

Submissions of Representations by AFC Wimbledon
to the Site & Policies Development Plan Document
in respect of the Wimbledon Greyhound Stadium



Part 1: AFC Wimbledon

History

In May 2002 an FA Committee made the highly controversial decision to allow Wimbledon FC to relocate to Milton Keynes. The club's fans believed passionately that a football club belongs in its community, so they decided to re-form their club at the lowest levels of English football and win their way back into the Football League, much as the original Wimbledon FC had done 25 years earlier.

AFC Wimbledon, owned and run by fans, has become one of the most remarkable football stories of modern times. In a mere ten years the club has progressed from open trials on Wimbledon Common to achieve five promotions, culminating in a play-off victory in May 2011 that returned the name Wimbledon to the Football League; it has bought a stadium (in a neighbouring borough); and it has launched extensive and highly innovative community initiatives which earned it a recent 'Big Society' award. And it has done all this on a financially sustainable basis.

AFC Wimbledon remains a fan-owned club, owned via the Dons Trust, which operates with the highest ethical and governance standards. Many of its activities are carried out by volunteers, reflecting the club's commitment to extensive community involvement.

The Club's Ambitions

The club's objective of returning to Wimbledon was enshrined in its stated aims shortly after it was founded. With its current stadium in Kingston constrained by a small footprint, it is clear that AFC Wimbledon cannot offer adequate facilities or expand its capacity, which it clearly needs to do – well over half the games in season 2011/12 were sold out. Recent research has shown that over 14,000 households have had commercial interaction with the club in the past few years, while season ticket renewals in the main, seated stand were over 97% for 2012/13.

With this combination of pent-up demand and the club's objective of moving back to the Wimbledon area, the time is right to come home. The aim is to build a stadium with an initial capacity of 12,000, capable of being increased to 22,000 as the club grows. The combination of the story of AFC Wimbledon, which is known and admired by football fans everywhere, a new stadium (which typically attracts growth in crowds of up to 50%) back home in Wimbledon, and a Football League presence make the club confident that a 12,000-capacity stadium will attract fans who supported it before 2002 along with many new fans. It is worth noting that Wimbledon FC attracted average crowds of over 18,000 while playing in the Premier League, and even after relegation to the Championship, and with many fans boycotting games in protest at the proposed move to Milton Keynes, crowds were over 8,000. These attendances were achieved when the club was groundsharing at Selhurst Park, with no sense of belonging and outside the club's home borough.

The challenges faced by AFC Wimbledon now are similar to when Wimbledon FC achieved promotion to the Football League in 1977. Back then, the fundamental problem was that, despite the years of achievement, the club did not have its own modern, high-quality stadium to allow it to grow, thrive and contribute to local life.

AFC Wimbledon is aware of these lessons from the past, but also that the football and sporting landscape is much different now. Changing consumer trends, stadium disasters, the seminal Taylor Report, advances in stadium development and management, and new technology and media are just some of the forces that make football now so radically different from how it was in the late 1970s. A new stadium for the club would reflect this changed sporting landscape.

It is clear that any stadium that lacks the ability to expand will expose AFC Wimbledon to the same restrictions that led the owners of Wimbledon FC to claim that it was necessary to move away from Plough Lane. The future growth of AFC Wimbledon must not be compromised by a lack of vision and ambition in the present. A review of fundamental issues such as timing/availability, scale, and the need for a balanced development reinforced the selection of Wimbledon Greyhound Stadium as the preferred site for a new stadium for the club.

A key criterion is for the development proposal to be a ‘balanced’ development that is compatible with the club’s existing and future community. The club has been instrumental in trying to ensure that any development proposal allows the local community to see the club as a positive influence on its future wellbeing, and that it offers something to its immediate community on matchdays and on non-matchdays.

Jobs and education are also part of the plans for the new Stadium for a Club that has always engaged with its supporters and its neighbours.

The conclusion therefore is that the Wimbledon Greyhound Stadium site offers the best opportunity to bring AFC Wimbledon back to Merton.

Club Ownership Structure

AFC Wimbledon has delivered a successful model based on ownership by its fans, prudent financial management, supporter participation, active volunteerism and community engagement.

The Dons Trust is a not-for-profit organisation that owns AFC Wimbledon and is the guardian of all principles and aims by which the Club operates. As a representative body of the “fan owners” the Dons Trust has to ensure governance and accountability to all, both financially and morally. Therefore the Dons Trust is committed to making the voice of supporters part of the decision-making processes at the football club, and strengthening the links between the club and the community of Wimbledon and the surrounding areas.

In addition to nearly 100 volunteers who help to make matchdays run smoothly, the Dons Trust has a number of volunteer groups tasked with driving the Club forward. Fans with professional expertise, enthusiasm and an interest in the Club are encouraged to get involved. Fans serve on working groups, each reflecting considerable depths of skill and experience, for Finance, Fundraising, Legal & Constitutional, and Stadium. Through these groups the Club has sought to apply best practice and provide leadership in transparency, financial management and community relations.

The Club wishes to do much more in its own home borough that can help develop its already strong brand, but is limited by not having its own stadium in Merton.

Part 2: Consultation

AFC Wimbledon

Following discussions between AFC Wimbledon and the London Borough of Merton (“LBM”), and workshops and surveys with supporters, the fundamental requirements of the Club from a stadium project have been identified as follows:

- A stadium owned by the football club located in the ‘Greater Wimbledon’ area of Merton.
- A stadium project that allows the Club to thrive.
- A stadium with the flexibility to allow staged increases in capacity and income-generating uses throughout the year, with an initial stadium capacity of 12,000 to 15,000 consisting of a mix of standing and seating accommodation, but future proofed to a capacity of 22,000.
- A stadium that offers a tight, intimate and atmospheric experience capturing the best of Wimbledon FC and AFC Wimbledon’s non-league, league and Premier League heritage.
- A high-quality stadium that is open to all elements of the community
- A stadium that is an essential part of the urban fabric and an exciting urban destination in Merton.
- A stadium that generates net benefits for the local community and helps LBM meet a range of objectives for Merton.

LBM

The largest response on any single issue throughout all the Local Development Framework consultations by LBM came from supporters of AFC Wimbledon wanting a football stadium or a multi-purpose sports complex with new community facilities within Merton. The supporters identified the site of Wimbledon Greyhound Stadium as their choice of location.

Part 3: Location

Site Search

An initial study was carried out by Colliers International in August 2011. The comprehensive report outlined the options available to AFC Wimbledon.

The report identified 18 original sites for potential relocation plus the existing site in Kingston. Four sites within Merton were shortlisted, each of which was a viable option subject to the resolution of some key issues. After analysing those issues the report concluded that only three sites were viable, but that all still had issues in terms of acquisition, technical challenges, designation and impact on jobs. Following further discussions and consultation, the report led the Club to a preferred site of the existing Wimbledon Greyhound Stadium.

The criteria used to evaluate the sites and the findings were:

Public sector support at the highest level. It was evident that cross-party support existed to bring AFC Wimbledon back to Merton.

Current use of land and property. The existing uses of the preferred site do not appear to bring a commercially attractive return and there is evidence of a lack of investment in the site.

Regeneration capacity. The redevelopment of the preferred site has the capacity to stimulate further enhanced development both within Merton and beyond.

Access. The preferred site is well serviced by public transport, and, for football events, whether access to public transport is sufficiently close to encourage its use, but at the same time sufficiently distant to ensure an orderly flow of crowds before and after major events.

Appeal to public/private sectors. The proposed development would attract private investors in the housing and commercial elements, but would also appeal to public sector bodies who would be encouraged to use the sporting 'hub' as an alternative training/educational centre.

Brand development. AFC Wimbledon has a brand value which can extend beyond football. LBM has been invited to work alongside AFC Wimbledon to optimise value to both the Club and LBM

A further factor to consider is the 'AFC Wimbledon market'. The population of Wimbledon is relatively young (approximately 50% in the 15–45 age group) and there is also a documented need to increase the attractiveness of the eastern area of the borough. The potential for attracting families and the subsequent social benefits of that commitment is clear. The objective for AFC Wimbledon is to secure local support by providing a suitable social sporting attraction for both the ordinary fan and the corporate supporter, and to convert that loyalty and associated spending patterns into a benefit for the Club and Merton. This would involve redirecting spending patterns from perceived 'top attractions' (e.g. Chelsea, Fulham) to a local but passionate and friendly destination. The club has a history and culture which makes this a realistic possibility.

LBM have already declared that they want AFC Wimbledon back in Merton. The Wimbledon Greyhound Stadium site is capable of achieving this and other sporting uses. A new stadium will act as a catalyst for regeneration in Merton and beyond. These factors gave an added momentum to the

selection of Wimbledon Stadium as the preferred site.

In contrast, the club recognised that any expansion of its existing stadium in Kingston would always be limited by physical constraints which would stifle the ambitions of the club, and that the Kingston stadium had been seen as a transitional home for a club that had its roots in Merton.

Wimbledon Stadium

Wimbledon Greyhound Stadium dates from the 1920s and has been refurbished in a piecemeal manner over the years. The stadium has a capacity of about 9,000, although in its heyday as many as 40,000 people attended events there.

The site covers approximately 12 acres (5 hectares) and the stadium footprint occupies roughly two-thirds of the site. The site is on the border of Merton and Wandsworth boroughs, at the north-east of Merton. It is bordered by Plough Lane, Riverside and Summerstown. To the west is an electricity sub-station and some light industry. To the south-west is Reynolds Gate, the residential development of about 600 units on the site of the historic home of Wimbledon FC.

The existing Wimbledon Greyhound Stadium is tired, and it is understood that the greyhound operation is challenged. This is perhaps the one area in Merton that has significant vacant, underused and inefficient land and property. As the site has an existing stadium use and is very close to the original home of Wimbledon FC on Plough Lane, it is seen as the obvious location for a new football stadium.

Part 4:

National and London Planning Policy

National Planning Policy Framework

The National Planning Policy Framework (NPPF) is the new national planning guidance and provides a framework within which communities can produce their own distinctive local and neighbourhood plans.

The NPPF encourages positive planning for the provision and use of community facilities such as sports venues (Para. 70) and the values the contribution that sports and recreation makes to the health and well being of a community (Para. 73). In particular, it states that planning policies should be based upon up-to-date assessments of the need for sports and recreation facilities and identify opportunities for new provision (Para. 73).

The London Plan

The London Plan is the overall strategic plan for London. It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital up to 2031. It forms part of the development plan for Greater London. For LBM, this means that its local plans need to be in general conformity with the London Plan, and policies in the London Plan guide decisions on planning applications by councils and the Mayor of London

London has limited opportunities for accommodating large-scale development. However, suitable areas are identified in the London Plan, including 33 Opportunity Areas and 10 Intensification Areas. The most important for LBM is the designation of South Wimbledon/Colliers Wood as an Intensification Area.

London's Opportunity Areas and Intensification Areas are viewed as key to planning development and can offer new homes and jobs. In short, these areas are seen as the locations where London's future growth can be targeted.

The London Plan makes a commitment to achieve new regional parks in London, including Wandle Valley Regional Park. AFC Wimbledon is committed to consultation in respect of the Wandle Valley Regional Park and in particular the unique habitat and biodiversity of the River Wandle and enhancing pedestrian access to the Wandle Valley Regional Park.

Master Plan

AFC Wimbledon proposes to produce a master plan in partnership with LBM to guide the redevelopment of the Wimbledon Greyhound Stadium site. Some of the considerations that will be taken into account are as follows:

The new stadium should not be a standalone sports and event venue. It should be embedded in a mixed-use development and become an integrated part of the urban fabric, and it should seek to support wider area regeneration initiatives.

The new stadium should become a destination within the urban environment and will be developed and operated as a commercial project to be vibrant all year round not just on match or event day.

The new stadium will be in a part of Merton where its presence will support, not hinder, further property development.

There will be a strong, well-thought-out business plan for the new stadium, a thoughtful and exciting design response to the local context and engagement with the local community. With these building blocks in place, a stadium can successfully anchor a new mixed-use project in a revitalised urban neighbourhood.

The components of the enabling development will have a clearly identified market position, use and business plan that fits within the wider area's strategic concept as a development project and that enabling development will underpin the capital investment required to deliver the Stadium

There will be integration of a well-thought-out mix of complementary uses with innovative use of space that considers the ebb and flow of fans and other visitors. As a result, fans will come early to games and remain afterwards to enjoy the environment locally, and when leaving they will have simple and easy access to the local area and to local transport.

The development will ensure that AFC Wimbledon, as the anchor sports team, engages beyond the stadium and into the local community. For example, AFC Wimbledon's brand will be extended via a range of commercial and non-commercial uses that help to promote the value of the club and the stadium to the Merton community.

The urban area should operate efficiently when the stadium is operating at peak capacity, and on days when there are no major events the street fronts and public spaces should be animated through businesses (for example shop units incorporated into stadium frontages), events and activities.

There should be first-class connectivity, signage and way finding that makes using the stadium and the enabling development easy for fans, occupiers and visitors alike. This should also ensure that the arrival and dispersal of large crowds minimises disruption to local residents, and that local business has the opportunity to benefit from stadium development.

AFC Wimbledon will liaise with LBM and the Environment Agency to address flood issues and incorporate appropriate flood mitigation measures into the design of the proposed development.

Part 5: The Stadium

Capacity and Phasing

The proposed stadium will be designed to have an initial capacity of 12,000 spectators, with the ability to increase to a capacity of approximately 22,000 as AFC Wimbledon grows. This expansion will be a phased development process over a period of time to match the anticipated growth in the support for the Club. The initial 12,000-capacity stadium will have a significant proportion of the permanent facilities in the west (main) stand which will contain the hospitality/conferencing provision. This will enable the club to operate the stadium in an efficient manner on both matchdays and non-matchdays.

The stadium will be specifically designed to allow a phased expansion towards its final capacity. Of key importance in creating a vibrant destination is the use of the expansion space during the intervening period. The Club have engaged with a specialist who will be responsible for the dynamic exploitation of the expansion space in order to engage with the wider community on matchdays and non-matchdays.

The transition from 12,000 to 22,000 has been shown to be achievable within the identified footprint of over 36,000 square metres (3.6 hectares).

The need to integrate the stadium development with the overall development is fully understood and, in particular, the interface between the two will be a primary objective for the master planning team. The outcome will be a dynamic, vibrant centre which embraces residential, commercial and sporting objectives in a holistic solution on the site.

The design will incorporate reusable components to facilitate a sustainable and cost-effective transition to the final configuration as a 22,000-seat Championship league stadium. The club have engaged experts in sports, business planning and Stadia design who have extensive experience of sports facility transformation through work on venues for the London 2012 Olympic and Paralympic Games and other major UK and international sporting events and stadiums.

The Principal Objectives of the Stadium

Over the past ten to twenty years, stadiums across the world have become increasingly sophisticated destinations, not only in terms of the event day experience they provide but also in the mix of supporting uses incorporated in and around them. At the same time, stadium developments have increasingly been used as drivers of urban renewal, city positioning and place brand development. So for AFC Wimbledon in Merton, a stadium should ideally:

- act as a catalyst for the revitalisation of the wider area and contribute to enhancing the Merton (Wimbledon) brand as a place to live, invest in and visit
- exemplify best practice in stadium business planning, design, development, operations and management
- be a 'scaleable' stadium during future phases of development. This must consider not only core stadium operations but also the surrounding urban fabric.
- be fully conscious of supporter preferences and seek to bring spectators close to the action and

provide a more intimate experience. This trend is evident in the return of terracing to smaller European football stadiums. Providing sections of cheaper terracing is popular with fans, for both affordability and atmosphere.

- be a ground-breaking stadium in design terms by being part of a strong urban block that recreates the look and feel of the traditional football ground in the urban environment, but with modern operational expertise minimising disruption to local residents
- have an emphasis on 'green' design and environmental sustainability
- have a first-class playing surface with dimensions to accommodate other sports and top-quality facilities for AFC Wimbledon and its supporters
- be financially viable and operational all year round
- secure the long-term future of AFC Wimbledon
- contribute positively to AFC Wimbledon playing budgets
- create a destination and buzz through the strong urban design response
- offer a hub for the AFC Wimbledon community and the wider Merton and South London area to facilitate community building and shared-experience destination, and similarly a hub for business, educational, meeting and conferencing opportunities.
- use new technology in innovative ways, for example smart cards that combine access control with pre-payment, and interactive experiences (e.g. 'play with the stars') and cutting-edge audio-visual entertainment systems.

Part 6:

Transport, Parking and Highways

The site has a PTAL rating of 3 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 has prepared an initial strategy for home and away fan zones and fan routes from public transport and a comprehensive study will accompany the planning application. The Club will have substantial 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. Match day fans will be actively encouraged to travel by 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.

Part 7:

AFC Wimbledon Suggested Land Use Designation in Sites Allocation

The potential for intensification of the Wimbledon Greyhound Stadium site is supported. The site can accommodate other uses that will be of benefit to the local area and may also be required to support the creation of a new stadium for AFC Wimbledon. The additional uses may include some or all of the following:

Sports Intensification (Use Class D2)

The current use of the site is Greyhound Stadium (D2 Use Class) and car park (Sui Generis Use Class). LBM's preferred use of the site is for the intensification of sporting activities (D2 Use Class) and this is supported. AFC Wimbledon proposes this Use Class D2 remain the planning designation for the site with a multi sporting use stadium having pitch dimensions designed to also accommodate other field team sports such a Rugby and Gaelic Games to intensify the sporting use on the site.

Hotel and Conference Centre (Use Class C1)

The Hotel could comprise 135 bedrooms, which is the optimum size for the efficient operator of an ancillary conference facility of this size. The Hotel could be located and connected to the conference facility within the stadium to maximise the interaction with the conferencing facility and other events bringing long term business and profile to Merton. The stadium design will take account of conference and 'event' requirements in terms of spatial layout as well as functional issues such as catering and parking. South London has few dedicated conference facilities and Merton has very limited capacity.

The stadium could include as part of the West Stand a hospitality capacity of approximately 1,000 clients rising to 1,500 - 2,000 in its final configuration.

AFC Wimbledon and their advisers have completed extensive research with tours of facilities and interviews with management at clubs such as Exeter RFC who operate highly successful and flexible conferencing facilities at Sandy Park in Exeter.

Residential (Use Class C3)

AFC Wimbledon recognises that the site is in a flood area. The Club will submit a detailed Flood Risk Assessment for agreement with LBM that addresses the flood issues. This will ensure an effective solution to mitigate the flood risk and ensure the safety escape of the occupants.

The proposed location of the new stadium approximately on the footprint of the existing stadium will act as an acoustic barrier and visual screen between the electrical substation and the proposed residential development.

The lack of open public realm space in the immediate vicinity of the site means that particular attention will be paid to the provision of high quality public realm space together with green and landscaped areas for residential occupants within the residential development.

Educational (Use Class D1 Non Residential Institutions)

It is recognised that significant pressures exist on crèches, schools and higher educational institutions in Merton. AFC Wimbledon, as well as expanding the program it currently undertakes with schools

in Merton and beyond, and the financial contributions that would be required towards education provision in Merton as part of the planning consent would like to see educational use included in the class designation. The Club will work with LBM and other stakeholders to enable significant areas for education facilities as part of the overall regeneration scheme.

Amenity Retail (Class A1)

Amenity Retail Use should be introduced to the enabling development that complements the existing comparison retail on the opposite side of Plough Lane and to enliven the daytime environment of the regeneration project. The selection of retail uses is very sensitive given the vacant commercial units at Reynolds Gate but the Wimbledon Stadium site is a better located for retail use as evidenced by the existing retail park.

Accordingly, we request that LBM's policy for this site (No. 37) states:

“Intensification of sporting activity (D2 Use Class) that could involve the construction of a new stadium (of at least 22,000 capacity) and other uses. The range of other uses will need to be considered in terms of compatibility with the sporting activity, and other site constraints. Other use(s) that are promoted to “enable” the sporting activity will be considered on the merits of the specific case”.

Part 8:

Employment and Sustainability

A stadium led mixed use residential and retail development will create significant levels of new employment in Merton with up to 750 permanent jobs being created. The creation of local jobs creates sustainable use of local transport links replacing the commute to jobs outside of Merton. The National Planning Policy Framework attaches significant weight to the creation of new jobs in the current economic environment.

Part 9:

Conclusion

The AFC Wimbledon story, achievements and brand are strong, while the market position and well recognised destination brand of Wimbledon also play out powerfully at local, regional, national and international levels.

A successful project at the Wimbledon Greyhound Stadium site to create a new quarter of mixed-use regeneration in Merton with the new stadium at its heart would be seen as a great London project and a leading international example of a stadium-led revitalisation in a complex urban environment.

The initial studies carried out by the Club and its advisors indicate that a financially viable solution is achievable, providing the Club with a realistic starting point from which it can realise its ambitions.

This is a very exciting and very challenging initiative, and given the history of AFC Wimbledon and the Merton area, it will have local, national and international resonance.

A successful stadium-led project will provide a strong foundation for the future success of both AFC Wimbledon and Merton.

Erik Samuelson, Chief Executive, AFC Wimbledon

Matthew Breach, Chairman, The Dons Trust Board