

Attention Sabah Halli
Development Control
London Borough of Merton
Merton Civic Centre
London Road
Morden
SM4 5DX

7th October 2015

Re: Planning application 14/P4361: Redevelopment of the Wimbledon Greyhound Stadium

Response to the revision of the AFC/Galliard Homes Application

Dear Sabah Halli

TRANSPORTATION

Comments on the new transportation documents on the Council's planning portal are in **black bold italics** against the original points raised in the WPRA responses.

Whilst the Applicants have responded to many issues raised by WPRA in the response table, their comments lack substance and instead of addressing the concerns directly, they've limited it to what may or may not be adequate for the statutory consultees. We note that TfL, the train and station operators have only their own interests to serve and these are not necessarily aligned with local residents, transport users or local businesses.

From the material posted on the planning portal, there is very little evidence of any input or comments from Merton's officers to the planning application but they have been present at meetings with TfL. Whilst the portal exhibits emails and meeting notes with TfL, there does not appear to be any record of the meetings with Merton's officers themselves which are likely to have taken place and would be of interest to WPRA.

The Principal Inadequacies and Failings of the Transport Assessment

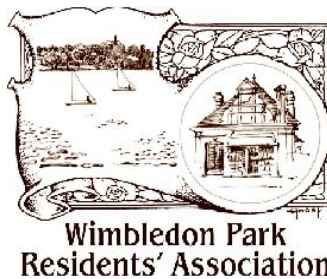
The Applicants have not carried out their surveys during a period of normal traffic conditions and have therefore not used realistic data for their Transport Assessment. They carried out their surveys during the period, 12th July – 18th July 2012. Some school holidays had already begun and many road users would have taken their holidays early, prior to the London Olympics commencing on 26th July 2012.

The Applicants have ignored the TFL guidance contained on their website (Trip Generation – Committed Development and Traffic Data) as follows; in most cases, TFL expects traffic surveys to be undertaken during school term times, a neutral month and neutral weekday; the observed local highway peak should form the basis of your TA. It is good practice to use validation data when collecting traffic survey data

The Applicants have responded to WPRA's comments and resurveyed the traffic flows in the same locations in Feb 2015. There is no significant difference between the two results for traffic counts on Plough Lane as a result of the proposed development but TfL have highlighted in their email on 30/3/15 that the re-modelling/testing carried out on the Plough Lane /Durnsford Rd junction had not been carried out in accordance with methodology acceptable to TfL and certainly not with best practice. Nonetheless, it shows the junction is already operating over its capacity and is made worse by the development.

What is clear is that the true impact of the development on this junction and nearby road system is not being properly tested and TfL are leaving it to Merton and LB Wandsworth to decide on any action required.

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In the same email, LB Wandsworth acknowledges the proposed scheme has a negative impact on their highways and there's no obvious solution and Richard Lancaster from LB Merton has acknowledged that the mitigation works proposed at Durnsford Rd (removal of parking bays to allow widening of the carriageway enough to create a dedicated right turning lane into Plough Lane from the South) falling within Merton's jurisdiction, might not be deliverable. The bays service local shops and a mini cab office and removal would undoubtedly have an impact. WPRA's concern is whether, as a result of inadequate testing, the impact is actually more serious than has been acknowledged by the Applicants and TfL are less concerned because the affected road junction fall under the responsibility of LB Merton, whose planning committee will decide the application and whose Councillor Judge is promoting the development.

The Applicants have not assessed the impact on Wimbledon town centre, the railway stations or local residential streets before and after matches when supporters will naturally be visiting the local bars and restaurants coinciding with peak shopping/leisure time on a Saturday. The supporters are unlikely to travel to and from a game without at least a proportion of them visiting a pub or restaurant. This will apply to all supporters and therefore needs to be considered for those supporters parking cars in residential areas and also those travelling by public transport.

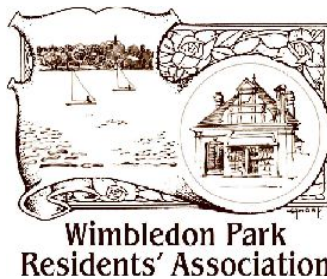
The Applicants have ignored WPRA's concern that the impact of the proposed development is tested over a wider area and limited their surveys to what's been accepted by TfL and therefore limited to their issues and not those of the residents. Their parking surveys aim to identify capacity for street parking within 2kms of the stadium and not the impact of it. It is therefore still not clear how the stadium will impact on the residents, shoppers and visitors to Wimbledon town centre on match days.

The Applicants will not provide any car parking for their supporters within the development and assume all football supporters and event attendees travelling by car will find parking spaces in residential streets and existing car parks within walking distance of the stadium. They also assume that the supporters will walk directly to the stadium and not into the bars and restaurants of Wimbledon, Tooting or Earlsfield centres before and after a game. These streets are already subject to the parking restrictions introduced in favour of residents and their visitors on Mon –Saturdays because they could not cope with commuter parking and visitors accessing the shops from these streets before the CPZ's were introduced.

The Applicants have not made any changes to their proposal that fans travelling to the stadium by car will be able to find spaces on residential streets within 2 kms of the stadium. It appears that both Merton and Wandsworth expect to make changes to CPZ's if parking problems arise on the streets and if residents are in favour. It is not yet confirmed how

residents will be protected or whether the Applicants will be responsible for any costs arising from changes to parking restrictions.

Instead of promoting sustainable transportation, the Applicants appear to be trying to secure off street parking for football supporters and whilst this might ease pressure on residential streets, it is likely to encourage supporters to use their cars and increase congestion on the wider road network. In response to the same issue being raised by TfL, it appears this is likely to be addressed though a S106 provision as per TfL's suggestion but no indication what this will mean for residents.



The parking beat survey undertaken by the Applicants and upon which they're relying, excluded the time period when matches would actually take place. Therefore, the period of overlap when spectators' cars are parked for matches and existing residents' demand for spaces turns over during a match, has not been assessed.

There has been no further work undertaken by the Applicants and it has not responded to this concern raised by WPRAS.

The Applicants have not considered or assessed the existing capacity of local public transport infrastructure and services and have therefore ignored the impact 20,000 supporters and 1491 new residents it might have.

TfL also shared WPRAS' concern and have obtained some data from South West Trains for the Applicants. TfL considers the data from SWT may not be accurate. However, on the basis of what's been issued by TfL, Thameslink and SWT, the Applicants conclude there are no capacity issues on either over ground or underground services. This appears to satisfy TfL'S concern, albeit based upon unverifiable data.

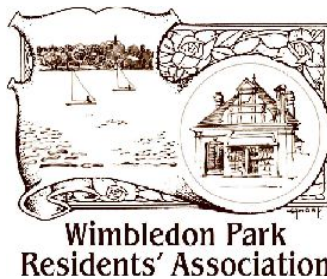
The Applicants have admitted to TfL that their initial assumptions around the use of Haydons Road station were overstated in their TA and instead there is likely to be higher usage at Tooting Broadway. It has also been acknowledged that the Applicants did not take account of any change or test their underlying assumption regarding on street parking availability and the impact of any change resulting in higher station usage and the associated pedestrian routes to the stadium.

The Applicants have undertaken sensitivity testing and concluded the stations can cope with the increases but it is clear that pavements and pathways between stations and the stadium cannot cope comfortably with the numbers associated with a stadium in excess of 11,000 people.

Despite the scoping exercise identifying a need to use specific software, VISSIM, for traffic modelling, the Applicants have failed to do so. Their Assessment already acknowledges the queuing traffic along Plough Lane which interferes with other junctions during weekday peak hours but they have not undertaken appropriate transportation modelling studies that consider how the entire local road network functions currently and how it will function once the additional burden of traffic and pedestrian movement from an 11/ 20,000 seat stadium and 602 housing units are added to that network. The modelling the Applicants have undertaken (Arcady8) takes no account of this and the true effect of additional traffic on Plough Lane is therefore not assessed accurately. Instead, they've chosen to study individual road junctions on a standalone basis which will not provide a realistic picture of the ability of the wider road network to cope with the impact of the development.

The Applicants have ignored WPRAS's concern and have not remodelled the traffic flows using alternative software. The Applicants' methodology appears to be acceptable to TfL despite not being able to audit the figures but as stated above, traffic was re-counted on nearby junctions but a wider impact was not assessed.

Page 10, Cl.4.11, Stadium Management Plan Strategy Appendix Q clearly states that it may be necessary to close some roads on match days to facilitate the movement of 11,000 football supporters. It is stated Plough Lane, Summerstown Rd and Riverside will need to close for 30 min periods on match days. This does not appear to have been tested in any modelling scenarios.



The Applicants appear to be ignoring the impact of pedestrian footfall at the end of matches on roads immediately adjacent to the stadium. Whilst the latest Update Note from the Applicants is silent on the issue, TfL's email 30th March states that for an 11,000 capacity stadium, road closures will form part of a combination of measures required in the hour post matches to mitigate unmanageable pavement congestion at pinch points. The Applicants have proposed some mitigation works but perhaps due to the constraints that exist, have not proposed any works that will actually enhance local infrastructure and this further proves that a stadium in this location cannot operate without causing disruption to local residents and road users.

The Applicants have adopted unrealistic modelling assumptions to assess traffic flows namely: Despite road closure being identified as a likely and necessary measure to facilitate the movement of supporters and stadium attendees, the modelling does not test the impact of this on traffic flows on the surrounding road network.

The impact of this omission of such a major factor from the testing and modelling is that the Traffic Assessment is incomplete, and its conclusions are fictitious.

The Applicants assume that supporters travelling by car will not drive across any junctions around the stadium on match days because they'll find spaces beforehand

This assumption remains unchanged and is now more relevant given the acknowledgement that the Applicant is seeking to secure parking on alternative sites nearby to ease pressure on local streets but inadvertently exacerbating the congestion and impact of the stadium.

The stadium once built, is very likely to be used by a second club (possibly rugby) and for other events such as music concerts in order to provide the financial sustainability.

The Applicants have responded by saying there is no intention to use the stadium for music events but they have not ruled this or anything else out.

The Applicants have not tested a scenario that assumes all the parking spaces in the 602 new flats will be used. The traffic generation of the flats was estimated from the nearby flats on

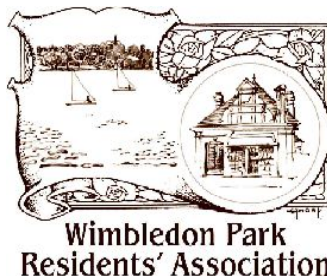
Plough Lane which themselves have underutilised car parking. By doing this, they have assumed a similarly underutilised car park for this scheme.

The Applicant has not made any changes to their assumptions

Further Inadequacies and Failings Identified

The Applicants propose that a 1,000 sq. m. supermarket fronting Plough Lane that derives trade from passing motorists will not require any customer parking other than those for disabled drivers.

The Applicants have responded by stating that TfL and LB Merton have removed an underground parking provision in the original application. We were not aware there was one proposed and consider this lack of parking provision for a 10,000 sq ft food store to be shortsighted.



The Applicants propose transport mitigation works which will negatively impact on established local businesses and they cannot provide any guarantee that these can be delivered or are feasible i.e. the removal of parking on Haydon's Road and narrowing of the carriageway on Plough Lane.

Despite TfL identifying the problems at the Plough Lane/Haydons Rd junction and it being over its operating capacity, the Applicants appear in denial about the need for any improvements. This is most likely the reason why they have used traffic modelling which cannot be audited and also because of the associated costs if it has to carry them out. The identified mitigation works are the Applicants' only means of mitigating the traffic and pedestrian impact of the stadium on nearby pavements and roads and are necessary but WPRA considers these measures may be undeliverable, due to the likely impact on local businesses and the compensation claims which may arise. We note that the Applicants have failed to take into account or acknowledge a planning consent granted by LB Merton (14/P3578) for residential and retail foodstore development on Haydons Road Filling Station site which includes a lorry loading bay on the highway. This will make it impossible to widen the road to improve the Plough Lane junction.

The Applicants have not tested whether the coaches can access, turn and exit the stadium when dropping off in Riverside Rd or whether the delivery vehicles can actually service the 1000 sq. m. retail unit thereby risking additional congestion and an unworkable traffic plan.

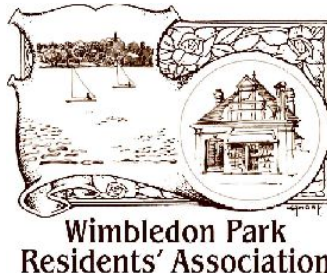
An issue that remains unresolved is where the coaches wait during the matches without causing congestion.

The Applicants have now undertaken further testing of the vehicle tracking and it appears that servicing the food retail unit with an articulated truck is not feasible due to the column layout.

Whilst it is noted that the PERS audit shows the condition of pavements around the sites to be poor, the Applicants, when carrying out the PCL survey, have not appeared to have assessed the existing utilisation of pavements and current pedestrian movements on the likely routes between train/tube stations and the development, thereby ignoring the impact that 20,000 football supporters and 1491 new residents might have on existing users on both match and non-match days.

The Applicants only consider the pavements near to the stadium to be of issue and have undertaken further testing with the result that a stadium in excess of the 11,000 seats is likely to create the need for road closures due to crowding. TfL believes a stadium of 11,000 will require road closures due to the pedestrian pinch points around the surrounding roads and this combined with inadequate size and frequency of trains at Haydons Road will cause the crowds to move towards other stations via residential roads with inadequate capacity. There is no attempt by the Applicants to create any meaningful infrastructure improvements to accommodate or mitigate this crowd impact.

A report prepared by RPS in 1996 on behalf of the London Borough of Merton and the Greyhound Racing Association Ltd ('Wimbledon Greyhound Stadium Feasibility Study') considered in detail the redevelopment of the stadium for a number of options. It concluded, due to the inadequacies of the existing transport infrastructure serving the site, that a fixed public transport link (an extension to Croydon Tramlink) would be required to serve a new football stadium.



Wimbledon Park
Residents' Association

The Applicants have chosen to ignore the findings of this report on grounds that is irrelevant. We believe this is negligent.

The Applicants state that the site is categorised as a Public Transport Accessibility Level (PTAL) rating of 3 when previous reports have stated 2.

The Applicants now state the site varies between 2 and 3.

The Applicants have not acknowledged how the prospect of Crossrail 2 in Wimbledon and Tooting, might impact and the fact that the two development programmes coincide.

The Applicants ignore Crossrail 2 on grounds that it is as yet, not a committed scheme. It should be seen as being in the interests of both the Applicants and the LB Merton as well as the residents that a joined up planning strategy for the borough is in everyone's best interests.

Yours sincerely

A handwritten signature in black ink, which appears to read "Iain C Simpson". The signature is written in a cursive, flowing style.