

**STATEMENT OF MR. PASCHAL TAGGART IN SUPPORT FOR THE RETENTION AND CONTINUATION OF GREYHOUND RACING AT WIMBLEDON GREYHOUND STADIUM, PLOUGH LANE**

Greyhound racing has taken place at Plough Lane, Wimbledon, since 1928. The English Greyhound Derby, which is the most famous greyhound race in the world, has been held there since 1985. The prize money for the winner of the William Hill Derby in 2014 will be £200,000. At one time there were 15 greyhound tracks across London but Wimbledon Greyhound Stadium is now the last remaining track.

Approximately eight years ago Risk Capital, Luke Johnson, and Galliard Homes, Stephen Conway, purchased the Greyhound Racing Association (“GRA”) which owned several greyhound stadia across England with the clear intention of running into the ground those tracks with development potential including Wimbledon, Oxford and Portsmouth. Ironically, the £50 million raised by Risk Capital and Galliard Homes to purchase the GRA was borrowed from the Irish Nationwide Building Society on a non-recourse basis. This institution has since gone bust and the loan is now held by NAMA, the National Asset Management Agency for Ireland.

It is my belief that Galliard Homes has, at the eleventh hour and after failing to meet every deadline set by the Council, now teamed up with AFC Wimbledon in order to achieve their long term ambition of closing down Wimbledon Greyhound Stadium. By agreeing to build a football stadium with AFC Wimbledon (a club which the Council has resolved to bring back into the borough) they will also realise their original aim of building a significant amount of houses on the site plus a large retail outlet, at a cost to the Greyhound Industry and local residents. It is disappointing that the Council have allowed such a very late and out of time proposal from Galliard Homes and AFC Wimbledon when I and my fellow investors were compelled to submit all our plans, reports and data by the closing date for each stage of the DPD process. We were even given a two week deadline to submit financial information when we attended a meeting back in February 2013 at the Council offices! Moreover, the original AFC proposal was with a partner called New Ridge, where the majority shareholder knew nothing about the proposed scheme.

However, that is not the matter for consideration here.

I cannot accept AFC Wimbledon’s claim to “coming home” to Plough Lane when the original Wimbledon FC football ground was located at the other end of Plough Lane and which was sold by Wimbledon FC over ten years ago and the team is now located in Milton Keynes and called the MK Dons. I cannot see how AFC feel they have any claim to the Wimbledon Greyhound Stadium site nor the right to depose greyhound racing which has taken place there for the last 85 years.

Sadly, through deliberate neglect, the main stand at the Greyhound Stadium has now been closed down on health and safety grounds, and the far side, as it is known, is in a dreadful condition. However, I and my fellow investors wish to replace the existing greyhound stadium with a modern state of the art stadium, as outlined by Hamilton Architects. We intend for this stadium to be on a par with Royal Ascot. We will also include a world class squash centre, gymnasium, dance studio and medical centre.

As a former Chairman of the Irish Greyhound Board, a position I held from December 1995 through to January 2006, I have plenty of experience and success in running greyhound stadiums. When I took over in 1995 the attendances at the races were 575,000, and the tote take was €6 million. When I left in 2006 the attendances were 1,400,000 and the tote take was €42 million. During that time the Board spent almost €70 million on building new tracks and renovating old tracks. Probably, Cork and Dundalk are the two finest greyhound stadiums in the world at this point in time.

I can foresee the new Wimbledon becoming one of the popular tourist attractions in London. All the new facilities combined would mean employment for up to 450 people, the majority of which would be in the 18 to 25 age bracket. Our proposed plans will most certainly benefit the local community and give the residents a complex which will up-lift the area and bring value to the neighbourhood.

## STATEMENT IN RESPONSE TO INSPECTOR ROBERT YUILLE, MSc DipTP MRTPI

On behalf of Hume Consulting Ltd we draw your attention to the following issues to assist you in your determination whether the Merton's Sites and Policies Plan and Draft Policies Map (The Plan) is sound. We submit that the plan is not sound in relation to Site 37, Wimbledon Greyhound Stadium, in so far as it is in conflict with the London Plan, against the provisions of Section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004.

The Plan is not sound because of the omission of any statement that greyhound racing should be retained on the site. The local development framework together with the Mayor's special development strategy ("London Plan") and the National Planning Policy Framework ("NPPF") provides the essential framework for planning at the Borough level. However the omission has the effect that The Plan ignores the policy of the London Plan. During the preparation of The Plan Merton had been made aware that there is no other location where the London Plan's Policy can be implemented as this is the last location where greyhound racing exists in London. In this unique circumstance it falls to Merton to include the London Plan's Policy as part of the overall planning policy for the site. Failure to protect greyhound racing, which has been defined as part of London's Cultural Heritage (ref paragraph 18 Appendix 1) cannot be viewed as in general conformity with the London Plan. In fact, failure to protect greyhound racing is a strategic concern and is in direct conflict with the London Plan. This demonstrates that, by omission, the development plan document is inconsistent with one or more of the policies in the London Plan. This omission is a significant inconsistency from the point of view of the delivery of the London Plan. Should greyhound racing be lost from the Wimbledon Site the London Plan Policy, to protect greyhound racing as part of London's Cultural Heritage, shall have been caused to fail.

Hume Consulting's submission (Appendix 2) including covering letter, demonstrates the London Plan Policy can be implemented in a sustainable way.

Hume Consulting's submission clarifies that the primary use proposed for the site is the retention of greyhound racing.

The London Plan 2011 Policy 7.9 HERITAGE-LED REGENERATION states Boroughs should support the principles of heritage led regeneration in LDF Policies (Appendix 3). The Mayor's Planning office has confirmed that they would support the intensification of the site for uses that would support the continuation of the use of the site for a greyhound stadium. This complies with a heritage led regeneration policy, as the Mayor's office have recognised that greyhound racing is part of London's Cultural Heritage. However, nowhere has support for intensification of the site to support a football stadium appeared in the statements from the Mayor's office. We would question whether there is a planning policy which would justify permitting the intensification of the site to support a football stadium. The fact that "on the face of it the allocation in the Plan would allow for either option" would not in our view justify the intensification of the site to support a football stadium.

## MAIN MATTERS AND ISSUES

Site 37. Wimbledon Greyhound Stadium.

- (a) *Is this site a suitable location for an intensification of sporting activity with supporting enabling development?*
- (b) *Support has variously been expressed for providing an enhanced greyhound stadium or a football stadium on the site. On the face of it the allocation in the Plan would allow for either option. It would not be appropriate at this stage to go into the relative merits of these schemes but it has been suggested that the Plan should include a more explicit reference to seeking to retain a greyhound stadium. Is there any merit in this suggestion?*
- (c) *Is the site suitable for the sort of enabling development (residential/leisure/retail) that has been suggested?*
- (d) *It has been suggested that the site is more suitable for industrial and warehouse development together with leisure facilities and school use. What are the advantages and disadvantages of this approach?*

(a) The site is capable of supporting a development which includes the intensification of some sporting activities. Hume Consulting's proposal demonstrates that intensification of greyhound racing on the site is achievable and sustainable. The exact mix of supporting residential and commercial development will be subject to planning negotiation and shall comply with the relevant planning policies.

In our view this site is not suitable for football but is suitable for other sporting uses including greyhound racing. The Hume Consulting proposal demonstrates that intensification of sport through greyhound racing with supporting enabling development can be accommodated on this site. The site is not suitable for a 20,000 capacity football stadium because:-

1. There is a lack of infrastructure in the area to support a 20,000 seated football stadium (the feasibility study carried out by Merton Council in 1996 Appendix 4 demonstrates that the infrastructure would not support a 20,000 seated football stadium on this site).
2. There is strong resistance of local residents to the imposition of a 20,000 seated football stadium into their residential area.
3. The closed in nature of the football stadium coupled with its supporting enabled development would create a unsustainable increase in the build footprint for this location. Any closed football stadium proposal would result in an unacceptable reduction to the area of functional flood plain in the area (by contrast the open nature of the greyhound stadium when coupled with its enabling development causes only a minor reduction in the functional flood plain. The Hume Consulting proposal creates only a 12% increase in the build footprint from an existing 12,256m<sup>2</sup> to a proposed build footprint of 13,790m<sup>2</sup>).
4. The requirement to protect the large playing surface of any football pitch coupled with its supporting enabling development shall in the event of a flood impede water flows. (By contrast, the greyhound stadium proposal allows the track infield area to accommodate water flow / attenuation ponding and together with the strategically placed trainer's carpark, the Hume Consulting proposal is designed to improve any

flood water flow through the site, particularly in the area of the existing enclosed stadium RPS Report).

5. In order for this site to be able to accommodate any sport with supporting enabling development the sport should be able to provide wider benefit to the local area. Any sport such as football which requires a closed stadium and a large area of protected playing surface will not be able to offer such a benefit. (By contrast an opened stadium such as the greyhound stadium in Hume Consulting's proposal offers opportunities to provide additional surface water attenuation within the track infield which will result in wider benefit for the local area RPS Report).

(b) See text above.

(c) As Hume Consulting's previous submissions have demonstrated, and the site is appropriate for residential/leisure/retail) and any developer will accept that the exact mix of enabling development must be taken through the full planning process and be subject to agreement in due course.

(d) No proposal for industrial and warehouse development together with leisure facilities and school use exists. In this location such a mix of development would be unlikely to be deliverable or sustainable. The disadvantage of failing to address the Borough's housing need would be considerable as with few alternative sites are available within the area. The loss of a cultural amenity for the people of London by removing greyhound racing from the area, which has been there since May 1928, would be a major disadvantage.

In conclusion we suggest that in order to make The Plan sound it should be amended to include the statement "Greyhound racing must be maintained on this site, known as the Wimbledon Greyhound site, in order to protect Greyhound racing as part of London's Cultural Heritage".

Yours faithfully



Seamus McCloskey  
on Behalf of Hume Consulting