

**Comments of the Wimbledon Park Residents Association on the proposed sharing of the Plough Lane stadium by a rugby club. (21/P1136)**

**Executive Summary**

The application to allow rugby matches in the Plough lane stadium which was purpose built for AFC Wimbledon introduces a new sporting activity in an area of poor public transport. It will generate traffic and pedestrian disruption that has not been quantified by the traffic and environmental assessments submitted so far as these were specifically carried out for the case of an AFC Wimbledon only stadium. As such the application can not be passed without satisfactory proper traffic, environmental and air quality assessments.

There are very good reasons, which were implicit in the original application, to suppose that the operation of the stadium for just AFC Wimbledon may be very problematic and it should be properly tested before any increased use is considered.

Very substantial sums of money have already been committed to the football stadium. It is unfair to expect local residents and businesses to put up with additional disruption that ground sharing will entail, particularly when it breaks previous assurances.

**1.New sporting venue**

- [1.1] The change of use to share with a Rugby club does not require significant changes to the stadium and apparently will not exceed the maximum permitted number of matches(104) played each year. However, it will very significantly increase the use of the stadium and if it goes to the permitted maximum use matches will take place on average every third day. We note that the football and rugby seasons have a considerable overlap during which they will both use the stadium. It will essentially double the number of journeys to and from the stadium and it is has the same effect as if a new application to hold a new sporting venue in Plough Lane had been submitted. This will will cause substantial disruption for local residents well beyond what was originally envisaged, and indeed in effect promised, when the original AFC application was put forward.
- [1.2] Since the original application the traffic levels in the surrounding roads has substantially increased, not least due to the waste processing sites in Weir Road and on the other side of the River Wandle. A Traffic Assessment that that takes account of this increased traffic must to be carried out.
- [1.3] The Traffic Assessment submitted with the original application only took into consideration the behaviour of the football fans in relation to parking and walking habits when attending football matches for AFC Wimbledon at Plough Lane. This even extended to use of a detailed data on the distribution of the existing AFC fan base and it was tied to the use of the stadium on the days when football is usually played, such as Saturday. In particular it also assumed the lower frequency of stadium usage appropriate to its use by AFC Wimbledon alone It is now proposed that the stadium

is also used by a rugby team that is not local and so has the majority of its fans and staff coming from afar. Games will be played on days which have not been assessed for impact including Sundays. This is not consistent with the assumptions of the transport assessments carried out so far. It is incumbent on Merton Council to properly understand the possibly very negative effects of the proposed change and as a result a new traffic assessment is required. The increased use of the stadium will lead to a substantial increase in traffic and in particular cars parking in nearby roads and this requires a air quality assessment, especially as the area is well known to have air pollution levels that exceed safe levels.

**The change to share the stadium with a rugby club introduces a new sporting activity into an area of poor public transport. This will lead to significantly increased traffic and disruption that was not taken into account of in the Traffic Assessment and Environmental Statement submitted with the original application. As such this new planning application requires a new Traffic Assessment, Environmental Statement and Air Quality Assessment to properly evaluate its effects**

## **2 The effects of the original application should be tested before any increase of activity is allowed**

The operation of the new stadium for AFC Wimbledon has never been tested, that is, a match with the usual number of fans has never been played. How precisely the fans would get to and from the football matches was not resolved in the original planning application and there are very good reasons to think that this could be very problematic given that the stadium is in an area of very poor public transport.

- [2.1] Given the very cramped nature of the Plough Lane site, it is difficult to imagine how the fans and their coaches will be organised without causing substantial disruption. It was with this in mind that both the TFL report and the transport assessment of Peter Bret (October 2014) submitted with the original application envisaged closures of Plough Lane for at least some of the time. Despite road closure being identified as a likely and necessary measure to facilitate the movement of supporters and stadium attendees, the Traffic Assessment and their Environmental Statements so far submitted did not test the impact of this on traffic flows on the surrounding road network. With few alternative routes across the River Wandle, the potential impact of this will be considerable for residents, businesses and any road users on the wider network. In addition Plough Lane is a main thoroughfare for emergency vehicles and South London traffic, and as mentioned previously, traffic levels have increased since previous reports were submitted.
- [2.2] Even at present the traffic can at times have very lengthy tail backs from the Plough Lane-Gap Road-Durnsford Road-Haydon Road. These can stretch from this junction to the bridge on Gap Road and to the southern end of Haydon Park Road. The impact also expands into Wandsworth and Tooting, back towards Earlsfield and St George's Hospital and beyond. Indeed even a small obstacle can at present lead to such tail backs. The resulting traffic chaos from closing Plough Lane is not difficult to imagine.

- [2.3] The Transport Assessment submitted with the original application relied on parking spaces for about 5000 plus cars on local residential streets. However, some of these streets will not be accessible to such parking as they now have, or will have, restricted parking. The current application for change of use lists a number of car parks in the vicinity of the stadium. Additionally, no quantitative account is provided of whether there are spaces in these car parks at the relevant times and they could well be full or possibly even closed (as for St George's Road car park which is listed in the applicant's documentation as among the choices for fans, yet has been closed for at least 18 months). In effect there has been no serious modelling of where the cars of the fans will park. It is not a justification to say, as the applicants do, that they can not park at the stadium. As we remarked above, the ways the fans would travel to and from the stadium was never satisfactorily resolved and in any case the modelling that was carried out was specific to the characteristics of football fans travelling to and from an AFC football match.
- [2.4] Doubts were also apparent in the minutes of the Merton Council meeting on 10 December 2015 that granted permission for the original planning application for the Plough Lane site. This document states that
- 18.1.14 It is proposed that on initial operation of the Stadium, the situation be monitored by the Club for a period of time to be agreed with LBM as part of an updated Transport Assessment and should any problem arise, a Coach Management Plan be submitted for approval and implementation.
- and
- 18.1.43 Monitoring of the Stadium and residential elements of the development once operational will be key to ensuring that any required mitigation in transport, logistical and amenity terms are installed.

**The way the stadium would operate just for AFC Wimbledon was never resolved in the original application and could well cause more disruption than local residents and businesses are prepared to put with. The operation of the stadium for AFC Wimbledon has to be properly tested before any ground sharing can be considered**

### **3. Contradiction of previous Commitments**

- [3.1] The designation of the Plough Lane site for "Intensification of sporting activity..." in The London Borough of Merton Sites and Policies Plan 2014 and the granting of the subsequent planning permission were engineered to provide a stadium for AFC Wimbledon. Merton Council "arranged" for Galliards to give 14 million to build the stadium and half of the site was gifted, which in turn had a very substantial monetary value.

Merton Council could have pursued a different course of action for the Plough Lane site with the result that similar substantial sums of money would have been used to benefit other, more widely spread, activities in Merton. In addition the local residents and businesses in the area will also have to put up with all the inevitable disruption and it was perhaps with this in mind that they opposed the construction of the football

stadium. The financial viability of a football stadium was questioned by some despite the assurances in the original planning application that it was viable.

We now learn that local residents and businesses must accommodate an increased use of the stadium and so even more disruption. It is unfair that local residents and businesses, who would have greatly benefitted from an alternative plan for the Plough Lane site, are now expected to make further sacrifices.

Ground sharing was also a course of action that AFC Wimbledon stated they would never do in order to be "good neighbours".

[3.2] The minutes of the Merton Council meeting on 10 December 2015 that granted permission for the original planning application for the Plough Lane site stated that

18.46 The stadium would only be used by AFC Wimbledon and on non-match days would only be used for small scale events such as conferences and hosting visitors in connection with the Clubs community work.

and

4.11 The stadium would be the permanent base of AFC Wimbledon and primarily be used to host football matches between AFC Wimbledon and opposing teams. The football season in England is from August to May each year and generally home games take place once a week. When not in match use, the stadium host community led event.

**The proposed change of use of the stadium, which was intended for just AFC Wimbledon, breaks assurances previously given. It is unfair to expect local residents and businesses to make further sacrifices in addition to those already envisaged.**

#### **4. 106 Agreement**

We hope the planning application is refused but if it is granted it will lead to significant flows of traffic and pedestrians. It is inevitable that this will in turn lead to increased costs for waste processing, policing, wear and tear as well as increased parking and other problems for residents. If the stadium is to be used to make money other than its original use as a football stadium then it is not unreasonable that the original investors, which are in effect the local residents of Merton, should be the ones to benefit.

**The future use of the stadium should be restricted to no more than 5000 Rugby fans, and it use never be further extended to include any other use than for the London Broncos. A very significant amount of the revenues arising from renting the stadium to London Broncos should be given to the local community to compensate it for the additional problems this additional use will cause , including the necessity of parking consultations, extra litter and waste collections, street maintenance and improved transport facilities such as cycle lanes, bus services and enhancements at Haydons Road Station.**

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