



protecting our amenities ... enhancing our quality of life

Development Control – Sabah Hall
LB Merton Council
Civic Centre
London Road
MORDEN SM4 5DX

Dear Madam

7 October 2015

REVISED PLANNING APPLICATION: PLOUGH LANE STADIUM 14/P4361

The suggested revisions to the original application appear to be relatively minor, and do not address the principal issues raised in the Society's letter of 11 January.

These mainly concerned the introduction of housing into the designated flood plain; inadequate transport, parking and pedestrian facilities; design, and the Stadium capacity.

The scheme still has 602 dwellings, at between 7 and 10 storeys high, with some 10% being single aspect: the Stadium is still for 20,000 spectators. Other uses, sports club, retail etc remain in place. The principal revisions appear to be:

- More visitor cycle parking, up from 30 to 100
- More resident cycle parking, up from 685 to 992
- Gateway arches to the north/south pedestrian street
- The back wall of the stadium facing the housing being less forbidding in appearance
- The addition of a children's nursery in NE corner
- 2 more wheelchair lifts
- Parking for squash club is to be in basement of block A
- Some social housing provided, subject to "viability"
- A single CHP (combined heat & power) energy centre system in the basement.

Accordingly, the objections in the original letter (**copy enclosed**) are re-iterated, and summarized below. Comments are also added on the revised material.

FLOODING ISSUES

The site is primarily in the 3B functional Flood Plain zone, where the Environment Agency (and the NPPF guidance) says that housing is classed as a "**highly vulnerable**" use in both of the flood zones 3A and 3B, and where it is deemed to be "**non-compatible**", and its "**development should not be permitted**" (NPPF Table 3 dated 3/2014: **copy enclosed**).

The Environment Agency letter (21/1/15 page 5) says that the "**site mostly falls within the 1 in 20 year flood extent**". As is made clear, the prime purpose of the flood plain is to accommodate and store flood water. The report by the Consultants PBA is helpful in setting out the flooding context, and describing the implications of flooding on such a scheme.

It says that within flood zone 3B there is a **greater than 1/100 annual probability of flooding** (PBA 3.1).

(go to page 2 of 5)

3/2014

Guidance

Flood Zone and Flood Risk Tables

by DCLG

Print

Table 3: Flood risk vulnerability and flood zone 'compatibility'

Paragraph: 067 Reference ID: 7-067-20140306

Flood Zones (<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-1-flood-zones/>)

Flood Risk Vulnerability Classification (<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-2-flood-risk-vulnerability-classification/>)

HOUSING

	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required	X	X	X	✓*

Key:

- ✓ Development is appropriate
- X Development should not be permitted.

Notes to table 3:

- This table does not show the application of the Sequential Test (http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/the-aim-of-the-sequential-test/#paragraph_019) which should be applied first to guide development to Flood Zone 1, then Zone 2, and then Zone 3; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea;
- The Sequential and Exception Tests (http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/the-exception-test/#paragraph_023) do not need to be applied to minor developments (http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/what-is-meant-by-minor-development-in-relation-to-flood-risk/#paragraph_046) and changes of use, except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site.

As background to the 1/100 year figure: in north Camden, three "one in a hundred year" floods are said to have happened since the mid 1970's. The Wandle has flooded in the 1950's and 1960's and in 2007.

The PBA report also says that **"The hazard across the whole site at the peak of the (flooding) event would be high, due to the depth of water within the site"** (3.1.4).

Also, **"Undercroft vehicle parking areas below residential blocks are susceptible to a very significant depth of flooding, potentially up to 3.2m"** (3.6):

And **"It will be necessary to ensure that these areas are vacated of vehicles"** (3.6).

Also that the **"Likely duration of flooding at the site would be up to 12 hours"** (5.1).

Also that **"flooded basements would only be pumped out once the peak of the surface water flood has passed"** (3.1.3).

It appears that a system of closable louvres is to be used to shut off the openings into the basement voids when flooding is imminent, and these are to be closed in the event of a flood alert (4.2.1). Whether such a system could ever be regarded as fool proof, and be activated in time, seems somewhat optimistic.

Preventing the basement from flood water ingress presumably reduces the flood-holding capacity of the site, contrary to its essential flood plain function.

The proposed CHP plant rooms are both sited in the basement, and therefore will presumably be flooded: the effect on their plant and equipment could be radical.

To summarise:

- Placing housing into the flood plain is against NPPF planning policy (table 3):
- In a flooding event, several hundred flats would be without heating/hot water and other services, as the central CHP plant would be flooded, and its technical machinery and control systems would be liable to significant longer term damage:
- The flood water would fill the basement and any vehicles remaining within it, to a depth that would be life threatening (up to 3.2m):
- Flood water would be likely to remain in place for many hours:
- The flats would presumably be without a functioning sewerage system, as this would be surcharged and not able to be used until the flood water had subsided: waste water from the upper flats would then be discharged into the lowest flats via the loos:
- Introducing Housing into such a site is not therefore a practical or desirable option.

THE FUTURE OF THE WIDER AREA

An outline "potential future **masterplan**" drawing has been submitted, aiming to illustrate how the surrounding area could be developed. This appears to show yet more housing on the flood plain, displacing the service industries that currently exist around the site, and which are a valuable part of the local employment and servicing infrastructure. Retail floorspace is also suggested.

Not being in a town centre location, and having a poor transport accessibility rating, retail use should not be accepted.

The needs of community/educational facilities, for a proper functioning pedestrian and cycle network with links to Earlsfield and other stations, for imaginative links to the green spaces nearby etc, and for uses that conform to the Council's planning policies, have not been adequately addressed.

Such a basic "master plan" therefore is not considered to illustrate the way ahead.

TRANSPORT

There are still no convincing proposals as part of the application to improve the **pedestrian links** to the four local stations.

The existing pavements would not be able to deal with the sudden exodus of 20,000 potentially volatile spectators, with the result that they would spill over into the carriageways, hindering traffic.

The PBA report says "**temporary road closures at the end of matches would be necessary to accommodate pedestrian flows**" (technical note table 3).

For any stadium to function, the enhancement of such pedestrian routes should be an integral part of the overall design, not some kind of afterthought (see policy DMT2).

Trains: Because of the locally poor public transport facilities and low PTAL rating, train use would be very important for a stadium of whatever size.

The train capacity report appears to indicate that 4 carriage trains on both Thameslink and SW Trains would be adequate. Local experience suggests that this is not the case at weekends even now (without Stadium overload).

Standing room on Saturday mornings is normal for a SW train from Wimbledon. On Thameslink travelling towards Wimbledon at Saturday lunchtime, it is standing room by the time one leaves Tooting.

Mid-week matches would be affected by trains being full up to at least 7pm.

More specific proposals for increased rail capacity catering for stadium events need to be an integral part of any application, but that is not done.

Road traffic is already congested particularly at the eastern end of Plough Lane. The present junctions with Wimbledon Road/Blackshaw Road and Summerstown would not be adequate for Stadium users. Road improvements to handle the predicted flows including coaches should be an integral part of the application proposals.

The envisaged temporary road closures, and the increased traffic would be likely to impact on the vital ambulance access to St George's Hospital, which is nearby.

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**" (eg para 2).

But this is an application that fails to meet established Development Plan policies in a number of important respects.

A very large amount of housing is proposed, yet housing use is precluded on this type of vulnerable flood plain site (see NPPF Flood Risk Table 3, where dwellings are classed as highly vulnerable, and not compatible with flood zone 3B (and 3A), and its "**development should not be permitted**").

Aside from the considerable damage to property and the inconvenience to residents, the depth of future flooding could cause significant personal drowning risk to residents.

The scheme 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. Pedestrian routes and connections to local stations are inadequate.

The massing and scale is unsatisfactory, and the detailed design does not sufficiently resolve the inevitable tensions between the different uses and activities on the site.

This planning application is not considered acceptable, it does not conform to national and local planning policies, and should be rejected.

If, despite these major objections, the Council is minded to accept the principle of a development of this type, then there are other significant issues that remain to be addressed.

DESIGN AND LAYOUT

The scale and height of the proposed blocks remains too high for this locality, and would appear over-bearing and over-development. The character of the scheme and the outlook between the various blocks is "inner urban" and not suited to this locality.

The London Plan says that "**where (public transport) connectivity and capacity are limited, density should be at the lower end of the range**" (3.39).

The proposed housing blocks appear to be significantly above the indicated density for the low PTAL 2 zone.

The result would be more use of the private car, and local traffic congestion.

The large number of small dwellings proposed is contrary to the London Plan policy (3.29) which says that these "**should be focused on areas with good public transport accessibility (as) measured by PTAL**".

Setting aside the point that housing is not an acceptable use in this flood plain site, whether such a mass of housing could ever be acceptable in such close proximity to the noise and crowd behaviour issues of a Stadium seems highly problematic.

There is also to be a sharing of the north/south pedestrian route between quiet residents and noisy spectators, which appears somewhat utopian, and is contrary to policy DMD1E which seeks "**a clear distinction between public and private space**".

Total separation of all Stadium areas from any other sensitive use should be a basic starting point in any layout, with enough space around the Stadium to accommodate its crowds as they congregate and then emerge.

Play facilities for residents/children (DMD2A4) are minimal.

Social housing is set at only 10% (subject to so-called "viability" which means that the real figure is going to be subsequently "negotiated" downwards to close to zero).

"Landscaping" on top of roof slabs means that the planting will be minimal (DMD2Ax).

There are unlit internal access corridors, and north-facing flats which have a view of service industry and waste transfer stations and the like; from past experience, such locations would presumably be where any social housing would be found.

PARKING

The amount of **residents parking** is less than half of the expected need, contrary 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 to public transport and local circumstances**".

Policy DMT3A also says that any "**Permit-free development will be expected to benefit from good access to public transport, generally PTAL 4 and above**".

Demonstrably, with the low 2 PTAL rating here, permit-free arguments do not stand up. Sufficient kerbside parking space locally is not available.

Coach parking for the spectators still appears to be rudimentary, with an expectation of being able to park on local roads.

These are already limited in size/width, and providing proper and adequate on-site coach parking should be an integral part of the overall design

The revised total of 100 **cycle parking** spaces would be quite inadequate for spectators.

CONCLUSION

The Society has argued in the past that this is a site that should continue to provide a significant leisure activity.

Indeed we also said to the Council in 2012 that consideration should be given to exploring how a football stadium could be accommodated on this site for the AFCW club.

We also said that the site should not be used for housing.

The Council's approved Plan says that the site should be used for "intensification of sporting activity, together with enabling development ... subject to meeting planning policy".

As explained above, planning policies are not met with the current scheme.

**This planning application is not considered acceptable.
It does not conform to national and local planning policies, and should be rejected.**

Yours Faithfully

John Mays: Chairman, Planning Committee

cc to LB Wandsworth Planning Office

ENCL: Society letter (to the Council 11:1:2015) on the original application 14/P4361

Table 3: Flood Risk Vulnerability & Flood Zone Compatibility:
Planning Practice Guidance: DCLG 3/2014



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Development Control - attn Sabah Halli
Planning Office
LB Merton Civic Centre
London Road
MORDEN SM4 5DX

Dear Madam

11 January 2015

PLANNING APPLICATION: PLOUGH LANE STADIUM

14/P4361

This application is for a 20,000 Football Stadium (initially said to be 11,000) together with 602 flats, 1273sqm Retail, Squash/Fitness club of 1730sqm, Hospitality and Coach Parking, and 297 parking spaces for residents in a semi basement. The comments of the Society are as follows, under three broad headings: flooding issues, transport/parking, and design.

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.

TRANSPORT

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.



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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.

PARKING

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.

DESIGN

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).



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The Table shows that the sustainable residential quality density for an urban area with a 2 – 3 rated 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.

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.

Yours faithfully

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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**.

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TRANSPORT

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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.

PARKING

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".

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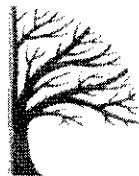
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