Site 37 the Wimbledon Greyhound Stadium

Dear Inspector Robert Yuille

Since the submission of our Statement in response to your letter we have received the submission by AFCW/Gilliards relating to site 37 Wimbledon Greyhound Stadium, obtained further clarifications from the Mayor of London's office and obtained a copy of the a Feasibility Study into locating a large football stadium on this site. The feasibility study was prepared on behalf of London Borough of Merton and Greyhound Racing Association Limited and was not made available prior to our submission. To assist you in your determination whether the Merton Sites and Policies Map (the Plan) is sound we set out below, information relating to whether the site is suitable for their allocated uses which arise from these documents.

FURTHER INFORMATION WITH REGARD TO:
(a) Is this site a suitable location for an intensification of sporting activity with supporting enablers development?

- The AFCW/Gilliards statement that the *existing sporting uses of a Greyhound Stadium / Squash Club and Stock Car racing establishes the ability of the site to support large numbers of people*, falls far short of establishing the site could support a football stadium of 20,000 seated, 800m2 fitness and squash court development, 1000m2 retail units and 600 residential units.

Given the time Gilliards have owned this site we suggest that if any documents were available to show the local infrastructure could support their intended uses these documents would have been provided in their submission. Therefore in the absence of any other contradictory studies we draw your attention to Appendix 1 and Appendix 2, the Summary contained in the Feasibility Study prepared on behalf of London Borough of Merton and Greyhound Racing Association Limited Volume 1 Written Statement. (To ensure full disclosure we attach the full documents obtained as Appendix 2.)

This information which was available to Merton should have been considered when drawing up (the Plan). Any reasonable reading of this document will conclude that the site has Transportation Limits which render it unsuitable for many forms of sporting intensification. In the absence of massive investment in public transportation links, this document indicates that the site is unsuitable for intensification of sporting activity with supporting enabling development to include a football stadium of 20,000 seated (the intended final capacity or any stadium for AFC Wimbledon) and 800m2 fitness and squash court development, 1000m2 retail units and 600 residential units.

In conclusion while the site may be suitable for the intensification of some sporting activity with supporting enabling development the lack of suitable infrastructure makes it unsuitable for any intensification which includes a 20,000 capacity football stadium.
(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?

- Galliards' assertion contained in their statement to you that there is no economic, social or land use policy reason for protecting the greyhound use on the site can be shown to be wrong. The London Plan identifies a strategic requirement to protect greyhound racing in London as a part of London's Cultural Heritage. As this is the last venue for greyhound racing in London this strategic requirement must be applied to this site. There is huge demand for safe, live sporting action in the form of greyhound racing, from Galliards' own figures a min of 119,285 patrons enjoyed greyhound racing as part of London's Cultural Heritage at this Wimbledon site. These numbers attended despite the appalling condition of the current greyhound stadium brought about through lack of investment by the current owners Galliards.

- Sir Edward Lister states retention of a greyhound stadium use at the site would be ideal. The Majors planning office through Stewart Murray Assistant Director of Planning has expressed concern that "the particular concerns raised regarding the proposed allocated use for site 37 Wimbledon Greyhound Stadium and the potential wording that could be interpreted as a diminution or loss of the greyhound stadium use in the future, despite the generic "stadium" designation proposals. The Major recommends that the wording is more explicit in seeking to retain a greyhound stadium use and other compatible stadium uses which do not prejudice its current functioning as a cultural and leisure offer as supported by London Plan policies on culture, sport and entertainment provision (Policy 4.6)".

The most up to date press release dated 14th January 2014 from the Majors press office has clarified the position further; Deputy Major for Planning, Sir Edward Lister said, "the Mayor has always been of the opinion that Wimbledon Stadium should remain a greyhound racing Venue. However, if this is not viable, he would accept the site being used for other stadia-based sport, as long as it is in line with strategic planning policy."

- This recommendation from a relevant planning authority is clear and states site 37 the Wimbledon Greyhound Stadium should remain a greyhound racing venue unless it is not viable. This should be reflected in the Plan. The Galliard's submission is also wrong and misleading when it states that a dog track on this site would require public subsidy. Hume Consulting have submitted to Merton Council proof of the sustainability and viability of a greyhound track in this location. While we consider this to be commercially sensitive material such information can be submitted in confidence.

Galliards may have acquired Greyhound tracks with the intention to shut them and maximise the planning gain for profit, however strategic planning concerns must outweigh such considerations. Galliards drive to maximise profit thro closing down greyhound racing at Oxford has already been rebuffed by the planning authorities. Unfortunately for those wishing to enjoy greyhound racing Galliards have already closed the stadium, causing further damage to the greyhound industry with consequent loss of amenity and jobs in the area. Therefore, we submit greyhound racing needs to be protected for the London public and in order to make the Plan sound the wording of the Plan should state that "Greyhound
racing must be maintained on this site unless it has been proven that it is not viable to do so".

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

- Because the site is within an active flood plan it is only suitable for enabling redevelopment if there is less flood risk than currently exists to the redevelopment or wider community and the site has suitable infrastructure to accommodate that redevelopment.

- AFCW/Galliard's have not achieved the balanced land use claimed. They refer to "Extensive transport modelling and research yet to be undertaken which may help them to manage highway and crowd movement." We submit the completed research delivered to the London Borough of Merton and Greyhound Racing Association Limited (Appendix 2) should be relied on and it indicates a stadium of 20,000 is unsuitable for the site infrastructure. This unsuitable rating can only be made worse when the additional requirements of the Galliards proposed 600 housing units, a 800m2 fitness and squash court development and 1,000m2 retail units have been considered.

- We submit that the most important factor which limits development on this site is building within a flood plain. The Galliard proposal creates something of a concrete jungle which increasing the building footprint in the floodplain from an existing 12,250 m2 to a massive 31,330m2 or an increase of 155% within the flood plain. The required 155% increase of building area to accommodate a football stadium and enabling development contrasts sharply with the Hume Consulting proposal which totals 13,790m2 a manageable increase of 12.5%.

This simple comparison demonstrates that because the site is in a flood plain only certain types of sporting intensification and enabling development are suitable. We suggest that the AFCW/Galliard's proposal is unsuitable for this location.

- AFCW/Galliards seem to miss the point when they state "As a result the expert view is that the proposals will have no adverse impact on flood storage and the development will be safe for all the occupants in the event that flooding does occur". The proposed huge increase in the building area on the site within the active floodplain shall cause the displacement of flood water. This displacement of floodwater, which should be contained within the site, will be displaced onto adjacent property, this shall increase the risk of flood problems within the local area. This is particularly concerning given the proximity of the major electricity substation.

- The cavalier statement by AFCW/Gilliard's that "In terms of flooding, based on historic data it is unlikely that the site is exposed to the frequency of flooding indicated by the Environment Agency flood modelling" is not borne out by the facts and does not lessen the risk involved. We can confirm that while preparing the detailed flood risk scoping report, which is contained within the Hume Consulting Statement, RPS were made aware that the flood risk on the site was recently upgraded to show an increase in the risk from flooding in the area. Our proposals are based on the most up to date flood risk technical information.
If the Plan is seen to ignore the flooding issues and permit the over intensification of this site it should not be considered sound.

- If Merton are considering permitting AFCW/Galliard’s to deliver the 20,000 football stadium and its enabling development on this site through the Plan then Merton should have first carried out a sequential test of all available sites. (Within AFCW/Galliards submission Colliers International have identified 18 other sites for a football stadium within Merton). This site (site 37) should only being considered for a football stadium if all other sites pose a greater flood risk. There is no other site available for a Greyhound Stadium redevelopment.

- Development should provide an opportunity to reduce the risk of flooding on the site. The Appendix 3 shows photographs of recent on site flooding, the car park is considered active flood plain which stores flood water. The active floodplain capacity should be maintained or increased. The expert flood risk advice given to Hume Consulting was that, “without the advantage of having an open infield area capable of providing flood water retention ponds within our track any increase in building floor area on the site would cause increased flood risk, and would be unacceptable”. Consequently the Galliard proposal which cannot offer infield flood water retention and requires a 155% increase in building area will cause an increase to flooding risk to the surrounding area. Therefore, we submit the Site is not suitable for the enabling development required by the AFCW/Galliard proposal.

Yours faithfully

Seamus McCloskey
on Behalf of Hume Consulting
21st January 2014