

South Western Project, Lord's Cricket Ground, St John's Wood

in the City of Westminster

planning application no. 15/07111/FULL

Strategic planning application stage II referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of the existing Tavern Stand, Allen Stand, Thomas Building MCC Office Building and Scorers Box and redevelopment comprising the erection of new stand, new Thomas Lord Building, an expanded basement, new Harris Garden Building, new scorers Box, internal and external alterations to the Pavilion, a new shop in the Bowlers Annexe together with relocation of the floodlight, hard and soft landscaping, servicing facilities and all necessary ancillary and enabling works, plant and equipment.

The applicant

The applicant is **Marylebone Cricket Club** and the architect is **Populous**.

Strategic issues

The strategic issues raised at the consultation stage regarding **urban design, inclusive design, energy** and **transport**, have been addressed through the provision of further information and measures secured by planning condition or obligation. As a result the application is now considered acceptable in strategic planning terms.

The Council's decision

In this instance Westminster City Council has resolved to grant permission.

Recommendation

That Westminster City Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 13 August 2015 the Mayor of London received documents from Westminster City Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 1C of the Schedule

to the Order 2008: *“Development which comprises or includes the erection of a building of one than 30 metres high and outside the City of London.”*.

2 On 28 September 2015 the Mayor considered planning report D&P/3218a/01, and subsequently advised the Council that while the application was supported in strategic planning terms, there were some outstanding issues that needed to be resolved and these were set out in paragraph 48 of the above-mentioned report.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 27 October 2015, Westminster City Council decided that it was minded to grant planning permission, for the revised application, and on 11 November 2015 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct the Council under Article 6 to refuse the application or issue a direction to the Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 24 November 2015 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 At the consultation stage Westminster City Council was advised that while the application was supported in strategic planning terms, there were some outstanding issues that needed to be resolved and these were set out in paragraph 48 of the above-mentioned report:

- **Principle of development:** The proposals to develop Lord’s Cricket Ground are in line with the objectives of the Mayor’s Sports Legacy Plan and the London Plan and are fully supported in strategic planning terms.
- **Urban design:** The overall design of the South West Project is supported. The applicant should however provide further information on the proposed arcade at the base of the new stand.
- **Inclusive design:** The overall strategy is supported and the Council should ensure an appropriate set of conditions requiring the submission of a detailed inclusive design strategy prior to commencement. The applicant is encouraged to continue its consultation with the Disabled Member’s Group to inform the detailed design stages.
- **Energy:** The applicant should provide further information regarding the size and location of the energy centre, the capacity of the proposed ground source heat pump and information on the uses and heat demands throughout the year of the Lords Cricket Ground as a whole, and on the heating systems currently present on site. In addition the applicant should liaise with the Council to ensure that the short fall in carbon dioxide reductions is met off-site.
- **Transport:** The proposals are broadly acceptable in strategic transport planning terms, subject to the submission of further information regarding any changes to TfL public highway, measures to encourage cycling to the site, trip generation, the submission of a coach management plan, and the Council securing a delivery and servicing plan and construction logistics plan, as set out above.

Urban design

6 As set out in the Mayor's initial representations, the overall design of the South West Project was supported. As requested, the applicant has provided further clarification on the materials used for the new street facing arcade that will address St John's Wood Road, confirming that the arches will allow views into the ground. This will provide a degree of animation onto the adjacent pathway which is welcomed. The pre-cast concrete arches reflect the proportions and materiality of the existing arches of the adjacent Mound Stand which helps provide a common boundary treatment and better reflects the character of the conservation area and improves the setting of the listed Grace Gates.

7 As recommended at the consultation stage, the detailed design of the proposed new building and stands has been secured by a number of planning conditions which is supported and will help ensure a high quality design is built through to the final development.

8 In addition to the above, it is noted that the residents of Century Court and the resident's association have objected to the application on the grounds that the new Thomas Lord building, by virtue of its increase in height of two storeys, will negatively impact on their outlook and privacy and the amount of daylight and sunlight received at those windows which face the building. The representations particularly object to the loss of light to the ground floor kitchen window to the porters flat and to the living rooms of the first to fourth floor flats above.

9 In addition to Century Court, the new stand will affect the current levels of daylight and outlook to the flats at St John's Wood Court on the opposite side of the St John's Wood Road, and the new MCC office building will affect the level of light and enclosure experienced at No 4 Grove End Road; a neighbouring house.

10 The applicant has carried out a daylight and sunlight assessment to support the proposals which includes the neighbouring and nearby properties that would be affected by the proposals. As set out within the Council's planning committee report, while it is accepted that a number of windows in neighbouring properties will experience some loss of daylight compared to the existing situation, most losses are within the BRE guidelines (20% reduction in vertical sky component), and in a small number of cases where the loss is likely to exceed the guidelines this is not considered so significant as to warrant the refusal of the application on these grounds. It is also noted that many of the windows that would experience the largest losses in VSC are for rooms that are also lit by other windows, which helps mitigate any impact.

11 It is also noted that a planning condition requiring the submission of an operational management plan for the relocated public house within the Thomas Lord Building and for the public use of Harris Gardens for both match and non-match days that will include any mitigation measures to protect the amenity of neighbouring residents, the hours of operation and will allow for a review after six months of operation, has been secured. Furthermore, it is noted that the glazing of the top floor of the Thomas Lord Building will be obscured, as will the top floor of the new stand to prevent views into neighbouring properties. It is also noted that a planning condition has been secured preventing the use of the roof of the Thomas Lord building as a publicly accessible roof terrace to further prevent any disturbance or loss of amenity to neighbouring properties.

Inclusive design

12 As set out at the consultation stage, the overarching inclusive access strategy has been informed by the ongoing consultation with the MCC Disabled Members Cricket Group and is supported as it demonstrates that the project would significantly improve the accessibility of this part of the ground particularly where new buildings and stands are proposed, helping achieve one of the key drivers for the grounds redevelopment.

13 GLA officers note that compliance with the access arrangements demonstrated in the approved drawings and as set out in the design and access statement is secured by planning condition and this is supported in accordance with the comments made at the initial consultation stage.

Sustainable development

14 In response to the comments raised at the initial consultation stage, the applicant has provided further information on the likely installed capacity of the ground source heat pump and clarification on how the ground source heat pump and the solar thermal system will be integrated. This is welcomed and no further information is required.

15 The applicant has also provided further detail on the thermal modelling that was undertaken to assess the risk of overheating which demonstrates that two out three CIBSE criteria can be met and will therefore satisfy the CIBSE recommendations for overheating. For the 2003 and 1976 Design Summer Years the Harris Garden Building is not expected to meet the CIBSE recommendation as more than two criteria will not be met. Due to the low usage and transient nature of this space the applicant considers that the exceedances are considered acceptable and is not proposing that mechanical cooling is included as a solution. Given the low frequency of occupation, this is accepted in this instance, however, the applicant should continue to monitor the performance of the building with regard to overheating and investigate the opportunity for further passive design measures as the detailed design progresses.

16 It is acknowledged that there is a marginal exceedance in the solar gains limit (0.8%) in North West facing Box. This is accepted in this instance, on the basis that the applicant has stated that the design team will seek to reduce solar gains for those areas identified during the next design phase through a review of g-values and the inclusion of internal blinds. However, the applicant should investigate this now as it is important that the principles of effective solar gain control are addressed at this stage as they could potentially impact on the visual appearance and layout of the building.

17 In light of the comments made at the initial consultation stage, the additional information provided and the commitment from the applicant to exploring further opportunities to reduce solar gains as the detailed design progresses, the proposals are considered acceptable in strategic energy policy terms.

Transport

18 In accordance with the comments made at the initial consultation stage, planning conditions and obligations have been agreed to secure a travel plan, service management plan and tree protection provisions. In addition, various pre-commencement conditions relating to construction management have also been agreed. It has been confirmed that two additional blue badge spaces would be created and there would be an overall reduction in parking. It is noted that 20% of all the parking spaces will be equipped with electric vehicle charge points. Whilst these aspects of the scheme are welcomed, despite Transport for London's (TfL) request there would be no increase in cycle parking to support the development.

19 The clarifications requested on the proposals involving TfL public highway and adjacent mature trees have not been provided. However, these would be subject to control through a section 278 agreement and other necessary agreements with TfL.

20 In light of the above, whilst it is disappointing that there would be no additional cycle parking, in the circumstances it is not considered a sufficient reason to recommend that the Mayor refuses the application. In all other aspects, TfL is satisfied that the proposals are in general accordance with the transport policies of the London Plan.

Response to consultation

Public consultation

21 Westminster City Council publicised the application by sending notifications to local owners and occupiers and the erection of site notices. In response 29 letters were received by the Council objecting to the proposals.

22 For the convenience of the Mayor the objections can be summarised as follows:

- Land use: Objectors are not convinced of the need for increasing the grounds capacity; the redevelopment is too extensive; the redevelopment will cause many years of interruption to daily life of local residents; the applicant has not taken residents' suggestions and objections.
- Design/heritage impact: Object to the loss of existing stands; new stand should not be taller than existing structure; should be a more appropriate form of development that is more in keeping with Lords; the new stand in its proximity to the Grade II* Listed Members Pavilion will cause substantial harm to its setting; the new stand is taller than the Pavilion and will dwarf and overshadow this listed building; the minor post-consultation amendments have not reflected local concerns; the retractable seats will be highly visible and the extra capacity they provide do not justify the harm to the listed pavilion and should be removed; only one drawing showing height and relationship with the pavilion; the new stand will be as high as the pavilion turret and will dominate it.
- Amenity: Loss of lights and increase sense of enclosure to flats in Century Court due to the increase in height of Thomas Lord Building; no further visuals demonstrating from the view from the flats have been provided; loss of privacy to Century Court residents; noise pollution from the beer garden in Harris Garden will cause disturbance to Century Court residents during the day and into the evening all year round; police have recently been called out to an incident at the public house; noise from corporate events; oppose proposals for new bars and restaurants, especially in open air plans for drinking and hospitality due to increased nuisance; Lords brings disruption, noise and pollution on match days and the proposals will make matters worse; no benefits to local neighbourhood on non-match days; Lord's should create a sports facility with discounted membership for local residents to acknowledge them and thank them for their patience; the Harris Gardens should remain as a 'champagne and Pimms bar' on match days only.
- Transport and highways: Increased traffic in a crowded residential area with many schools and young and old residents; the bus stop on Grove End Road should not be moved or removed as a result of the proposals.
- Other: Question Lord's claim that it is a big employer in the area as most of their staff are temporary agency workers; documents online are unavailable.

23 The objections raised during the public consultation process are addressed in within the Council's committee report and do not raise any strategic issues that have not already been considered in the stage one report or this report.

Responses from statutory consultees and other organisations

24 The statutory consultees issued responses to the consultations covering the following issues:

- **Historic England**: Were minded to direct the granting of the listed building consent. It was acknowledged that the Allen Stand and bridge retain some architectural and historic

interest, but were unlikely to meet the very high standards for statutory listing and it therefore did not wish to resist the loss of the stand. It considered that the new design was not overbearing and far enough from the Pavilion to not intrude significantly on its setting. Furthermore, it considered that the roof structure has a family resemblance with the existing and consented structure across the complex but it sufficiently distinct to sustain the concept embedded in the masterplan. It did consider that the size of the scoreboard and retractable raked seating above it would be a distracting feature within the setting of the Pavilion and requested that the Council satisfy itself that there is no other configuration for the seating across the Allen Stand that would eliminate the need for the retractable seating and that the dimensions of the scoreboard are the minimum necessary. The Council was also urged to explore with the applicant the necessity of illuminated advertising in this location, or whether this could be limited or controlled so as to not visually compete with the Pavilion. Further amendments that might enhance the seating in the Pavilion were recommended. In conclusion, the Council was advised that where harm cannot be avoided, it must weigh this against the public benefits of the scheme, including securing the long term future of the grounds as the home of cricket. In all other respects, it considered the scheme to be well conceived and capable of delivering a much improved public realm and enhanced setting for the Grace Gates as well as the area to the rear of the Pavilion. It is noted that the Council has explored alternative options for the retractable seating and scoreboard location with the applicant and assessed them within the committee report. The Council accept the proposed location of the scoreboard cause an element of harm to the setting of the Pavilion, but this is considered the most appropriate location and the harm will be less than substantial and is outweighed by the benefits of the new stand. With regards to the retractable seating, again, Council officers consider that this will cause less than substantial harm on the days when they are in use, and during the rest of the year they will not be visible.

- **Sports England:** Raised no objections.
- **Thames Water:** Identified an inability for existing wastewater infrastructure to accommodate the needs of the proposals and requested a Grampian condition be included to secure the submission of a drainage strategy, that fat traps are installed on all catering establishments, the provision of a piling method statement, in order to safeguard underground sewage infrastructure. Suitable conditions have been included in the draft decision notice.
- **St John's Wood Society:** The Society have met with the applicant and the architects on a number of occasions and significant amendments have been made to original design. The Architects have responded and developed the design in a positive, flexible and exemplary way and should be congratulated. However, concerns remained regarding the loss of light and increased enclosure for the lower level flats of Century Court, the disturbance to neighbouring residents from the relocated Tavern with balcony and use of the Harris Gardens and the maintenance of the green wall and whether tree planting might be more visually pleasing. As set out within the Council's committee report and summarised within this report, the issues raised by the society have been addressed through further assessment and mitigated through planning conditions.
- **St John's Wood Court Residents Association:** Objected to the plans on the grounds that the increased height of the new stands would not be subservient to the listed Pavilion and would result in harm to its setting.
- **Century Court Resident's:** Object to the loss of light to residents in terms of number of windows and that the submission does not address the fact that a number of balconies are winter gardens. The Association argue there is no justification for the additional height of the new Thomas Lord building which is causing the loss of light and increased enclosure and the offending floors should be removed. If MCC should locate the office development on another part of the ground. Further objections were

submitted to the relocation of the Tavern public house and the use of Harris Gardens on increased noise, emission and antisocial behaviour grounds. Objections were also raised to the impact of the new stand on the setting of the listed Pavilion and the Association considered it to cause substantial harm and that it would not be subservient to the Pavilion due to its height and proximity. As set out within the Council's committee report and summarised within this report, the issues raised by the society have been addressed through further assessment and mitigated through planning conditions.

25 The statutory responses and those received from local amenity groups and residents associations to the Council's consultation do not raise any material planning issues of strategic importance that have not already been considered by the Mayor at the consultation stage and/or in this report or addressed in detail within the Council's planning committee report.

Article 7: Direction that the Mayor is to be the local planning authority

26 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage 1, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

27 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

28 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

29 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

30 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

31 The strategic issues raised at the consultation stage regarding urban design, inclusive design, energy and transport, have been addressed through the provision of further information and measures secured by planning condition. As a result the application is now considered acceptable in strategic planning terms.

for further information, contact GLA Planning Unit (Development & Projects Team):

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28 September 2015

South Western Project, Lord's Cricket Ground, St John's Wood

in the City of Westminster

planning application no. 15/07111/FULL

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of the existing Tavern Stand, Allen Stand, Thomas Building MCC Office Building and Scorers Box and redevelopment comprising the erection of new stand, new Thomas Lord Building, an expanded basement, new Harris Garden Building, new scorers Box, internal and external alterations to the Pavilion, a new shop in the Bowlers Annexe together with relocation of the floodlight, hard and soft landscaping, servicing facilities and all necessary ancillary and enabling works, plant and equipment.

The applicant

The applicant is **Marylebone Cricket Club** and the architect is **Populous**.

Strategic issues

The principle of the phased **redevelopment of Lord's Cricket Ground** to upgrade existing facilities is supported in strategic planning terms.

Issues with respect to **urban design, inclusive access, energy** and **transport** should, nevertheless, be resolved before the application is referred back to the Mayor at his decision making stage.

Recommendation

That Westminster City Council be advised that while the application is supported in strategic planning terms, there are some outstanding issues that need to be resolved and these are set out in paragraph 47 of this report.

Context

1 On 13 August 2015 the Mayor of London received documents from Westminster City Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. As agreed with the Council, the Mayor has until 28 September 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1C of the Schedule to the Order 2008: *"Development which comprises or includes the erection of a building of one than 30 metres high and outside the City of London."*

3 Once the Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The internationally renowned Lord's Cricket Ground is situated in St John's Wood in the City of Westminster, between St John's Wood Road and Wellington Road. The proposals relate to the south-west portion of the cricket ground including the Tavern Stand and Allen Stand, the Thomas Lord Building, the Marylebone Cricket Club shop, the Harris Garden Building and the associated public realm surrounding the Grade II Listed Grace Gates. The Allen Stand, which is the second oldest in the Ground, lies directly to the south of the Grade II* Listed Members Pavilion and adjoins the Tavern Stand. The Tavern Stand which abuts the Mount Stand on its eastern boundary is the fourth oldest, however, neither of them are fit for modern purposes as they have poor accessibility for disabled visitors and limited catering and WC facilities.

6 The proposals represent the second phase of a wider project to upgrade Lord's in order to ensure that it remains a competitive choice for hosting major international cricket matches and tournaments. The Mayor has previously considered a planning application for the redevelopment of the Warner Stand, which sits directly to the north of the Member's Pavilion and on 6 April 2014 advised Westminster City Council that he was content to allow the City Council to determine the case itself. Planning permission was subsequently granted in June 2014 and works are scheduled to start in August 2015.

7 The venue and its predominantly residential immediate surroundings fall within the St. John's Wood Conservation Area.

Details of the proposal

8 As mentioned above, the proposals form the second phase of the wider project to upgrade the existing cricket ground and comprise six main components. These include the provision of a new Tavern Stand and Allen Stand including new restaurant and conference facilities, a new Thomas Lord Building, a new Harris Garden Building, the internal reorganisation of the Members Pavilion and the reconfiguration of the entrance area around the Grace Gates. As a result of the redeveloped stands the capacity at the Pavilion end will provide a moderate increase in capacity to

approximately 1,082 seats but will deliver significantly improved spectator views of the cricket, improved disabled access and supporting facilities.

9 In addition to the increase in capacity, the proposals would enable the consolidation of existing offices, of which there are currently 52 locations around the site, within a new Thomas Lord Building. The new building will also provide a new reception facing on to St John's Wood Road and into the ground, including a new extended basement that will accommodate the delivery and servicing requirements, thus removing the need for vehicles to enter through the listed Grace Gates.

10 The newly proposed Harris Garden Building will provide two extra dressing rooms which will enable Lord's to host several teams on a single day and will be linked through to the Members Pavilion via the Memorial Building. The internal alterations consist of reorganising and repurposing the existing space to provide more space for international teams and match day officials in order for the facilities to meet the requirements of the England and Wales Cricket Board and the International Cricket Council.

11 In addition to the above, a new entrance court will be created around the listed Grace Gates providing an improved arrival experience for spectators and visitors.

Case history

12 The applicant engaged in pre-application discussions with GLA officers regarding the proposals for the application site in March 2015. The discussions concluded that the proposals to update Lord's Cricket Ground to ensure it remains a competitive choice for hosting major internal matches are tournaments are fully supported in strategic planning terms. However, the applicant was advised that the further comments provided regarding urban design, heritage, inclusive design, sustainable development and transport should be fully addressed within any future planning application submission.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

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|---------------------------|--|
| • World city role | <i>London Plan</i> |
| • Urban design | <i>London Plan</i> |
| • Tall buildings/views | <i>London Plan, Revised View Management Framework SPG</i> |
| • Historic Environment | <i>London Plan; World Heritage Sites SPG</i> |
| • Ambient noise | <i>London Plan; the Mayor's Ambient Noise Strategy;</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |
| • Transport/parking | <i>London Plan; the Mayor's Transport Strategy</i> |

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the January 2011 City of Westminster Core Strategy, and the London Plan (with Alterations since 2011).

The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- The London View Management Framework (March 2012).

Principle of development

15 Lord's Cricket Ground has no specific land use designation in the London Plan or the City of Westminster's Core Strategy Proposals Map (other than to identify part of the western side of the Grounds as being in an area of open space deficiency and the venue as being within the St John's Wood Conservation Area).

16 Nonetheless, the masterplan proposals for a phased update of London's premier international cricket venue is, in principle, wholly consistent with the London Plan vision (policies 1.1 and 2.1) to retain and extend London's global role as an internationally competitive and successful world city. More specifically, London Plan Policy 3.19 provides that development proposals that increase or enhance the provision of sports and recreation facilities will be supported; whilst those that result in a net loss of such facilities, including playing fields, would be resisted. Paragraph 3.110 of the plan further acknowledges that sports and recreation facilities are important parts of the social infrastructure, providing a range of social and health benefits for communities and neighbourhoods. Furthermore, London Plan Policy 4.6 supports the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits they offer to its residents, workers and visitors.

17 Furthermore, supported by the Mayor's Sports Legacy Programme, the London Plan looks to ensure that the development of sports facilities is given increasing prominence up to and after the 2012 Olympic Games. The proposals to develop Lord's Cricket Ground and ensure it remains a competitive choice for hosting major international matches and tournaments are in line with the above policy objectives and are, therefore, fully supported in strategic planning terms.

Design and heritage

18 As set out during pre-application discussions, the proposals enable the continued upgrading of existing spectator facilities to better address the requirements of a world class sports venue, while providing an enhanced arrival area at the Grace Gates entrance, with improved access arrangements and legibility for spectators. This is welcomed.

19 The proposed Thomas Lord Building introduces a more consistent building edge, aligning with the Harris Garden building to the north while opening up views of the southern gable of the Grade II* listed Member's Pavilion. A vehicular ramp with direct access from St John's Wood Road enables servicing access to be contained at basement level, allowing the amount of entrance area to be maximised and flanked by public facing, active frontages.

20 The height and massing of the new Tavern & Allen Stand sits comfortably with that of the recently approved Warner Stand, providing a consistent level of enclosure to the sports ground and a balanced massing relationship with the Pavilion. While the proposal involves a height increase of approximately five metres overall, the scoreboard and northern section of the stand has been rationalised and designed to be reduced in height in comparison to the existing configuration. This, in conjunction with retaining the 'Baker's Gap', maintains visual separation between the new stand and the Member's Pavilion and the simple and refined form of the

glazed bridging element provides a clear contrast and differentiation between old and new elements whilst opening up the views into the ground through the gap. It is understood from the submission that this intervention will also provide the opportunity to restore the stonework to the south gable of the pavilion, following the removal of the existing bridge, which is recognised as having little heritage/architectural value. The applicant has stated that the materials used as part of the reinstatement of the original facade design will be agreed with Historic England. This approach is welcomed and accords with both the NPPF (paragraphs 131 and 132) and London Plan policies 7.8 and 7.9 on the historic environment, subject to the Council securing the key details via appropriate planning conditions.

21 With regards to the wider context, the proposed height and massing of the new stand and office building remain recessive in relation to that of the neighbouring fifteen storeys Century Court and nine storey Pavilion Apartments block on the opposite of St John's Wood Road, raising no specific strategic issues. However, it is acknowledged that the new Tavern & Allen Stand and Thomas Lord Building will encroach further towards the boundary, marginally increasing the scale of development on the St John's Wood Road. However, as illustrated in the views provided by the applicant, it is considered that the new build elements remain broadly in keeping with the scale of the existing Mound Stand, do not appear over bearing and will provide a more formal presence for the main entrance to the International Cricket Ground. Furthermore, the inclusion of an arcade at the base of the new stand of similar dimensions to that screening the Mound Stand will provide a more consistent appearance to the boundary of the ground and contribute towards a high quality streetscape. Notwithstanding this, further information on the materials used for the new arcade is welcomed and whether the arches will be visually permeable to allow views into the ground. The applicant should also address those comments in the transport section below regarding the pedestrian environment.

22 The intention to open up and frame the listed Grace Gates is welcomed and the scale and massing of the proposed Thomas Lord Building creates a more legible and improved sense of arrival into the ground while providing visual consistency with the proportions and scale of the new stand. This is further improved by the replacement of the existing red brick boundary wall with visually permeable, perforated, ornate metal fencing; which appears subservient to the listed gates and enhances their setting. The double height entrance area to the Thomas Lord Building helps to maximise the openness of the entrance area, however, the architectural detailing and use of facing materials to the soffit in particular require careful consideration to achieve a high quality and refined appearance that does not detract from the setting of the listed gates. The Council should therefore secure these details by condition.

23 As requested, the applicant has submitted a detailed Heritage and Townscape Assessment assessing the impact of the proposals on the adjacent residential dwellings, the wider St John's Wood Conservation Area and the Regents Park Conservation Area. It is considered that the proposals will not harm the setting of the conservation areas, particularly in the longer views towards the site.

24 While it is considered that the overall mass of the proposals will not harm the adjacent conservation areas, it is acknowledged that the telescopic floodlight mast will be visible (except in views from Regents Park) in some of the closer views when extended for evening matches. However, it is considered that this impact will be no greater than the existing situation with the current mast extended and will be temporary due to the retractable nature of the structures.

25 The architectural approach to the new stand is broadly supported and the visual information provided suggests that a high quality appearance can be achieved through a simple massing arrangement. The undulating form of the proposed canopy introduces a distinctive form

suitable for a high profile building, while complementing the varying existing use of fabric canopies within the ground.

Inclusive design

26 One of the key drivers to redevelop the ground is to improve its accessibility. As set out at the pre-application stage, the applicant has engaged with the MCC Disabled Members Group which has helped inform the inclusive design strategy; prepared by People Friendly Access Consultants, which is welcomed. The approach set out within the strategy considers the issues that need to be addressed at the detail design stage and is broadly acceptable at this stage.

27 It is understood that the new stand, including circulation routes and associated facilities, will be fully accessible with each level served by two lifts which are large enough to accommodate two wheelchair users; this is welcomed. In response to requests from the Disabled Members Group, a variety of wheelchair accessible seating with associated companion seating is proposed at pitch-side and each level above, including box seating. This will be provided throughout the stand and within different seating categories to provide a choice of views which is supported. The seating will also be within acceptable distances of accessible WC facilities.

28 With regards to the alterations to the Members Pavilion, the refurbishment works include significant improvement to player facilities and it is understood that they are designed to be as accessible as possible. However, it is accepted that there are constraints imposed by the listed nature of the building and that it is not possible to make it fully accessible. Disabled cricket is currently only played on the nursery ground, however, it is understood that there are aspirations to host disabled matches on the main pitch in the future which is welcomed. Should this be possible, it is envisaged that teams of disabled players would be accommodated within the new accessible dressing room facilities in the new Harris Garden building. This is accepted.

29 The overarching strategy is welcomed and demonstrates that the project would significantly improve the accessibility of this part of the ground particularly where new buildings and stands are proposed. The applicant should continue to consult with the Disabled Members Group as the detailed design progresses. In order to ensure that the detailed design meets the relevant standards and delivers fully-accessible and world class spectator facilities, the Council should secure an appropriate set of planning conditions requiring the submission and approval of a detailed access strategy prior to commencement.

Sustainable development

30 The applicant has applied the energy hierarchy detailing savings through the provision of energy efficiency measures of 1% and savings of 22% from the use of renewable technologies, in this case solar thermal and photovoltaic panels on the roof and the use of a ground source heat pump (GSHP) to provide heating and cooling for the building. The applicant should clarify how the GSHP will operate alongside the solar thermal heating and is recommended to review Appendix 3 of the GLA energy assessment guidance for further information.

31 As part of this exercise, the applicant should provide additional information on the likely installed capacity of the heat pump and the heating and cooling demand to be met by the system. Due to the intermittent nature of the heat load associated with the proposed use, the applicant is not proposing to use of a Combined Heat and Power (CHP) unit and this is accepted in this instance.

32 The demand for cooling will be minimised through shading and a dynamic thermal modelling exercise was carried out to assess the risk of overheating in the Harris Garden Building

(naturally ventilated) using CIBSE TM52 and TM49 guidance. However, the applicant has not commented on the results and the table provided appears to show that the requirement for meeting two of the three criteria is not met for most of the design years assessed. The applicant should review the results and clearly outline where a criterion has not been met.

33 For the spaces with mechanical cooling the applicant has provided the cooling demand which shows that for each space the demand is lower than the notional performance. However, it is noted from the supporting data that the solar gains are exceeded in a number of zones. The applicant should therefore review the performance in these areas and where necessary include additional passive measures.

34 The applicant has also carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. The applicant is proposing to install a site heat network for the South Western Project with all proposed buildings connected to the network. The applicant has also investigated the feasibility of connecting the existing buildings and stands at the cricket ground to the heat network, however, due to the intermittent nature of the building usage profiles not all of the buildings will be able to connect. It is understood that the same strategy will be followed for the Memorial Building and the Members' Pavilion which are served by the same boilers and the future East Gate Project and this is welcomed.

35 In summary, the on-site carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan. While it is accepted that there is little further potential for carbon dioxide reductions onsite, in liaison with the Westminster City Council, the developer should ensure the short fall in carbon dioxide reductions, equivalent to 33 tonnes per annum, is met off-site.

Transport

Car, Cycle & Coach Parking

36 A reduction in car parking is proposed, from 32 to 28 spaces, plus two blue badge spaces and this is supported. Any spaces to be modified as a result of the proposals should be provided with electric vehicle charging provision (active and passive) in accordance with London Plan Policy 6.13.

37 The various application documents make conflicting statements about the level of existing or proposed cycle parking for staff or visitors. It is unclear what provision would exist following this development, and whether that level is adequate in regard to the aim of London Plan Policies 6.9 and 6.13. The measures proposed aimed at encouraging an increased level of cycling to and from the site appear to be inadequate, and should be remedied. TfL will provide further comments with regard to the impact of the development upon the capacity of the local Cycle Hire stations.

38 A coach management plan should be provided and additional coach parking should be implemented on St John's Wood Road if demand shows this is necessary.

Trip Generation

39 Conflicting information is also evident within the trip generation and mode share analysis, specifically in regard to the cycling mode. Further work is required to address this and ensure that travel plan targets are appropriate and are capable of being meaningfully

progressed. The applicant should refer to the detailed comments that were issued to the Council by TfL dated 27 August 2015.

Public transport

40 The moderate impact of the additional trips expected is not considered to be significant enough to warrant any specific mitigation towards public transport facilities or services in the vicinity of the site.

Pedestrian Environment

41 Further information is required with regards to the specific changes proposed to the TfL public highway. The applicant should clearly set out on plans the existing and proposed highway layout and materials which are to be affected by the proposed development in order to allow an appropriate assessment of the proposed changes.

42 At present TfL are unable to determine whether the proposed development would result in harm to, or the loss of, a mature street tree in the vicinity of the new buildings proposed. Further information is therefore required in order to demonstrate that the development could proceed without harming the health of all street trees upon the TLRN in the vicinity of the proposed works.

Servicing and Construction

43 A delivery and servicing plan (DSP) and construction logistics plan (CLP) that accords line with TfL guidance should be secured by planning obligation or condition. The CLP should be submitted and agreed (in consultation with TfL) prior to commencement of development, and the DSP prior to first use of the stand.

Community Infrastructure Levy

44 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100 sq.m. or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £50 per square metre of additional floor space in the City of Westminster.

Local planning authority's position

45 The local planning authority's position is not known at the time of writing this report.

Legal considerations

46 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

47 There are no financial considerations at this stage.

Conclusion

48 London Plan policies on London's Global role, sports facilities, urban design, heritage, inclusive access, sustainable development and transport are relevant to this application and overall the scheme is strongly supported. However, there are some outstanding issues that need to be resolved and these and their potential remedies are set out below:

- **Principle of development:** The proposals to develop Lord's Cricket Ground are in line with the objectives of the Mayor's Sports Legacy Plan and the London Plan and are fully supported in strategic planning terms.
- **Urban design:** The overall design of the South West Project is supported. The applicant should however provide further information on the proposed arcade at the base of the new stand.
- **Inclusive design:** The overall strategy is supported and the Council should ensure an appropriate set of conditions requiring the submission of a detailed inclusive design strategy prior to commencement. The applicant is encouraged to continue its consultation with the Disabled Member's Group to inform the detailed design stages.
- **Energy:** The applicant should provide further information regarding the size and location of the energy centre, the capacity of the proposed ground source heat pump and information on the uses and heat demands throughout the year of the Lords Cricket Ground as a whole, and on the heating systems currently present on site. In addition the applicant should liaise with the Council to ensure that the short fall in carbon dioxide reductions is met off-site.
- **Transport:** The proposals are broadly acceptable in strategic transport planning terms, subject to the submission of further information regarding any changes to TfL public highway, measures to encourage cycling to the site, trip generation, the submission of a coach management plan, and the Council securing a delivery and servicing plan and construction logistics plan, as set out above.