



**Wimbledon Park  
Residents' Association**

Attention Sabah Halli  
Development Control  
Planning Office  
London Borough of Merton  
Morden SM4 5DX

Appendix 7 14/P4361 Wimbledon Stadium  
Committee Report

25<sup>th</sup> January 2015

Dear Madam

**Planning Application 14/P4361 – Wimbledon Greyhound Stadium**

Please find enclosed the objection of the Wimbledon Park Residents Association to the planning application of AFC/Galliard Homes number 14/P4361. 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

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## **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. 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.

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{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.

**4. 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.

Yours faithfully

Iain Simpson

Peter West

Michael Tyler

Planning members of the Wimbledon Park Residents Association

Attached reports: Flood Risk: Transport: Heritage: Community: Consultation.

**From the Chairman, Iain C Simpson  
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## Flood Risk and the AFC/Galliard Homes Planning Application

We first comment on the site and its flood risks:

- F1 The Plough Lane site has been determined to be a functional flood plain, that is, it is a site of highest risk of flooding with a 3b designation. It is, with one possible exception, the site in Merton that is at most risk of flooding. Such a designation implies that on average the site would flood 1 in every 20 years. These designations were given in the study carried out for the Environment Agency and it is the designation given to the site by Merton Council in the Sites and Policies Plan, formally called the Local Development Framework document (LDF). Although the developers asked for the designation to be changed when the Government Inspector held his review of the LDF, this was refused.
- F2 The detailed flood maps prepared for the Environment Agency show that the flood risk on the site is 3b, except for a narrow corridor of 3a flood risk along the eastern boundary of the site. Thus almost all of the site is within a 3b flood zone, consistent with its overall classification. The relevant flood map is on page 336 of the environmental statement volume 2 of the developers application.
- F3 The site consists of a stadium and a large car park. The car park is a flat area and it can be used to store water in time of flood.
- F4 The National guidelines for flooding are given in the National Planning Policy Framework and the associated Planning Practice Guidance up-dated March 2014 and found at  
(<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>)
- It states that the only development allowed in a 3b flood zone are essential infrastructure and water compatible development. Indeed the former is only allowed if it passes the sequential and exception tests discussed below. These permitted uses do not include residential housing or anything like it. We note that in a 3a zone residential housing may be allowed, subject to the two tests just mentioned.
  - Furthermore any development on a 3b flood plain must result in no net loss of flood plain storage, not impede water flows and not increase flood risk elsewhere.
  - We do not share the confusion of the developers concerning the Planning Practice Guidance which was revised in March 2014. In particular we find that the guidelines are very clear as to what is permitted in a 3b flood plain, indeed it is set out in table 3 and is specified as stated above. The exception and sequential tests are to be carried out subject to the uses permitted in table 3. The new guidelines have also changed the way developed vs undeveloped land is to be treated and how this affects the allowed development. Indeed, the new guidelines do not make a distinction between developed and undeveloped land and treat flood zone 3b as we have stated regardless of its previous use. This change also invalidates part of policy DM F1 in Merton's Sites and Policies Plan, even as it was revised during the visit of the Government Inspector, and renders the substantial discussion in the planning application concerning the developed, or otherwise, nature of the site irrelevant.

F5 We note that the original report (Strategic Flood Risk Assessment Merton level 2 Final Report) carried out for the Environment Agency states for this site that 'Residential development is not appropriate therefore lower vulnerability uses should be considered. Significant mitigation measures required to demonstrate safety of development, which is likely to be very challenging and will require significant emergency planning and site design.'

F6 The site is subject to surface water drainage problems and it was flooded many times this winter and in previous years. It has been suggested that this is due to the fact that the site is on a gravel bed and some of the water is ground water in addition to surface flooding due to rainfall.

Having set out the background to the site we now comment on the full planning application submitted by AFC/ Galliard homes:

FR1 The plan submitted has been formulated on the assumption that the site carries a 3a flood risk designation instead of the 3b flood risk which has been determined for the site by Merton Council and the Environment Agency. The application notes that in response to the developers challenge of the flood risk classification, the Environment Agency has suggested that the developers carry out their own modelling, but they have declined to do so. Thus the developers have failed to show that the flood risk is the 3a designation that their plans assume. The large number of planning documents submitted have a somewhat schizophrenic nature; they do occasionally state that the site is indeed largely a 3b flood plain but for the overwhelming majority of the application they refer to the site as being flood zone 3, or largely 3a, or a 1 in 100 year flood risk.

The developer does mention that it has not flooded since 1968. However, this is of little statistical significance. Put roughly, if one is playing heads and tails and tails comes up twice in a row, would one bet your house on tails coming up again.

**The developer do not accept the 3b flood risk designation of the site and as a result the submitted plans are not appropriate for the site that actually exists**

FR2 The National Guidelines state that one can not build residential houses in a 3b flood zone. The stadium, block B and indeed the entire development except block A are completely in the area of flood risk 3b. However, even block A is substantially in the flood risk 3b area.

**All but one of the proposed buildings are in flood area 3b except block A but even this one is largely in flood area 3b and thus they are not permitted.**

FR3 The main mechanism for flood prevention is the possibility that the voids can be flooded. These are car parks situated at the bottom of blocks A and B. They are below ground level and are basements. It is explicitly stated in Merton's Sites and Policies Plan in policy DM F1, that basements are not permitted in a 3b flood plain and so this invalidates the main mechanism for flood alleviation proposed in the plan. Furthermore the developers also mention that the football pitch can be used to store water, however, there is no mechanism for the water to collect there rather than on

surrounding land, and in any case they are only 0.1 m above the expected flood level and so cannot store any significant quantity of flood water.

**The developers do not have an effective or allowed flood storage plan and the basements used to store the water in time of flood are explicitly forbidden by Merton's policies for a 3b flood plain.**

FR4 As we have stated above, residential housing is not allowed in a 3b flood plain, however, let us imagine for a moment that the site is in a 3a flood plain, even though it is not, and consider if the plans pass the sequential test. This test can be used to permit certain developments in a flood plain. However, this test must be applied to the parts of the development which has the highest vulnerability category and one must show that there are no other sites with a lower flood risk where the development can be sited.

The developers have not applied the sequential test to the very substantial housing, the most vulnerable element of the plan. Indeed, no justification has been given to suggest that the 602 residential units cannot be built elsewhere in the borough.

Instead, the developers have applied the sequential test to the football stadium. However, they only take Merton as the area in which the test is to be applied. In fact, according to the national guidelines (NPPF) the test should be applied in a larger area for certain developments. The area that should be considered is "the catchment area for the type of development proposed". Clearly, this is an area which is well beyond the borough of Merton. Indeed, the postcode plots on page 588 of the environment statement volume 2 appear to show that only a minority of AFC supporters live in Merton. We note that AFC currently have a modern and well equipped 5,000 capacity ground at Kingsmeadow in Kingston upon Thames which is only about 7km from Plough Lane and 2.5km from the boarder of the borough of Merton. Furthermore, the capacity of this ground has not, to our knowledge, been exceed while AFC have been there and so it is a puzzle as to why a larger stadium is required. We also note that the homes of the AFC football supporters as shown on page 588 of the environmental statement volume 2 appear to be just as much distributed around the Kingsmeadow ground as they are around the Plough Lane ground. In fact the Greyhound Stadium on Plough Lane is not where AFC used to play and so it is not their historic home as is often claimed (see the document on Heritage and the AFC/Galliard Homes application). Thus when the sequential test is applied to the correct area, one finds no compelling need to build a new football stadium in Plough Lane.

We also note that an earlier report by Colliers (AFC Wimbledon. Returning Home, Summary Report, updated 2013) identified a number of other sites in the borough of Merton. On the basis of criterion (which are questionable) it decided, by only a small margin, that the Greyhound stadium site was preferred. However, we think that the consequences of the 3b character of the site were underestimated. Consequently, there is not substantial evidence even within Merton that the Greyhound Stadium site is the only home for AFC.

**Hence even if we were to imagine that the site possess a 3a flood risk, rather than the 3b which it does, the plans do not pass the sequential test.**

FR5 The proposed plans wish to build, on a 3b flood plain, a very high density development with a considerably larger foot print than exists on the site at present. It is very difficult to see how this can lead to greater flood water storage on the site and not push water into the surrounding areas off the site. The flood compensation calculations are presented in only one table which is called Wimbledon Greyhound Stadium Summary of Flood Compensation Calculations. Given the importance of this calculation one might have expected much greater detail. It is also not possible to check the calculations from the table given especially as the labelling is unclear to us. As such the calculations are not of sufficient detail to provide a justification for the plan. We look forward to the Environment Agency's calculations on this subject. The developers have also failed to consider the flooding that could be caused in the surrounding areas, that is, off the site, although this is a crucial component of the National Planning Guidelines. One way to look at the calculation is to take the old and new stadium alone and see if there is an increase in flood storage. Given the size and construction of the new stadium it is difficult to believe that there is any significant increase in flood storage. The other part of the development on the original site is a car park which is to be replaced with the development of 602 residential units and a retail store covering the site in a very high density development. It does not seem likely that there would be improved flood storage and this inclines us to doubt the claim to the contrary.

**The developers have failed to demonstrate in a convincing way that their flood storage mechanism increases the flood storage capacity on the site and they have made no attempt to show that flooding will not increase off the site.**

FR6 In their consideration of surface water flooding the developers do not appear to have considered surface water that comes from off site. This is not only likely but inevitable as the site is at a low point and one can expect not only rain water from the surrounding area, but also water coming up through the drains. The underground basement car parks are voids which are designed to store water in times of flood and as such they will be open to any water and in particular the surface and ground water so commonly found on the site. Hence these are likely to be frequently flooded. We note that if the surface water is somehow kept out of the voids it will flow elsewhere, possibly off site. Finally we note that the only way to get rid of flood water from the Wandle, or surface water, is to pump the water into the drains and this can only happen once the drains are free from water. This could take quite some time.

**The developers do not seem to have taken into account surface water flowing from off-site. This and other surface water is likely to frequently flood the underground car parks.**

FR7 The development must also pass the exception test; this demands that "the development provides wider sustainability benefits to the community that outweigh the flood risk" in order to justify such exceptional development in a flood plain. As we noted above the national guidelines require that only water compatible developments and essential infrastructure can go on a 3b flood plain and even then for the latter

only if they pass the exception test. We now consider some of the reasons given in justification by the applicants who largely assume that the site has a 3a designation.

- The developers state that Greyhound racing "is not a sustainable operation moving forwards, with the stadium falling into disrepair." This is very disingenuous. As we understand it, in 2005 Risk Capital brought the Greyhound Racing Association (GRA) who owned a number of Greyhound stadia in the UK. It is fair to say that since that time the infra structure of the Wimbledon Greyhound Stadium has declined, but despite this it still has about 1,500 spectators at its events. There is every reason to believe that the proposal by Paschal Taggart for a new Greyhound Stadium would be financially successful as even the current number of spectators is close to the number required. Clearly, this number should significantly increase if a state of the art Greyhound Stadium is built as has been the case in Stadia Paschal Taggart has built in Ireland. Risk Capital have now teamed up with Galliard homes to build 602 residential units on the site and so make a very significant profit. We leave it to the reader to conclude to what extent it is in the owners interest to ensure that Greyhound racing on the site comes to an end even though this will bring to an end almost one hundred years of greyhound racing tradition on the site. We note that AFC want to build a stadium that has a capacity which is far larger than their current needs and it is a leap of faith to believe that they can financially service such a stadium in the long term.
- The return of AFC to the borough is generally supported. However, the postcode plot given on page 588 of the environmental statement volume 2 gives the homes of the AFC supporters and this appears to show that it is only a minority of the AFC supporters who live in Merton. This would mean that roughly less than one in every hundred people in Merton will truly benefit. Much is made of the community benefit of AFC. However, there is no reason that they can not continue this work where they are now. We discuss the community benefit of AFC in the document called 'The Community element and the AFC/Galliard Homes application'.
- We believe that the development if approved will adversely affect the local area and even the areas quite far away as we have spelt out in the transport section. This is likely to have negative effects on local residents and shopping centres. Thus this development will not enhance the local area as claimed.
- It is inappropriate to try to use the creation of a small number of jobs in a retail store in such an exception test.
- The claims for benefit are even contradicted by section 6 of the Environmental Statement of the developers and in particular the summary table called The Impact of the Proposed Development and Significance. In this table it is stated that the effect of the proposed development on direct/indirect employment generation, increased community cohesion, improved health and well-being of residents through greater participation in sporting activities, increase of tourism and visitors to the area, strengthening of the Wimbledon Brand and sporting intensification to the area is of minor benefit for each of these categories. Indeed the only source of major benefit is the contribution of 602 residential units to the housing stock, but as we have mentioned above these are not allowed on a 3b flood plain and it has not been shown to pass the sequential



test.

**The arguments given to pass the exception test are very weak. The arguments put forward have little to do with sustainability**

FR8 The developers note that they have been unable to get the agreement of the Environment Agency to their overall plan. Given this development is in a flood plain it is surprising that they have not done so already at this late stage.

**The plans do not appear to have the agreement, or the support, of the Environment Agency**

### **Conclusion**

The developers have submitted plans for a very high density development in a functional flood plain. This is intuitively incorrect and a detailed analysis of the plans show that they are not compatible with the National Guidelines on flooding for the reasons detailed above.

## Transport Assessment and the AFC / Galliard Homes Planning Application

### Summary

The subject of traffic, transportation and access to and from the proposed development is covered in a number of the application documents including: **Design and Access Statement, Environmental Statement, Transport Assessment Statement of Community Involvement and the Planning Statement.**

The Statements have been drafted to support the Planning Application which, if approved, will provide housing for **1491** new residents and a stadium for **11/20,000** people on a site without any upgrades to transport infrastructure.

We believe the Transport Assessment to be flawed and as a result, many of the supporting statements in the Environmental, Design and Access and Planning Statements concerning transportation are therefore misleading. We consider the frequent reference to the "robustness" of this Transport Assessment as a disingenuous attempt to justify the proposed development, falsely inflate the scheme's sustainability credentials and play down the impact it will have on the residents, businesses and infrastructure in Merton, Wandsworth and Tooting.

Whilst the Transport Assessment extends to 845 pages, instead of being a thorough and realistic assessment of the sustainability and impact that the 11,000/20,000 stadium attendees, new housing, retail and a private sports club will have on the surrounding community and its infrastructure, the report draws its conclusions from inappropriate data, flawed assumptions and fails to consider whether or how the existing roads, pavements and public transport infrastructure are currently coping with existing usage.

### The Principle Inadequacies and Failings of the Transport Assessment

- The Applicants have not carried out their surveys during a period of normal traffic conditions and have therefore not used realistic data for their Transport Assessment. They carried out their surveys during the period, 12<sup>th</sup> July – 18<sup>th</sup> July 2012. Some school holidays had already begun and many road users would have taken their holidays early, prior to the London Olympics commencing on 26<sup>th</sup> July 2012.

The Applicants have ignored the TFL guidance contained on their website (Trip Generation – Committed Development and Traffic Data) as follows; in most cases, TFL expects traffic surveys to be undertaken during school term times, a neutral month and neutral weekday; the observed local highway peak should form the basis of your TA. It is good practice to use validation data when collecting traffic survey data

**The impact of using an abnormally light traffic count is that any transport modelling that PBA has undertaken where this data has been used will produce misleading, incorrect and unreliable outputs. In this case they're pretending the roads are quieter than they are which will falsely reduce the impact of the development on the road junctions and the network as a whole.**

- The Applicants have not assessed the impact on Wimbledon town centre, the railway stations or local residential streets before and after matches when supporters will be naturally be visiting the local bars and restaurants coinciding with peak shopping/leisure time on a Saturday. The supporters are unlikely to travel to and from a game without at least a proportion of them visiting a pub or restaurant. This will apply to all supporters and therefore needs to be considered for those supporters parking cars in residential areas and also those travelling by public transport.

**There is a potentially very significant impact on the character and quality of the environment of the town centre if 11000 / 20,000 fans are visiting the pubs and restaurants pre and post matches on Saturdays and weekday evenings. This point seems to have been ignored by the Applicants in terms of the anticipated pedestrian movements between transport hubs and the stadium. Routes will depend on the venues frequented and will mean movement of fans through the residential streets outside of the routes considered by the Applicants.**

- The Applicants will not provide any car parking for their supporters within the development and assume all football supporters and event attendees travelling by car will find parking spaces in residential streets and existing car parks within walking distance of the stadium. They also assume that the supporters will walk directly to the stadium and not into the bars and restaurants of Wimbledon, Tooting or Earlsfield centres before and after a game. These streets are already subject to the parking restrictions introduced in favour of residents and their visitors on Mon –Saturdays because they could not cope with commuter parking and visitors accessing the shops from these streets before the CPZ's were introduced.

**This assumption on the part of the Applicants is very concerning for residents in any street that has unrestricted parking on Saturdays and weekday evenings. The Applicants have undertaken a survey of all local residential streets within walking distance of the stadium and identified the streets could provide 5544 spaces for their supporters. This appears to be their justification for not providing any within the development. The applicants are proposing that their supporters travelling by car should be able to find adequate opportunities to park in residential streets within walking distance to the stadium. Residents and their visitors in these streets (children's parties, church groups, shoppers etc) will be unable to park whenever there is an event at the stadium. Given the high likelihood that, once built, there could be another rugby/football club sharing the stadium, evening concerts and other events could be staged during the week, this is something that is going to make life very difficult for residents if this stadium goes ahead in the manner proposed. Residents will naturally lobby for more extensive restrictions to protect their streets and the impact of supporters driving around looking for a space to park in before a match will cause additional congestion in the road network and be a major irritation for residents. This assumption on behalf of the Applicants proves they really have no regard for the residents and businesses within two miles of the stadium and the sustainability of this development will be wholly at the expense of the local residents.**

- The parking beat survey undertaken by the Applicants and upon which they're relying, excluded the time period when matches would actually take place. Therefore, the period of

overlap when spectators' cars are parked for matches and existing residents' demand for spaces turns over during a match, has not been assessed.

**The robust conclusions reached by the Applicants insofar as the capacity of local residential streets being able to accommodate the parking for supporters are therefore unsubstantiated and the true impact on residents has not been assessed.**

- The Applicants have not considered or assessed the existing capacity of local public transport infrastructure and services and have therefore ignored the impact 20,000 supporters and 1491 new residents it might have.

**It seems extraordinary that the Applicants appear to ignore the fact that the local stations and buses are already well utilised by the public on Saturdays and weekday evenings and have failed to consider what capacity actually exists to accommodate either 11000 or 20,000 stadium visitors. They assume that the capacity exists and 11000 or 20,000 supporters will just fit onto the trains and buses services, flowing through the stations as part of a normal flow without any need for any improvements. What happens if there is not enough capacity when the match / events are taking place and surely they should have tested a scenario during Wimbledon Tennis Championship fortnight?**

- Despite the scoping exercise identifying a need to use specific software, VISSIM, for traffic modelling, the Applicants have failed to do so. Their Assessment already acknowledges the queuing traffic along Plough Lane which interferes with other junctions during weekday peak hours but they have not undertaken appropriate transportation modelling studies that consider how the entire local road network functions currently and how it will function once the additional burden of traffic and pedestrian movement from an 11/ 20,000 seat stadium and 602 housing units are added to that network. The modelling the Applicant has undertaken (Arcady8) takes no account of this and the true effect of additional traffic on Plough Lane is therefore not assessed accurately. Instead, they've chosen to study individual road junctions on a standalone basis which will not provide a realistic picture of the ability of the wider road network to cope with the impact of the development.

**The consequence of not considering the network of roads and junctions as a whole is that the Traffic Assessment will present an inaccurate assessment of the impact of the development. It is relying on incorrect data and therefore producing false results. Anyone living and working in the area or travelling from Haydons Road/ Gap Road to Garrett Lane will appreciate that queues are a regular problem at peak times already. We believe the modelling software and the methodology are wrong. Instead of Arcady 8 software, the applicants should have used an alternative such as the Tfl model or Vissim because the modelling needs to take account of traffic queuing and the timing of signals at junctions which will require different programmes when 11,000 pedestrians are arriving and leaving the stadium.**

- Page 10, Cl.4.11, Stadium Management Plan Strategy Appendix Q clearly states that it may be necessary to close some roads on match days to facilitate the movement of 11000 football supporters. It is stated Plough Lane, Summerstown Rd and Riverside will need to

close for 30 min periods on match days. This does not appear to have been tested in any modelling scenarios.

**With few alternative routes across the River Wandle, potential impact of this will be considerable for residents, businesses and any road users on the wider network on every occasion the stadium is used as Plough Lane is a main thoroughfare for emergency vehicles and South London traffic. The Applicants appear to have ignored the impact of this likely scenario in their Traffic Assessment and their Environmental Statement.**

- The Applicants have adopted unrealistic modelling assumptions to assess traffic flows namely;
  - I. Despite road closure being identified as a likely and necessary measure to facilitate the movement of supporters and stadium attendees, the modelling does not test the impact of this on traffic flows on the surrounding road network.

**The impact of this omission of such a major factor from the testing and modelling is that the Traffic Assessment is incomplete, and its conclusions are fictitious.**

- II. The Applicants assume that supporters travelling by car will not drive across any junctions around the stadium on match days because they'll find spaces beforehand

**Not only does this assumption ignore the likelihood of supporters making their parking location choice linked to which restaurants and bars they'll visit before and after the game, human nature will ensure anyone driving to the stadium will try to park as close as possible to the stadium. Some will inevitably end up on the junctions in the vicinity of the stadium, adding to the congestion and compounding the risk of queues. This scenario appears to have been ignored and the impact will be the model is not reflective of realistic scenarios. Increased congestion and pollution will result. Local residents will ensure restrictions are increased and supporters will be unable to use these streets to park. This scenario has not been tested and is a likely one.**

- III. The stadium once built, is very likely to be used by a second club (possibly rugby) and for other events such as music concerts in order to provide the financial sustainability.

**The Traffic Assessment has been drafted in consideration of football only and the behaviour of their fans in relation to parking and walking habits. This is an unrealistic long term scenario and assumes a lower frequency of stadium usage. Music events operate on different time scales to football matches and the behaviour and patterns of crowds attending events will be different. The impact of these alternative events and a more frequent use of the stadium has not been tested and further highlights the inadequacy of the Traffic Assessment and Environmental Statement.**

- IV. The Applicants have not tested a scenario that assumes all the parking spaces in the 602 new flats will be used. The traffic generation of the flats were estimated from the

nearby flats on Plough Lane which themselves have underutilised car parking. By doing this, they have assumed a similarly underutilised car park for this scheme.

**The results of a model based on this assumption are unlikely to demonstrate the true potential impact of the development. Either the traffic generation of the 602 proposed flats is an underestimate or the Applicants are providing excess car parking for the flats. If the traffic generation from the flats is an underestimate then the junction capacity assessments are not robust. If they are providing excess car parking then this is against Government policy and they should reduce the number of car parking spaces provided – if they refuse to do this and maintain car parking as they have proposed, then they should undertake additional junction capacity assessments which assume full occupation of the car parking spaces and demonstrate the true impact.**

**Again, the Traffic Assessment appears to be flawed and Environmental Statement is therefore also inaccurate.**

#### **Further Inadequacies and Failings Identified**

- The Applicants propose that a 1000 sq. m. supermarket fronting Plough Lane that derives trade from passing motorists will not require any customer parking other than those for disabled drivers.

**This is unrealistic and the impact of not providing customer parking is that cars are likely to stop on the carriageway and cause an obstruction resulting in queues on an already congested Plough Lane. 1000 sq. m is a reasonably large store, more than just convenience and as such will be targeting a wider catchment than just the proposed development. The existing Tesco Express in Summerstown adjacent to the site has customer parking and this is regularly full. This store is approximately 200 sq. m and has 16 customer parking bays which is a ratio of 1:12.5 sq. m. We note that a 1000 sq m retail unit in this location proposed could be expected to provide up to 30 spaces if it is to comply with LB Merton's Sustainable Transport Policy. Notwithstanding the impact on the road network, a store of this size with no customer parking in this location seems commercially unrealistic from an occupier perspective.**

**Similarly, there is no parking proposed for the leisure use in the Squash Club – the leisure use is already in place and does provide existing parking on site. It would relocate as a result of these proposals and given that there is an existing parking demand, it seems unrealistic that this has not been provided for.**

- The Applicants propose transport mitigation works which will negatively impact on established local businesses and they cannot provide any guarantee that these can be delivered or are feasible i.e. the removal of parking on Haydon's Road and narrowing of the carriageway on Plough Lane.

**The transport mitigation proposals designed to improve the flow of traffic in the vicinity of the stadium are the permanent removal of some parking and loading bays outside the shops, restaurants, mini cab office and showrooms on Haydons Road between the station**

and Plough Lane junction. This proposal, if implemented will potentially have a detrimental effect on these businesses and is likely to be resisted.

There is no proposal as to where these parking spaces and loading spaces could be relocated to. Furthermore, there has been no measurement of the demand for these bays and therefore, the impact of removing these bays has not been considered. If demand is high (there is no evidence to suggest demand is not high) then such a displacement may result in a severe impact.

On a similar note, it is proposed to introduce parking restrictions on Summerstown. There is no proposal as to where this existing demand would be relocated or if it could be accommodated. It appears that a large proportion of the existing demand is associated with the existing businesses on Summerstown. If demand is high (there is no evidence to suggest demand is not high) then such a displacement may result in a severe impact.

Similarly, narrowing Plough Lane to provide a widened cycle lane for use by the football supporters and other attendees of the stadium events has been presented as a solution to an overburdened pedestrian pavement. The Applicant provides no comment as to whether this can actually be achieved. The impact of this is likely to be the restriction of emergency vehicles using Plough Lane to reach St Georges Hospital effectively and again needs to be tested.

- The Applicants have not tested whether the coaches can access, turn and exit the stadium when dropping off in Riverside Rd or whether the delivery vehicles can actually service the 1000 sq. m. retail unit thereby risking additional congestion and an unworkable traffic plan.

Visiting fans will arrive by coach and need to be dropped safely at the stadium without blocking roads. The impact of the coaches and service vehicles not being able to physically turn and manoeuvre on and off the site safely is a highly likely scenario and will cause a chaotic traffic management scenario in the vicinity of the stadium unless it is addressed as part of the overall design of the scheme.

- Whilst it is noted that the PERS audit shows the condition of pavements around the sites to be poor, the Applicants when carrying out the PCL survey have not appear to have assessed the existing utilisation of pavements and current pedestrian movements on the likely routes between train/tube stations and the development, thereby ignoring the impact that 20,000 football supporters and 1491 new residents might have on existing users on both match and non-match days.

Other than looking at the condition of the pavements, again, there has been no account taken of how many people are currently utilising the pavements between public transport sites, the restaurants and pubs likely to be used as pre/post match venues. There is a presumption that streets have the capacity to accommodate whatever footfall increases the stadium brings but no account is taken of the shoppers, cinema goers, and visitors to the shopping areas on a Saturday who will still expect to be able to go about business on the pavements. Without testing the current pedestrian flows, the Applicant is unable to identify the impact and therefore ignoring the interests of local residents and businesses.

- A report prepared by RPS in 1996 on behalf of the London Borough of Merton and the Greyhound Racing Association Ltd ('Wimbledon Greyhound Stadium Feasibility Study') considered in detail the redevelopment of the stadium for a number of options. It concluded, due to the inadequacies of the existing transport infrastructure serving the site, that a fixed public transport link (an extension to Croydon Tramlink) would be required to serve a new football stadium.

**Since 1996 there has been no change to the public transport infrastructure serving the site, the former football ground at Plough Lane has been developed into residential apartments and the Haydons Road Station alone has seen a huge increase in passenger usage (320% between 2004/5 and 2006/7). It seems extraordinary that the Applicants can now conclude that an unimproved road and pedestrian network and public transport infrastructure should simply absorb 11/20,000 supporters without any impact on the local businesses and residents.**

- The Applicants state that the site is categorised as a Public Transport Accessibility Level (PTAL) rating of 3 when previous reports have stated 2.

**The Applicants appear to be overstating the site's PTAL rating and as a result are exaggerating its sustainability credentials and the suitability of the site for a 20,000 seat stadium.**

- The Applicants have not acknowledged the prospect of Crossrail 2 in Wimbledon and Tooting, how it might impact and fact that the two development programmes coincide.

**There is clearly going to be significant impact of both these proposals and the cumulative impact should be included with the Environmental Statement and the impact tested.**

On account of the inadequacies of this Transport Assessment and the fact that it is this document that is being used to underpin the Applicant's justification for establishing an 11,000 /20,000 seat stadium with over 600 new housing units on this site, we consider there's a strong risk that the traffic and transportation impact has been grossly understated and therefore compromises the Environmental Statement, as a result.

Further, we consider the Environmental Statement and its references to transportation / traffic to be incomplete and its conclusions inaccurate. The ES includes an assessment of the magnitude of change in traffic but it is unclear over what period or on which days this has been carried out. If it has been undertaken on a weekday in peak hours, then it is probably not representative of the periods of maximum magnitude of change for the proposed uses on site. The Environmental Assessment considers the magnitude of change but there is a high risk the results are misleading because the Traffic Assessment assumes existing site traffic remains in the baseline data. If existing trips were removed from the baseline data, the magnitude of change will undoubtedly be higher and the impact will be greater - further evidence that the impact of this development proposal is understated.