

# AFC Wimbledon

## Introduction

In July 2012, AFC Wimbledon (we/the Club) submitted representations to the London Borough of Merton in response to its Stage 2a Sites and Policies Development Plan Document (DPD) consultation. In summary, these representations highlighted our objective to return to Wimbledon and focused on the opportunity provided at Site Proposal 37 of the Sites and Policies DPD (2013) as a potential new home for AFC Wimbledon, as part of a major mixed use redevelopment masterplan. The full details of the representation is not repeated here, but in summary, it explained the Club's vision for the Site Proposal 37, with a new football stadium at its hub providing a catalyst for regeneration, supported by a mix of residential, educational, hotels and amenity retail uses.

The AFC Wimbledon story and achievements are well known. The representations submitted sought to capture the excitement of our potential return to its Merton home, and encourage the creation of a suitable policy context in the Council's emerging development plan documents to facilitate this objective to the benefit of both the Club and the Borough.

We therefore welcome the acknowledgement of these representations within the Council's Emerging Development Plan, specifically the inclusion of Site Proposal 37 of the Sites and Policies DPD (2013) and further support the Council's preferred use of the site for the "intensification of sporting activity (D2 Use Class) with supporting enabling development".

These representations have been prepared in respect of the London Borough of Merton's Stage 3 Site and Policies DPD and build on those earlier representations referred to above. Initially, we provide an update on how the emerging proposals for the site are progressing, and this is followed by specific reference to the Council's proposed policies for Site Proposal 37.

AFC Wimbledon acknowledges the need to secure assistance in their plans to return to the London Borough of Merton. We have therefore signed a Memorandum of Understanding with a developer, The Newridge Group, to assist us in evaluating the options available to us.

## Background and Emerging Proposals

### *Background*

As explained in our previous representations, the return of AFC Wimbledon to Merton is about more than practicalities; it presents an opportunity to reconnect the Club with its history and its community. However, whilst the prospect of our return to Merton raises these emotive issues, it is also about securing the long-term future of AFC Wimbledon, enabling it to expand and allowing it to continue to progress. Equally, it is about delivering regeneration and new housing for the community, along with stimulating investment and job creation in the area; and it is about making best use of resources, transforming the outlook of the site and the creation of a new mixed use sport focused hub for Merton.

We were keen to ensure that whilst delivering a high quality, modern and state-of-the art stadium, the package of proposals will be a viable regeneration proposition, supported by suitable and sufficient enabling development comprising a mix of retailing and approximately 500 new homes for the community. To do this we engaged with people with appropriate expertise, and in particular The Newridge Group, a company with extensive experience in Merton and beyond. We review details of the emerging masterplan below.

### *The Proposals*

The masterplan proposals for Site Proposal 37 have been developed since the previous representations were submitted, as discussions with stakeholders, the Council and statutory bodies have progressed. This remains an on-going activity, as is appropriate, and it is envisaged that with additional consultation, the proposals will be further refined. However, as with the previous representations, the proposals for the site remain a stadium-led mixed use redevelopment, comprising a new stadium for AFC Wimbledon; residential accommodation; a hotel; education uses; and retail. It is the case that to reflect essential viability and cross funding issues, the nature of the retail use proposed is now more intensive. The proposals also intend to create new facilities including replacement squash courts and gym for Christopher's Squash Club.

We review these uses, and other key issues below.

### *Sporting Intensification*

The aim is to build a stadium with an initial capacity of 12,000, capable of being increased to 22,000 as AFC Wimbledon grows the Club. As explained in the previous representations, the transition from a 12,000 to 22,000 capacity stadium is both achievable and desired given the real potential for the Club in a return to Merton. The development of the stadium should be allowed to mirror the success of the football club going forward with sufficient land and infrastructure in place to allow that success to be realised upon our return to Merton.

AFC Wimbledon's ethos dictates that the proposed development should be for the benefit of the local community, and deliver the enjoyment of a variety of sports to spectators. The proposed stadium would be multi user and have pitch dimensions designed to accommodate other field team sports such as Rugby. New facilities for the Christopher's Squash Club would be proposed to be accommodated, which we note is encouraged by the Council by virtue of Site Proposal 37. This would intensify the sporting use on Site Proposal 37, and also ensure that the stadium would be used to its full capacity creating a real sports hub within Merton and other sporting uses will be considered as the plans develop.

### *Residential*

The emerging masterplan for the Site Proposal 37 would include the construction of approximately 500 residential units provided within a high quality living environment. The proposed location of the new stadium approximately on the footprint of the existing greyhound track will act helpfully as an acoustic barrier and visual screen between the major transformer substation and the proposed residential development. The complementary nature of the two uses is therefore evident, with the stadium effectively assisting with improving site characteristics. The residential component of the masterplan is much needed and the tranche of policy support and Government pronouncements on the provision of new homes both strongly support the scheme coming forward.

## *Retail*

To ensure a viable development project, new retail floorspace is likely to be required. Whilst other land uses can offer enabling opportunities, to deliver the vision for the site currently promoted through draft policy, namely the intensification of sporting uses, it is important for a large retail component to be considered within any masterplan. It is envisaged that as the masterplan proposals for the site are further advanced, viability evidence can be submitted for consideration, demonstrating the critical role of retailing in bringing forward the development proposals.

The role of retailing within the masterplan also plays an important role in achieving an appropriate balance of uses across Site Proposal 37, to the benefit of the sustainable credentials of the scheme.

In line with para. 70 of the NPPF, the proposed retail floorspace would provide a community service which would help to create a 'healthy community'. Retailing would not only provide a service to the proposed residents, it would also provide a service to the users of the stadium and support the wider area.

We understand from a review of relevant technical studies that there is retail capacity within the area and a new retail store could be accommodated to help meet this un-served demand. A detailed Retail Impact Assessment would be submitted at the appropriate time to demonstrate capacity and the potential for an enabling retail store to be provided without impacting on existing local retail provision.

## *No. 47-76 Summerstown Road*

Further to the previous representations, The Newridge Group has secured the office and warehouse building at No. 47 – 76 Summerstown Road. This property and adjacent land falls within Site Proposal 37. The inclusion of No. 47 – 76 Summerstown Road will enable the Club to plan comprehensively for the redevelopment of all of Site Proposal 37 and surrounding highways and with this, the best solutions for design, access and layout can be achieved, free from restrictive highway widths, existing property rights and amenity concerns.

## *Job creation and sustainable development benefits*

A stadium led mixed use residential and retail development will create significant levels of new employment in Merton. Early estimates suggest that up to 1,000 permanent jobs can be created. The NPPF attaches significant weight to the creation of new jobs in the current economic climate and it is considered to be a key element of sustainable development.

## Site Proposal 37 – Representations

AFC Wimbledon comment on the wording of the proposed site allocation as follows:

### *Site Description*

The site description does not make reference to the offices, warehouse and land at no. 47 – 76 Summerstown Road, which falls within Site Proposal 37 as defined on the appropriate plan. As previously identified, AFC Wimbledon have seen the opportunity that the inclusion of this land brings to be the ability to create a more cohesive development offering more for the local community, as well as being better able to improve transport links by adapting the road layout. The Newridge Group initiative to acquire this land is seen as positive and we would propose that the land is specifically referenced in Site Proposal 37.

### *Strategic Planning Factors*

It is acknowledged that the site has a PTAL of 2. With the inclusion of the premises at no. 47 – 76 Summerston Road, we are confident that there are opportunities to improve access to the site from the public transport network and the capacity of the local roads, in particular Summerstown. Discussions are progressing with highways and transport consultants and we look forward to sharing the findings with the Council, Transport for London and the adjacent Borough of Wandsworth in due course.

### *Use Suggested / Organisation*

We acknowledged the different expressions of interest submitted in respect of Site Proposal 37. Since the submission of previous representations we are mobilising to further develop regeneration plans for Site Proposal 37. We request that the suggested uses are updated to reflect the emerging proposals, as follows:

- a A 12,000 capacity football stadium, capable of being increased to 22,000 capacity
- b Approximately 500 new homes
- c Ancillary sporting and retail facilities
- d A comparison retail store

It is acknowledged that the retail element of the proposals remains subject to other policy tests, but its inclusion will be recognition that the retail floorspace may be required for the provision of any sizeable sporting element and specifically, a new stadium for AFC Wimbledon. We and/or The Newridge Group will submit viability evidence in due course, to assist the Council in this regard.

Accordingly, we request that the London Borough of Merton's policy for this site (No. 37) is amended as follows:

*Intensification of sporting activity (D2 Use Class) that could involve the construction of a new stadium (of at least 22,000 capacity) with supporting enabling development, which could include residential and retail uses. Developments that facilitate more sporting activity may be enabled by more viable uses, subject to meeting planning policy, evidence and consultation.*

As detailed above, this policy support for a 22,000 capacity stadium, residential and retail uses is required for the deliverability of the scheme.

#### *Council's Preferred Use*

We fully support the Council's preferred use of the site for the "intensification of sporting activity (D2 Use Class) with supporting enabling development". We welcome recognition from the Council that enabling development may comprise more viable uses.

As referred to above, The Newridge Group have tested a number of different development scenarios and are confident that to viably deliver a new stadium for the Site Proposal 37 a significant comparison retail store may be required along with some 500 new residential units. Having undertaken some initial research it is considered that there is capacity to accommodate a new retail store at this site. More evidence will be presented on this point to the Council in due course.

The proposed stadium is intended to act as a 'kick-start' to further investment in this area. Policy support and recognition of the role of enabling uses is key to ensuring that a successful development is viably delivered. We consider that "enabling development" should be more tightly defined to specifically include references to residential and retail uses.

We also welcome the removal of the reference to preferred uses also comprising industrial and warehousing uses, on the basis that they are not necessarily compatible uses with existing adjacent residential uses.

## Issues

### *Flooding*

It is acknowledged that the development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional flood plain and to minimise flood risk. To this end, we welcome the support provided by the Environment Agency to explore options in this regard. We look forward to discussing a flood alleviation and drainage strategy with the Council and the Environment Agency at the appropriate time.

### *Transport and Accessibility*

The site has a PTAL rating of 2 with a 20 minute walk from Wimbledon Mainline Station, a 15 minute walk from Wimbledon Park Station (Underground), Earlsfield and Tooting Broadway (Underground) Stations and Haydons Road Station is about a 5 minute walk. The area is also served by several bus routes.

AFC Wimbledon will have sufficient car parking on site for the stadium but recognises that road widening, traffic calming and other highways improvements will need to be incorporated into a traffic strategy when the necessary traffic and parking surveys have been undertaken. We are confident that the congested public highway at Summerstown can be widened with the development of the entire site to assist with traffic issues and to improve links to public transport. The non sporting uses will have self contained parking, delivery and servicing arrangements that will be planned and assessed as part of the overall highways, parking and transport strategy for the stadium and will be designed to minimise conflicts on match days. Match day home and away fans will be actively encouraged to travel by public transport

AFC Wimbledon has prepared an initial strategy for home and away fan zones and fan routes from public transport and a comprehensive study would accompany any future planning application.

Initial investigations to create a detail solution are ongoing and we look forward to the opportunity of discussing this further with the Council, Transport for London and the London Borough of Wandsworth at the appropriate time.

### *The Way Forward*

As part of our response to the call to call for sites, we have worked closely with The Newridge Group but are aware of other parties who have an interest in developing this site. Where we have been offered the opportunity, we have engaged with those parties and have explained in technical and practical terms the scale and scope of our aspirations for a sustainable stadium which will allow us to return to our historical home and once more allow us to enrich the local community in Merton.