches 1 – 2 times per week and for the 6 months of the year that the football season operates. Full matches outside of this would be rare and would be subject to limitation through a condition on any approval.
- 17.12 The impact on properties surrounding the Stadium following matches would be short in duration since with adequate crowd control, spectators would be expected to have dispersed and left the site within 20-30 minutes following the end of a game. With the exception of the Corner Pin public house at the junction between Riverside Road and Summerstown, there are no other public house/food facilities within or very close proximity to the site which spectators may use following a match. It is expected that most spectators would either leave to make their journey home immediately or if wishing to stop and visit a public house/restaurant before or after a match, that it would be those within the town centres of Wimbledon, Earlsfield, or Tooting and those close to train/underground stations.
- 17.13 It is not proposed that the Stadium would be used for non-match uses such as large scale music events and a condition restricting the use of the Stadium to

football matches and training only can be added to any approval. Should the Club wish to allow the use of the Stadium for concerts or other such uses, this would then require formal approval from the Council and would be assessed on its merits. The required Stadium Management Plan would control the operation of the Stadium public address system and flood lights, in the interests of the amenities of the occupiers of the adjoining and surrounding properties.

17.14 Retail

17.15 Noise from the proposed retail units (independent unit and Club shop) and associated servicing are expected to be negligible with the implementation of noise limits on any proposed plant and machinery and restrictions on opening hours to be controlled by conditions on any approval, in addition to any relevant licensing and lease agreement terms.

17.16 Squash and Fitness

17.17 Noise from this ground and basement floor facility and associated servicing are expected to be negligible with the implementation of noise limits on any proposed plant and machinery, community use, and restrictions on opening hours to be controlled by conditions on any approval in addition to any relevant licensing and lease agreement terms.

17.18 Daylight/Sunlight

17.19 As part of the environmental impact assessment of the proposed development the applicants have carried out daylight/sunlight testing in respect of the nearest residential properties directly facing the development, which are the upper floors of Corner Pin public house (10 Summerstown) and 99 Summerstown.

17.20 The methodology for assessment of daylight, sunlight and overshadowing matters is set out in the Building Research Establishment (BRE) guidelines (GLA, 2013) 'Site Layout Planning for Daylight and Sunlight 2011'. The document provides advice on site layout and planning to achieve good daylight and sunlight levels within buildings and in the open spaces between them, the measurement tests and target criteria for daylight, sunlight and overshadowing issues, and provides a recommended calculation technique to qualify the available sunlight and daylight.

17.21 This guidance is accepted by LPAs as a means of assessing the issues of daylight, sunlight and overshadowing in relation to neighbouring residential property/ies and public open spaces. In accordance with the BRE Guidelines and with relevant policy guidance, the assessments undertaken have only considered residential properties that immediately surround the site.

17.22 The BRE guidelines advise that bathrooms, toilets, storerooms, circulation areas and garages need not be analysed.

- 17.23 The site is located in an industrial area with some residential properties within the vicinity. The site is bordered by Plough Lane to the south with commercial premises and a cemetery in close proximity. The south-west, west and north-west of the site are bordered by further commercial premises. To the north of the site is the Corner Pin Public House which appears to contain residential accommodation on upper floors. To the east of the site there are predominantly commercial buildings, however 99 Summerstown is a converted public house which has residential use at first floor level and above.
- 17.24 Currently the properties located around and adjacent to the site receive high levels of daylight and sunlight because a large proportion of the site, particularly on the eastern side, contains no buildings and the buildings that are within the site are 3 storeys or less. The largest building within the site is the Greyhound Stadium building, which is 3 storeys in height, and located some distance from the nearest residential properties.
- 17.25 Commercial properties are not considered sensitive receptors and therefore the surrounding commercial buildings have not been tested.
- 17.26 The residential dwellings on Copper Mill Lane were not identified as sensitive to changes in light as their main source of daylight is over the National Grid Sub-Station, with no direct impact on their daylight/sunlight from the proposed development.
- 17.27 With respect to the Corner Pin Public House and 99 Summerstown, the closest residential sites to the development, the daylight/sunlight assessment concludes that at present, given the urban setting in which they are located, the daylight and sunlight levels greatly exceed the BRE guidelines. This is due to the open nature of the northern and eastern parts of the site, allowing for uncharacteristically high levels of daylight and sunlight levels at these points.
- 17.28 Given their proximity to the site and the height of the proposed development, the overall daylight and sunlight impact to The Corner Pin Public House and 99 Summerstown show expected reductions. Both properties currently face on to parts of the site which are open areas of hardstanding, with no existing mass. If the development is approved, the nearest part of the scheme to them would be the residential Block A at 12m and 18m respectively. The daylight/sunlight assessment concludes that the reduction in daylight/sunlight to the Corner Pin Public House would be moderate and the impact on 99 Summerstown would not be significant. As such, the daylight/sunlight impact of the development on these two closest properties and residential properties further afield from the site would not such that would warrant refusal of this application.

17.29 Privacy

- 17.30 It is not considered that the proposed development would result in a detrimental loss of privacy to the nearest residential properties, which are located at Keble Street and Wimbledon Road (behind commercial units along

Summerstown), Maskell Road (behind commercial units along Riverside Road), Garratt Lane, Coppermill Lane, and Plough Lane. The proposed residential blocks will range from 6 – 10 storeys in height however Block C faces a retail park opposite the site at Plough Lane and Block B faces the Stadium and Garratt Business Park. Block A, being the longest block, has the most direct orientation towards the nearest residential dwellings however the majority of these are located behind existing commercial units and/or are not close enough to be affected due to their distance away from the site:

Street/Road	Distance from Nearest Residential Block (m)
Wimbledon Road	40
Keble Street	55-90
Summerstown and Garratt Lane	70-140
Maskell Road	45
Coppermill Lane	25
Plough Lane	215

17.31 Air Quality

17.32 It is expected that the demolition of the existing buildings and construction of the development would generate high levels of dust due to the scale of demolition and construction required. The suspension of particles in the air is dependent on surface characteristics, weather conditions, and on-site activities. Separation distance is also an important factor since larger dust particles, responsible for most dust annoyance, will largely deposit within 100 m of sources. As such, significant dust impact is usually limited to within a few hundred metres of its source. Smaller particles are deposited slowly and may travel up to 1 km.

17.33 Typically the main cause of unmitigated dust generation on construction sites is from demolition and vehicles using unpaved haul roads, and off-site from the suspension of dust from mud deposited on local roads by construction traffic.

17.34 Whilst rainfall is a major mitigator, there may however, be periods when sufficient dust is generated to cause annoyance. This is more likely in the summer months, when higher temperatures evaporate surface moisture more readily. Any Construction Environmental Management Plan required as part of any approval, would be required to include mitigation measures to reduce dust generation and movement from the site as far as possible during demolition and construction phases.

17.35 Dust is not considered to be an issue during the operational phase of the development.

17.36 Conclusion

17.37 Whilst residents in LBW have raised objections on amenity grounds, the formal objection from LBW does not cite potential impacts on the amenities of

nearby residential properties as a reason for objection and the committee report presented by LBW Officers to their Planning Committee considers that the proposed development is acceptable on amenity grounds. This notwithstanding, the distance between the proposed development and the residential properties within LBM and LBW are considered sufficient that there would be not be a level of adverse impact on the amenities of the occupiers to warrant refusal of the scheme.

- 17.38 It is considered that any adverse impacts arising from the demolition and construction phases of the development can be adequately mitigated for through the imposition of a detailed Construction Environmental Management Plan (CEMP) and Construction Method Statement (CMS).
- 17.39 Operational impacts on amenity are most likely to be those arising from the commercial uses (Stadium, retail unit, and Squash and fitness facility) and it is considered that these can be mitigated for by controls on opening hours, delivery and servicing times, sound levels and emissions from plant and machinery, and the imposition of an Event Management Plan for the Stadium, as part of the Stadium Management Plan, which would include controls on the use of any public address systems and Stadium flood lights.
- 17.40 The proposed development is not considered would result in a detrimental impact on the outlook, privacy, or daylight/sunlight of the occupiers of the surrounding residential properties due to the distance of the residential blocks from those properties.

18. DEVELOPMENT OPERATION

- 18.1 There are 4 components to the proposed development: Football Stadium, residential units, retail unit, and Squash and fitness facility, and these will have different operational requirements, and which must be properly managed and co-ordinated to ensure that the functioning of one element is not unduly compromised by another.

18.2 Residential

- 18.3 Once fully completed and occupied, the residential element of the development is the most straightforward in terms of operational requirements since the responsibility of the up-keep of the blocks and communal areas will be the responsibility of a dedicated management company, and internally, the units would be the responsibility of the occupiers.
- 18.4 A Concierge would be located within the ground floor of Block A, at the entrance to the North-South street from Plough Lane, and would oversee the day-to-running of the residential blocks (except the affordable units which would be managed by the relevant Registered Provider) and deal with any maintenance issues/queries from residents.
- 18.5 Each residential block has specific delivery and servicing arrangements. Block A would be serviced from the basement parking area, Riverside Road, and

along the North-South route through the lowering of the bollards to allow small vans through for specific planned deliveries and maintenance. Aside from for this and for planned maintenance of the East façade of the stadium and Club Shop, the North-South street would be pedestrian access only, with bollards at each end of the street raised to prohibit unauthorised vehicular access.

- 18.6 Block B would be serviced from the basement car parking area and from Riverside Road.
- 18.7 Block C would be serviced at grade at the south end of the North-South street. There is adequate space for any small vans/refuse vehicle to enter the plaza area, turn, and exit onto Plough Lane without reversing.
- 18.8 Car Parking
- 18.9 London Plan policy 6.3 advises that the maximum standards set out in Table 6.2 of the Plan’s Parking Addendum should be the basis for considering planning applications and that developments must:
- a) Ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
 - b) Provide parking for disabled people in line with Table 6.2
 - c) Meet the minimum cycle parking standards set out in Table 6.3
 - d) Provide for the needs of businesses for delivery and servicing.

18.10 The maximum standards of table 6.2 are as follows:

Maximum Residential Parking Standards			
Number of Beds	4 or more	3	1-2
Parking spaces	Up to 2 per unit	Up to 1.5 per unit	Less than 1 per unit

18.11 Table 6.2 notes that all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit and that adequate parking spaces for disabled people must be provided preferably on-site 20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

18.12 The proposed residential car parking provision is as follows:

Building	Car Parking Spaces		
	Total	Accessible	Electric Car Charging Points
A	167	17	42

B	33	3	8
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18.13 This equates to 0.33 spaces per unit. The 60 wheelchair accessible units would be allocated an accessible parking space within the terms of their leases should they be taken up by a wheelchair user/s. This proposed level of residential parking is considered acceptable given the PTAL of the site, the level of cycle parking provision, proposed enhancements to Plough Lane, Summerstown, and Riverside Road, and the proposed bus route enhancement secured as part of any S106 legal agreement, and discussed further in this report. Car Club spaces would be located within the residential basement parking area/s and would be secured through a S106

18.14 The majority of surroundings roads within LBM and LBW are within Controlled Parking Zones (CPZs) and it will be confirmed to potential occupiers/buyers of the units whether their unit is allocated a parking space within the development.

18.15 It should also be noted that all of the proposed residential units would be designated as parking 'permit free' by S106 and therefore the occupiers would not be eligible for parking permits within the LBM. The occupiers of the units would not be eligible for parking permits within LBW since the site lies in LBM.

18.16 Cycle Parking

18.17 Policy 6.9 of the London Plan advises that developments should: a provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards (or subsequent revisions) and where possible, provide links to existing and planned cycle infrastructure projects including Cycle Superhighways, Quietways, the Central London Grid and the 'mini-Hollands'. It should be noted that proposed Quietway 5, connecting Wimbledon to central London, is located within a short cycle ride of the site, and the proposals will provide an off-carriageway cycle link to connect to this facility.

18.18 Table 6.3 cycle parking minimum standards are as follows:

Land Use	Long-stay	Short-stay
C3 residential	1 space per studio and 1 bedroom unit 2 spaces per all other dwellings	1 space per 40 units

18.19 TfL had required that the provision of residential cycle spaces be increased from that originally submitted to accord with the new FALP standards. This has been done and residential cycling has been increased to 992 spaces:

Cycle Parking Location and Type		Cycle spaces
Basement (double-	Block A	762

stacked)	Block B	136
Ground Level	Block C	32
Podium Level	Block A	62
Total Residential Cycle Parking		992

18.20 Retail

- 18.21 As yet, an occupier of the proposed retail unit has not yet been secured however it is anticipated that it would be a medium sized 'convenience' food retailer. There is also the option for the unit to be split into two units if one occupier for the unit cannot be found and two occupiers express an interest. The unit would be restricted to A1 (retail) use by a condition on any approval meaning that any change of use to another class outside of A1 would require planning permission. Likewise conditions would be added to any approval controlling the extent and types of advertising within the shop fronts and any external signage.
- 18.22 As per the Squash and fitness facility, it is anticipated that the retail unit would be ready for occupation at the same time as the Stadium. As per the Stadium and Squash and fitness facility, the opening hours would be controlled by condition as would times for servicing and delivery, in addition to any proposed plant and machinery.
- 18.23 Deliveries and servicing to the retail block are to be from the Stadium car park and which provides access to the rear of the retail unit. Access to the retail unit through the basement would be by arrangement with the Stadium management team. A detailed Servicing and Delivery Plan for the Stadium, retail, squash and fitness facility, and residential elements of the development would be required as part of a S106 agreement attached to any approval.
- 18.24 Car Parking
- 18.25 The London Plan advises that the starting point for meeting parking demand for new retail development should be use of existing public off-street provision. Parking needs should be assessed taking account of the reduction in demand associated with linked trips. If onsite parking is justified there should be a presumption that it will be publicly available.
- 18.26 The London Plan maximum car parking standards for retail use are as follows:

Maximum Standards for Retail Uses: Space per m2 of Gross Floor Space (GIA)	
Use	PTAL 4 – 2
Food: up to 2500 m2	30-20
Non - food	50-30

18.27 Note: It is most likely that the retail unit will be occupied by a food retailer however since this has not yet been confirmed, figures have been given for both food and non-food retail uses.

18.28 The above figures are maximum standards, and at the request of Officers, on the grounds of highway and pedestrian safety, no parking is proposed for the retail unit aside from 2 disabled parking spaces located along Coppermill Lane and to be shared with the Squash and fitness facility. This approach has been agreed with TfL. The retail unit is proposed to meet the needs of the local catchment, including the new residential community and therefore it is envisaged that the majority of shoppers will walk, cycle, or use public transport. Any on-street parking within the vicinity of the site is likely to be available on Waterside Way, but this will be dependent on any future changes to the parking controls on this road.

18.29 Cycle Parking

18.30 London Plan table 6.3 Cycle Parking minimum standards are as follows:

Land Use	Long-stay	Short-stay
A1 food retail	From a threshold of 100 m2: 1 space per 175 m2	From a threshold of 100 m2: first 750 m2: 1 space per 40 m2 thereafter: 1 space per 300 m2

18.31 9 bicycle parking spaces are proposed and these are located at grade to the front of the retail unit. This is compliance with London Plan standards.

18.32 Squash and Fitness Facilities

18.33 As with the retail unit, an occupier of the facilities has not yet been determined however it is proposed that the facilities be completed fully fitted out and ready for an eventual occupier by the time the Stadium is operational (to be secured through S106). The facilities include squash courts, dance/aerobic studio, gym, hydrotherapy suite, and bar. As with the retail unit and Stadium, operating hours would be limited by conditions and conditions would be imposed in terms of any plant and machinery and deliveries/servicing hours. This facility would be serviced at grade.

18.34 Car Parking

18.35 There are currently no standards within the London Plan in terms of car parking for sporting facilities/venues.

18.36 That notwithstanding, the Squash and fitness facility would include its own separate user car parking located within the basement car park beneath Block A. 19 spaces are provided, based on usage of the existing facilities and the proximity to the site of bus and rail links. Entrance and exit to the car parking would be from Summerstown with pedestrian access also directly onto North-

South street. 2 disabled car parking spaces are provided along Coppermill Lane and which would be shared with the retail unit. There is also scope to allocate a proportion of the 19 basement parking spaces for disabled parking if required.

18.37 The proposed vehicular access arrangements are considered acceptable in traffic safety terms. There are currently two accesses to the Greyhound stadium at the southern end of Summerstown and the proposed would include no more than two accesses along this road.

18.38 Cycle Parking

18.39 Table 6.3 of the London Plan gives the following cycle parking minimum standards:

Land Use	Long-stay	Short-stay
D2 sports (e.g. sports hall, swimming, gymnasium, etc.)	1 space per 8 staff	1 space per 100 m

18.40 6 cycle parking spaces are proposed to the front of the Squash facility and this would be in line with the above standards.

18.41 Conclusion

18.42 It is considered that the operation of the residential, retail, and Squash and fitness elements of the proposed development, would not result on an undue impact on the local parking, public transport, or highways conditions, subject to proper management through the relevant Servicing and Delivery Plans, Travel Plans, and the other mitigation measures (discussed in more detail below).

18.43 The Servicing and Delivery Plans and Travel Plans would be required by a conditions/S106 agreement attached to any approval.

18.44 Stadium

18.45 Non-Match Day Use

18.46 The stadium would only be used by AFC Wimbledon and on non-match days would only be used for small scale events such as conferences and hosting visitors in connection with the Club's community work.

18.47 Hospitality Suites

18.48 The hospitality facilities are proposed to be open for use daily and would host events such as conferences, receptions, and parties. The exact opening

hours are not yet known however they would be controlled by a condition attached to any approval.

18.49 AFC Wimbledon Shop

18.50 This is proposed to open on match days and non-match days and would sell match tickets and merchandise. Opening hours would be controlled by a condition on any approval.

18.51 Crèche

18.52 A child day care facility is proposed to be located within the East part of the stadium, occupying space at ground and first floor levels. Whilst the final occupier is not yet known, the facility would be installed to shell and core as part of the Stadium construction contract and this would be complete for the same time as the remainder of the Stadium. The day care facility is anticipated to cater predominately for residents living with the development in addition to those living within walking distance of the site and as such, there is no specific parking proposed for the facility.

18.53 Similarly to the proposed Squash and fitness facilities, a condition would be attached to any approval to ensure that the day care floor space is provided and proper marketing carried out to ensure an occupier is found.

18.54 The day care facility would be serviced from North-South street, whereby deliveries would be made at Riverside Road and items brought to the facility. The entrance is located at the north-east corner of the Stadium and very close proximity to Riverside Road.

18.55 The nursery operator would not be permitted to operate during match/event times without the agreement of the Stadium management team.

18.56 As with the other non-residential uses, hours of operation, and servicing/deliveries would be controlled by condition.

18.57 Café

18.58 In addition to the proposed day care facility, it is proposed that a small café would operate from within the East concourse of the Stadium and which would be open for members of the public. Opening hours would be controlled by a condition on any approval as would servicing and delivery arrangements.

18.59 Waste would be taken to a designated refuse store at the southern end of the North-South street. As per the crèche, Stadium, and Club shop, there would be no vehicle drop off facilities for cafe users.

18.60 For safety and logistical reasons the café would not operate during match/event times without the agreement of the Stadium management team.

18.61 Similarly to the proposed Squash and fitness facilities and crèche, a condition would be attached to any approval to ensure that the café floor space is provided and proper marketing carried out to ensure an occupier is found.

18.62 Match Day Use

18.63 Although the capacity of the stadium will be up to 11,000 initially, for the purposes of the ES and other assessments carried out, the impacts have been assessed on the basis of a full capacity (20,000 seater) scenario. The football season runs from August to May and matches would be played once mid-week and once during weekends, except when the team is playing away for a particular match.

18.64 On match days it is proposed that the stadium would be open from 9am to 18.30 however the hospitality areas may be open until later if there are functions being held.

18.65 Safety and Security

18.66 All stadia under the umbrella of the Football Association (which includes the Premier League and the Football League) are required to satisfy the Sports Ground Safety Authority (SGSA) in order to get a license to open their stadia to an approved capacity under their jurisdiction. The SGSA is authorised under the Football Spectators Act 1989. The criteria for evaluation include both physical and operational elements and have been established over a number of years to reflect best practice. They are rigorously enforced. The assessment of grounds for granting of a license is carried out annually by the SGSA.

18.67 The safety certificate is provided by the Local Authority. The SGSA will oversee the work of the local authority and regularly sit on the Safety Advisory Group, which usually includes the emergency services, the Club and Local Authority.

18.68 A Safety Advisory Group is required to be established for every licensed stadium and to meet monthly to oversee all aspects of the operation of the stadium. As part of that group the SGSA are able take account of the operational and physical performance at the stadium in deciding if a license can be awarded or what capacity a stadium can safely operate at, following the guidance laid out in the Guide to Safety at Sports Grounds, 5th Edition.

18.69 General Stadium Management

18.70 Servicing of the stadium (stock management, waste management, maintenance, etc) would be managed by the Stadium management team, and the contact details and job responsibility details of which would be required as part of the Stadium Management Plan.

18.71 The applicant advises that the main reception would be manned during normal office hours (as a minimum) to deal with any enquiries. The Club

would appoint a Stadium Manager who will be responsible for overseeing the management of the stadium.

18.72 The basement car parking area would be closed when the Stadium and hospitality areas were not in use and it would not be possible for the retail unit or Squash and fitness facility to be serviced at certain times on match days so as not to impede spectator entry and exit to the stadium. This would be controlled by S106 agreement.

18.73 Staff and visitors would be allocated parking by the Stadium management team and this would take into account any pre-arranged deliveries to the retail unit. The retail unit would not be permitted to leave stock, waste, packaging within the rear parking/serving area at any time for security reasons but to also ensure that all parking spaces are available. The Club does however understand the need to be flexible in dealing with requests for access from the retail operator. A detailed Servicing and Delivery Plan for the Stadium, retail, squash and fitness facility, and residential elements of the development would be required as part of a S106 agreement attached to any approval.

18.74 Match Day Stadium Management

18.75 The applicants advise that in a match/event scenario the Stadium management team, working with the Safety Advisory Group (normally comprising the Club safety officer, Club operations manager, stadium manager, all emergency services, Sports Ground Safety Authority (SGSA), and LBM) would agree the period before, during and after a match/event when the access road will have very limited access (e.g. for player coaches). The period of limited access would normally be a maximum of 8 hours.

18.76 The basement parking area would only be accessible with the prior agreement of the Stadium management team. Exit from the parking area would take place once the access road was reopened and/or by agreement with the Stadium management team.

18.77 The allocation of the match/event parking would be determined by the Stadium management team. For matches, the expectation is that the following will be offered parking;

- Match officials
- Visiting Directors
- Home Directors/key workers
- Main Sponsors

18.78 Disabled parking spaces would be allocated according to need and a detailed Parking Management Plan in respect of the Stadium and residential elements of the development would be required as part of a S106 attached to any approval of any approval.

18.79 The access road passing residential unit Block B would be stewarded to avoid congestion and only specifically authorised vehicles would be permitted. The

applicants advise that the Club would provide a steward, if required, to the Garratt Industrial Park to advise supporters of the parking restrictions and/or designated parking areas.

18.80 TfL and Officers are satisfied in principle with the above arrangements.

18.81 Access and Transport

18.82 Pedestrians

18.83 London Plan policy 6.10 advises that development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space and provide for the undertaking of audits to ensure that the existing pedestrian infrastructure is suitable for its proposed use and that new development improves pedestrian amenity.

18.84 The proposed development includes enhancements to pavements along Plough Lane, Summerstown, and Riverside Road in addition to various improvements along these roads:

- Widening of footway along Riverside Road
- Installation of Pelican crossing at southern end of North-South street, across Plough Lane
- Widening of northern footway of Plough Lane between the development and the access to the Wandle Cycle route. This will allow the introduction of a new segregated cycle lane, which can be used as pedestrian spill-over area
- Implementation of an informal crossing point adjacent to the junction of Plough Lane with Waterside Way

18.85 The areas for improvement that have been identified, including improvement works to Haydons Rd/Plough Lane/Dursford Rd/Gap Rd junction; footway along plough lane; reconstruction of carriageway and footway; road markings and signage; provisions of a pelican crossing, an informal crossing and cycle lane on Plough Lane will be administered through s106/s278

18.86 For all of the main modes of transport to be used by supporters to access the stadium, the final stage of the trip will involve walking to the stadium itself. The impact that these pedestrian trips will have on local footways has been analysed by a Pedestrian Comfort Analysis of certain 'links'/roads.

18.87 Concerns were raised by TfL in their initial comments on the application regarding the potential crowding of some footways at the end of matches, based upon the analysis presented within the applicants' Transport Assessment. It was accepted by TfL that the measurement of pedestrian comfort level is not particularly appropriate for a Stadium scenario due to the

expected number of spectators, and that this methodology will only give a crude indication of the level of pedestrian comfort.

- 18.88 The further work then carried by the applicant on the Pedestrian Comfort Analysis has been accepted by TfL for the 20,000 capacity scenario, whereby only a small number of links are indicated to be particularly crowded after an event. It has been acknowledged that some measures such as temporary closure of Summerstown post event may be required to mitigate the undesirable level of crowding, and that this would be acceptable in principle. The details of this and any other required road closures would be detailed within an updated Travel Assessment and Stadium Management Plan, both of which would be required as part of any S106 legal agreement, and both of which would require review at fixed points in time.
- 18.89 The results for the 20,000 capacity scenario indicate much more undesirable levels of pedestrian comfort which may require more positive management measures. The stadium will however initially only be built to 11, 000 capacity, therefore there will be the opportunity to monitor pedestrian movements before it is expanded further and this will provide a sound basis for assessing appropriate crowd management measures as part of any increase in capacity.
- 18.90 Should the application be approved, a revised Transport Assessment and Stadium Management Plan would be required before any further significant expansion of the stadium beyond the initial 11,000 capacity, through the S.106 agreement.
- 18.91 The proposed North-South route also be secured as a public route through S106 legal agreement.
- 18.92 Cycle Parking
- 18.93 Policy 6.9 of the London Plan advises that developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards (or subsequent revisions) and where possible, provide links to existing and planned cycle infrastructure projects including Cycle Superhighways, Quietways, the Central London Grid and the 'mini-Hollands'.
- 18.94 TfL raised concerns in their original comments on the application that the proposals provided insufficient parking for spectators and that other similar schemes such as Brentford Football Stadium have achieved a 2% cycle parking provision although there is no approved standard relating to football stadia. TfL requested that the scheme provided as close as possible to the number required to achieve a 2% cycle mode share for the 11,000 and 20,000 stadium. The application as originally submitted provided 30 cycle parking spaces along the North-South street and this has now been increased to 100 spaces.

18.95 Based upon current observed usage the applicant considers that this level of provision should be sufficient however they advise that talks have been held with local schools regarding the possibility of providing additional cycle parking for matches, including with Smallwood Primary School (approximately a 400 metre walk from the Stadium) and these talks have been positive.

18.96 As part of any updated Transport Assessment, cycle usage on match days would need to be monitored and should this show a requirement for additional cycle parking the Club would need to seek to secure additional parking off site within a reasonable walking distance of the stadium.

18.97 This approach is considered acceptable by TfL and Officers and the delivery of the 100 cycle parking facilities would be required prior to occupation of the Stadium.

18.98 Car Parking

18.99 There is no on-site car parking for spectators except for a limited number of Blue Badge Holders within the Stadium basement.

18.90 TfL had raised a concern in their initial comments regarding the level of Blue Badge parking that would be provided for the Stadium and the apparent mismatch between parking and the number of wheelchair accessible seats.

18.1.1 Following the submission of further information by the applicant, TfL have accepted that Blue Badge parking is being provided in accordance with the guidance for Accessible Stadia and that there were no specific London Plan standards requiring a higher level of provision.

18.1.2 There will be occasions when demand for on-site disabled parking is higher than spaces available and so it is proposed that a location on Plough Lane be used where mobility impaired people can be dropped off/picked up and the Club would provide stewards in that location to assist and to ensure that cars/taxis can undertake this efficiently. Details of an exact drop off/pick up point have not yet been determined however this would be reviewed as part of the updated Transport Assessment. The applicants have also confirmed that on those occasions where a match was not broadcast live, some additional disabled parking was likely to be available on site in the area allocated for broadcasting /press vehicles to the north west of the Stadium.

18.1.3 Off-Site Parking – LBM and LBW

18.1.4 The site is not located within a Controlled Parking Zone (CPZ) however it adjoins CPZs within LBM and LBW. There are also yellow line restrictions along Plough Lane, Summerstown, and Riverside Road and in order to mitigate against the highway impacts of the proposed development and improve current highway conditions, some works will be required to these existing parking and waiting and loading restrictions (i.e. conversion to double yellow lines) and signalling at the Plough Lane/Durnsford Road/Haydons Road/Gap Road interchange and within LBW.

- 18.1.5 A financial contribution covering these relevant works and any public consultations required in LBM and LBW has been agreed with the applicant and will be secured through a S106 legal agreement
- 18.1.6 It is noted that there is a number of roads in close proximity to the site within LBM and LBW which are not CPZs or are within CPZs, however the hours would allow unrestricted parking during match times and at other times. As such, there is the possibility of undue impact on these roads as result of the proposed development as spectators using the Stadium, and residents of the development without allocated parking may park in these locations.
- 18.1.7 Parking assessments carried out by the applicant suggest that a low proportion of spectators would use private vehicle given the location of the site and the tradition of walking to a Stadium when watching matches. Furthermore, the proximity of public transport links would also mean spectators are less likely to drive to the site.
- 18.1.8 In terms of residents of the proposed development, it is suggested that those buying/renting flats there would be aware very early on if they would not be allocated a parking space and so would be unlikely to take a unit with no parking and no guarantee of local parking elsewhere.
- 18.1.9 That notwithstanding, both LBM and LBW Officers have agreed that specific match day controls on existing CPZs and/or the creation of new CPZs and/or extension of existing CPZ hours may be required in future however that these cannot be carried out without the necessary public consultations. Should local residents be in favour of such controls then these will be implemented and the costs of both the public consultations and implementation of any controls in both boroughs would be borne by the applicant. This has been agreed with the applicant and included as part of a S106 attached to any approval.
- 18.1.10 Coaches
- 18.1.11 It is proposed that on match days AFC Wimbledon and opposition team coaches will make drop-offs within the basement parking area and exit onto Plough Lane at least two hours before matches, prior to the Stadium access road and basement being closed off. Pick-ups would similarly be carried out once spectators had dispersed and the Stadium access road and basement car park had been re-opened.
- 18.1.12 On non-match days, coaches would be able to access and exit the basement parking area at any time that it was open.
- 18.1.13 There would not be any facility for spectator coaches to conduct drop-offs/pick-ups along Riverside Road or along Plough Lane/Summerstown.
- 18.1.14 It is proposed that on initial operation of the Stadium, the situation be monitored by the Club for a period of time to be agreed with LBM as part of

an updated Transport Assessment and should any problem arise, a Coach Management Plan be submitted for approval and implementation.

18.1.15 Taxis

18.1.16 It is a given that Taxis will be used by some spectators as a means of transport from the nearest stations and initially, both TfL and Officers had requested consideration be given in terms of specific taxi drop off and pick up points.

18.1.17 Following further assessment of the highway conditions surrounding the site, it has been concluded that with the exception of spectators with disabilities/special access needs, taxi drop offs/pick-ups would most likely be carried out from the highway network not immediately adjacent to the Stadium, and that any pick-ups after an event would be delayed until the crowds have dispersed from the area.

18.1.18 Officers are in agreement with TfL that management is key with regards to taxi pick ups/drop offs, and that it would be sensible to deal with taxi related matters if and when this emerged as an issue, rather than implementing mitigation strategies prior any Stadium events. Monitoring of Taxis during Stadium events would be required as part of any updated Transport Assessment.

18.1.19 Local Bus Services

18.1.20 TfL have requested a financial contribution of £1, 200, 000 be made by the applicant towards the upgrading of peak hour bus service frequency on Garratt lane due to the increase in trips generated by the new development and the relocation of the bus stop prior to first occupation of the development.

18.1.21 It has been estimated that with 4 additional buses used during AM and PM peak only for a three year period, this would mitigate against the increased demand generated by the development. This level of contribution has been agreed with the applicant and would be secured by S106 legal agreement. A contribution would also be required from the applicant regarding bus stop relocation costs and this has been agreed with the applicant and would be secured through S106 legal agreement also.

18.1.22 Rail

18.1.23 Concern had previously been expressed by TfL and LBW regarding potential capacity of stations and rail services to accommodate peak demands generated by the Stadium. Concerns were not raised in relation to the residential element of the development and capacity.

18.1.24 Following further investigations by the applicant and TfL, it has been accepted by TfL and Officers that there are no capacity issues with either of

the two train operators, Govia Thameslink (Haydons Road station) and South West Trains (Wimbledon and Earlsfield Stations).

- 18.1.25 Whilst there do not appear to any issues with capacity, Haydons Road station does not have any staff presence at weekends and so it may be necessary for the Club to liaise with Govia Thameslink regarding the provision of a crowd management team should it be required.
- 18.1.26 TfL have confirmed that they are satisfied that the relevant Underground Stations (Wimbledon, Wimbledon Park and Tooting Broadway) have sufficient capacity to accommodate the likely level of demand. There are not considered to be issues with crowd management at these stations since they are staffed however should any issues arise, the Club will need to liaise with TfL with respect to any crowd management measures which may be needed on match days.
- 18.1.27 Haydons Road station has a limited staff presence, particularly in evenings and at weekends, and so some crowd management in the form of Stewards may need to be provided there by the club on match days. Details of this would be secured through the Local Area Management Plan as part of the Stadium Management Plan.
- 18.1.28 Govia Thameslink, who maintain Haydons Road station, have not made a specific request for additional funds for crowd management however any such funding would need to be agreed and arranged between Govia Thameslink and the club.
- 18.1.29 Travel Planning
- 18.1.30 Each element of the development (Stadium, residential, Squash and fitness) would be subject to the requirement for a Travel Plan to be implemented and regularly monitored. The findings of which would be required to be submitted to LBM and should any alterations need to be made at the request of Officers, these would need to be implemented. The requirement for the Travel Plans would be ensured through conditions on any approval/S106.
- 18.1.31 Emergency Vehicles
- 18.1.32 Emergency vehicles would be able to access the site from Plough Lane and Riverside Road, and through the North-South street with the restrictive bollards lowered.
- 18.1.33 Noise, Light, and Litter
- 18.1.34 It is to be expected that on match days there will be an element of increased noise, light, and potentially litter, due to the increased activity on the site however these impacts would be limited to a short duration prior to matches and after matches.

- 18.1.35 The matches would be tightly stewarded in order to reduce any potential disturbance and disperse spectators as efficiently as possible following the end of a match. This would be ensured through the Stadium Management Plan, which would likewise include details on measures for cleaning-up to be carried out within and around the site following a match.
- 18.1.36 The general provision of litter bins within the site would be detailed within a Refuse and Recycling Strategy for the site.
- 18.1.37 Crime and Antisocial behaviour
- 18.1.38 The applicants have advised that the Club does not have a history of crime or antisocial behaviour associated with its supporters since it's a 'local' team and has a large family fan base. However in the rare instance that an incident has occurred, they have been pro-active in dealing with offenders.
- 18.1.39 Matches would be subject to tight control by the Club and Police in terms of security and crime/antisocial behaviour.
- 18.1.40 Conclusion
- 18.1.41 The day-to-day operation of the stadium would be tightly controlled through the safety licensing obligations governing all Stadiums in the UK and in Planning terms, by appropriately worded conditions and S106 heads of terms securing the following:
- 18.1.42 Construction Environmental Management Plan (S106)
 Construction Logistics Plan (S106)
 Phasing Plan (condition)
 Stadium Management Plan (including Event Management Plan, Stadium Emergency Evacuation Plan, and Local Area Management Plan) (S106)
 Delivery and Servicing Plans (Stadium, Residential, and Squash and Fitness, including a Refuse and Recycling Strategy for each) (S106)
 Flood Warning and Emergency Plan (Condition)
 Travel Plans (Stadium, Residential, and Squash and Fitness) (S106)
 Car Park Management Plan (Stadium and Residential) (S106)
 Transport Assessment (Updated) (Stadium, Residential, and Squash and Fitness) (S106)
- 18.1.43 Monitoring of the Stadium and residential elements of the development once operational will be key to ensuring that any required mitigation in transport, logistical and amenity terms are installed.
- 18.1.44 The use of the Stadium would be restricted to football matches participated in by AFC Wimbledon only given the size and location of the stadium in addition to the proposed parking provision at both phases, however it is possible that in the future an application may be made to allow the Stadium to be used for non-football uses such as concerts and other outdoor uses. Any such application would be assessed on its merits.

19. REFUSE AND RECYCLING

19.1 The proposed residential, Stadium, retail, and squash and fitness elements are each provided with separate refuse and recycling stores, and to be managed for collection.

19.2 Residential

19.3 With respect to Blocks A and B, space is provided at grade for general refuse, recyclable refuse, and bulky waste and the stores are located close to the cores to provide easy access for residents.

19.4 On waste collection days the refuse would be taken by the Building Manager(s) to a refuse holding area at grade. The holding store for Blocks A and B is located adjacent to Riverside Road. It is proposed that the refuse vehicle would stop at the top of the North-South street to collect the refuse and then turn and exit onto Riverside Road. Refuse and recycling storage is also provided under the staircases to the ground/upper ground level maisonettes for garden refuse and recyclable refuse and likewise, refuse from these would be transported to the holding store by the Building Manager(s) on collection day.

19.5 Two refuse stores are provided at grade for Building C. Bins would be collected by the refuse vehicle stopping at the south end of the North-South street. It has been demonstrated that there is space for a standard refuse vehicle to turn and drive back onto Plough Lane without reversing.

19.6 Stadium, Retail, and Squash and Fitness

19.7 The applicant has advised that the requirements for waste management by the Club will be agreed as part of the terms of the Club's occupancy of the site. This would include as a minimum:

- Recycling to be a key component of the waste management strategy.
- Provision of sufficient recycling bins around the stadium (glass, cans, plastics etc.) for spectators to use.
- Provision of sufficient 'Euro' bins or similar stored in an agreed area in order to store waste prior to collection by a commercial waste collection service, which will include formal recycling arrangements
- Food outlets within the Stadium will collect waste generated by their operations and store securely until collected and will likewise be required to provide for recycling

19.8 The retail unit, and Squash and fitness club occupiers would be required under the terms of their leases also to collect waste generated by their operations and store it securely until collected. As per the Stadium, they would be required to include recycling storage and collection of

reusable/recyclable materials, provision of sufficient bins for visitors to deposit refuse, and arrangement of commercial waste collection to dispose of waste.

19.9 Conclusion

19.10 A development of the size proposed has the capacity to generate a great deal of waste and it is therefore important to ensure that any waste is adequately stored and provisions are made for regular collection and maximum opportunities for recycling are created.

19.11 LBM Waste and Recycling Officers have not objected to the proposed development however request detailed Refuse and Recycling Plans, as part of the Delivery and Servicing Plans in respect of the residential, Stadium, retail, and squash and fitness elements be submitted to the LPA for approval, and to be regularly updated as needed. This is particularly so since the Stadium will open at 11,000 capacity with the potential to progress to 20, 000 capacity, and the level of waste generated would rise accordingly. The Stadium Management Plan would also cover the Waste and Recycling Plan for the stadium. The Delivery and Servicing Plans and Stadium Management Plan would be secured by S106 legal agreement.

20. **INCLUSIVE ACCESS**

20.1 Policy 7.2 of the London Plan and CS 8 of the Core Strategy seek to ensure new development is as accessible as possible to those who with disabilities.

20.2 Residential

20.3 Policy CS 8 of the Core Strategy requires that all new housing be built to Lifetime Home standards and that 10% of new housing be wheelchair accessible or easily adaptable for residents who are wheelchair users. The proposed residential units are Lifetime Homes compliant and 10% of the units would be fully wheelchair accessible in compliance with policy 7.2 of the London Plan.

20.4 The residential units are all accessed from communal entrances. Due to the level difference required by the flood strategy, lift access is at lower ground (street level). The lifts are dual entry lifts and also provide access to the residential courtyards.

20.5 Ground level maisonettes are accessed via stairs to their front entrances however also have fully compliant access to their rear curtilages from the residential courtyards (accessed via the lifts at street level). Ramps at the required gradient are provided to the north and south-east corners of the courtyards within Block A and to the east of residential Block B.

20.6 Although not specifically allocated to the wheelchair accessible/adaptable units, a proportion of accessible parking spaces are proposed and allocation of these spaces would be managed through a Parking Management Plan. The spaces are split between the basement car parks of Blocks A and B. In

line with Lifetime Homes requirements, the accessible parking spaces are located close to lift cores.

20.7 Retail Unit and Squash/Fitness Facilities

20.8 Whilst there is level access at grade to the retail unit, the Squash and fitness club reception is necessarily set at a higher level, above the flood zone levels. The facilities would however be fully accessible by a dual entry lift, which would provide access to all floors.

20.9 Two disabled parking spaces are proposed along Coppermill Lane for the retail unit and Squash facilities.

20.10 Stadium

20.11 The stadium itself has been configured to comply with relevant legislation on accessibility.

20.12 The applicant advise in the Design and Access Statement that the following design measures have been incorporated into the proposal to ensure the Stadium is fully disabled accessible:

- Entrances designed to be compliant with BS 8300, Approved Document M and the Guide to Safety at Sports Grounds.
- The entrance route for wheelchair users are as inclusive as practicable and so that the experience of arrival is shared as much as possible between all spectators.
- The North and East stands are accessible at grade from the North-South street.
- Provision for ticketed gates for spectators using wheelchairs which will be adjacent to general spectator ticket entry. The South and West stand elevated concourses will include lifts and platform lifts available.
- In Phase 1 ramped access is also proposed to the South West corner. This is due to the hospitality block containing the lifts not being fully installed until later as part of Phase 2.
- Lifts serving the South and West stand spectator entrances, hospitality Levels 2 and 3 and the basement car park providing vertical circulation between all floors. There are no lifts in the North and East stands as the concourse is at grade.
- Wheelchair viewing platforms at pitch level and accessible via ramps.
- Two platform lifts to the South East entrance of the South stand and access to the viewing area for wheelchair users from here is level.

- Two 13 person lifts from the South West corner Hospitality block entrance to Hospitality on Levels 2 and 3. One of these lifts also serves the basement and disabled car parking. This lift will also be in use on non-match day for circulation between floors.
- Two platform lifts for general spectators from the South West corner hospitality block Level 0 to Level 1. These are positioned within the building and therefore in a covered area with sufficient waiting area should the lift be in operation.
- Provision of accessible ancillary accommodation throughout the Stadium. This includes WCs and concessions with all areas designed to current guidance and legislation. Most of the ancillary accommodation for spectators is located directly off the concourses, which is important for spectator wayfinding and inclusiveness. Hospitality and back of house areas will also be fully accessible.
- Provision of approximately 150 wheelchair spaces within the ground and with each having an adjacent companion seat. To the West and South stands there are also additional seats on the same row which can be used by either companions or general spectators.
- Wheelchair accessible viewing areas have been distributed across each stand ensuring there is provision in all 4 stands.
- Variation in platform heights across the stadium with pitch level viewing platforms on the North and East stands, mid-level viewing on the South and West stands, and high level viewing areas in hospitality.
- Sightlines to all viewing areas have been considered to ensure that wheelchair seating locations have clear sightlines to the pitch which are not obstructed if other supporters stand.
- The use of the hospitality areas for conferencing, events, and community use is an important aspect of the Club's business plan and as such these areas are fully accessible also.

20.13 There is no car parking within the stadium for general spectators however there are 4 disabled parking spaces allocated these spaces would be allocated in advance on match days.

21. 'SECURED BY DESIGN' AND SECURITY

21.1 The applicant has confirmed that the proposed development has been designed to be 'Secured by Design' compliant. The Metropolitan Police Designing Out Crime Officer has been in discussions with the applicant both at pre-application stage and during the course of this application and has raised no objections to the proposed development.

- 21.2 Stadium specific security on match and non-match days would be the responsibility of the Club and would form part of the Stadium Management Plan, required as part of S106 attached to any approval. Furthermore, following the 1989 Hillsborough Stadium incident, there also are now strict controls and standards regarding Stadium design and operation which must be adhered to for safety and security purposes.
- 21.3 Any additional security measures required by the squash and fitness facility and retail facility would be installed by the occupiers of those facilities.

22. HYDROLOGY AND FLOODING

- 22.1 At the time of the submission of the application in November 2014, the site and its surrounds lay within the functional floodplain of the River Wandle (Flood Zone 3b which has a 1 in 20 year annual probability or greater of fluvial flooding) and with parts of the site being within Flood Zone 3a (High Risk: This zone has 1 in 100 annual probability or greater (>1%) of fluvial flooding). The majority of the site was also within a critical drainage area for surface water flooding (see Appendix 1).
- 22.2 Flood Zone 3a - Development proposals are constrained to 'water compatible', 'less vulnerable' and 'more vulnerable' classification. Development classed as 'Highly vulnerable' will not be permitted by the council in line with Environment Agency guidance. For proposed developments within this flood zone both the 'Sequential test' and 'Exception test' are required which includes the submission of a Flood Risk Assessment (FRA). This is discussed in more detail further below.
- 22.3 Flood Zone 3b - The functional floodplain will be protected by not allowing any form of development on undeveloped sites unless it is:
- Classed as 'water compatible'
 - For development of 'essential infrastructure' which has to be located in a flood risk area and where no alternative locations are available, should be developed safely, without increasing flood risk elsewhere and where possible reduce the flood risk overall.
- 22.4 The council will only support redevelopment of existing developed sites if there is no greater flood risk than currently exists to the re-development or wider community.
- 22.5 For proposed development within this zone both the 'Sequential Test' and 'Exception Test' are required for development called as 'essential infrastructure'.
- 22.6 The Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The Exception Test, as set out in paragraph 102 of the NPPF, is a method to demonstrate and help ensure that flood risk to people and property will be

managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Essentially, the two parts to the Test require proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

22.7 In accordance with the NPPF if, following the application of the Sequential Test, it is not possible, consistent with the wider sustainability objectives, for development to be located in flood zones with lower probability of flooding:

- The developer must demonstrate that the development provides a wider social, environment, and economical benefit to the wider community that outweighs the flood risk, as informed by the SFRA and,
- Submit a site specific flood risk assessment which must demonstrate that the development will be safe for the life time of the build taking into account vulnerability of it users, without increasing the risk to the development and surrounding area; and where possible will reduce flood risk overall.

22.8 This is discussed in more detail further below.

22.9 In July 2009 a Strategic Flood Risk Assessment (SFRA) was undertaken for the London Boroughs of Wandsworth, Merton, Sutton and Croydon. The SFRA has identified areas at risk from flooding along the Wandle, including around Colliers Wood town centre, the Pyl Brook (feeding into the Beverly Brook), Plough Lane and the Wandsworth border, and to the west of the borough around Shannon Corner. The SFRA states that the Exception Test is required for residential development located in Flood Zone 3a. Ground floor levels should be set a minimum of 300mm above the modelled 1 in 100 (1%) annual probability plus allowance for climate change flood level. The SFRA also states that floodplain compensation will be required on a level for level basis up to the 1 in 100 (1%) plus allowance for climate change flood level.

22.10 Following publication of the latest Environment Agency remodelling of the river Wandle, which is referred to in the Environment Agency response to this application and provided by the application for the second consultation, the SFRA for the four boroughs is currently being updated. The 2014-15 flood risk maps for the SFRA update are published on the Merton website, to ensure that the residents, businesses and developers have access to the most up to date and best available information. More detail on this is available in Appendix 15.

22.11 Environment Agency Surface Water flood mapping for the area shows the site to be at risk from surface water flooding, classified as between 'high' and 'medium' flood risk. The areas of high risk are located on the northern side of the site, adjacent to Riverside Road (see Appendix 3).

- 22.12 Thames Water sewer records show an existing culvert running between Plough Lane in the south-east of the Site and Riverside Road in the north. This culvert would require diversion as part of any proposed development and formal permission from Thames Water would need to be sought however Thames Water have confirmed that this would be acceptable in principle.
- 22.13 Members are made aware that during the course of the pre-application and application, the EA's hydraulic model of the River Wandle catchment was in the process of being re-modelled and updated, the results of which were not released until June this year (2015). Following completion and validation of the updated modelling, the risk to the site from fluvial flooding has been reduced i.e. there is now a decrease in flood risk compared to previously. The consequence of this is that the site remains in Flood Zone 3a but the entire site is not designated as Functional Floodplain (Flood Zone 3b), as the site is outside the 1 in 20 year annual probability flood extent. Merton is in the process of updating the borough wide Strategic Flood Risk Assessment (SFRA) to take account of the best available flood risk data and Merton has published the new maps, including the new Flood Zone 3b outlines online. The proposed mitigation for river flood risk, such as the proposed raised height of 'podium' level and floor level of the proposed residential units has not changed and therefore this mitigation affords a higher level of safety and resilience against the risk of river flooding, taking into consideration this risk has now reduced.
- 22.14 The existing stadium has a surface water drainage system which is not able to accommodate relatively heavy rainfall but it is assumed to be based on attenuation and pumped discharge to the existing Thames Water sewer; however the exact details of this network are unknown. The existing car park has unrestricted discharge (without treatment) to the existing Thames Water sewer which crosses the site through a number of connections. Due to the poor standard of the existing drainage onsite, the car park area in particular is prone to surface water flooding.
- 22.15 The existing operation of the site will continue to be at risk from surface water flooding if undeveloped and the drainage system does not improve. The northern half of the site is located in a Critical Drainage Area (CDA).
- 22.16 The site is recorded as having flooded during the July 2007 surface water flood event, which was believed to have been exacerbated by a pump failure in the stadium drainage system. Risk to the site from a similar magnitude flood event remains at the stadium while the areas of car parking continue to drain unrestricted at a high discharge rate to the Thames Water Sewer and with the associated potential for surface water flooding at the Site.
- 22.17 If the site were not redeveloped, appropriate management of the car park drainage inlets would be required to keep them free from debris and detritus which could reduce the ability of the existing drainage system to serve the site and potentially further increase the likelihood of surface water flooding.

22.18 The NPPF and London Plan policies 5.12, 5.13, Merton's policy CS 16, and SPP policies , DMF1, DMF2 and DMD2 all seek to ensure that adequate flood risk reduction measures, mitigation, and emergency planning are in place for existing and new development. The core principles of the policies are:

- The management and reduction of flood risk from all sources of flooding;
- The application of the sequential and exception tests to avoid inappropriate development in relation to flood risk and the encouragement of development to lower flood risk areas.
- That the proposed development must not increase flood risk elsewhere for the lifetime of the development.
- That all development proposals must have regard to the Local Flood Risk Management Strategy.
- Implementation of Sustainable Drainage Systems (SUDs) in order to reduce the post development runoff rate and provide betterment.
- Ensuring that flood resilience and resistance measures are incorporated into design of development proposals in any area susceptible to flooding, in order to manage and where possible, reduce the risk of flooding for the lifetime of the development.
- That any users of a development at risk of flooding will remain safe and operational under flood conditions through a strategy of either safe evacuation and/or safely remaining in the building is followed under flood conditions
- Fully engage in flood risk emergency planning including the pre, during and post phases of flooding event;
- Permitting appropriate development in Flood Zones 1, 2, 3a and 3b subject to meeting the criteria set out in the Local Plan.
- That key services including electricity, water etc will continue to be provided under flood conditions and that buildings are designed for quick recovery following a flood.

22.19 In addition to a Flood Risk Assessment (FRA), two separate Surface Water Drainage Strategies (SWDS) have been prepared for the site covering the residential, retail, and squash and fitness facilities elements, and the stadium but which would work in conjunction with each other to cover the site as a whole.

22.20 A Flood Warning and Evacuation Plan (FWEP) has also been submitted in respect of the development and a final version to be submitted for agreement by the LPA would be required as part of any approval.

22.21 Flood Risk

22.22 Sequential Test:

22.23 The NPPF follows a sequential risk-based approach in determining the suitability of land for development in flood risk areas, with the intention of steering all new development to the lowest flood risk areas, where possible. The purpose of the Sequential Test is to ensure that a sequential approach is followed to steer new development to areas with the lowest probability of flooding, where possible. The flood zones, which are published by the Environment Agency and defined in Merton's Strategic Flood Risk Assessment provides the basis for applying the Sequential Test.

22.24 The aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding) where possible. Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

22.25 The application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds. According to the information available, all forms of flooding should be treated consistently with river flooding in mapping probability and assessing vulnerability to apply the sequential approach across all flood zones.

22.26 The NPPG advises that the Sequential Test does not need to be applied for individual developments on sites which have been allocated in development plans through the Sequential Test, or for applications for minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site). This site has been allocated in the Sites and Policies Plan where the test was applied and it is therefore deemed to have passed the Sequential Test.

22.27 Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The site, identified within the Sites and Policies Plan as 'Site 37', was allocated for sports intensification (use D2 Class) with

enabling development in July 2014. This is the only site identified within the SPP which is considered to be appropriate and suitable for this use.

- 22.28 The Council considers that the sequential test was explored, examined and passed for Site 37 (Wimbledon Greyhound Stadium) via the Local Plan, otherwise the site could not have been allocated. Please see below for more information.
- 22.29 Several representations have been made to this planning application where representors are concerned about the application of national, regional and local planning policy on flood risk, including the sequential test. To address these concerns, more information on this issue is included in this report as Appendix 15.

22.30 Background to the application of the Sequential Test for this Site

22.31 As mentioned previously, it is not the place of this report to debate the merits of the sites allocation in the SPP however Members will find it useful to note the history below of the allocation and application of the Sequential and Exception Tests.

22.32 In October 2013, the Council submitted Merton's Sites and Policies Plan to the Secretary of State, recommending the allocation of Site 37 based on all the evidence and consultation over the previous 3 years.

22.33 Details can be found here:

http://www.merton.gov.uk/sp4.23_site_allocations_-_deliverability_assessments.pdf

(Please note that the information regarding Site 37 appears on page 195).

22.34 In January 2014, as part of the Inspector's examination into the Sites and Policies Plan, they chaired a hearing and held a specific session to examine Site 37, Wimbledon Greyhound Stadium on Wednesday 22 January 2014. All of the relevant information on the examination hearings, including details of the hearing held on Site 37 22 Jan 2014, can be found via this webpage:

www.merton.gov.uk/examination-sites_and_policies_and_policies_map

22.35 Prior to the hearing, the inspector specifically asked the council: Site 37. Wimbledon Greyhound Stadium:

'(ii) Is this site a suitable location for an intensification of sporting activity with supporting enabling development?'

22.35 The Council's statement presented to the examination and sent by the Programme Officer to all participants, demonstrates that the Council considered that the sequential test was passed, and includes the sequential

test evidence base (Colliers CRE) report as an appendix. Please see the following link (Paragraph 7.1.8 onwards)

http://www.merton.gov.uk/7._merton_council_matter_7.pdf

- 22.36 In February and March 2014, following the hearing, the Council consulted on the proposed changes to the Plan for six weeks. All the responses that the council received to this consultation were sent to the Planning Inspector as part of his examination of the Plan. It is therefore reasonable to conclude that neither the Planning Inspector nor other participants disagreed with the Council's statement on the sequential test for Site 37 Wimbledon Greyhound Stadium or it would have been raised either at the examination hearings or during the six-week post hearing consultation.
- 22.37 In June 2014, the Planning Inspector sent his report to the council, which found the Plan sound, subject to 11 major modifications (including ones on the flood risk policy and on Site 37). The report does not raise the Site 37 sequential test as Inspector's reports will only summarise issues where the Inspector or other parties have disagreed with the Council, not list all the areas of agreement.
- 22.38 On the 9th July 2014, the Council adopted Merton's Sites and Policies Plan, allocating the Wimbledon Greyhound Stadium site.
- 22.39 In summary, the sequential test has been passed in accordance with the NPPF and NPPG. The Council explicitly clarified this position regarding the application of the sequential test publicly in the pre-examination Hearing Statements (on Main Matter 7,) and it was not raised as an issue of debate or disagreement by either the Inspector or any other participants during the Hearings or in the six-week consultation after the hearings. Appendix 15 of this report goes into more detail on this issue to address the concerns that representors have raised to this particular application

22.40 Exception Test

- 22.41 Paragraph 102 of the NPPG states if, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:
- a. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
 - b. a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

- 22.42 Both elements of the test will have to be passed for development to be allocated or permitted.
- 22.43 There is evidence provided within the Flood Risk Assessment (FRA) and supporting planning application documents of the wider sustainability (social, environmental and economic) benefits of the development to the community from the proposals, which meets part 1 of the Exception Test as outlined in Paragraph 102 of the NPPG.
- 22.44 The Exception test was also explored for Site 37 via the SPP examination and the Council allocated the site on the basis that it can be passed by complying with Paragraph 102 of the NPPG.
- 22.45 In this instance, part 2 of the Exception Test is considered to have been passed as the site specific flood risk assessment and proposed drainage strategies submitted demonstrate that the development will be safe for its lifetime and will not increase flood risk elsewhere. Both surface water and fluvial flood risk will not be worsened and will actually be lowered/bettered as result of the proposed development. It is has also been demonstrated that flood plain compensation will be like for like and with no losses in net storage.
- 22.46 The Environment Agency has no objections to the proposed development on the basis of the information submitted and the proposed use of the site, including residential use, is, supported.

22.47 The Proposed Development

- 22.48 The baseline conditions at the site are such that there is a risk of surface water flooding; there is poor water quality in the River Wandle, unrestricted drainage to sewers and poor surface water drainage within the site. The proposed development incorporates a number of features that are designed to mitigate potential impacts. Fluvial/Tidal Flooding.

22.49 Flooding

- 22.50 The residential units, being a flood sensitive use, are located on raised podium structures surrounded by landscaped courtyards. The Finished Floor Level (FFL) of the podium structures has been set at 10.93 m AOD for Blocks A and B, which provides an approximate 800mm allowance above the modelled 1 in 100 (1%) annual flood probability plus allowance for climate change flood level at the site
- 22.51 The elevation of ground floor levels will ensure that none of the residential units are impacted by flood water during different magnitude flood events.
- 22.52 The proposed stadium has concourses set at two levels. The West and South stand concourses are set at 11.48 m AOD, which provide an adequate allowance above the 1 in 100 (1%) annual probability flood level so that both

these concourses will remain dry throughout the different magnitude flood events.

- 22.53 The North and East Stand concourses are set at the ground level of 8.73m AOD under each stand. This level is approximately 1.4 m below the 1 in 100 (1%) annual probability plus allowance for climate change flood level at the Site. This helps to ensure that there is no loss in floodplain storage and therefore no increase in flood risk. In the unlikely event of flood water impacting the site on a match day, spectators would be evacuated following the issue of a flood warning for the area.
- 22.54 The proposed football stadium includes a finished playing surface at a level of approximately 9.0m AOD, located approximately 0.1m below the modelled 1 in 20 (5%) annual probability flood level for the Site. The pitch is designed to accommodate water during a flood event. This helps to ensure that there is no loss in floodplain storage from existing and therefore no increase in flood risk
- 22.55 Beneath the residential podiums, basement undercroft car parking is provided for both private vehicles and bicycles and these areas would provide an increase in floodplain storage in the event of a flood.
- 22.56 Residential Blocks A and B incorporate void openings around the perimeter of the blocks to allow flood water to enter and be stored under the development podiums. Void openings will include louvres which will permit the ingress and egress of flood water, whilst retaining security to the car parking areas. The void openings have been located in accordance with EA guidance, forming approximately 30% of the building perimeter. This will ensure that flood water is able to enter the site and be stored during a flood event.
- 22.57 Flood resilience measures have been incorporated into the basement (including non-floodable plant rooms) which will ensure that power and other services remain in operation for the duration of a flood event. This will allow residents to remain safely within the site and with full access to residential services.
- 22.58 The potential impact of the proposed development on fluvial flood risk is mitigated by ensuring 'level for level' flood compensation within the design (i.e. 'direct' compensation to ensure that the compensatory flood storage becomes effective at the same point in a flood event as the lost storage would have done). Flood compensation calculations have been undertaken for the proposed development as detailed with the FRA, and which demonstrate that 'level for level' flood compensation would be achieved. The FRA and calculations have been assessed by both the Council and E.A and no objections are raised.
- 22.59 A draft Flood Warning Emergency Plan (FWEP) has been submitted for the site and which would provide guidance to future occupants of the residential accommodation of the measures to be taken before, during, and after a flood event. A final FWEP would be prepared in consultation with the LBM as Lead

Local Flood Authority, and secured via condition on any approval. The FWEP would also include information on the EA's Flood Warnings Direct service, which aims to give advance warning of flooding to the public using a system of flood warning codes.

22.60 The proposed Stadium would be managed by a dedicated Safety Officer on match days. A Stadium Emergency Evacuation Procedure Plan would be adopted as part of the Stadium Management Plan which would provide details of the appropriate procedure to follow in the unlikely event that a flood warning is issued for the site on a match or non-match day. Although to be initially built to a capacity of 11,000, crowd movement modelling has been undertaken by the stadium Architects for a capacity crowd of 20,000 spectators and this modelling has demonstrated that an approximate time of 10 minutes is required for the evacuation of spectators from the site to the surrounding area. Further movement to land located outside of the floodplain can take place if required.

22.61 Drainage

22.62 Stadium

22.63 The proposed re-development of the site will result in a slight increase in permeable areas as the proposed football pitch will cover a larger area of the site than the grassed areas within the existing Greyhound stadium.

22.64 The proposed stadium will include management of surface water through on-site attenuation and pumped discharge at a restricted rate to the realigned culvert. The attenuation pumps would include appropriate resilience measures, while the attenuation measures would include catch-pits to remove silt whilst still being accessible for cleaning and maintenance.

22.65 The proposed football pitch will also include an appropriate drainage regime in order to manage surface water.

22.66 The drainage strategy for the proposed stadium covers 2.6 hectares (ha) of the site would result in improvements in surface water management compared to the existing situation and reduce flood risk to the site.

22.67 The final drainage strategy would be subject to approval from the Council, ensured through a condition on any approval.

22.68 Residential, Retails, and Squash and Fitness Facility

22.69 The Surface Water Drainage Strategy for the residential and commercial areas of the site has been designed to provide on-site attenuation up to and including a 1 in 100 (1%) annual probability plus allowance for climate change rainfall event. A residual risk exists for a rainfall event of greater magnitude, although as part of the climate change allowance, a 30% increase in attenuation has been applied to mitigate for the uncertainty associated with climate change.

- 22.70 As detailed previously, the residential accommodation is located on a podium structure raised above the surrounding site ground levels. Landscaped gardens at podium level across the residential blocks will provide additional storage for surface water with consequent opportunities for evapotranspiration as well as associated benefits to biodiversity. In an extreme rainfall event which has the potential to overwhelm the drainage network, surface water would temporarily pond at ground level however would not impact any of the residential accommodation.
- 22.71 Surface water would be attenuated across the site within cellular storage located inside the podium levels and within the pipe network before discharging at a restricted rate (via flow control devices) to the realigned culvert, crossing the site under the North-South Street.
- 22.72 The change in land use of part of the site from predominately light industry and vehicle parking to mixed used residential, retail and leisure will reduce the risk of pollution and contamination from industrial sources affecting the local watercourses and sewer network thereby improving water quality. The basement car parks would be drained via pumps to a gravity system at lower ground level. All drainage from the basements would pass through a petrol interceptor to remove pollutants for the surface water.
- 22.73 As with the present situation, there is a residual risk to the site from a failure in the pumps associated with the surface water attenuation for the proposed stadium and areas of under-croft car parking however the pumps will include appropriate resilience measures to minimise this risk.
- 22.74 Impacts during Construction
- 22.75 The applicants have advised that a Construction Environmental Management Plan (CEMP) would be created for the site, providing details of the appropriate measures to be undertaken to mitigate the impacts of the site build out.
- 22.76 The proposed phased construction of the development would ensure that there was no reduction in floodplain storage compared to the existing baseline scenario and construction of the residential and commercial accommodation would not begin until site clearance was complete. This would ensure that appropriate levels of floodplain storage remained across the site for the duration of the construction phasing and that there was no temporary increase in flood risk elsewhere.
- 22.77 The construction of the new stadium is proposed to take place in two phases, with the initial 11,000 seater stadium completed by 2017 and the full 20,000 capacity built by 2025 dependent on demand. The flood compensation scheme has however been based on the completed stadium.
- 22.78 Furthermore, given that the site is located approximately 130m east of the River Wandle, the demolition and construction activities would not have a direct impact on the watercourse during normal conditions.

- 22.79 As per the completed development, it is recommended that an emergency FWEP be put in place for the construction phasing to ensure that construction workers are able to safely evacuate the site prior to flood water impacting. This would mitigate the impact of potential flooding on construction site workers and visitors.
- 22.80 The requirement for a construction phase FWEP would be imposed through a condition on any approval.
- 22.81 Drainage and Water Quality
- 22.82 Construction phase activities could disturb, expose, or mobilise existing contaminants within the site. The works would introduce new potential sources of contamination through the temporary storage of chemicals (fuels) and potentially through the importation of construction materials and earthworks.
- 22.83 During earthworks and construction operations, there is potential for the on-site generation of surface water runoff contaminated with hydrocarbons from machinery, fuel storage or heavy vehicles parked on site. In addition, fine particles may also originate from stockpiles of construction materials, plant and wheel washing. Surface water runoff could also potentially become silty during construction.
- 22.84 The basement excavation works during the construction phase, with stockpiling of excavated materials, could also impact the overland flow routes and cause flooding through this stockpiling.
- 22.85 The construction phase could affect groundwater beneath the site through mobilisation of contamination and without appropriate measures in place, the construction phase could cause sedimentation and potential blockage of the existing sewer network with debris and waste, which in turn could increase the risk of surface water flooding. This site lies in a Critical Drainage Area (CDA) and so construction phase impacts need to be carefully mitigated and this can be ensured through the requirement for a CEMP by a condition any approval.
- 22.86 Impacts during Operation
- 22.87 The proposed development has been designed in accordance with the principles set out in the relevant policy documents, in conjunction with detailed discussions with both LBM Officers and the EA.
- 22.88 Both the stadium and residential/commercial drainage strategies have been prepared in accordance with the principles set out in The London Plan and aim to reduce surface water discharge to the greenfield runoff rate. This provides a substantial reduction compared to the existing car park which presently drains at an unrestricted rate to a Thames Water sewer. It is also likely to provide an improvement compared to the existing greyhound stadium,

although the uncertainty over the existing drainage regime for the stadium means this benefit is difficult to assess.

22.89 The proposed development would result in a change in the Flood Risk Vulnerability at the site from 'Less Vulnerable' to 'More Vulnerable' due to the introduction of residential use on the site however the proposed surface water drainage strategies would provide an improvement over the existing informal drainage arrangements at the site.

22.90 Assessment of Cumulative Effects

22.91 The redevelopment of the Nelson and Springfield hospital sites in Merton and Wandsworth respectively, have been identified in the ES as requiring consideration in the assessment of cumulative effects. Both sites are located in Flood Zone 1 'low probability' outside the floodplain of the River Wandle. The ES concludes that the cumulative effect of these developments coming forward with the Wimbledon Stadium development would not provide an adverse effect on the River Wandle hydrological catchment.

22.92 The summary table below is taken from the FRA within the submitted ES.

Potential Effect	Mitigation
Construction	
Construction phase could cause sedimentation and potential blockage of the existing sewer network with debris and waste which in turn could increase the risk of surface water flooding	Successful implementation of mitigation measures in the CEMP would reduce the effects during demolition and construction phases
Site at risk of fluvial/surface water flooding during construction.	Emergency FWEP will be put in place for the construction workers at the site. Demolition of existing buildings before construction will ensure that no loss in floodplain storage occurs across the site.
Completed Development	
The surface water drainage strategies provide an improvement over the existing informal drainage arrangements at the site.	Use of attenuation and restricted discharge, slight reduction in impermeable area, and Drainage Strategy resulting in an approximate 50% reduction in surface water flows (residential and retail element). Improvement of existing stadium drainage regime
Change in Flood Risk Vulnerability of the land use at the site.	Raised ground floor levels in excess of EA guidance and safe refuge for residential accommodation and

	<p>imposition of a FWEP for the lifetime of the development. The submitted FRA demonstrates that the prompt evacuation of the stadium can be achieved in the unlikely event of a Flood Warning being issued for the area during a football match or other event.</p>
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22.93 Utilities

22.94 Thames Water have raised no objections to the proposed development subject to applications being made to them for the relevant consents and subject to certain conditions being added to any approval. Officers have made some necessary revisions to the conditions proposed by Thames Water to ensure that the development is fully covered and acceptable flooding, drainage, and sewerage terms. Other utilities providers consulted have also not objected to the proposed development.

22.95 Conclusion

22.96 It is considered that the proposed development has passed both the Sequential Test and Exception Test, in line with national, regional, and local planning policy and using the best available information, has been adequately designed to mitigate against any fluvial or surface flood risk. Appendix 15 contains more detail on this issue.

22.97 There will always be a residual risk to the residential accommodation from a flood event of greater magnitude than the design standard event however all of the residential accommodation is located on raised podium structures with ground floors raised above the different magnitude flood levels at the site. The podium structures will also include flood resilient measures to ensure that the residential units remain functional during a flood event.

22.98 The under-croft car parking located under the podium structures includes void openings around the perimeter to allow flood water to enter the car parking during different magnitude flood events. This will ensure that appropriate levels of flood plain storage are maintained across the site following the Proposed Development.

22.99 A draft Flood Warning and Emergency Plan (FWEP) has been prepared for the site, which provides details to future occupants of the measures to be taken before, during, and after a flood event. The final FWEP would be prepared in liaison with Emergency Planners at LBM, distributed to residents, and would remain operational for the lifetime of the development.

22.1.1 A Stadium Emergency Evacuation Procedure Plan (SEEP) would also be prepared and would include details of the appropriate measures to be taken in the unlikely event that a Flood Warning is issued for the River Wandle in the area immediately prior to or during an event at the stadium. Crowd movement

modelling has been undertaken by the stadium architects which demonstrates that a capacity crowd of 20,000 people can be quickly evacuated in the unlikely event of a Flood Warning being issued during an event at the stadium. The SEEP would be secured as part of the Stadium Management Plan and through a S106 legal agreement.

22.1.2 A Construction Environmental Management Plan (CEMP) would be prepared for the site would serve to mitigate against the assessed potential minor adverse effects to surface water through construction activity at the Site.

22.1.3 The CEMP and SEEP would be secured through a S106 as part of any approval and would be subject to the approval of the LPA.

22.1.4 Importantly, since the allocation of the site in the SPP and the duration of the pre-application and current application, EA modelling has concluded that the flood risk of the site is now lower and accordingly the site is now categorised as lying within Flood Zone 3b. This provides an additional level of protection for any sensitive uses.

22.1.5 The EA is a statutory planning consultee on development and flood risk matters. Should the EA raise objections and the Local Planning Authority (LPA) still wish to approve a planning application for a major development (10 or more residential dwellings or 1,000 m² of non-residential floor space) the LPA must notify the Secretary of State.

22.1.6 The Environment Agency is not raising an objection to the proposed development subject to certain conditions being imposed on any approval.

22.1.7 Volante site

22.1.8 Any redevelopment of this site would operate its own flood and surface water drainage system and this would be required to not compromise any flood mitigation and/or surface water drainage strategies at the Stadium site.

23. SUSTAINABILITY

23.1 LP policies 5.2, 5.6, 5.7 and 5.9, CS policy CS 15, and SPP policies DM EP.1 and DM EP.3 policy all seek to ensure that new developments:

- Achieve a high standard of sustainability and make efficient use of resources and material and minimise water use and CO₂ emissions
- Demonstrate that they been designed in accordance with the Mayor's energy hierarchy (be lean; be clean; be green) outlined in Policy 5.2 of the London Plan 2015 and Policy CS15 part b of Merton's Core Planning Strategy 2011.
- Be sited and designed to withstand the long term impacts of climate change

23.2 To achieve national CO2 reduction targets, the London Plan outlines a number of policies intended to help deliver emissions reductions through the planning system. The London Plan (2011) energy hierarchy (Policy 5.2) states that “development proposals should make the fullest contribution to minimising CO2 emissions in accordance with the following energy hierarchy:

- Be lean – use less energy
- Be clean – supply energy efficiently
- Be green – use renewable energy”

23.3 A number of design solutions/technologies are proposed within the development so that it will achieve all/ the majority minimum regional and local target levels for CO2 reduction and on-site energy generation.

23.4 The design solutions and technologies proposed are:

- Solar PV panels
- Air Source Heat Pumps (ASHP)
- Gas-fired combined heat and power (CHP),
- Mechanical Ventilation Heat Recovery (MVHR) to a limited number of units
- Passive design measures such as building orientation, fabric performance, air tightness and natural ventilation within the buildings to prevent overheating and avoid excessive requirements for heating and cooling.
- Water efficiency measures through storage and use
- Site Waste Management Plan in respect of refuse and recycling
- Planting and landscaping to increase the biodiversity value of the site
- Electric charging points for vehicles
- Provision of Energy Display Devices to each dwelling that will inform the occupants of their energy consumption, enabling them to manage their dwelling in more energy efficient manner.

23.5 The table below provides a summary of the achievements of the development against key London Plan and LBM policy requirements:

Requirements		Achievements	
Policy	Target	Phase 1	Phase 2
London Plan 5.2 (Total carbon reduction)	35%	35.1%	39.4%
London Plan 5.7 (Carbon reduction from renewables)	20%	14.2%	21.6%
LBM CS 15	BREEAM ‘Very	‘Very Good’	‘Very Good’

	Good' rating		
LBM CS 15	Code for Sustainable Homes 'Code Level 4'	Code Level 4	N/A

- 23.6 Members are advised that since the original submission of the application the Government has withdrawn the Code for Sustainable Homes aside from the management of legacy cases. Legacy cases are those where residential developments are legally contracted to apply a code policy or where planning permission has been granted subject to a condition stipulating discharge of a code level, and developers are not appealing the condition or seeking to have it removed or varied. In these instances it is possible to continue to conduct code assessments.
- 23.7 Whilst there is now no regional or local policy requirement for the residential units to achieve Code for Sustainable Homes 'Level 4' rating, the applicant has confirmed that the development has been designed to achieve this, and would accept conditions being imposed on any approval still requiring this.
- 23.8 The units would all be Lifetime Homes compliant and in compliance with London Plan standards and 10% of all units are wheelchair compliant and adaptable. The wheelchair compliant units are a mixture of 1, 2, and 3 bedroom units?
- 23.9 The non-residential parts of the development would be split and assessed under two separate BREEAM schemes. The stadium, and squash and fitness facilities will be assessed under the BREEAM NC 2014 – Other Buildings: Assembly and Leisure methodology, while the retail space will be assessed under BREEAM NC 2014 – Retail. BREEAM is a worldwide standard for best practice in sustainable building design, construction, and operation and BREEAM assessment uses established benchmarks to evaluate a building's specification.
- 23.10 Gas-fired Combined Heat and power (CHP)
- 23.11 The London Plan requires that all new developments consider CHP, a decentralised energy generation technology, before renewable sources of energy are applied to a site. Building up a network of mini-power stations that are far more efficient than traditional centralised power stations is an important part of the London Plan overall strategy to move London towards its long term carbon reduction targets. CHP is an engine which produces electricity and the process of creating the electricity produces heat as a by-product. This heat can be easily stored in a thermal storage tank and distributed across the site to provide for hot water and heating demands.
- 23.12 The Mayor's energy hierarchy and the London Plan Policy 5.6 require all major developments to demonstrate that the proposed energy systems have been selected in accordance with the following hierarchy:

- Connection to existing heating or cooling networks
- Site wide CHP network
- Communal heating and cooling.

- 23.13 The applicant advises that an investigation of the area was undertaken using the 'London Heat Map' tool to determine whether there are any opportunities to connect to existing heat infrastructure. The London Heat Map indicates that there are not any existing or proposed CHP installations in close proximity (1000m2 radius) to the site. There is an existing CHP installation at St Georges Hospital, however it is not feasible to connect to this due to the distance between the two sites. It is also unlikely that the hospitals energy centre has sufficient capacity to supply the proposed development. Therefore, connection to an existing CHP or district heat network is not possible.
- 23.14 The opportunities for future connection to a district heat network have been explored and although it is not possible to connect now, the scheme has been designed to enable a future connection. This would also be expected of the adjoining Volante site should it come forward for redevelopment.
- 23.15 A site located gas fired CHP system has been considered and determined to be a suitable solution for the residential, and squash and fitness facility parts of the development, meeting 64% of the hot water and space heating demand for those and providing a further reduction in carbon emissions.
- 23.16 The retail units and stadium are not currently included in the heat network as the applicant states that connection for these buildings is not appropriate due to their intermittent usage pattern. The intermittent use patterns associated with the football stadium arise due to the very limited demand for energy each week, which peaks on match days for 3-4 hours on 30 occasions per year i.e. fortnightly during the football season.
- 23.17 The applicant advises that at this stage of the project, to measure the match day peaks and to assess the non-standard energy patterns would require dynamic thermal simulation, which involves considerably more detail than is currently available for the stadium. It is not considered appropriate to undertake such a study until the next stage of the design process. Therefore, in order to definitively establish the technical and financial viability of designing the CHP system to include the stadium, it would be reasonable to include a planning condition as part any approval to require a further feasibility study prior to commencement development and to include a prediction for energy demands of Phase 2 of the stadium.
- 23.18 The retail unit is not proposed to be connected to the CHP network because hot water demand is significantly lower in proportion to the hot water demand of the residential and leisure areas, and therefore its connection would not be feasible. Hot water generation is to be provided to the retail areas by instantaneous electric water heaters.

- 23.19 Electricity generated through the operation of the CHP system that is not used within the landlords supply and communal areas will be sold into the local grid networks. Selling electricity via a private wire network to customers is highly regulated, and it is not current practice to allow electricity to be sold by one supplier to the consumer, therefore the clean electricity would be sold into the grid. The regulations for supplying heating and electricity are very different, and at this time it is only possible to sell heat to the communal network.
- 23.20 Ventilation to commercial areas will also include MVHR and the proposed system for providing comfort cooling to the stadium, retail, and leisure areas will comprise of efficient roof mounted ASHPs, indoor fan coil units and associated circulation pipe runs.
- 23.21 Solar PV panels
- 23.22 Solar Photovoltaic (PV) systems generate electricity from both direct light and diffuse light and PV panels can either be mounted external to the building or be integrated into the building cladding (known as Building Integrated Photovoltaic or BIPV). PV panels are proposed within roof areas of the residential blocks and the stadium roof has been designed to allow for the installation of PV panels along the rear edge of the roof of the West stand in phase 1 of and on the roof of the East stand in phase 2.
- 23.23 Air Source Heat Pumps (ASHP)
- 23.24 An ASHP is a system which takes in outside air and condenses it to create heat, which can then be used to provide heating or cooling.
- 23.25 Energy modelling has demonstrated ASHP to be the most efficient system for supplying space heating and comfort cooling to the stadium spaces; meeting at least 75% of the stadium heat demand and offering further carbon emission reduction
- 23.26 Due to the smaller thermal demand and a larger cooling demand associated with the stadium areas, significant CO₂ reductions would be achieved through the use of an ASHP system.
- 23.27 The proposed community CHP system would provide heating and cooling to the residential blocks.
- 23.28 Mechanical Ventilation Heat Recovery (MVHR)
- 23.29 MVHR systems functions by extracting warm, damp, air from a home and drawing in fresh air from outside. The warm, extracted air is passed through a heat exchanger to recover the heat before being expelled outside. The cool, outside air is also passed through the heat exchanger, without coming into direct contact with the pollutant, air where it is pre-warmed before being pumped in to the property.

The majority of the proposed residential units are dual or triple aspect, allowing for natural cross ventilation (e.g. through opening windows) without the need for MVHR. Ventilation to the units would be via natural means (openable windows). MVHR will however, be included in several units (see applicant's submitted Energy Strategy Fig 13 p20) to mitigate against air quality, noise, thermal comfort and security concerns. The applicant proposes to use MVHR where local roads will impact on local air quality, to ensure acceptable levels of air quality and to ensure adequate levels of ventilation. It will also be used to ensure that thermal comfort can be maintained, ensure that there is no risk of summertime overheating, and reduce security risks in some locations.

23.30 Ventilation to commercial areas will also include MVHR.

23.31 A planning condition has been recommended to ensure that the development is delivered in line with the applicant's energy strategy.

23.32 Electric Charging points for vehicles

23.33 Electric charging points will be provided with the stadium car park and residential car parking under blocks A and B.

23.34 Water Efficiency

23.35 As highlighted in the London Plan, in dry years London's water consumption outstrips supply. With a rapidly growing population it is essential to use water efficiently to reduce consumption and the need for large infrastructure schemes to boost supply.

23.36 The following proposed water efficiency measures are proposed:

- In line with the minimum standard for Code Levels 4 under issue Wat 1, water fittings and fixtures will be specified to ensure that a calculated water consumption rate of ≤ 105 litres/person/day is achieved in the dwellings. This will include the specification of low flow showers, low flow taps and dual flush toilets.
- The commercial spaces will also be fitted with highly efficient water fittings to the extent that all 5 credits are achieved for issue Wat 1 – Water Consumption under the BREEAM 2014 New Construction assessment.
- Rainwater harvesting will be incorporated to provide non potable water for garden and landscape irrigation to private and communal areas.
- The proposed dwellings will be individually metered for water consumption.

23.37 Site Waste Management

23.38 A Site Waste Management Plan (SWMP) is proposed to be prepared for the demolition, construction, and operational phases of the development and would be required as part of a Construction Management Plan, itself secured by s106 legal agreement. The plan would provide guidance on the approach to waste management for the proposed development.

23.39 A SWMP sets out to achieve the following:

23.40 Demolition:

- Assessment of waste streams generated during the construction phase
- Assessment of opportunities for recycling and re-use of materials
- Minimisation of offsite disposal, although it is anticipated that this will be limited to crushed concrete and masonry for temporary working platform purposes

23.41 Construction Phase:

- Estimates of types of wastes generation during the construction phase;
- Assessment of waste streams generated during the construction phase
- Re-use of construction waste to minimise offsite disposal;
- Assessment of opportunities for recycling and re-use of materials.

23.42 Operational Phase

- Identification of operational waste streams
- Identification of the potential for segregation, recycling or re-use of operational waste.

23.43 The SWMP would be updated periodically to record how much estimated and actual volumes of waste have been processed and how.

23.44 All buildings within the site will be demolished as part of the proposed and it is proposed that demolition materials will be segregated for recycling, with a target of 95% of demolition waste to be recycled.

23.45 This will contribute towards achieving Code for Sustainable Homes (Level 4) for the proposed residential units and BREEAM Credits (Very Good) for all other uses, where such credits are applied for.

23.46 It is expected that the majority of materials excavated from the site could be re-used on other sites. However, where the material is found to be unsuitable for use (e.g. as a result of contamination), then it would be transported off-site for treatment prior to reuse or final disposal, in accordance with the Landfill Regulations.

23.47 The SWMP would also ensure that all contractors working on a site comply with waste legislation and best practice guidance. The SWMP would also need to be consistent with the Construction Environment Management Plan (CEMP).

23.48 The SWMP for the operational phase would become effective as each part of the development was handed over and the residential units were occupied. The plan would set out the arrangements for sorting, segregating and recycling/disposing of waste for the stadium, residential, retail, and squash and fitness facilities.

23.49 Ecology

23.50 An ecological appraisal has been carried out and the site has been identified as having some ecological value in the form of two mature willow trees, and foraging bats and feral pigeons.

23.51 The appraisal also makes recommendations in order to ensure compliance with best practice and wildlife legislation. It is proposed that all of the recommendations will be implemented and as a result credits have been allocated under Code and BREEAM ratings.

23.52 These include recommendations for new native planting, management of planting to maximise value to biodiversity, creation of living roofs and incorporation of features for bats to roost, and house sparrows and starlings to nest. Providing the recommendations are adopted, it is considered that the proposed development will result in an overall increase the value of the site in terms of biodiversity

23.53 Conclusion

23.54 A variety of the technologies and design solutions are proposed in order to provide a development which achieves the highest level of sustainability from demolition to operational phases.

23.55 The total overall carbon reduction for the development is predicted to be 35.1% for Phase 1, increasing to 39.4% for Phase 2. Site analysis and calculations have determined, gas-fired combined heat and power (CHP), Solar PV panels and ASHP (providing heating and cooling to the stadium) to be the most suitable renewable energy technologies for the site. Energy modelling demonstrates that the proposed development meets the London Plan Policy 5.2 and London Borough of Merton Policy CS 15 requirements for a 35% carbon reduction.

23.56 Due to the constraints of the development, London Plan Policy 5.7 requirements for a 20% reduction in CO2 emissions through on-site renewable would not be achieved in Phase 1, however, would be met for Phase 2.

24. SOCIAL INFRASTRUCTURE

24.1 National, regional, and local planning policy requires that the impacts of any development be assessed in terms of their potential impacts on a wide range of issues ('material considerations') such as design, transport, residential

amenity, sustainability/climate change, and social infrastructure (affordable housing, education, health, and sport and leisure).

24.2 London Plan Policy 3.16, Core Strategy Policy CS 11 and SPP policies DM C1 and DM C2 seek to ensure adequate provision of social infrastructure such as education and health facilities.

24.3 London Plan policy 3.16 states that development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs assessments and that proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted. The policy states that adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity area planning frameworks and other relevant area action plans.

24.4 Core Strategy policy CS 11 states that the Council will support the provision and improvement of infrastructure of the borough for those living, working and visiting Merton and to accommodate population growth by also requiring new development to provide for any necessary infrastructure;

24.5 SPP policies DM C1 and DM C2, linked to policy CS 11, likewise aim to ensure there is adequate social infrastructure to cope with existing demands but also demands placed by large scale developments.

24.6 **Affordable Housing**

24.7 The NPPF, London Plan, and Local Plan emphasise the importance of providing affordable housing and this is similarly a priority for Council. Policy CS 8 and DM H3 require affordable housing to be provide onsite for schemes providing 10 or more residential units. London Plan policy 3.11 states that in order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale.

24.8 The Council seeks the maximum proportion of affordable housing achievable on-site in accordance with the national, regional, and local policy in order to contribute towards the Mayor's target of at least 14,200 more affordable homes per year in London over the term of the Plan.

24.9 Policy CS 8 states that the Council will aim for the borough-wide affordable housing target of 40% which is equivalent to the numerical target of 1,920 affordable homes in Merton for the period 2011- 2026. The Council will also expect the following level of affordable housing units to be provided on individual sites:

Threshold	Affordable Housing Target (Units)	Affordable Housing Tenure Split	Provision Requirement
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10 units or more	40%	60% Social Rented and 40% Intermediate	On-site: Only in exceptional circumstances will the Council consider the provision of affordable housing off-site or financial contributions in lieu of provision on-site and this must be justified.
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24.10 In seeking affordable housing provision the Council will have regard to site characteristics such as site size, site suitability and economics of provision such as financial viability issues and other planning contributions.

24.11 Viability Appraisal

24.12 Policy 3.12 of the London Plan states that in negotiating affordable housing in private schemes, boroughs should seek the maximum reasonable amount of affordable housing having regard to their affordable housing targets, the need to encourage rather than restrain residential development, and the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy, the implications of phased development including provision for re-appraisal and other scheme requirements.

24.13 The applicant states that the scheme is not viable with any on-site affordable housing provision however has made a ‘without prejudice’ offer of 60 affordable units, to be located within Block B, equating to a 9.6% provision and that these units would be of intermediate sale only. The applicant states that a higher, policy compliant (40%), provision of affordable housing within the site would make the Stadium unviable in reducing the funding available to subsidise the stadium, prohibiting its delivery.

24.14 An independent assessment of the applicants submitted viability assessment has determined that the scheme can viably support additional affordable housing units or/and a revised mix of affordable housing tenures (with some affordable rented units).

24.15 Given the below target level of affordable housing that is proposed, it is recommended that a review or “claw back” mechanism be included within any S106 legal agreement, which would require the economic viability of the development to be reviewed and independently assessed at fixed points in the delivery period to allow the Council to maximise the amount of affordable housing by capturing a proportion of any increase in value in the development (taking into account for example, any decrease in costs in building the stadium

or providing a fully fitted out squash facility and other changes in viability across the scheme) for provision of affordable housing off-site, via an affordable housing viability review.

- 24.16 The applicant has agreed to a review mechanism and if viability increases to an agreed level, then affordable housing contributions will be made.
- 24.17 Likewise, upon suggestion by Officers, the applicant is supportive of the principle that as part of any S106 agreement any other S106 monies claimed by LBM and LBW and not spent within agreed time periods would be retained and transferred to an 'escrow' account held by LBM to contribute to off-site affordable housing within the borough. This support is on the proviso that the aggregate of the value of the onsite affordable housing provision that is delivered and the payment in-lieu (the "pot" for affordable housing from the scheme) is capped at a maximum value equivalent, in value terms, to policy compliant affordable housing provision, on-site (40%). Officers recommend that restrictions be placed upon the spending of the payments in-lieu to redress any imbalance in tenure mix with respect of the policy requirement.
- 24.18 It would be necessary for the S.106 legal agreement secure any onsite provision, for the proposed 60 units in Block B. However members should note that under S.106 BA of the Act, developers can make an application (and under S.106 BB can appeal the council's decision on such an application) to reduce the amount of affordable housing, where it is confirmed subsequent to the grant of planning permission that the viability of development does not support the quantum or mix of affordable housing originally approved. Accordingly members should be prepared for such an application from any scheme, particularly given the scale of a scheme of this nature and associated sensitivity of viability inputs. The risk of such an application to reduce the amount of affordable housing underlines the importance of a review/clawback mechanism so that additional public benefit can be generated in the viability picture improves. As part of this mechanism officers consider it necessary and reasonable to take the level of on-site affordable housing actually delivered, rather than the amount originally secured when calculating the contribution of on-site affordable housing makes to the affordable housing pot from this scheme.
- 24.19 Conclusion
- 24.20 A policy compliant provision of on-site affordable housing would normally be expected for a scheme that includes the proposed number of dwellings, however this is not a typical development given the development costs include a proposed football stadium.
- 24.21 The 9.6% provision is substantially lower than the requirement however it has not be established through the viability assessment process that the current overall viability of the development can support a higher level of affordable housing *at present* without adversely affecting the deliverability of the stadium. A "claw back"/review mechanism is therefore recommended at an advanced stage of delivery of the residential component of the scheme where a viability

assessments would be reflective of actual scheme values and costs , which would ensure that should viability improve in future to an extent that affordable housing can be provided, that this is secured.

24.22 Furthermore, it must be highlighted that the provision of the stadium is bound by the policy requirements of policy 37 of the SPP. Although the policy does not specify the provision of a football stadium as part of any redevelopment of this site, in this instance the proposed Stadium and Squash facility fulfil the ‘sporting intensification’ policy requirement, and with the residential and retail elements providing the ‘enabling development’. As such, Members should consider the lack of affordable housing against the strategic benefits of the Stadium and Squash and fitness facility.

24.23 **Education**

24.24 The development proposes 602 new dwellings (13 studio, 212 1-bed, 245 2-bed, 127 3-bed, and 6 4-bedroom units), which will include 9.6% (60 units) affordable intermediate sale. There will therefore be a ‘child yield’ which will impact on the sufficiency of school and childcare places both within LBM and LBW.

24.25 The GLA (Greater London Authority) Population Yield Calculator and Single Year of Age Tool provide the following child yield estimate for each school related age group:

Education Age Group Yields	Sub region: South
0 - 3 (pre-school)	134.5
4 - 10 (primary school)	67.1
11 - 15 (secondary school)	22.7
16 - 17 (6th form)	9.6
Total	233.9

24.26 It is noted that is likely that the residential element of the development would not be occupied before the 2017-18 academic year.

24.27 Primary school places (4-11 years)

24.28 With primary school starting for children aged 4 at the start of September each year, an estimate of the child yield for the seven years of primary school is approximately 67 children, which is approximately 10 per year.

24.29 This is within the context of the council providing over 4,000 additional primary school places across the borough over the past six years to provide sufficient places. For school organisational reasons, the council would generally only expand schools by ‘full forms of entry’ i.e. 30 pupils per year to a total of an additional 210 children per school. The estimated child yield from this

development would therefore not be sufficient to promote a primary school expansion on its own, but would put pressure on existing places, and may contribute to the need to further expansion.

- 24.30 There are 10 existing primary schools that are less than 1 mile from the development and, with the development being almost adjacent to the LBM/LBW border, half of these are located within LBM and half within LBW.

School	Borough	Distance from site (miles)
Smallwood Primary School	LBW	0.3
The Priory C. of E. School	LBM	0.5
Broadwater Primary School	LBW	0.5
Garfield Primary School	LBM	0.7
Earlsfield Primary School	LBW	0.7
Wimbledon Park Primary	LBM	0.7
Holy Trinity C. of E.	LBM	0.8
All Saints C. of E.	LBM	0.8
Gatton (VA) Primary School	LBW	0.8
Beatrix Potter Primary School	LBW	0.9

- 24.31 These schools are largely full with many having already expanded recently and whether any further expansion would be required would depend on overall changes to demand by the time some of the units are occupied, which would be 2017 or later. The child population forecasts without this development are currently for a plateau in demand within the general area at reception year (start of school) age from 2015 to 2019. The council would need to include this development as part of its overall planning for school places.

- 24.32 Considering the almost equal impact on LBW, LBM officers met with colleagues from LBW in September 2014 at pre-application stage and agreed that, should the development proceed, there would need to be a review of local demand and supply in autumn 2016. Should there be an insufficient supply of local primary school places when the Wimbledon Stadium child yield is taken into account, expansion of a local school in one of the boroughs would need to be considered within the context of overall school expansion requirements. LBW would also consider this in the context of any new school planned on the Springfield Hospital site, Tooting. The school to be expanded could be either a LBM or LBW school, with appropriate admissions priorities, and an amount of Merton Community Infrastructure Levy (CIL) funding could be accordingly allocated.

24.33 Secondary School places (11-15 years)

24.34 The model forecasts an increase in demand by approximately 23 children. This is within the context of over 2,000 extra 11-15 places needing to be provided over the next 10 years due to general increases in demand coming from existing primary schools.

24.35 CIL funding will therefore be required to contribute to this expansion programme.

24.36 Pre-school childcare

24.37 The model indicates that this development will provide for a child yield of approximately 135 children of 3 years and under.

24.38 The current GLA forecast for pre-school children is for a relatively “flat” number i.e. not a significant increase or decrease in demand. It should also be noted that there is a range of potential provision for childcare at pre-school age, for example, childcare at home, with a childminder in their home; in a private crèche; in a state-funded nursery. At the present time the council is struggling to provide sufficient pre-school childcare and education places in all years, and has a particular challenge due to the council’s new statutory duty to secure sufficient nursery places for certain children of 2 years.

24.39 This is evidenced by:

1. Local state funded schools with nursery provision for 3-4 years currently being full
2. Local private and voluntary sector providers also being full with waiting lists, as evidenced by a recent telephone survey the council has undertaken
3. Current problems finding providers that can provide places for 2 year olds

24.40 Given the child yield from the new development, it is anticipated that it would lead to a deficit in pre-school childcare places, which will require additional provision. Given this need, and child care settings being much smaller institutions, the council would expect a development of this size to provide a child care/nursery facilities on-site and which should include a facility open 8am to 6pm for working parents.

24.41 The scheme proposes a child day care facility at ground and first floor levels within the East section and this provision would be ensured through a relevant condition on any approval.

24.42 Health

24.43 Health and Wellbeing

- 24.44 In terms of general health, Merton CCG and NHS England have no objections to the proposed development, noting the provision of a new football stadium and enhanced Squash and Fitness facilities. These will contribute to the overall wellbeing of the local population through the community use of the Stadium and general public use of the fitness facilities. Enhancements to the nearby Garratt Park will also be to the benefit of local public health in making the park more attractive for use for all and more accessible once improvements to signage and pedestrian access to the park are improved.
- 24.45 Given the low level of residential parking to be provided, that the closest train stations to the site are within walking distance, and the high provision of cycle parking within the development for residents and visitors, it is considered that this will encourage residents to use more sustainable and active forms of transport.
- 24.46 The LBM Public Health Officer has requested that the Stadium operators make a commitment to providing healthy foods as far as possible and this can be secured through a condition attached to any approval and as part of an approved Stadium Management Plan
- 24.47 Health Infrastructure
- 24.48 NHS England, Merton Care Commissioning Group (CCG), and St Georges Hospital have been consulted on the proposed development and whilst there has not been an objection in principle of the proposed scheme, concerns were initially raised regarding the impact of the residential element and its impact on local health care provision through the additional burden that would be placed on existing facilities, such as GP surgeries.
- 24.49 NHS England submitted evidence of existing GP surgeries within a 1 mile radius of the site within LBM and LBW and details of their capacities and patient numbers. Members should note that this includes a GP surgery in Vineyard Hill Road, Wimbledon, which was proposed to be closed earlier this year following the retirement of the existing GPs, however has not closed and is operational having been taken over by new GPs.
- 24.50 Members should also note that NHS England, Merton CCG, and St Georges Hospital were consulted during the various stages of the Sites and Policies Plan formation, including the 'call for sites' stage in which the Greyhound site was included and the relevant policy prepared, and at no point were any objections/comments made regarding possible healthcare impacts of any redevelopment of this site.
- 24.51 The information submitted by NHS England indicates that the closest GP surgeries to the site are all over capacity and according to their calculations the proposed development would generate a requirement for an additional 130m² of healthcare floor space.
- 24.52 NHS England has stated that it would not be feasible for the required 130m² floor space to be accommodated through the extension of existing GP

surgeries because many of them are located within residential units which have been converted to surgeries and the scope for built extension is limited. 130m² is also considered to be too small an amount to justify the creation of a new GP surgery.

- 24.53 The provision of 130m² within the development site would also not be viable due to the very small floor space relative to the costs involved of fit-out and GP relocation. As such, NHS England raise no objections to the proposed development on healthcare provision grounds subject to a financial contribution of £402,500 to be paid in lieu of on-site provision and to be secured through a S106 legal agreement. It is proposed that should the Volante site come forward for development, this would include an onsite health care facility (1000m²), and the commuted sum paid by the applicant here would be used by NHS England to contribute towards the fit out of, and GP relocation to, that facility. This approach has been agreed in principle by the applicants NHS England, Merton CCG, Wandsworth CCG, and the potential developer of the Volante site through pre-application discussions with LBM.
- 24.54 Should the Volante site not come forward for development the money would be held in an escrow account by LBM (along with other S106 monies generated by the development and to be claimed by outside parties) until a location/scheme for additional healthcare facilities within LBM/LBW and within the vicinity of the site comes forward. Should this not occur within 5 years of the completion of the development the monies would be used towards maximising the level of affordable housing provision supported by the development within the borough, in accordance with Adopted Core Strategy 2011 policy CS8.
- 24.55 **Sport and Leisure**
- 24.56 In their initial comments on the application Sport England advised the following: *'The site is not considered to form part of, or constitute a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184), therefore Sport England has considered this a non-statutory consultation.'*
- 24.57 Sport England do not object to the principle of the proposed new Stadium or replacement Squash and fitness facility. They do not object to the principle of the residential element of the development but initially raised an objection on the grounds of the additional burden which would be placed on existing sport and leisure facilities in the vicinity of the site by the occupants of the proposed 602 dwellings.
- 24.58 Sport England advised that their Sports Facilities Calculator (SFC) can aid in providing an indication of the likely demand that will be generated by a development for certain facility types. Their SFC indicates that a population of 1,505 would generate a demand for 0.08 swimming pools (£283,497), 0.11

sports halls (£343,733), 0.01 indoor bowls centres (£25,269) and 0.05 artificial turf pitches (£51,632 3G or £45,506 Sand).

24.59 Following discussions with Officers, Sport England agreed that the sum would be covered by Merton CIL funding. Leisure projects have been identified on the Merton CIL 123 list, which is the list of projects or type of projects that Merton has stated that it would be looking to prioritise for CIL funding.

24.60 Following their initial comments, Sport England raised an objection to the proposed development on the basis that they did not consider that the provision of the squash and fitness facilities to shell and core level was sufficient to guarantee its delivery, a shell and core facility would not comply with the requirement in paragraph 74 of the NPPF; that the loss resulting from the proposed development needs to be “*replaced by equivalent or better provision in terms of quantity and quality in a suitable location*”, and therefore the scheme would result in a loss of existing sporting provision.

24.61 Sport England consider that to ensure the delivery of the replacement Squash and fitness facilities, they should be delivered fully fitted out despite the final occupier or their requirements not being known. Furthermore, that any facilities should be subject to a Community Use Agreement (CUA) to allow free/subsidised access to the facilities for members of the public

24.62 Members are asked to note the following:

1. That when the collective sporting ‘offer’ of the proposal is considered, the proposed replacement squash and fitness facilities in addition to the proposed Stadium will result in an increased level of sporting provision at the site.
2. That the final occupier of the Squash and fitness facilities has not yet been determined and although the Council would support the facilities being occupied by Christophers, this is a commercial decision and one the Council cannot direct.
3. The final occupier and their specific requirements are not known, however it is not considered unreasonable to expect the applicants to deliver the Squash and fitness facilities fully fitted out.
4. Any monies spent by the applicant (as opposed to the final occupier) on a full fit-out above shell and core level, would necessarily have to be deducted from the level of on-site affordable housing provision.

24.63 In order to ensure delivery of the Squash and fitness facilities, the draft S106 legal agreement includes a provision requiring the full facilities to be provided and that full and proper marketing is carried out to secure an occupier as soon as possible.

24.64 Regarding a Community Use Agreement, officers do not consider it is reasonable to attach a requirement for this to the Squash and fitness facility

since allowing free access to the facilities for non-members could harm the viability and functioning of the facilities and potential uptake by an occupier. In terms of subsidised rates, fitness facilities offer this as a standard, whereby there are reduced rates for off-peak access, students, children and senior citizens. Christophers currently operate on a member-only basis

24.65 Members are also asked to note that Sport England were asked to provide examples of privately run commercial fitness facilities where they had requested a CUA be implemented however they were unable to provide any such examples.

25. VOLANTE SITE, 46 – 76 SUMMERSTOWN, TOOTING

25.1 In separate ownership however also part of 'Site 37' as defined in the Sites and Policies Plan, this site is also subject to the same policy requirements as the main stadium site.

25.2 Any proposed redevelopment of the Volante site will be considered in the context of any approved redevelopment of the main Greyhound site and should any application be approved, it would be tied to the development of the Greyhound site to ensure it would not be delivered prior to the completion of an agreed proportion of the main site. With respect to Health care provision, the value of the Volante site contribution to funding the delivery of the on-site facility would be proportionate to the number of new residents, as per the value of the contribution from the Stadium site, with NHS England securing the balance of the funding required to deliver the facility.

26. SUSTAINABILITY AND ENVIRONMENTAL IMPACT ASSESSMENT REQUIREMENTS

26.1 The proposal is for a major, mixed use development, and constitutes a Schedule 2 (EIA) development. Accordingly, an Environmental Statement has been submitted with the application and the application has been advertised as such.

26.2 The contents of the Environmental Statement have been duly considered in assessing the proposed development.

26.3 The sustainability requirements for the proposal and what targets will be achieved have been discussed earlier in this report in section 23.

27. MAYORAL CIL

27.1 The proposed development would liable to pay the Mayoral Community Infrastructure Levy, the funds for which would be applied by the Mayor towards the Crossrail project. The CIL amount is non-negotiable and planning permission cannot be refused for failure to agree to pay CIL.

28. LOCAL FINANCIAL CONSIDERATIONS

- 28.1 Merton's Community Infrastructure Levy was implemented on 1st April 2014. This will enable the Council to raise, and pool, contributions from developers to help pay for things such as transport, decentralised energy, healthcare, schools, leisure and public open spaces - local infrastructure that is necessary to support new development, but can't be secured via site specific mitigation through planning obligations or conditions. Merton's CIL has replaced Section 106 agreements as the principal means by which pooled developer contributions towards providing the necessary infrastructure should be collected except for affordable housing.
- 28.2 The site is located within the London Borough of Merton however the closest infrastructure likely to be used by occupants of the development (schools, health care, and leisure facilities, in addition to associated highway upgrade works) are primarily located in the adjoining London Borough of Wandsworth.
- 28.3 As such, in order to mitigate for the additional burden on these resources it is necessary for a proportion of the Merton CIL, and S106 monies raised by the development to be made available to LBW and this has been agreed in principle by the relevant Officers at LBM and LBW. Calculations have been carried out with Officers at LBW in terms of the amount of CIL and S106 monies required and this would first be brought before Members at a Cabinet meeting for final authorisation.

29. SECTION 106 LEGAL AGREEMENT

- 29.1 Planning obligations, enforced through Section 106 (S106) legal agreement (Town and Country Planning Act 1990 (as amended)), assist in mitigating the impact of potentially unacceptable development to make it acceptable in planning terms however they should only be used where it is not possible to address unacceptable impacts through a planning condition. Planning obligations should also only be sought where they meet all of the following tests within the Community Infrastructure Levy regulations 2010:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 29.2 Where obligations are being sought, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. An approval subject to a S106 is not final until the S106 agreement has been completed and signed by all parties.
- 29.3 A section 278 (S278) agreement (Highways Act 1980 (as amended)) is a legally binding document between the Local Highway Authority and the developer to ensure that the work to be carried out on the highway is completed to the standards and satisfaction of the Local Highway Authority.
- 29.4 The document is prepared by the Local Highway Authority's solicitor and issued to the developer's solicitor in draft format. The details of the

agreement are then agreed before the final document is completed and signed by both parties before the commencement of any work on site.

29.5 The agreement details what the requirements of both the Local Highway Authority and developer are to ensure that the proposed works are carried out in accordance with the approved drawings. It also details how the Local Highway Authority may act should the developer fail to complete the works.

29.6 Paragraph 203 of the National Planning Policy Framework states “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions”. Paragraph 206 of the National Planning Policy Framework states “Planning conditions should only be imposed where they are:

1. Necessary;
2. relevant to planning and;
3. to the development to be permitted;
4. enforceable;
5. precise and;
6. reasonable in all other respects.”

29.7 Should the application be approved, there are S106 (including S278) heads of terms recommended in addition to recommended planning conditions to ensure that the development is acceptable in planning terms, and does not result in an undue impact on local parking and highways conditions from construction through operation, an undue impact on health and education provision in both Merton and Wandsworth boroughs, an undue impact on the amenities of the occupiers of the adjoining and surrounding residential and commercial properties, delivers the maximum amount of on-site affordable housing the scheme will viably allow, contributes towards sustainable energy provision and biodiversity gains, delivers a development of an aesthetic high quality and high quality of residential accommodation, and which makes the maximum contribution towards the provision of employment opportunities on site from construction through to operation.

29.8 The recommended planning conditions and S106 heads of terms are laid out in section 31 further below.

30. CONCLUSION

30.1 The existing Greyhound stadium site presents a number of challenges for any proposed redevelopment however the potential to overcome these challenges and provide a high quality, mixed use, development has been reflected in the site’s allocation in the adopted Sites and Policies Plan (‘Site 37’) for *‘Intensification of sporting activity (D2 Use Class) with supporting enabling development. Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation.’*

- 30.2 This current application proposes the demolition of the existing Greyhound stadium and other commercial buildings within the site and the erection of a replacement mixed use development comprising an 11, 000 - 20, 000 seat football stadium for AFC Wimbledon, which is to be enabled by the proposed 602 residential units, new Squash and fitness facility, and new retail unit, with associated parking and landscaping. The proposed scheme will also provide an on-site child day-care facilities in addition to providing mitigation and contributing to wider enhancements in the surrounding area within LBM and LBW through S106 and CIL monies.
- 30.3 It is considered that the proposed development is, on balance, acceptable in national, regional, and local policy terms and has satisfactorily overcome and addressed the site constraints in respect of flooding and transport and that the mitigation measures proposed through the design and/or relevant S106 and/or Merton CIL will result in a high quality development, which will begin a much needed regeneration of this area, and provide wider socio-economic and environmental benefits within both Merton and Wandsworth boroughs.

31. RECOMMENDATION

GRANT PLANNING PERMISSION

- 31.1 That planning permission is granted subject to the following conditions and securing the planning obligations below through the completion of a satisfactory legal agreement made under Section 106 of the Town and Country Planning Act 1990 and/or other appropriate legislation, and subject to:
1. The application being referred to the Mayor of London, in accordance with the Mayor of London Order 2008.
 2. If the legal agreement is not completed by X 2016 (or any agreed extended period), then the Development Control Section Manager is hereby authorised to refuse planning permission for the reason that the proposal should include planning obligations required to make the development acceptable in planning terms in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, development plan policies and the Planning Obligations SPD and to ensure that the development is delivered and as closely as possible to the Sites and Policies Plan delivery period (2014-2019), in the interests of the regeneration of the site and wider area.
 3. Following the grant of planning permission, where (a) requested to enter into a deed of variation or legal agreement in connection with the planning permission hereby approved and by the person(s) bound by the legal agreement authorised in paragraph 1 above, and (b) where the planning obligations are not materially affected, and (c) there is no monetary cost to the Council, the Head of Development Control is hereby authorised (in consultation with the Chair of the Planning Committee and upon the advice of the Head of Sustainable Communities) to enter into a legal agreement(s) (deed of variation)

made under Sections 106 and/or 106A of the Town and Country Planning Act 1990 and or other appropriate legislation.

- 31.2 The relevant S106 legal agreement between LBM, AFC Wimbledon, Galliard, Greyhound Racing Acquisitions Ltd, and Greyhound Racing Association Ltd, TfL, shall include the following heads of terms (as is normal practice, obligations as specified are still subject to further negotiations. The Committee will be provided with an updated position at the Committee meeting).
1. Enabling sporting intensification: the provision for a ready-for-occupation stadium and a ready-for-occupation squash and fitness facilities prior to the occupation of a proportion of residential units and associated provision of 19 car parking spaces in Block A as proposed..
 2. Affordable housing: Subject to viability, the provision of 60 intermediate within Block B, to be available in-perpetuity to persons or households who meet Merton's affordable housing eligibility criteria.
 3. Affordable housing viability review mechanism: the Council requires the applicant to undertake a viability review, at an advanced stage in the delivery of the residential element of the development. This will identify whether the development generates any financial surplus that could be used to provide additional off-site affordable housing via payment of a financial contribution to the council, in-lieu of on-site provision (the clawback mechanism recommended at head of term number 4 being the tool proposed to secure this).
 4. Clawback mechanism (affordable housing): to be undertaken at fixed trigger points following commencement and during or following the delivery of development in order to recoup surplus funds to be used for off-site affordable housing (capped, so that the total amount clawed back, when added to the value of on-site provision, would not exceed the policy target expressed in the adopted Merton Core Strategy Policy CS8).
 5. Health: Proportional financial contribution towards the provision of off-site health care facilities. If the health care facility is not provided within 1 mile of the site within five years from final residential occupation, then the sum is to be otherwise redirected for off-site affordable housing in accordance with the clawback mechanism.
 6. Older children play provision: Provision for a proportional financial contribution for identified enhancements to Garratt Park following a review to be conducted by the London Borough of Wandsworth into current usage levels and facilities of the Park, together with signage improvements to the route between the site and the Park to direct users to the Park entrance accessed via Garratt Lane. The financial contribution shall be used within 5 years of receipt and any funds remaining at the end of this period shall be returned to LBM to be

redirected for off-site affordable housing in accordance with the clawback mechanism.

7. Bus services contribution: Provision of £1,200,000 to be paid to Transport for London towards increase in bus capacity on AM and PM peak routes from Garratt Lane for a period of 3 years. If funds are unapplied to the stated purpose then they are to be (repaid to Merton/) redirected for off-site affordable housing in accordance with the clawback mechanism
8. Bus Stop relocation: £8,386.94 for bus stop infrastructure plus Section 278 works associated with moving bus stop known as BP5011. If funds are unapplied to the stated purpose then they are to be (repaid to Merton/) redirected for off-site affordable housing in the first instance in accordance with the clawback mechanism
9. Highways works within London Borough of Merton: to be completed prior to occupation of the development, to be secured by S.278 agreement to be entered into prior to commencement of development. Works to include:
 - a. the provision of the pedestrian lane or the shared pedestrian/cycle lane on the Plough Lane Dedication Land and existing public highway on Plough Lane running from the Wandle Trail to the Development Site;
 - b. the relocation of the bus stop known as BP5011 and payment of bus stop infrastructure costs of £8,386.94 via financial contribution as per head of term above;
 - c. the provision of a pelican crossing across Plough Lane at the junction with the proposed Public Access Route;
 - d. the provision of a two lane northbound entry flow from Haydons Road into the junction of Haydons Road, Gap Road, Durnsford Road and Plough Lane, including all associated changes to road markings, parking bays, kerbs, drainage, lighting and signals
 - e. Realignment of the kerb on the corner of Gap Road/Durnsford Road;
 - f. the provision of a pedestrian refuge island, along with associated works, on Plough Lane within close vicinity to Waterside Way
 - g. the removal of all carriageway parking on Plough Lane between Waterside Way and Summerstown Road
 - h. Reconstruction of the highway (carriageway and footway) around the site at Plough Lane and Waterside Way which may include, inter alia
 - i. New footways and carriageway

- ii. Revised access/crossover arrangements
 - iii. Relocation/replacement of street lighting
 - iv. Relocation of services, if and where necessary
 - v. Road markings and signs and related traffic management orders
- i. Consultation and implementation costs for any parking management in connection with highways / Section 278 costs.
10. Works associated with utilities diversion Any works to divert utilities either on or offsite, including Thames Water sewer/s, shall include associated works to LB Merton and LB Wandsworth's highway assets including highway drainage connections.
11. Dedication under S.38 of the Highways Act: of land within the application site boundary, to form part of the public highway on Plough lane to accommodate the cycle/footway connecting the site to the Wandle Trail
12. Highways works within LB Wandsworth: to be completed prior to occupation of the development, to be secured by S.278 agreement with London Borough of Wandsworth prior to commencement of development. Works to include:
- a. Reconstruction of highway abutting the site in Summerstown and Riverside Road which may include, inter alia
 - i. New footways and carriageway
 - ii. Revised access/crossover arrangements
 - iii. Relocation/replacement of street lighting (if required)
 - iv. Relocation of services, if and where necessary
 - v. Road markings and signs and related traffic management orders
 - b. Footway and road safety improvements in the direction of Garratt Lane, to include new dropped kerbs, tactile paving and pedestrian signage
13. LB Merton on-street parking controls (CPZs): Provision of funds to LBM to cover the cost of public consultation on changes to identified CPZ's to enable specific controls and the imposition of these controls should the public consultation be in favour. Any funds not spent within a specified period following occupation of the stadium would be redirected for off-site affordable housing in accordance with the clawback mechanism.
14. LB Wandsworth on-street parking controls (CPZ): Provision of funds to LBM to be passed to LBW to enable public consultation on changes to identified CPZ's to enable specific controls and the imposition of these controls should the public consultation be in favour. Any funds within a specified period following occupation of the stadium would be

transferred back to LBM to use for off-site affordable housing in accordance with the clawback mechanism.

15. LB Merton on-street parking controls (waiting and loading): Provision of funds to LBM to cover the costs of alterations to existing waiting and loading restrictions along Waterside Way and Plough Lane. Any funds not spent prior to occupation of the stadium would be transferred to use for off-site affordable housing in accordance with the clawback mechanism.
16. LB Wandsworth on-street parking controls (waiting and loading): Provision of funds to LBM to be passed to LBW in respect of and waiting and loading restrictions. Any funds not spent within a specified period following occupation of the stadium would be transferred back to LBM to use for off-site affordable housing in accordance with the clawback mechanism.
17. Public Access Route – North-South Spine Route: public access controls (to be sensitive to any amended Construction Management Plan and Delivery and Servicing plans provisions for Stadium enhancements)
18. Stadium Management Plan: (including (but not exclusive to) Stadium Travel Plan, Local Area Management Plan, Coach Management Plan, Stadium Emergency Evacuation Procedure Plan) (this is to be considered a “stadium document” for the purposes of the below heads)
19. Delivery and Services Plan (for the stadium and all other uses so therefore this is to be considered a “stadium document” for the purposes of the below heads). This will include site waste management plans in respect of the storage and removal of refuse and recycling for all elements of the approved development (including stadium, crèche, retail unit, squash and fitness facility and residential units)
20. Car Club spaces to be provided within residential parking area.
21. Electric vehicle charging points: provision for electric vehicle charging points (passive and active provision) to be provided on site in accordance with the agreed plans.
22. Travel plans: travel plans (including annual monitoring and publication of the results) to be provided in respect to the stadium and the residential units
23. Residential units to be ‘permit free’, which means that all users and occupiers of residential units proposed shall not be entitled to a permit to park a vehicle within a CPZ within the vicinity of the site (blue badge holders excluded).

24. Construction Management Plan: including Construction Logistics Plan, Site Waste Management, and Construction Environmental Management Plan (which shall include a Japanese Knotweed Management Plan) to be submitted to and approved by LBM prior to commencement of development. An updated/or additional Construction Management Plan and associated documents to be submitted and approved prior to work to increase the capacity of the stadium or up to the maximum of 20,000 persons. Development to not be carried out except in accordance with the approved plans.

25. Car Park Management Plans: to cover the Stadium, and residential development and 19 squash and fitness facility car parking spaces. The Stadium Car Park Management Plan comprises a “stadium document” for the purposes of the below head of terms.

26. Provisions required in connection with stadium enhancements: Require the monitoring and review of “stadium documents” required under the S.106 agreement, including
 - a. an updated Transport Assessment (the scope of which to be agreed in advance with LBM)

 - b. a draft schedule of proposed further mitigation measures to be prepared and submitted to the Council for approval, with the final schedule submitted [] (which may include but not be limited to):
 - i. further highways works;
 - ii. further parking controls and associated payments to LB Merton and LB Wandsworth
 - iii. provisions to facilitate the use of Haydon’s Road Station on match days; and
 - iv. amended “stadium documents”)

 - c. delivery timescales for those measures as approved by the Council, 1) prior to commencement of works to increase the capacity of the stadium up to or above 15,000 persons; and, if not part of the aforementioned works to increase the capacity to or beyond 15,000 persons, 2) prior to commencement of works to increase the capacity of the stadium up to or beyond 19,000 persons, with works not to be commenced until such documents are approved, in the form of a written notice, by LBM

27. Further mitigation measures – stadium enhancements: Prior to commencement of the associated stadium enhancement securing agreement between the football club and LB Merton to the further mitigation measures, identified in the aforementioned written approval notice, to be delivered by the football club, and associated delivery timescales.

28. Legal Agreement confirming Delivery of the Approved Development: : No development shall commence until written evidence has been submitted to the Local Planning Authority confirming that all relevant parties have signed a legal agreement ensuring the full, approved, redevelopment of the site. The redevelopment of the site shall be carried out in accordance with the approved drawings and in line with any approved phasing plan(s).
29. The developer agreeing to meet the Council's costs of preparing, drafting, or checking the agreement.
30. The developer agreeing to meet the Council's costs of monitoring the agreement.

And the following conditions:

Conditions and Informatives

1. Time Limit for Implementation: The development to which this permission relates shall be commenced not later than the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 (as amended) of the Town & Country Planning Act 1990.

2. Phasing Plan: No development shall take place until full details, including plans, of the phasing of the development have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in strict accordance with the approved details of phasing, unless any variation or amendments have first been agreed in writing with the Local Planning Authority.

Reason: To ensure the development progresses in an orderly manner without undue loss of amenity to the surrounding area and that satisfactory facilities are provided to service all stages of the development.

3. The development hereby permitted shall be carried out in accordance with the following approved plans: [insert plans]

Reason: For the avoidance of doubt and in the interests of proper planning

4. Materials to be approved: No development above ground shall take place until details of particulars and samples of the materials to be used on all external faces of the development hereby permitted, including window frames and doors (notwithstanding any materials specified in the application form and/or the approved drawings), have been submitted to the Local Planning Authority for approval. No works which are the subject of this condition shall be carried out until the details are approved, and the development shall be carried out in full accordance with the approved details.

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2011, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

5. Elevational Detailing: No development above ground shall take place until plans showing the final detailing and materials of the Stadium east elevation, details and materials of the proposed feature arches, and proposed podium levels and louvres to the residential blocks shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2015, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

6. Internal Detailing (Stadium): No development above ground shall take place until plans showing the detailing and internal layout of the East concourse, facilitating the approved Café, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2015, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

7. Ramped Access Detailing: No development above ground shall take place until plans showing the final detailing and materials of the ramped access to residential Block A, located at the juncture of Plough Lane and Summerstown, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2015, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

8. Stadium and Hospitality Entrance Detailing: No development above ground shall take place until plans showing the final detailing and materials of the main Stadium Entrance and Hospitality entrance, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2015, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

9. Samples of Approved Materials: Samples of all approved materials/finishes to be used within the approved development shall be stored on site for the

duration of construction and shall be made available for viewing by the Local Planning Authority at their request, during normal working hours.

Reason: To ensure a satisfactory appearance of the development and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2015, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

10. Details of Surface Treatment: No development shall take place until details of the surfacing of all those parts of the site not covered by buildings or soft landscaping, including any parking, service areas or roads, footpaths, hard and soft have been submitted in writing for approval by the Local Planning Authority. No works that are the subject of this condition shall be carried out until the details are approved, and the development shall not be occupied / the use of the development hereby approved shall not commence until the details have been approved and works to which this condition relates have been carried out in accordance with the approved details.

Reason: To ensure a satisfactory standard of development in accordance with the following Development Plan policies for Merton: policies 7.5 and 7.6 of the London Plan 2011, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D1 and D2 of Merton's Sites and Polices Plan 2014.

11. Details of Walls/Fences: No development above ground shall take place until details of all boundary walls or fences are submitted in writing for approval to the Local Planning Authority. No works which are the subject of this condition shall be carried out until the details are approved, and the development shall not be occupied / the use of the development hereby approved shall not commence until the details are approved and works to which this condition relates have been carried out in accordance with the approved details. The walls and fencing shall be permanently retained thereafter.

Reason: To ensure a satisfactory and safe development in accordance with the following Development Plan policies for Merton: policies 7.5 and 7.6 of the London Plan 2011, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D1 and D2 of Merton's Sites and Polices Plan 2014.

12. Levels: No development shall take place until details of the proposed finished floor levels of the development, together with existing and proposed site levels, have been submitted to and approved in writing by the Local Planning Authority, and no development shall be carried out except in strict accordance with the approved levels and details.

Reason: To safeguard the visual amenities of the area and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2011, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

13. Window Openings: The window openings for the approved retail units and Squash and Fitness facility shall be glazed in clear glass and retained as such

and nothing shall be applied or fixed to the windows so as to obscure views into and out of the store.

Reason: To provide visual interest to the shopping frontage, to maintain the vitality and viability of the town centre and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2011, policy CS14 of Merton's Core Planning Strategy 2011 and policy DM D7 of Merton's Sites and Polices Plan 2014.

14. Foundation/Piling Design: Piling or any other foundation design using penetrative methods shall not be permitted other than with the express consent of the Local Planning Authority, in liaison with the relevant utility providers, following submission of a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works), which may be given where it has been demonstrated that there is no resultant unacceptable risk to above or below ground utility infrastructure. The development shall be carried out in accordance with the approved Piling Method Statement.

Reason: To ensure that the piling design is protective of above and below ground utility infrastructure assets and controlled waters, and to comply with the following Development Plan policies for Merton: policy 5.15 and 5.21 of the London Plan 2015, policy CS16 of Merton's Core Planning Strategy 2011 and policy DM F2 of Merton's Sites and Polices Plan 2014.

15. No Cables, Flue, and Meter Boxes: No cables, wires, aerials, pipework (except any rainwater downpipes as may be shown on the approved drawings) meter boxes or flues shall be fixed to any elevation facing a highway.

Reason: To safeguard the appearance of the development and the visual amenities of the area and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2011, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

16. No Satellite Dishes: Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and re-enacting that Order with or without modification), no Satellite dishes or Aerials shall be installed on any part of the approved development without planning permission being first obtained from the Local Planning Authority.

Reason: To safeguard the appearance of the development and the visual amenities of the area and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2015, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

17. No Use of Flat Roofs: Other than any approved designated roof terraces, access to the flat roofed areas of the development hereby permitted shall be for maintenance or emergency purposes only, and the flat roofed areas shall not be used as roof gardens, terraces, patios or similar amenity areas.

Reason: To safeguard the amenities and privacy of the occupiers of adjoining properties and to comply with the following Development Plan policies for Merton: policy 7.6 of the London Plan 2015, policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2 and D3 of Merton's Sites and Polices Plan 2014.

18. Opening Hours (Retail unit): The use hereby permitted shall not be open to customers except between the hours of ----- and ----- on any day and no staff shall be present at the premises -----hour after the closing time.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2011, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

19. Opening Hours (Squash and fitness facility): The use hereby permitted shall not be open to customers except between the hours of ----- and ----- on any day and no staff shall be present at the premises -----hour after the closing time.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2011, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

20. Opening Hours (Stadium and Stadium Shop): The use hereby permitted shall not be open to customers except between the hours of ----- and ----- on any day and no staff shall be present at the premises -----hour after the closing time.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2011, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

21. Opening Hours (Stadium hospitality suites): The use hereby permitted shall not be open to customers except between the hours of ----- and ----- on any day and no staff shall be present at the premises ----hour after the closing time.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2011, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

22. Opening Hours (Crèche): The use hereby permitted shall not be open to customers except between the hours of ----- and ----- on any day and no staff shall be present at the premises ----hour after the closing time.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2011, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

23. Opening Hours (Café): The use hereby permitted shall not be open to customers except between the hours of ----- and ----- on any day and no staff shall be present at the premises ----hour after the closing time.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2011, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

24. No Amplified Sound (Hospitality suites) No music or other amplified sound generated on the premises shall be audible at the boundary of any adjacent residential building.

Reason: Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2011, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

25. No Amplified Sound (Squash and fitness facility) No music or other amplified sound generated on the premises shall be audible at the boundary of any adjacent residential building.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2011, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

26. Noise Levels (Plant and Machinery) : Noise levels, (expressed as the equivalent continuous sound level) LAeq (10 minutes), from any new plant/machinery associated with each separate commercial unit shall not exceed LA90-10dB at the boundary with the closest residential or noise sensitive property.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2015, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

27. Noise Levels (Mechanical Ventilation): : Noise levels , (expressed as the equivalent continuous sound level) LAeq (10 minutes), from any mechanical

ventilation and heat recovery/combined heat and power, air source heat pumps, lift gear associated with the development shall not exceed LA90-10dB at the boundary with the nearest residential boundary.

Reason: To safeguard the amenities of surrounding area and to ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2015, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

28. Kitchen Ventilation Systems (Stadium, Retail, and Squash and Fitness Facility) The use hereby permitted shall not commence until detailed plans and specifications of a kitchen ventilation system, including details of sound attenuation for a kitchen ventilation extract system and odour control measures have been submitted to and approved in writing by the Local Planning Authority. The kitchen ventilation extract system shall be installed in accordance with the approved plans and specifications before the use commences and shall be permanently retained as such thereafter.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and to ensure compliance with the following Development Plan policies for Merton: policies 7.14 and 7.15 of the London Plan 2011, policy CS7 of Merton's Core Planning Strategy 2011 and policies DM EP2 and DM EP4 of Merton's Sites and Polices Plan 2014.

29. Details of MVHR): No development above ground shall take place until details of the residential units to be fitted with a Mechanical Heat Ventilation (MHV) system as outlined in the Environmental Statement and Energy, and Sustainability Statements shall be submitted to the Local Planning Authority for approval in writing and the MVH system shall be installed to those units and permanently retained and maintained as such thereafter.

Reason: To safeguard the amenities of the occupiers of those properties and ensure compliance with the following Development Plan policies for Merton: policies 7.14 and 7.15 of the London Plan 2015 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2015, policy CS7 of Merton's Core Planning Strategy 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

30. Noise Management Plan (Deliveries Non-Residential Uses): : Due to the potential impact of the surrounding locality and approved commercial uses on the residential development, a Noise Management Plan for protecting residents within the development from noise (including but not limited to, sound attenuation of low frequency tonal noise (principally 100Hz, 200Hz and harmonics) controls on delivery times, white noise reversing beepers, rubber mats to minimise noise from cages, improved sound insulation to dwellings if required, use of conveyor belts for loading and unloading) shall be submitted

to and approved in writing by the Local Planning Authority prior to any development above ground commencing. The scheme is to include acoustic data for the glazing system and ventilation system to the residential units. The internal noise levels shall meet those within BS8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings as a minimum. The approved scheme shall be implemented in accordance with the agreed details.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2015 and policies DM D2, DM D3, DM EP2 and DM EP4 of Merton's Sites and Policies Plan 2014.

31. Odour Control: No development above ground shall take place until, details of measures to control odour from all mechanical systems serving any individual food premises shall be submitted to and approved in writing to the Local Planning Authority. The odour control measures shall be designed so as to limit the impact on neighbouring residential units from any odours generated by the approved commercial uses and the approved measures shall be implemented prior to occupation of any of the residential development and permanently retained and maintained as such.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and to ensure compliance with the following Development Plan policies for Merton: policies 7.14 and 7.15 of the London Plan 2015, policy CS7 of Merton's Core Planning Strategy 2011 and policies DM EP2 and DM EP4 of Merton's Sites and Policies Plan 2014.

32. Healthy Catering and Healthy Work Places Schemes: Prior to occupation of the Stadium, details confirming exploration of, and accreditation from, the London Borough of Merton's 'Healthy Catering Commitment' and the Greater London Authority's 'Healthy Workplaces' scheme shall be submitted to the Local Planning Authority.

Reason: In the interests of contributing towards the improvement of public health within the London Borough of Merton and in compliance with policy 3.2 of the London Plan 2015.

33. Scheme of Lighting: No development above ground shall take place until a scheme of lighting for the approved development shall be submitted to and approved in writing by the Local Planning Authority and any such approved external lighting, shall be positioned and angled to prevent/minimise any light spillage or glare that will affect any existing or new residential premises. The approved scheme of lighting shall be implemented prior to occupation of the relevant part of the approved Phasing Plan.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2015

and policies DM D2, DM D3, DM EP2 and DM EP4 of Merton's Sites and Polices Plan 2014.

34. CCTV Details: No development above ground shall take place until details of all CCTV and security lighting within/serving the approved development and its linkages with any external CCTV system shall be submitted to and approved in writing by the Local Planning Authority and thereafter permanently maintained and retained as such. The approved scheme of CCTV and security lighting shall be implemented prior to occupation of the relevant part of the approved Phasing Plan.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2015 and policies DM D2, DM D3, DM EP2 and DM EP4 of Merton's Sites and Polices Plan 2014.

35. Contamination: Prior to development commencing an investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site, and shall be submitted to and approved in writing by the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced and submitted to and approved in writing by the Local Planning Authority.

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policies 5.21 and 7.14 of the London Plan 2015 and policy DM EP4 of Merton's Sites and Polices Plan 2014.

36. Contamination Remediation: Subject to the findings of a site investigation for contaminated land as required by condition 35, if necessary, a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Any approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policies 5.21 and 7.14 of the London Plan 2015 and policy DM EP4 of Merton's Sites and Polices Plan 2014.

37. Contamination Remediation Verification: Following the completion of any measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out shall be submitted to and approved in writing by the Local Planning Authority.

In the event that contamination is found at any time whilst implementing the approved development, which was not previously identified, details of the contamination must immediately be reported in writing to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11' and where remediation is necessary a remediation scheme must be prepared, and submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policies 5.21 and 7.14 of the London Plan 2015 and policy DM EP4 of Merton's Sites and Polices Plan 2014.

38. Electro-Magnetic Radiation: Prior to the occupation of the development the applicant shall provide written evidence to the Local Planning Authority that electro-magnetic radiation emissions from the adjacent sub-station do not exceed ICNIRP (international commission on non-ionizing radiation protection) guidance levels of 100 microteslas and 5 kilovolts per metre within the residential properties, Squash and fitness facility, and Creche.

Subject to the findings of site investigation, if necessary, a detailed remediation scheme to bring any electro-magnetic radiation emission levels to within ICNRP guidance levels of 100 microteslas and 5 kilovolts per metre shall be submitted to, and be subject to, the approval in writing of the Local Planning Authority.

Any approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policies 7.14 and 7.15 of the London Plan 2015 and policy DM EP4 of Merton's Sites and Polices Plan 2014.

39. Stadium Use(s): The approved Stadium shall only be used for general sporting uses and football matches up to an average of twice weekly, and for no other commercial sport or public events.

Reason: To allow the Local Planning Authority to control the level of sporting and hospitality use within the site to safeguard the amenities of the occupiers of the adjoining and surrounding properties, local transport conditions, and ensure compliance with the following Development Plan policies for Merton: policy 6.13 of the London Plan 2015 and policies DM EP2, EP4, T2, T3 and T5 of Merton's Sites and Polices Plan 2014.

40. Stadium Capacity: The approved Stadium (including hospitality suites) shall not exceed a total spectator capacity of 20,000.

Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2011 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

41. Employment Strategy: Prior to development commencing an Employment Strategy shall be submitted to the Local Planning Authority for approval in writing in respect of both construction and operational phases of the development, which details the measures to be taken to primarily recruit skilled and unskilled staff/personnel from the London Boroughs of Merton and Wandsworth, and only if it can be demonstrated that such staff/personnel cannot be sourced from within these boroughs, that they may be recruited from outside of these borough. The approved Employment Strategy

Reason: To ensure provide opportunities for local residents and businesses to apply for employment and other opportunities during the construction of developments and in the resultant end-use and compliance with the following Development Plan policies for Merton: policy 4.12 of the London Plan 2015, policy CS 12 of Merton's Core Planning Strategy 2011 and policy DM E4 of Merton's Sites and Polices Plan 2014.

42. Squash and Fitness Facilities (Use): The Squash and fitness premises shall only be used for Squash and general fitness and ancillary purposes and for no other purpose, (including any other purpose within Class D1 of the Schedule to the Town and Country Planning (Use Classes Order) 1997), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

Reason: The Local Planning Authority would wish to retain control over any further change of use of these premises in the interests of safeguarding the site's 'Site 37' SPP policy allocation, residential amenities of adjoining properties, the transport conditions of the area, and to ensure compliance with the following Development Plan policies for Merton: policy 6.3 and 7.15 of the London Plan 2015, policy CS 14 and CS 20 of Merton's Core Planning Strategy 2011 and policy DM EP2 and DM T2 of Merton's Sites and Polices Plan 2014.

43. Retail Unit (use): The retail premises shall only be used for food/convenience retail and for no other purpose, (including any other purpose within Class A1 of the Schedule to the Town and Country Planning (Use Classes Order) 1997), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

Reason: The Local Planning Authority would wish to retain control over any further change of use of these premises in the interests of safeguarding the amenities of the area and to ensure compliance with the following Development Plan policies for Merton: policy 6.3 and 7.15 of the London Plan 2015, policy CS 14 and CS 20 of Merton's Core Planning Strategy 2011 and policy DM EP2 and DM T2 of Merton's Sites and Polices Plan 2014.

44. Crèche (Use): The crèche premises shall only be used for child day care and for no other purpose, (including any other purpose within Class D1 of the Schedule to the Town and Country Planning (Use Classes Order) 1997), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

Reason: The Local Planning Authority would wish to retain control over any further change of use of these premises in the interests of safeguarding the amenities, social infrastructure, and transport conditions of the area and to ensure compliance with the following Development Plan policies for Merton: policy 6.3 and 7.15 of the London Plan 2015, policy CS 14 and CS 20 of Merton's Core Planning Strategy 2011 and policy DM EP2 and DM T2 of Merton's Sites and Polices Plan 2014.

45. Hospitality Suites (Uses): The hospitality suite premises shall only be used for uses associated with the sporting use of the Stadium and for no other purpose unless otherwise agreed in writing by the Local Planning Authority.

Reason: The Local Planning Authority would wish to retain control over any further change of use of these premises in the interests of safeguarding the amenities of the area and to ensure compliance with the following Development Plan policies for Merton: policy 6.3 and 7.15 of the London Plan 2015, policy CS 14 and CS 20 of Merton's Core Planning Strategy 2011 and policy DM EP2 and DM T2 of Merton's Sites and Polices Plan 2014.

46. Delivery of Café and Crèche: The approved Stadium shall not be occupied until the approved café and child day care facilities are built ready for occupation.

Reason: In the interests of providing activity along the North-South street and providing child day care facilities, of which there is a need within the London Borough of Merton, and to ensure compliance with the following Development Plan policies for Merton: policy 7.5, 7.6, 3.16 and 3.18, of the London Plan 2015, policy CS 14 and CS 11 of Merton's Core Planning Strategy 2011 and policy DM D1, DM D2 and DM C2 of Merton's Sites and Polices Plan 2014.

47. Wheelchair Accessible Units: During construction of each agreed residential phase for occupation, a proportional amount of the approved, fully wheelchair accessible, units shall also be completed for occupation.

Not less than 10% of the dwelling units hereby permitted shall be constructed shall be wheelchair accessible throughout or easily adaptable for residents who are wheelchair users and shall be retained as such unless otherwise agreed in writing with the Local planning Authority.

Reason: In the interests of providing fully wheelchair accessible residential units during all phases of the development and compliance with the following Development Plan policies for Merton: policy 3.8 of the London Plan 2011, policy CS8 of Merton's Core Planning Strategy 2011 and policy DM D2 of Merton's Sites and Polices Plan 2014.

48. Accessibility Strategy: Prior to the occupation of any part of the approved development, details of a full 'Accessibility Strategy' for the approved development shall be submitted to the Local Planning Authority for approval in writing.

Reason: In the interests of providing wheelchair access units during all phases of the development and compliance with the following Development Plan policies for Merton: policy 3.8 of the London Plan 2011, policy CS8 of Merton's Core Planning Strategy 2011 and policy DM D2 of Merton's Sites and Polices Plan 2014.

49. Temporary/Mobile Food/Drink Sales: No temporary or permanent mobile food/drink/alcohol sales facilities shall be established or carried out within the site or public highways other than in the designated food/drink areas within the approved Stadium unless otherwise agreed in writing by the Local Planning Authority..

Reason: In the interests of maintaining a high standard of appearance of the development and the amenities of the occupiers of the adjoining and surrounding residential properties and to ensure compliance with the following Development Plan policies for Merton: policy 7.5, 6.3 and 7.15 of the London Plan 2015, policy CS 14 and CS 20 of Merton's Core Planning Strategy 2011 and policy DM D1, DM D2, DM EP2 and DM T2 of Merton's Sites and Polices Plan 2014.

50. Landscaping/Planting Scheme: No development above ground shall take place until full details of a landscaping and planting scheme, including details of the door-step play spaces for under 5 year olds, has been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved before the commencement of the use or the occupation of any building hereby approved with the relevant phase of the Phasing Plan, unless otherwise agreed in writing by the Local Planning Authority. The details shall include on a plan, full details of the size, species, spacing, quantities and location of proposed plants, together with any hard surfacing, means of enclosure, play equipment, and indications of all existing

trees, hedges and any other features to be retained, and measures for their protection during the course of development.

Reason: To enhance the appearance of the development in the interest of the amenities of the area, to ensure the provision sustainable drainage surfaces and to comply with the following Development Plan policies for Merton: policies 3.6, 3.16, 5.1, 7.5 and 7.21 of the London Plan 2011, policies CS11, CS13, CS14, CS16, and CS20 of Merton's Core Planning Strategy 2011 and policies DM D2, F2 and O2 of Merton's Sites and Polices Plan 2014.

51. Landscape Management Plan: Prior to the occupation of the development a landscape management plan including long term design objectives, management responsibilities and maintenance schedules for all landscaped areas, other than small, privately owned, domestic gardens, shall be submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out in accordance with the approved scheme unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the appearance of the development is maintained in the interest of the amenities of the area, to ensure the maintenance of sustainable drainage surfaces and to comply with the following Development Plan policies for Merton: policies 5.1, 7.5 and 7.21 of the London Plan 2011, policies CS13 and CS16 of Merton's Core Planning Strategy 2011 and policies DM D2, F2 and O2 of Merton's Sites and Polices Plan 2014.

52. Street Furniture and Signage: Prior to the occupation of any part of the development, full details of all street furniture and signage within the site shall be submitted to the Local Planning Authority for approval in writing and no further street furniture or signage shall be imposed without the approval in writing of the Local Planning Authority.

Reason: In the interests of maintaining a high standard of appearance of the development and to ensure compliance with the following Development Plan policies for Merton: policy 7.5 and 7.6 of the London Plan 2015, policy CS 14 of Merton's Core Planning Strategy 2011 and policy DM D1 and DM D2 of Merton's Sites and Polices Plan 2014.

53. 'Green' Roofs and Walls: No development above ground shall take place until , full details, including a management strategy, of the approved Sedum and Substrate 'green' roofs and 'green' walls shall be submitted the Local Planning Authority for approval in writing. The approved 'green' roofs shall be installed and permanently maintained in accordance with the approved details.

Reason: In the interests of maintaining a high standard of appearance, ensuring net biodiversity gains and to ensure compliance with the following Development Plan policies for Merton: policy 7.19 of the London Plan 2011, policy CS 14 and CS 13 of Merton's Core Planning Strategy 2011 and policy DM D2 of Merton's Sites and Polices Plan 2014.

54. Biodiversity Enhancements: No development above ground shall take place until, details of the biodiversity enhancement features such as the provision of bat boxes and bird nesting, as recommended in the approved of Ecological Appraisal by BSG Ecology, shall be submitted to the Local Planning Authority in writing and shall thereafter be permanently retained and maintained as such.

Reason: In the interests of enhancing the ecological value of the site and surrounds and to ensure compliance with the following Development Plan policies for Merton: policy 7.19 of the London Plan 2011, policy CS13 of Merton's Core Planning Strategy 2011 and policy DM D2 of Merton's Sites and Polices Plan 2014.

55. Advertisements: No advertisement is to be displayed within the site without the approval in writing of the Local Planning Authority and without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

Reason: In the interests of maintaining a high standard of appearance of the development and in the interests of the amenities of the occupiers of the residential units within the site and to ensure compliance with the following Development Plan policies for Merton: policy 7.5 and 7.6 of the London Plan 2015, policy CS 14 of Merton's Core Planning Strategy 2011 and policy DM D5 and DM D7 of Merton's Sites and Polices Plan 2014.

56. Flood Risk Assessment: The development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment (FRA) by Peter Brett Associates LLP dated October 2014, supported by the Flood Risk Assessment – Addendum by Peter Brett Associates LLP dated April 2015 and the Technical Note No. TN14A by Peter Brett Associates LLP dated 2nd September 2015. The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of flooding to the proposed development and future users, to ensure flood risk does not increase offsite and to ensure compliance with the following Development Plan policies for Merton: policy 5.12 and 5.13 of the London Plan 2015, policy CS 16 of Merton's Core Planning Strategy 2011 and policy DM F1 and DM F2 of Merton's Sites and Polices Plan 2014.

57. Flood Plain Compensation Scheme: The development hereby permitted shall not be occupied until such time as a floodplain compensation scheme is implemented which ensures that the flood risk is not increased, as detailed in Section 4.4 of the submitted FRA and supported by Section 4.1, Section 4.2 and Appendix B of the submitted FRA Addendum. The implemented scheme shall include flood openings (voids) and these voids must be maintained and remain operational for the lifetime of the development. The scheme shall be

fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of river flooding to the proposed development and future users, to ensure flood risk does not increase offsite and to ensure compliance with the following Development Plan policies for Merton: policy 5.12 of the London Plan 2015, policy CS 16 of Merton's Core Planning Strategy 2011 and policy DM F1 of Merton's Sites and Policies Plan 2014.

58. Finished Floor Levels: The development hereby permitted by this planning permission shall ensure that finished floor levels for all residential units shall be set no lower than 300mm above the 1 in 100 year plus climate change flood level (in metres above Ordnance Datum) as detailed in Section 4.1 of the submitted Flood Risk Assessment and Addendum. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of flooding to the proposed development and future users and to ensure compliance with the following Development Plan policies for Merton: policy 5.12 of the London Plan 2015, policy CS 16 of Merton's Core Planning Strategy 2011 and policy DM F1 of Merton's Sites and Policies Plan 2014.

59. Scheme for Surface and Foul Water Drainage: No development approved by this permission shall be commenced until a detailed scheme for the provision of surface and foul water drainage has been implemented in accordance with details that have been submitted to and approved in writing by the local planning authority and in consultation with Thames Water. The final drainage scheme shall be designed in accordance with the details submitted in the Flood Risk Assessment – Addendum by Peter Brett Associates LLP dated April 2015, including the Price and Myers Surface Water Drainage Strategy (Re-issue Civil Engineer's Statement – Below Ground Drainage (Rev P6 – For Planning)) and the Momentum Structural Engineer's Drainage Strategy Addendum (AFC Wimbledon Foul and Surface Water Drainage Strategy – Addendum (13th Feb 2015, Ref: 1785)).

The drainage scheme will dispose of surface water by means of a sustainable drainage system (SuDS) to sewer at the agreed restricted rate in accordance with drainage hierarchy contained within the London Plan Policy (5.12, 5.13 and SPG) and the advice contained within the National SuDS Standards. Where a sustainable drainage scheme is to be provided, the submitted details shall:

- i. provide information about the design storm period and intensity, the method employed to delay (attenuate) and control the rate of surface water discharged from the site at a maximum rate of 180.19l/s for the 1 in 100 year

climate change event. Appropriate measures must be taken to prevent pollution of the receiving groundwater and/or surface waters;

- ii. include a timetable for its implementation; and
- iii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.

Reason: To reduce the risk of surface and foul water flooding to the proposed development and future users, to ensure surface water and foul flood risk does not increase offsite and to ensure compliance with the following Development Plan policies for Merton: policy 5.13 of the London Plan 2015, policy CS 16 of Merton's Core Planning Strategy 2011 and policy DM F2 of Merton's Sites and Polices Plan 2014.

60. Site Contamination (Water): Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1) A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To protect Controlled Waters because the site is located over a Secondary Aquifer and no information has been provided on the potential for contamination gains and to ensure compliance with the following Development Plan policies for Merton: policy 5.21 of the London Plan 2011,

policy CS 16 of Merton's Core Planning Strategy 2011 and policy DM EP4 of Merton's Sites and Polices Plan 2014.

61. Site Contamination Remediation (Water): If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: To ensure that the Environment Agency is consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters, and to ensure compliance with the following Development Plan policies for Merton: policy 5.21 of the London Plan 2011, policy CS 16 of Merton's Core Planning Strategy 2011 and policy DM EP4 of Merton's Sites and Polices Plan 2014.

62. Site Contamination Remediation Verification (Water): Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To ensure that, if remediation be deemed necessary, the applicant demonstrates that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use, and to ensure compliance with the following Development Plan policies for Merton: policy 5.21 of the London Plan 2011, policy CS 16 of Merton's Core Planning Strategy 2011 and policy DM EP4 of Merton's Sites and Polices Plan 2014.

63. No Infiltration of Surface Drainage: Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that infiltrating water, which has the potential to cause remobilisation of contaminants present in shallow soil/made ground, does not

ultimately cause pollution of groundwater and to ensure compliance with the following Development Plan policies for Merton: policy 5.13 of the London Plan 2011, policy CS 16 of Merton's Core Planning Strategy 2011 and policy DM EP4 and DM F2 of Merton's Sites and Polices Plan 2014.

64. Flood Warning and Evacuation Plan: The development hereby permitted shall not be occupied until such time as a Flood Warning and Evacuation plan and procedure is implemented and agreed in writing to the satisfaction of the Local Planning Authority. The Flood Warning and Evacuation Plan shall be implemented in accordance with the submitted document included within Appendix D of the FRA Addendum by Peter Brett Associates (FWEP Issue 2, Ref:21533_020 dated March 2015) and the procedures contained within the plan shall be reviewed annually for the lifetime of the development. Consultation of the plan shall take place with the Local Planning Authority and Emergency Services.

Reason: To reduce the risk of flooding to the proposed development and to ensure compliance with the following Development Plan policies for Merton: policy 5.12 of the London Plan 2015, policy CS 16 of Merton's Core Planning Strategy 2011 and policy DM F1 of Merton's Sites and Polices Plan 2014.

65. Archaeology Scheme of Investigation: No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall *take place other than in accordance with the agreed stage 2 WSI which shall include:*

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Reason: Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with section 12 of the NPPF, policy 7.8 of the London Plan 2011,

policy CS14 of Merton's Core Planning Strategy 2011 and policies DM D2, D3 and D4 of Merton's Sites and Polices Plan 2014.

66. Renewable Energy Feasibility: Prior to the commencement of development a further renewable energy feasibility study shall be carried out, including a prediction for energy demands for Phase 2 of the approved stadium and an assessment of the feasibility of connecting the commercial units to the site-wide CHP network.

Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of resources and to comply with the following Development Plan policies for Merton: policy 5.2 of the London Plan 2011 and policy CS15 of Merton's Core Planning Strategy 2011.

67. Sustainability: No part of the development hereby approved shall be occupied until evidence has been submitted to the council confirming that the development has achieved not less than the CO2 reductions (ENE1), internal water usage (WAT1) standards equivalent to Code for Sustainable Homes level 4. Evidence requirements are detailed in the "Schedule of evidence Required for Post Construction Stage from Ene1 & Wat1 of the Code for Sustainable Homes Technical Guide. Evidence to demonstrate a 35% reduction compared to 2013 part L regulations and internal water usage rats of 105l/p/day must be submitted to, and acknowledged in writing by the Local Planning Authority, unless otherwise agreed in writing.

Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of resources and to comply with the following Development Plan policies for Merton: policy 5.2 of the London Plan 2011 and policy CS15 of Merton's Core Planning Strategy 2011.

68. Energy Strategy Objectives: No part of the development hereby approved shall be occupied until evidence has been submitted to the council confirming that the development has achieved the sustainability objectives identified in the applicants' Energy Strategy (06/11/2014) and sustainability statement (24/10/2014). This should include all post-construction certificates for the sustainable design and construction standards (both domestic and non-domestic) discussed it the approved energy strategy and sustainability statement.

Reason: To ensure that the development has been delivered in accordance with the approved Energy Strategy and to comply with the following Development Plan policies for Merton: Policy 5.2 of the London Plan 2015 and Policy CS15 of Merton's Core Planning Strategy 2011. To ensure

69. Sound Insulation: No part of the development hereby approved shall be occupied until evidence has been submitted to the council confirming that the development has achieved sound insulation values of not less than:

- Airborne sound insulation values at least 5db higher

- Impact sound values at least 5db lower than the performance standards set out in the Building regulations approved document E (2003 edition with amendments 2004) for each sub-group of flats. Evidence should comprise of pre-completion testing carried out post-construction based on the Normal programme of testing described in approved document E. Copies of the sound insulation field test results and a letter of confirmation that the required sound insulation performance standards have been achieved along with evidence that the test have been carried out by a Compliant Test Body.

Reason: To ensure compliance with the following Development Plan policies for Merton: policy 7.15 of the London Plan 2015 and policy DM EP2 of Merton's Sites and Polices Plan 2014.

70. New Vehicle Accesses: No development shall commence until details of the proposed vehicular access to serve the development have been submitted in writing for approval to the Local Planning Authority. No works that are subject of this condition shall be carried out until those details have been approved, and the development shall not be occupied until those details have been approved and completed in full.

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Polices Plan 2014.

71. Vehicle Access to be Provided: The development hereby approved shall not be occupied until the proposed vehicle access has been sited and laid out in accordance with the approved plans

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Polices Plan 2014.

72. Redundant Cross-Overs: The development shall not be occupied until the existing redundant crossover/s have been be removed by raising the kerb and reinstating the footway in accordance with the requirements of the Highway Authority.

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Polices Plan 2014.

73. Visibility Splays: Prior to the occupation of the development --- metre by --- metre pedestrian and vehicular visibility splays shall be provided either side of the vehicular access to the site. Any objects within the visibility splays shall not exceed a height of 0.6 metres.

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Polices Plan 2014.

74. Cycle Parking Details: No above ground works shall take place until details of secure cycle parking facilities for the occupants of, and visitors to, the development have been submitted to and approved in writing by the Local Planning Authority. The approved facilities shall be fully implemented and made available for use prior to the first occupation of the development and thereafter retained for use at all times.

Reason: To ensure satisfactory facilities for cycle parking are provided and to comply with the following Development Plan policies for Merton: policy 6.13 of the London Plan 2011, policy CS18 of Merton's Core Planning Strategy 2011 and policy DM T1 of Merton's Sites and Polices Plan 2014.

75. Cycle Parking Implementation: The development hereby permitted shall not be occupied until the cycle parking hereby approved under condition 78 has been provided and made available for use. These facilities shall be retained for the occupants of and visitors to the development at all times.

Reason: To ensure satisfactory facilities for cycle parking are provided and to comply with the following Development Plan policies for Merton: policy 6.13 of the London Plan 2011, policy CS18 of Merton's Core Planning Strategy 2011 and policy DM T1 of Merton's Sites and Polices Plan 2014.

76. Travel Plan (Residential): Prior to the occupation of the development hereby permitted, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall follow the current 'Travel Plan Development Control Guidance' issued by TfL and shall include:

- (i) Targets for sustainable travel arrangements;
- (ii) Effective measures for the on-going monitoring of the Plan;
- (ii) A commitment to delivering the Plan objectives for a period of at least 5 years from the first occupation of the development;
- (iii) Effective mechanisms to achieve the objectives of the Plan by both present and future occupiers of the development.
The development shall be implemented only on accordance with the approved Travel Plan.

Reason: To promote sustainable travel measures and comply with the following Development Plan policies for Merton: policy 6.3 of the London Plan 2011, policies CS18, CS19 and CS20 of Merton's Core Planning Strategy 2011 and policy DM T2 of Merton's Sites and Polices Plan 2014.

77. Gates: The doors of any gates hereby approved shall not open over the adjacent highway.

Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies CS18 and CS20 of Merton's Core Planning Strategy 2011 and policies DM T2, T3, T4 and T5 of Merton's Sites and Polices Plan 2014.

78. Secure by Design Plan: Prior to development commencing a Secure by Design Plan in respect of the approved development, demonstrating that the development has incorporated the optimal applicable Metropolitan Police 'Secure by Design' principles/measures as possible, shall be submitted to the Local Planning Authority for approval in writing.

Reason: In the interests of the safety of occupiers and visitors to the approved development and residents in the vicinity of the site and to comply with the following Development Plan policies for Merton: policies 7.3 of the London Plan 2011, policy CS14 and CS 18 of Merton's Core Planning Strategy 2011 and policies DM D1 and DM D2 of Merton's Sites and Polices Plan 2014.

Informatives

1. The developer is advised to contact Thames Water Developer Services prior to the commencement of any works on site.
2. The developer is made aware that it is their responsibility to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater.
3. The developer is made aware that where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921.
4. The developer is made aware that there are public sewers crossing or close to the development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The developer is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the options available at this site.
5. The developer is made aware that Thames Water recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to

enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

6. The developer is made aware that there are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.
7. The developer is made aware that they are required to submit a Section 185 Diversion application indicating a proposed diversion route for the sewer. Once the application has been received, a decision as to how best handle the diversion will be made.
8. The developer is advised to contact to Metropolitan Police Designing Out Crime Officer prior to developing the required Secure by Design Plan.
9. The developer is advised to contact the National Grid Asset Protection Team and National Grid Plant Protection Team prior to the commencement of any works on site.
10. The developer is made aware that written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
11. The developer is made aware of their responsibilities under the Wildlife and Countryside Act 1981.
12. The developer is made aware that any detailed landscape plan should be informed by the advice of an Ecologist, as recommended in paragraph 5.27 of the submitted Ecological Appraisal by BSG Ecology.
13. The developer is advised to contact and consult with Merton Council Waste Services prior to developing the required Site Waste Management Plans.
14. Details on Merton Council's 'Health Catering Commitment' scheme can be found here: http://www.merton.gov.uk/health-social-care/health/foodsafety/healthier_catering_commitment.htm
15. Details on the Greater London Authority's 'Healthy Workplace' scheme can be found here: <http://www.london.gov.uk/priorities/health/focus-issues/london-healthy-workplace-charter>
16. Note 1