

27 September 2024

Wimbledon Park Golf Club

Local Planning Authorities: Merton; Wandsworth

Local Planning Authority reference: 21/P2900, 2021/3609

Planning Application

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

The proposal

Cross boundary (Merton/Wandsworth) hybrid planning application (comprising part full permission and part outline planning permission) for expansion of the All England Lawn Tennis Club (AELTC) grounds onto Wimbledon Park Golf Course with the introduction of new tennis courts, tennis related infrastructure and new buildings. Full planning permission for the provision of 38 grass tennis courts and associated infrastructure, comprising of the re-profiling of the landscape and the removal, retention and replanting of trees; provision of 7no satellite maintenance buildings; the provision of a boardwalk around the perimeter of and across Wimbledon Park lake, lake alterations (including lake edge, de-silting & de-culverting), highway works to Church Road; new pedestrian access points at the northern and southern ends of the site; new vehicular access points; and the creation of a new area of parkland with permissive public access.

Outline planning permission (with appearance, means of access, landscaping and scale reserved - layout only considered in detail) for the construction of new buildings and structures, including an 8,000-seat parkland show court incorporating a qualifying player hub, guest facilities and associated event operational facilities; a central grounds maintenance hub and 2no. players hubs.

An environmental statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The applicant

The applicant is the **AELTC** and the architect is **Allies and Morrison**.

Recommendation

The Deputy Mayor for Planning, Regeneration and the Fire Service, acting as Local Planning Authority for the purpose of determining this application;

- i. grants conditional planning permission in respect of applications 21/P2900 (Merton) and 2021/3609 (Wandsworth) for the reasons set out in the approval section below, and subject to the prior completion of a section 106 legal agreement;
- ii. delegates authority to the Head of Development Management to issue the planning permission and attach, add, delete or vary, the final detailed wording of the conditions and informatives as required with any material changes being referred back to the Deputy Mayor, and authority to negotiate, agree the final wording, and sign and execute, and complete the section 106 legal agreement;
- iii. delegates authority to the Head of Development Management to agree any variations to the proposed heads of terms for the section 106 legal agreement;
- iv. delegates authority to the Head of Development Management to refer it back to the Deputy Mayor, if by 01 February 2025 the section 106 legal agreement has not been completed;
- v. notes that reserved matters applications pursuant to the outline planning permission would be submitted to, and determined by, the Mayor, unless he directs Merton or Wandsworth Councils to do so;
- vi. notes that approval of details pursuant to conditions imposed on the planning permission would be submitted to, and determined by Merton or Wandsworth Councils;
- vii. notes that Merton and Wandsworth Councils would be responsible for the enforcement of the conditions attached to the planning permission.

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Introduction

1. Having assumed authority to determine this planning application, this report sets out the matters that the Deputy Mayor for Planning, Regeneration and the Fire Service must consider in determining whether to grant or refuse planning permission and to guide his decision making at the upcoming representation hearing. This report includes a recommendation from GLA officers, as set out below.

Officer recommendation – reasons for approval

2. The Deputy Mayor for Planning, Regeneration and the Fire Service, acting as the local planning authority, has considered the particular circumstances of this application against national, strategic and local planning policy, relevant supplementary planning guidance and all material planning considerations. He has also had regard to Merton Council's Development and Planning Applications Committee report dated 26 October 2023 and Wandsworth Council's Planning Applications Committee report dated 27 November 2023, the separate draft decision notices prepared by both boroughs setting out the reasons for approval or refusal and all consultation responses and representations made on the case to Merton Council, Wandsworth Council and the GLA. The reasons set out below indicate, in summary, why this application is acceptable in planning policy terms:
 - a) The application proposes the expansion of the Wimbledon Championships site onto the adjoining Wimbledon Park Golf Course site.
 - b) The proposal represents a very significant economic benefit to the London and UK-wide economy. The projected total economic impact of the Wimbledon Championships (the Championships), with this proposal, for the UK economy on an annual basis is £336.02 million (2028 numbers) and the proposal would result in the creation of 40 year-round jobs and 256 Championships jobs. As such, the proposal would provide a very significant economic benefit to the local, regional and national economies in accordance with the NPPF; London Plan Policies E8 and E10; Merton Core Strategy Policy CS12, Merton Sites and Policies Plan (2014) (Merton SPP) Policy DM E4, Draft Merton Local Plan Policy N9.1 and Wandsworth Local Plan Policies SDS1 and LP39.
 - c) The Championships are one of the most prestigious tournaments in world tennis which attracts global visitors and contribute to London's brand as a visitor destination. The proposal would support and enhance the Championships, securing its future in this location. This accords with the NPPF; and London Plan Policy HC5.

- d) The application proposes 11.1ha of accessible public open space that has been secured in perpetuity by Section 106 (s106) legal agreement. This open space would adjoin and connect into the existing Wimbledon Park and Wimbledon Park Lake to create an interconnected area of 38.7ha (including area of Wimbledon Park Lake) of recreational space that is open to the public. The provision of publicly accessible open space that would be managed and maintained as parkland by the AELTC provide qualitative improvements and is considered to accord with the NPPF; London Plan Objective GG5 and Policies G1 and G4; Merton SPP Policy DM O1 and Wandsworth Local Plan Policy LP20.
- e) The proposal, in particular the Parkland Show Court, is representative of outstanding design, which would promote high levels of sustainability in accordance with the NPPF; London Plan Policy D4; Merton Core Strategy Policy CS14; Merton SPP policies DM D1 and DM D2; as well as Wandsworth Local Plan Policy LP1.
- f) The site is part of a Registered Park and Garden (RPG), Grade II* which sits on the Heritage at Risk Register. The proposed development has sought to avoid and minimise heritage harm whilst delivering very significant heritage benefits including removal of the golf course features, de-silting and enhancing Wimbledon Park Lake, protection of existing ancient and veteran trees as well as the production of a Conservation Management Plan. This is in accordance with Paragraphs 205, 206 and 208 of the NPPF; London Plan Policies D3 and HC1; Merton Core Strategy Policy CS 14; Merton SPP Policy DM D4; and Wandsworth Local Plan Policy LP3.
- g) The proposal has sought to remove trees that are inconsistent with the heritage landscape whilst protecting the Veteran Trees on site. A substantial level of tree planting is proposed. This is in accordance with the NPPF; London Plan Policy G7; Policy DM 02 of the Merton SPP and Policy LP56 of the Wandsworth Local Plan.
- h) The desilting of Wimbledon Park Lake represents a significant undertaking, with the lake not having been desilted or upgraded since it was originally constructed in the 1760s. This would provide ecological benefits through the improved water quality, heritage benefits through the re-establishment of the historic shape of Wimbledon Park Lake, as well as open space benefits through improvements to access and enhancement of the recreational and amenity value of the lake for sailing, angling, improved access across the new boardwalk, as well as other recreational activities. This accords with the NPPF; and London Plan Policies SI16 and SI17.
- i) The adverse amenity impacts including daylight, sunlight, overshadowing, privacy, outlook, light and noise are very limited whilst the construction impacts would not unacceptably affect neighbourhood amenity. Therefore, the proposal is compliant with the NPPF, London Plan policies D3, D9 and D14, Merton SPP Policy DMD2 as well as Wandsworth Local Plan Policy LP2.
- j) The proposal has used the opportunity presented through this application to move towards a public transport orientated event. Car parking numbers

have been significantly reduced, from 3,345 down to 1,020 across the wider site, and public transport and active travel have been supported through the application and the s106 obligations. This accords with the NPPF; London Plan policies T2, T5, and T6; Merton Core Strategy policies CS18, CS19 and CS20; as well as the Wandsworth Local Plan policies LP49, LP50, LP51 and LP52.

- k) The Wimbledon Park ES has been prepared in accordance with the EIA Regulations and is sufficient for the purposes of decision making. GLA Officers do not consider there would be unacceptable effects on the environment that would warrant refusal of the application. This takes into consideration all relevant environmental information before GLA Officers, including the findings of the Wimbledon Park ES (including addendums), relevant feedback from statutory consultees and agreed mitigation to be secured via conditions and s106 Agreement.
- l) The proposed development would facilitate very significant public open space and recreational, community, cultural, heritage, ecology, and biodiversity, economic and employment, design, and transport related public benefits. The weight that GLA officers have ascribed to those benefits is set out in the main body of this report, along with the harm to the MOL, heritage assets and other harm identified, and the weight to be given to that harm. GLA Officers have concluded that, applying the relevant balance required in each case, the benefits would clearly and definitively outweigh the harm caused by the proposal and for the purposes of considering proposals for inappropriate development on MOL the benefits are considered to represent Very Special Circumstances in accordance with NPPF Paragraph 152.
- m) The proposed expansion would continue to support the AELTC in their funding of the Lawn Tennis Association (LTA), being the national governing body of tennis in Great Britain. Furthermore, it would allow continued support for the Wimbledon Foundation, the charity of the AELTC and The Championships, which collectively supports a wide range of community initiatives across London and the UK.
- n) Appropriate, relevant, reasonable, and necessary planning conditions and planning obligations are proposed to ensure that the development is acceptable in planning terms and the environmental impacts are mitigated, in line with London Plan Policies DF1 and T9.
- o) It is officers view that the proposals accord with the development plan, read as a whole. It is the view of GLA officers, applying section 38(6) of the 2004 Act, that material considerations, when read together and considered on balance, do not justify a departure from the development plan but rather confirm that the proposals should be granted planning permission.

Section 106 legal agreement

3. The following s106 measures have been agreed to be contained within the s106 legal agreement:

Community Space within The Golf Club House and Parkland Show Court

4. AELTC to deliver at least 400sqm of on-site community space.

Community Access to WPP Grass Courts

5. From one week following the end of The Championships until the end of the Grass Court season at least 7 of the new grass courts will be made available for use by the local community. These would be bookable by local residents at a comparable cost to booking the tennis courts in Wimbledon Park.
6. The applicant must prepare a Community Tennis Court Community Use Plan detailing how the Community Tennis Courts shall be used by local residents.

Curated Tours of the site

7. Curated tours of the WPP development will be offered to local people. Tours offered free of charge to residents of Merton and Wandsworth.

Local Residents Ticketing Scheme – Parkland Show Court Allocation

8. During the Championships not less than 500 Parkland Show Court tickets per day will be made available at face value to residents of Merton and Wandsworth (with 50 of which to be made available through the Wimbledon Foundation free of charge to charitable organisations, schools, and community groups based in the boroughs).

Contributions to the delivery of the Wimbledon Park Strategic Landscape and Heritage Conservation, Enhancement and Management Plan

9. A contribution of £10,687,893 (Index Linked) to be used towards the delivery of a variety of works for the purpose of enhancing Wimbledon Park in heritage, recreational and amenity terms. Works are anticipated to include:
 - Resurfacing of paths within Wimbledon Park.
 - Provision of new play equipment and facilities within Wimbledon Park.
 - Creation of a new pathway connection between Wimbledon Park and the AELTC Parkland.
 - Resurfacing of Wimbledon Park Northern Car Park, Revelstoke Road Car Park and provision of New Entrance Gates to the car parks.
 - The provision of a first set of Toilet Facilities and associated drainage in Wimbledon Park.
 - Refurbishment of stairs to the Wimbledon Park Pavilion and the installation of New Entrance Gates to Home Park Road.
 - Wayfinding signage.
 - Provision of gates and new footpaths around the existing Wimbledon Park boathouse.

- Drinking Fountains in Wimbledon Park.
- Demolition of existing boat house in Wimbledon Park and provision of enhanced multipurpose sports and leisure facility
- Drainage improvements in the northern field of Wimbledon Park
- Removal of the Leylandii trees surrounding the Athletics Track and new tree planting within the public Wimbledon Park.
- Landscaping improvements in the northern part of Wimbledon Park in the vicinity of the Northern Parkland for the purposes of enhancing Wimbledon Park and Registered Park and garden in biodiversity, heritage and landscaping terms and enhancing recreational leisure facilities within Wimbledon Park.
- Construction of a second set of new public toilet facilities in the northern part of Wimbledon Park for the purpose of enhancing recreational leisure facilities within Wimbledon Park.

Wimbledon Park Strategic Landscape and Heritage Conservation, Enhancement and Management Plan

10. The LB Merton shall prepare a project brief for a Wimbledon Park Strategic Landscape and Heritage Conservation, Enhancement and Management Plan with the aim of removing the Registered Park and Garden from Historic England's Heritage at Risk Register.

Boardwalk Connection Works (Interface with Wimbledon Park adjacent to Athletics Track)

11. Works to be undertaken by AELTC to connect the new boardwalk into Wimbledon Park on Council owned land.

New AELTC Parkland

12. AELTC shall deliver 11.1ha publicly accessible park for use by the public free of charge in perpetuity and maintained by AELTC. A Public Access Plan shall be submitted by AELTC and approved by the Council to establish rules of access.
13. Parkland access plan AELTC to provide annual report to LB Merton detailing which areas of the AELTC Parkland were closed within the previous calendar year.

De-silting of Wimbledon Park Lake

14. AELTC to carry out de-silting works to Wimbledon Park Lake.

Provision and Maintenance of Boardwalks within Wimbledon Park Lake

15. Construction of new boardwalks around Wimbledon Park Lake by AELTC. AELTC to solely fund, repair, and maintain the boardwalk in perpetuity.

Angling Pontoons

16. 26 new pontoons to be constructed (and maintained) by AELTC and connected into the lake boardwalks which LB Merton may make available for angling.

Air Quality Contributions towards monitoring air quality/noise impacts and installation of air quality monitoring station

17. £114,138 (Index Linked) for the purposes of air quality monitoring and management in Wandsworth and Merton.

Annual Access Management Plan

18. AELTC will submit for approval (and, once approved, implement) an annual access/management plan for safe and secure routes for pedestrians and cyclists during the Qualifying Event and Championships.

Highway Works (s278 agreement for Church Road)

19. S278 Agreement relating to the carrying out of highway works in accordance with the approved Transport Assessment. The highway works must be completed before the Parkland Show Court is used for any competitive match.

Development Liaison Group

20. AELTC to establish a WPP Development working group which Merton, Wandsworth, AELTC, Ward Councillors, and Wimbledon Club will be invited to join.

Public Liaison Officer and telephone hotline

21. Appointment of a Public Liaison Officer to respond to queries regarding the construction of the development, including a telephone hotline for residents.

Travel Plan Monitoring Fee

22. £56,888 (Index Linked) towards the costs of monitoring the Travel Plans.

Retention of Architects

23. Retention of the Appointed Architects (or appointment of suitable replacement architects approved by Merton Council and the GLA) to oversee and/or carry out the remaining design work in order to ensure the remaining design of the Development reflects the quality of the scheme presented to the GLA.

Operational Travel Plan (OTP) Fund and Measures

24. A Travel Plan submitted to both Merton and Wandsworth. The AELTC would be required to review the operation of the OTP on the first, third and fifth anniversary of the date of first implementation.
25. A £350,000 fund would be paid to Merton Council and held for five years. This fund would be applied towards the implementation of any additional measures required in order to meet the targets set out in the OTP.

Championships and Qualifying Active Travel Strategy and Active Travel Fund

26. Production and implementation of a strategy for identifying schemes for improving cycling and active travel to the Qualifying Event and the Championships including identifying routes, upgrades, wayfinding, cycle parking, advertising campaigns and other improvements.
27. £650,000 has been secured within the Active Travel Fund to be applied by the owner towards the measures identified within the strategy.

Reduction in Car Parking (east of Church Road)

28. Reduction in the total area of car parking within the Development to an agreed maximum total of 275 spaces.

Controlled Parking Zone Review and Contributions towards Mitigation Measures

29. £191,916 (Index Linked) to be used by the Councils to review and resultant mitigation measures (if required) into CPZs in the vicinity.

Submission of Energy Strategy and payment of Carbon Offset Contribution

30. Submission and approval of initial and final energy strategies. Where zero-carbon target not fully achieved on-site, any shortfall to be provided either:
 - through a cash in lieu contribution towards the Council's carbon offset fund; or
 - through off-site measures provided that an alternative proposal is identified and delivery is certain.

'Be Seen' Energy Monitoring Guidance

31. AELTC will comply with the GLA's 'Be Seen' Energy Monitoring Guidance.

Local Employment and Skills Plan and Contribution

32. £129,094 (Index Linked) (either in cash terms or provision in kind or a mix of the two) towards employment and training opportunities for local people during the construction and operation phase. In addition, implementation of a local employment and skills plan.

London Underground Mitigation Contribution

33. £178,905 (Index Linked), being £35,781 per annum to TfL for 5 years (starting from the first Qualifying Event at the site) for mitigation measures at Southfields station and Wimbledon Park station.

Park and Ride CCTV Contribution

34. If the Park and Ride facility at Morden Park is to be used, AELTC will enter into a s278 agreement to fund additional CCTV covering the part of the A24 used by park and ride.

Arts and Culture Contribution

35. £52,524 (Index Linked) to Wandsworth towards supporting and promoting off-site arts and cultural projects in Wandsworth.

Arts and Culture Strategy

36. An Arts & Culture Strategy will be developed with Merton.

Tickets for Local School Children and/or Community Youth Groups for the Qualifying Event

37. Not less than 1,000 tickets each year for The Qualifying event to be made available free of charge to Local School Children of the London Boroughs of Wandsworth and Merton.

Local Business Engagement Event

38. Means an annual event to be organised by AELTC for the benefit of Local Businesses in which Local Businesses (for 5 years following first occupation of the Parkland Show Court) shall be provided with information regarding business opportunities which may arise in connection with the operational stage of the Development.

Section 106 Monitoring

39. Contributions secured for both Merton and Wandsworth towards monitoring of the s106 obligations.

Conditions to be secured

40. The following list provides a summary of the subject matter of the conditions and informatives to be attached to any planning permission which is to be granted:
1. Time Limit
 2. Phasing Strategy
 3. Approval of Reserved Matters
 4. Reserved Matters Time Limit
 5. Approved drawings and documents
 6. Temporary overlay for The Championships and Qualifying Event
 7. Annual Event Car and Cycle Parking Overlay Plan
 8. Inclusive design statement
 9. Basement Impact Assessment
 10. Lighting strategy

11. Signage strategy
12. Secured by Design certification
13. Boundary treatment
14. AELTC Park general and event management
15. Boardwalk details
16. Angling Pontoon details
17. Satellite Maintenance Hubs (details of materials)
18. Landscape management plan
19. Accessibility to the Golf Clubhouse **(Merton Condition only)**
20. Reserved Matters Specification – Design Codes
21. Fire Statement – Outline Component
22. Irrigation and Maintenance
23. Written scheme of Archaeological Investigation
24. Details of new vehicular access
25. Phase-specific Detailed Construction Logistics Plan (CLP)
26. Construction Travel Plan
27. Pre-commencement Championships (Main Grounds) Event Travel Plan
28. Championships (Main Grounds) Event Travel Plan Review
29. Operational Travel Plan
30. Operational Travel Plan Review
31. Delivery, Servicing, Waste and Recycling Plan
32. Details of year-round car and cycle parking facilities
33. Overarching Construction Environmental Management Plan & Ecological Mitigation Plan (Overarching CEMP-EMP)
34. Phase-specific Construction Environmental Management Plan & Ecological Mitigation Plan (CEMP-EMP)
35. Phase-specific Landscape and Environmental Management Plan (LEMP)
36. Site-wide Landscape and Environmental Management Plan (LEMP)
37. Submission of Ecological Monitoring Reports (Operational Phase)

38. Landscape design
39. Phase-specific landscape drawings
40. Pre-construction Mammal survey
41. Urban Greening Certification
42. Updated Arboricultural Impact Assessment
43. Phase-specific Arboricultural Method Statements and Tree Protection Plans
44. Tree Transplanting Method Statement
45. Tree Health Review
46. Phase-specific Earthworks and Cut and Fill Plans
47. Veteran Tree management plans
48. District Heat Network
49. BREEAM (Interim Report)
50. BREEAM
51. Whole Life Carbon Statement Compliance (Development Approved in Full)
52. Whole Life-Cycle Carbon Assessment – Reserved Matters Updates
53. Submission of Whole Life-Cycle Carbon Assessment – Post Construction Assessment
54. Circular Economy Statement Compliance (Development Approved in Full)
55. Circular Economy Statements – Reserved Matters Updates
56. Circular Economy Post-Construction Monitoring Report
57. Water saving requirements – player hubs **(Merton Condition only)**
58. Water saving requirements – satellite maintenance hubs **(Merton Condition only)**
59. Site-wide surface water drainage scheme
60. Site-wide drainage management and maintenance plan
61. Phase-specific drainage verification
62. Site-wide drainage verification
63. Flood Risk Assessment compliance
64. Watercourse landscape method statement

- 65. Water Network upgrades confirmation
- 66. Protection of Thames Water assets
- 67. Method details for below ground works
- 68. Use of the Parkland Show Court
- 69. Conclusion of play – hour limit
- 70. PM10 Monitoring Plan
- 71. Non-road Mobile Machinery (NRMM)
- 72. Requirement for Noise Impact Assessment with RMAs
- 73. Noise limit control
- 74. Time restriction for vehicles entering and exiting Central Grounds Maintenance Hub
- 75. Contaminated land – Preliminary Risk Assessments
- 76. Contaminated land – Site Investigation
- 77. Contaminated land – Remediated method statements
- 78. Contaminated land – Remediation verification

Informatives

- 1. Section 106 Agreement
- 2. Pre-commencement conditions
- 3. Deemed discharge
- 4. Adverts
- 5. Further approval and consents
- 6. Licensing
- 7. Community Infrastructure Levy (CIL)
- 8. Cadent Gas
- 9. Secured by Design
- 10. Water Resources
- 11. Signing up for flood warnings
- 12. Regard to Reservoirs Act 1975

13. Surface water runoff

14. Information re: Condition 35 (Phase-specific Landscape and Environmental Management Plan (LEMP))

15. Environment Agency pre-application advice

Statement of positive and proactive action in dealing with the application

Site description and surrounding area

41. The application site comprises approximately 39.7 hectares of land identified as the former Wimbledon Park Golf Course, Wimbledon Park Lake as well as a section of Church Road. The site lies to the east of the AELTC Main Grounds, where The Wimbledon Tennis Championships (The Championships) are held every year. AELTC are the freeholder owner of the former Wimbledon Park Golf Course, having acquired ownership of this land in the 1990's.
42. Wimbledon Park Lake is owned and maintained by the London Borough of Merton (hereafter referred to as 'Merton' or 'LBM'). The lake has a surface area of approximately 9.6ha and a water capacity of approximately 160,000m³, which is now reduced to 80,000m³ due to siltation. It is classified as a Category A dam.
43. The majority of the application site lies within the LBM. However, a northern section of the golf course sits within the London Borough of Wandsworth (hereafter referred to as 'Wandsworth' or 'LBW'). The application is therefore a cross-boundary planning application and was submitted to both Local Planning Authorities (LPAs) for consideration.
44. The application site does not include Wimbledon Park except for a small section of land to the north of Wimbledon Park Lake (to enable the proposed boardwalk connection the existing lakeside path).
45. The Wimbledon Park Golf Course site is owned by the AELTC whilst the Wimbledon Park Lake and Church Road are owned and managed by the LBM.

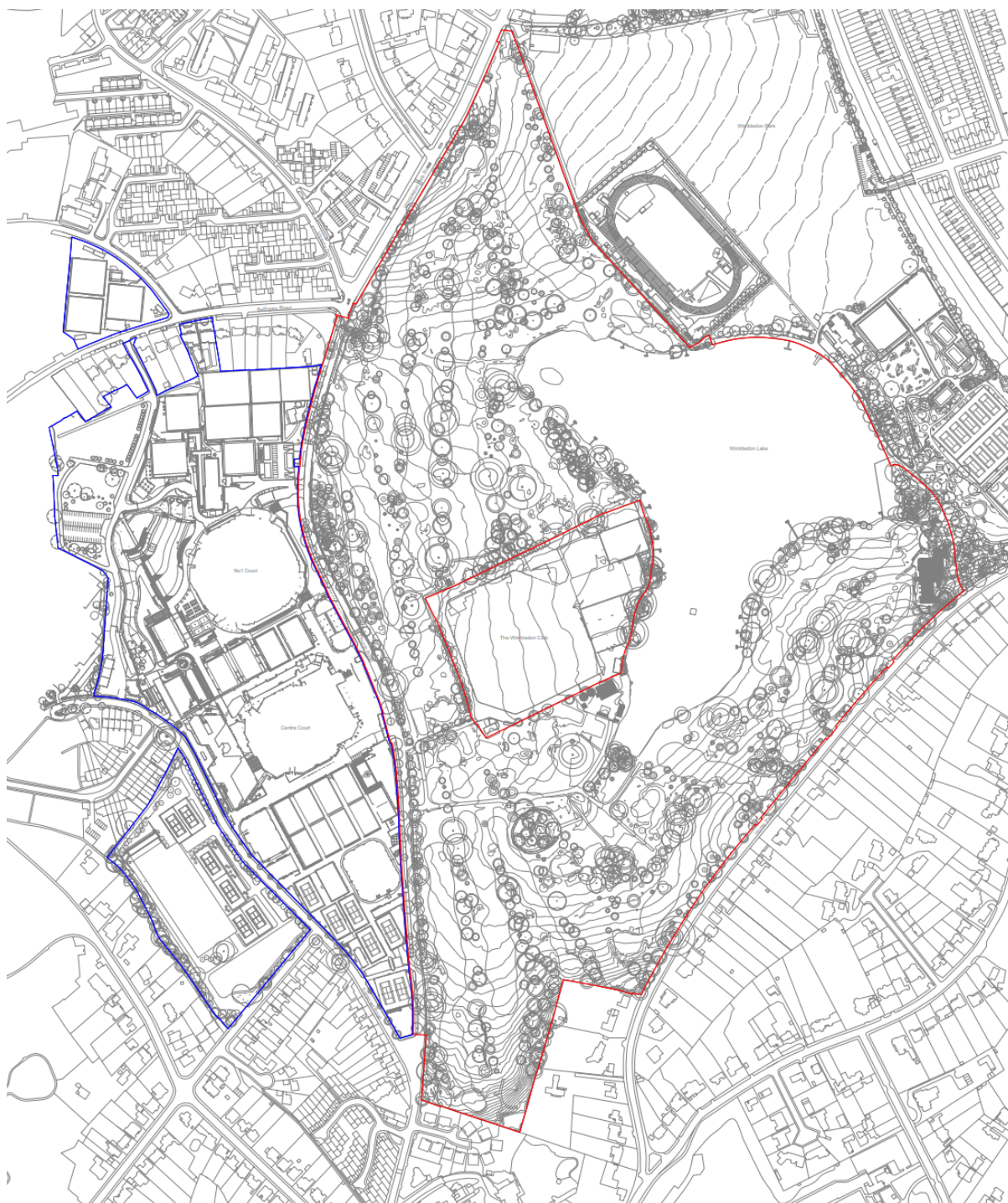


Figure 1: Red line boundary outlining the subject site. The AELTC Main Grounds, located to the west, are outlined in blue.

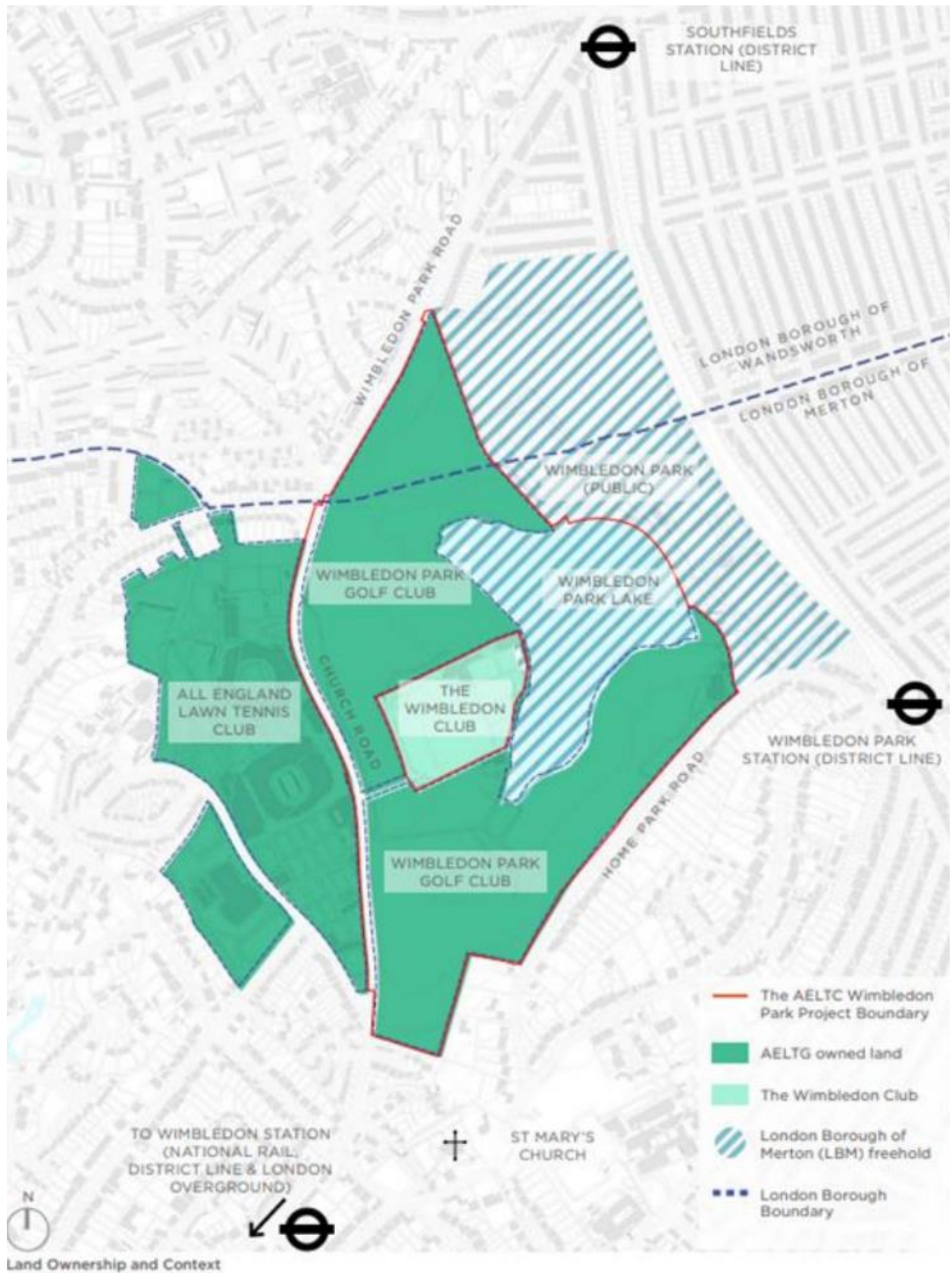


Figure 2: Extent of AELTC owned land with the LPA boundary shown splitting the site

Surrounding context

46. To the north-east of the application site beyond Wimbledon Park Lake is recreational land forming part of Wimbledon Park, including Wimbledon Athletics Track. Beyond this to the east and north-east is the Southfields Grid, which predominantly comprise residential terraces. The south-eastern site boundary is marked by Home Park Road, which is characterised by detached residential dwellings.
47. To the west of the application site beyond Church Road is the AELTC's main grounds, whilst beyond the northern end of the site (within LBW), there are residential dwellings and, slightly further north, are a range of retail shops and commercial premises close to Southfields tube station.
48. The Wimbledon Club is a roughly rectangular site located in the middle of the Wimbledon Park Golf Course but excluded from the application site. It is entirely surrounded by Wimbledon Park Golf Club and Wimbledon Park Lake but does include vehicle and pedestrian access connecting the site to Church Road.

Policy context

49. The application site is subject to a number of key planning policy designations within adopted planning policy. These include the following designations:
 - Wimbledon Park, the former Wimbledon Park Golf Course, as well as The Wimbledon Club are collectively designated as Metropolitan Open Land (MOL) and Open Space, as well as forming part of a Green Chain.
 - Registered Park and Garden of Special Historic Interest (Grade II*) – the application site is a remnant of a larger historic landscape designed by Lancelot "Capability" Brown. The designation includes the Wimbledon Park Golf Course, Wimbledon Park Lake and also includes the neighbouring Wimbledon Club and Wimbledon Park. The entire Registered Park and Garden (RPG) is included on Historic England's 'At Risk' Register.
 - The application site is included within a Site of Importance for Nature Conservation (SINC) and is also part of a defined Green Corridor.
 - The application site is located within the Wimbledon North Conservation Area.
 - The application site is part of an Archaeology Priority Zone.
 - All the trees on the Golf Course are protected under a Tree Preservation Order or a Conservation Area designation.

Heritage context

50. The Wimbledon Park Golf Course adjoins and was part of a much larger park, once landscaped by Lancelot "Capability" Brown in the 18th century. This related to a series of large houses forming the manor house of Wimbledon, which were historically located to the south, outside the current site, near St Mary's Church. None of these houses survive, the last being demolished in 1949.

51. Wimbledon Park was at its largest extent around 1800. In the later 19th and early 20th century edge areas were sold off for housing. In 1898 part of the park was sold and laid out as a new course for the Wimbledon Park Golf Club. In 1914 an area to the north was bought by the local council and became, and remains, a local public park. An area of land to the west was sold in 1920 to the AELTC.
52. The entirety of the site is within the Wimbledon Park Registered Park and Garden (RPG), being Grade II* Listed. The RPG draws its significance primarily from the elements of the designed landscape which were put in place by Capability Brown, and which survive. These include a large man-made lake and the associated dam, about 41 trees in areas of woodland, belts of trees and open-grown trees and tree clumps, the former driveway to the house (now Victoria Drive and Church Road) and the arrangement of the landscape to provide views towards the house (now views towards St Mary's Church).
53. This RPG is on the Heritage at Risk Register due to the long-term effects of divided ownership leading to areas of differential management, the lack of a coherent site-wide strategy for conservation and on-going management, impacts to designed views, and the condition of the lake.
54. The design of the golf course itself is not considered to be significant in heritage terms. The existing golf clubhouse was designed by F P M Woodhouse (1894-1916) in the Arts and Crafts style and built circa 1935, partially rebuilt after war damage in 1944, and subject to extensions in the 1990s. This building is of modest significance.
55. All of the site is within the Wimbledon North Conservation Area, with two separate designations in both Merton and Wandsworth boroughs. There are no listed buildings or other designated structures within the site.
56. There is a group of listed buildings to the south of the site which are in the setting of the site and have strong visual and historical links with the park; these include the Parish Church of St Mary and the associated Old Rectory (both Grade II*) and a group of 24 listed tombs in the churchyard as well as Stag Lodge and the Artesian Well (both listed Grade II) which have historical links with the park.

Photographs of the Golf Course site

57. Photographs of the site can be seen below:



Figure 3: Views towards the north



Figure 4: View towards Wimbledon Park Lake



Figure 5: View souths towards St Mary's Church



Figure 6: Wimbledon Park Golf Clubhouse



Figure 7: Wimbledon Park Golf Course viewed from Bathgate Road / Church Road intersection



Figure 8: Wimbledon Park



Figure 9: Wimbledon Park Lake

Photographs of the AELTC site (operational)

58. Photographs of the AELTC Main Grounds in operation are shown below.



Figure 10: Court 18 during the Championships



Figure 11: St Mary's Walk during the Championships



Figure 12: Crowds between courts during The Championships (AELTC Main Grounds)



Figure 13: Practice Courts during The Championships



Figure 14: Aorangi Hill (commonly known as Henman Hill) during The Championships



Figure 15: Indoor sports centre



Figure 16: Car Park 4 during The Championships

Details of the proposal

59. The proposal seeks permission for the expansion of the AELTC into the former Wimbledon Park Golf Course with the introduction of new tennis courts, tennis related infrastructure and new buildings to enable the hosting of the Wimbledon Qualifying Event and to improve the functioning and operation of The Championships. The Hybrid application would encompass detailed, and outline elements as outlined below.

Detailed Permission

60. The detailed element of the application seeks permission for:
- provision of 38 grass tennis courts and associated infrastructure.
 - re-profiling of the landscape and the removal, retention and replanting of trees.
 - provision of 7 satellite maintenance buildings.
 - the provision of a boardwalk around the perimeter of and across Wimbledon Park Lake.
 - Improvements to Wimbledon Park Lake (including lake edge alterations, de-silting & de-culverting).
 - highway works to Church Road.

- new pedestrian access points at the northern and southern ends of the site.
- new vehicular access points.
- Creation of new area of parkland with permissive public access.

Outline Permission

61. The Outline portion of the application includes the following elements (with appearance, means of access, landscaping and scale reserved):

- 8,000-seat parkland show court.
- Central grounds maintenance hub
- 2 players hubs.

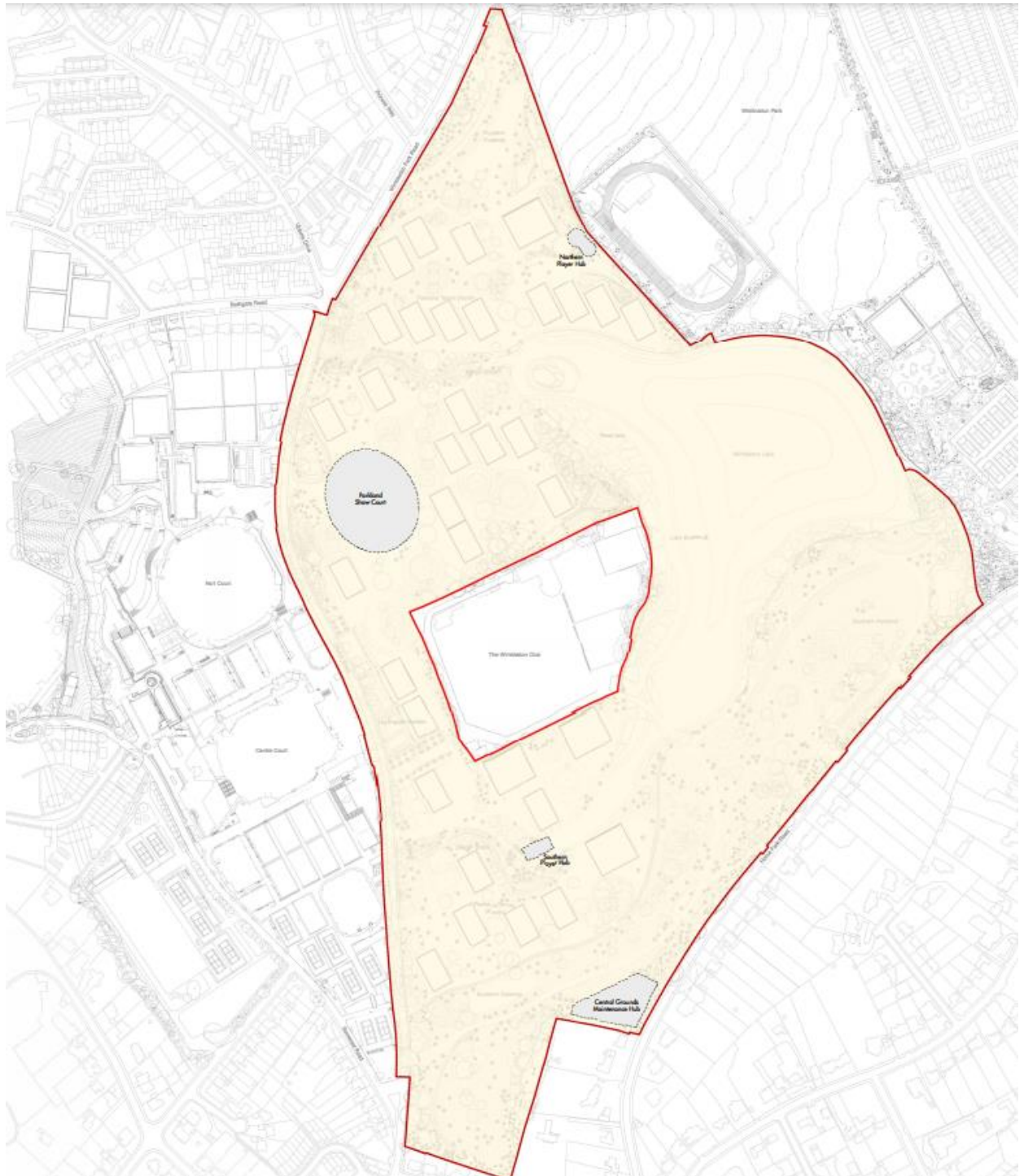


Figure 17: Outline development zones

62. The location and extent of the outline buildings are detailed in the Outline Development Zones Plan as shown in Figure 17 above. Parameter plans set maximum parameters for the following aspects:

- Outline development zones;
- Building lines;
- Maximum below ground extent; and

- Maximum building heights.

63. As part of this application, The Championships period at this venue would be extended by one week to include the Qualifying Event. The Qualifying Event is currently held in Roehampton the week prior to The Championships.

Cross boundary application

64. The proposed application site sits across two London boroughs. The majority of the site falls within the London Borough of Merton. The northern section, which is proposed to contain the main entrance, northern parklands, five tennis courts, three maintenance hubs and the northern player hub fall within the London Borough of Wandsworth.



Figure 18: Council boundary (shown in blue) illustrated on site layout plan

65. The applicant submitted identical applications to both Councils.

Proposed land uses

66. The proposed use can be broadly categorised as a sporting complex focused on tennis. The specific aspects of the proposal are discussed in more detail below.

Proposed Buildings - Outline

Parkland Show Court

67. The new Parkland Show Court would comprise an 8000 seat, show court stadium, located to the east of the No.1 Court and to the north-east of Centre Court. This aspect is submitted in Outline, with details for appearance, access, landscaping and scale (within the maximum parameters) reserved for a future application.

68. The parameter plans allow for this building to be a maximum of 28m in height (49m AOD) and the basement to be excavated down by a maximum of 6m (to 19m AOD).

69. In a similar manner to Centre Court and Court 1, a retractable roof would allow play to continue in the event of rain. Once the roof closes the associated plant would provide a climatically controlled enclosure to control the humidity on the grass.

70. Ancillary spaces would be provided within the basement/lower ground floor within the footprint of the seating bowl. This lower level is partially submerged with a lower level of food and drink accessible on the lakeside. Specifically, the basement/lower level includes the following space:

- Public WCs and Food and Drink;
- Player facilities;
- Staff space; and
- Plant, back of house logistics hub and grounds maintenance.

71. A cross-sectional image of the Parkland Show Court, including the roof structure, concourses and basement level is illustrated in Figure 19 below.

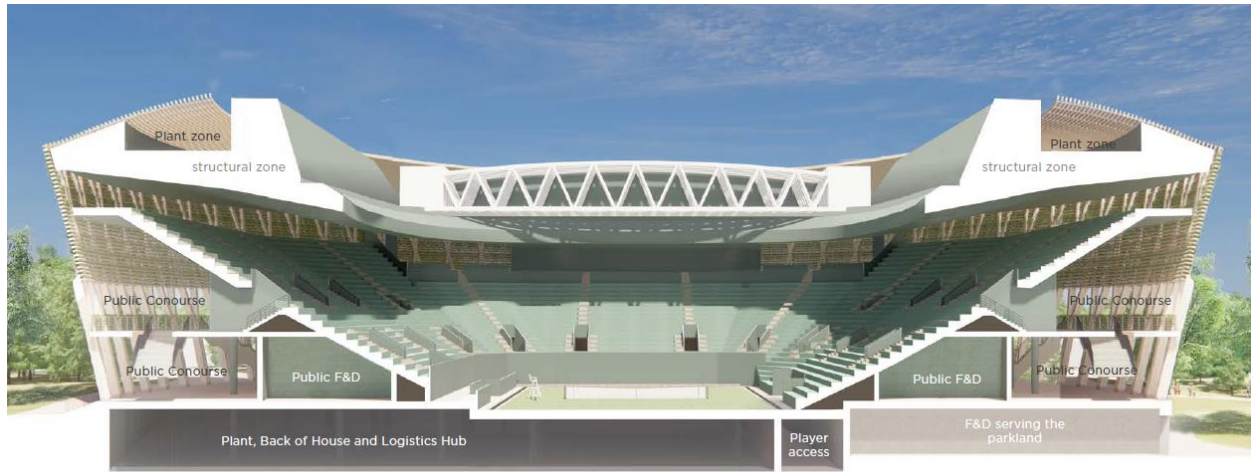


Figure 19: Cross-section of the Parkland Show Court

72. The proposed Parkland Show Court has been conceived to minimise impacts on the landscape. The tree-like structure would support the building while also providing a permeable frame across which climbing plants can grow. This external façade is illustrated in Figure 20 below.



Figure 20: Parkland Show Court

73. In a similar manner to the existing show courts, particularly Centre Court, the use of Virginia Creeper on the facade is being explored.

Central grounds maintenance hub

74. A Central Grounds Maintenance Hub (CGMH) would be located in the south-east corner of the site adjacent to Home Park Road. This building is being submitted in outline with further detail to be developed and submitted as part of a future Reserved Matters application.

75. The building would be subterranean with it being designed to utilise the level change from Home Park Road. It would be set over two tiers, submerging the larger portion of the building below ground. The upper level would contain space primarily for staff offices, welfare, and training facilities. The lower level would provide for storage, vehicle maintenance, tools, and equipment.
76. The CGMH would have a height (measured from FFL to roof) of 8.5 metres. However, this would be entirely below ground. It would comprise an area of approximately 2,790sqm GIA.
77. The purpose of this structure is to provide a centralised storage and maintenance facility for the courts and horticulture equipment and vehicles.

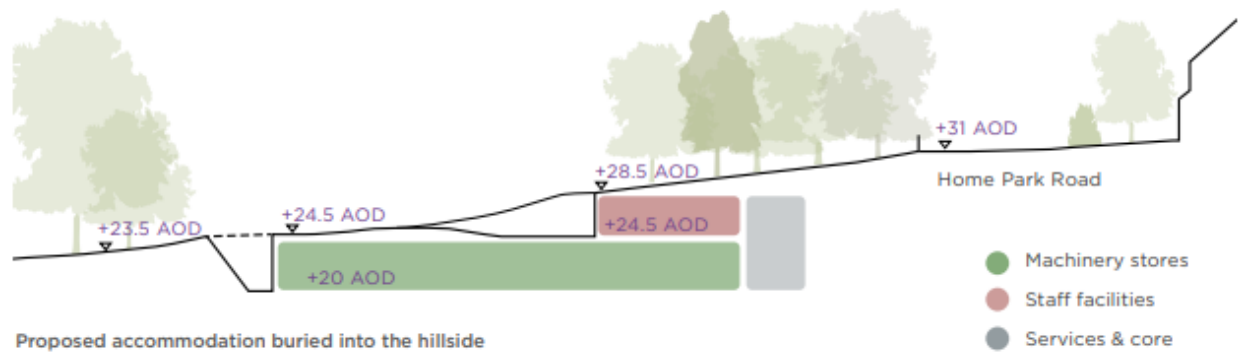


Figure 21: Section showing proposed accommodation within CGMH buried into the hillside.

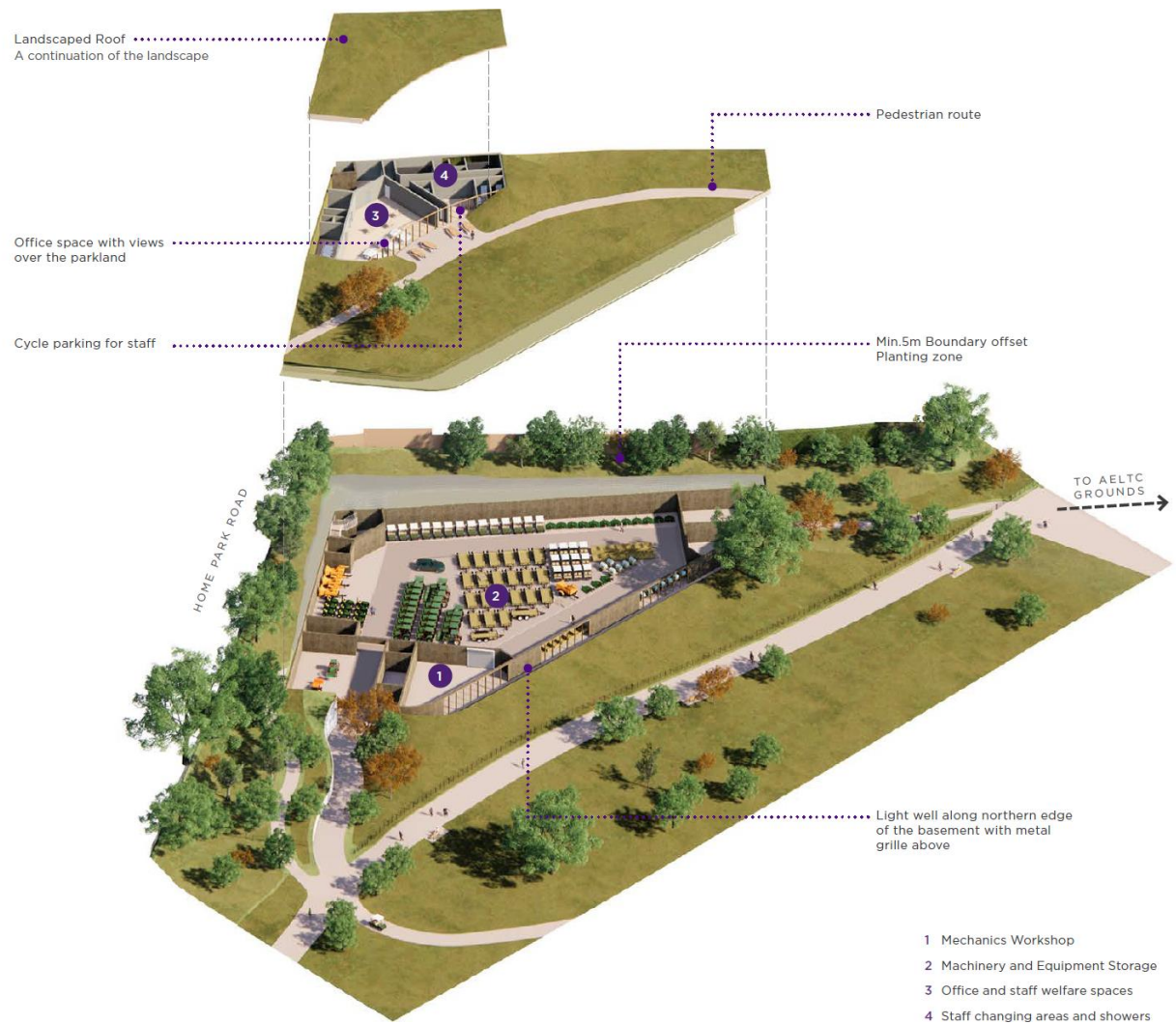


Figure 22: Accommodation overview of the CGMH



Figure 23: Illustrative axonometric view of the CGMH as it sits in southern AELTC parkland

78. The only outwardly facing element of this structure, as visible on the illustrative axonometric above, would be a light well along the north face of the basement which allows air and light into this level and allows the building to be passively ventilated.

Player hubs

79. Two player hubs would be developed offering alternative facilities for players and members. Both hubs are being applied for in Outline.
80. The northern player hub would sit on the boundary edge against the existing athletic track building as illustrated in Figure 24 below.



Figure 24: Potential design of Northern Player Hub

81. The southern player hub would take the form of a small contemporary boathouse. This would sit in the proximity of an original boathouse that sat on the lake edge.
82. It is envisaged that the southern player hub would also be available to support the community tennis programme (secured by s106) on the seven southern playing courts.

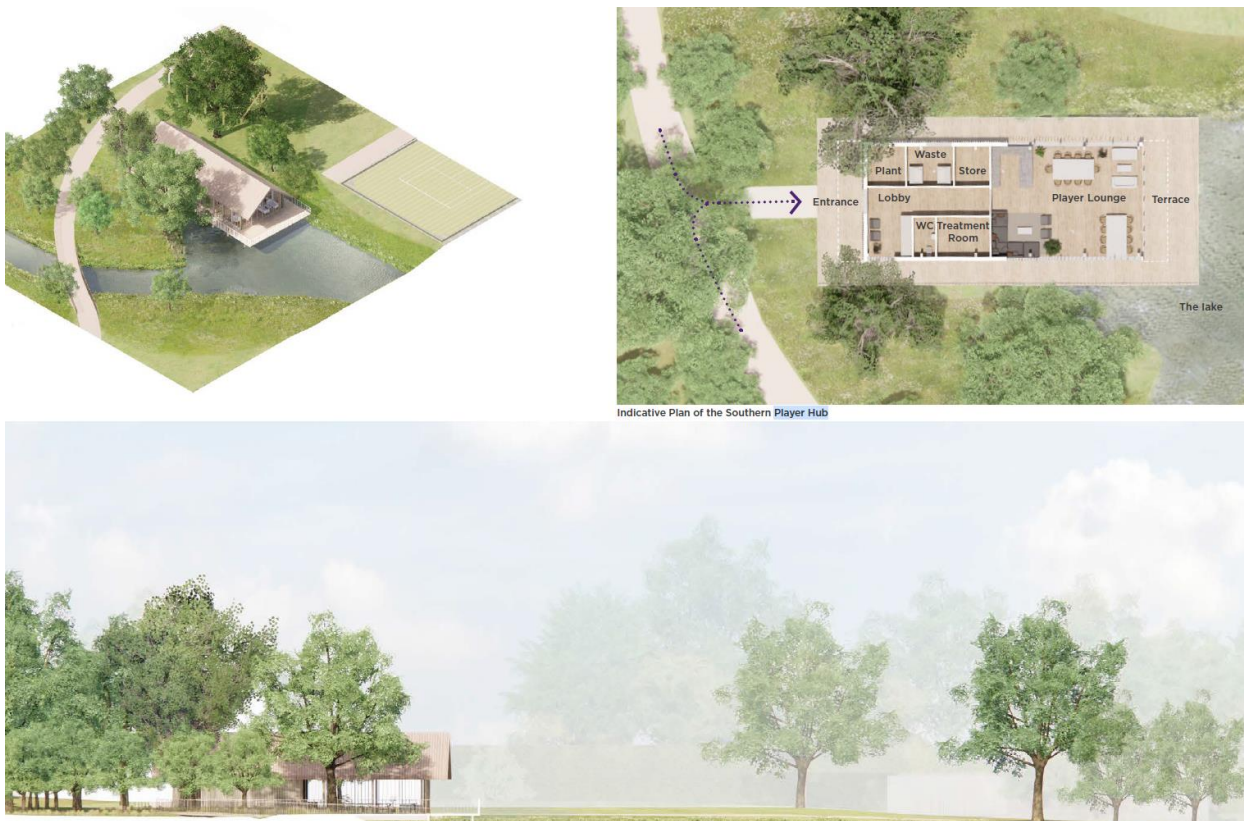


Figure 25: Outline design of the Southern Player Hub

83. These structures would be single storey, clad in timber and natural materials and sit adjacent to heavily landscaped areas to minimise the visual impact. The northern player hub would also incorporate a green roof.

Proposed buildings and land uses - Detail

Demolition

84. The proposal incorporates minor demolition works to the existing golf course maintenance yard, which comprises a variety of buildings located adjacent to the southern boundary of the Wimbledon Club.
85. It would also entail the removal of several other small structures in the vicinity of the Golf Course Clubhouse.

Maintenance Hubs

86. To support the operation of the Qualifying Event and The Championships, seven (7) satellite maintenance hubs are proposed across the site. These single storey structures (maximum 4.0 metres in height) are proposed in full detail. The locations of the seven buildings are shown in Figure 24 below.
87. The buildings would be multifunctional, providing electrical, data, storage, and irrigation infrastructure. They would also provide toilet facilities for guests, players and AELTC staff.



Figure 26: Location of the maintenance hubs

88. The maintenance hubs are located across the site in a manner to allow them to serve a group of tennis courts.

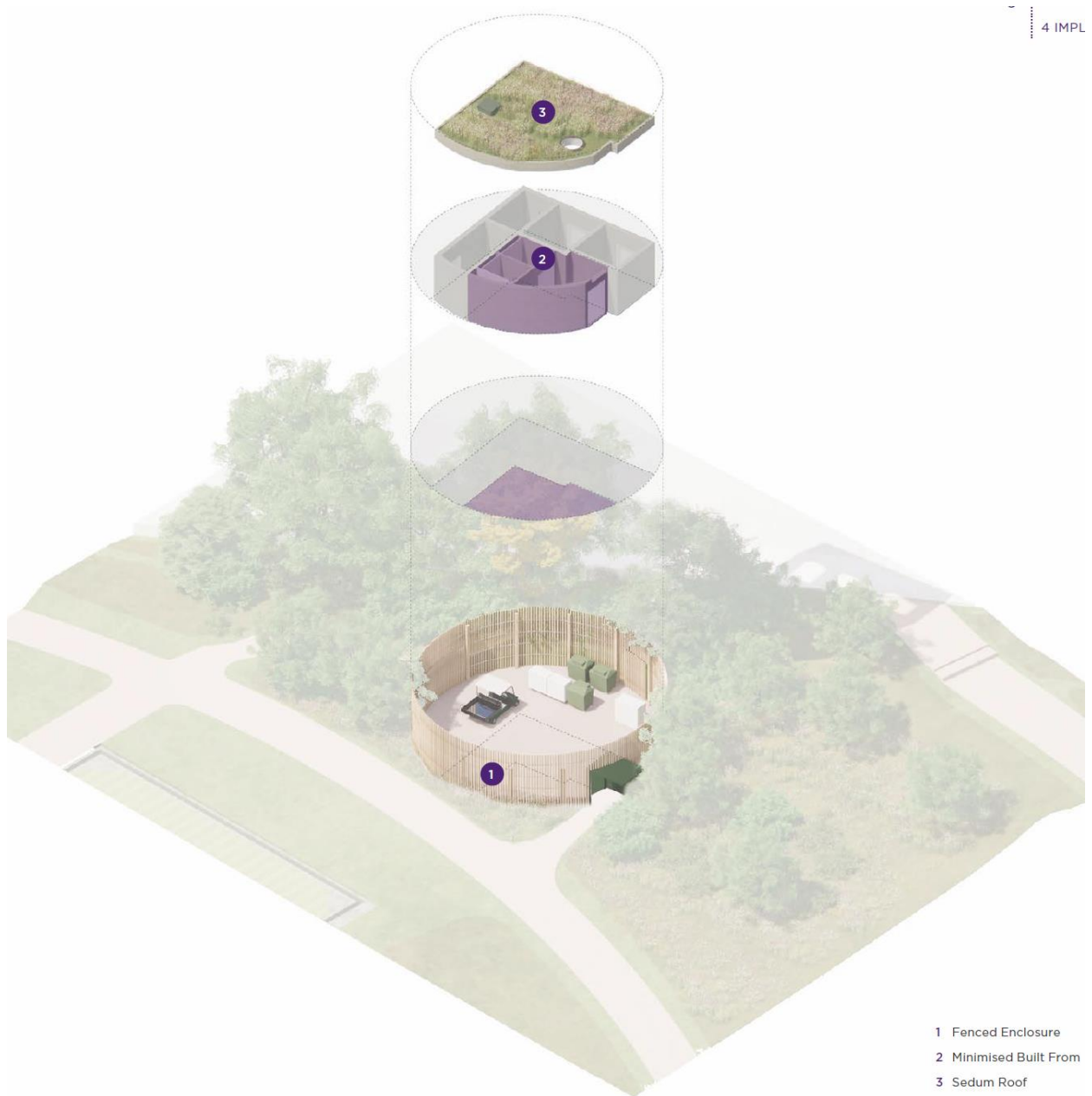


Figure 27: Sectional view of Hub 01

89. They have been designed to integrate with the parkland landscape, with soft building forms and the proposed use of timber as the external material.

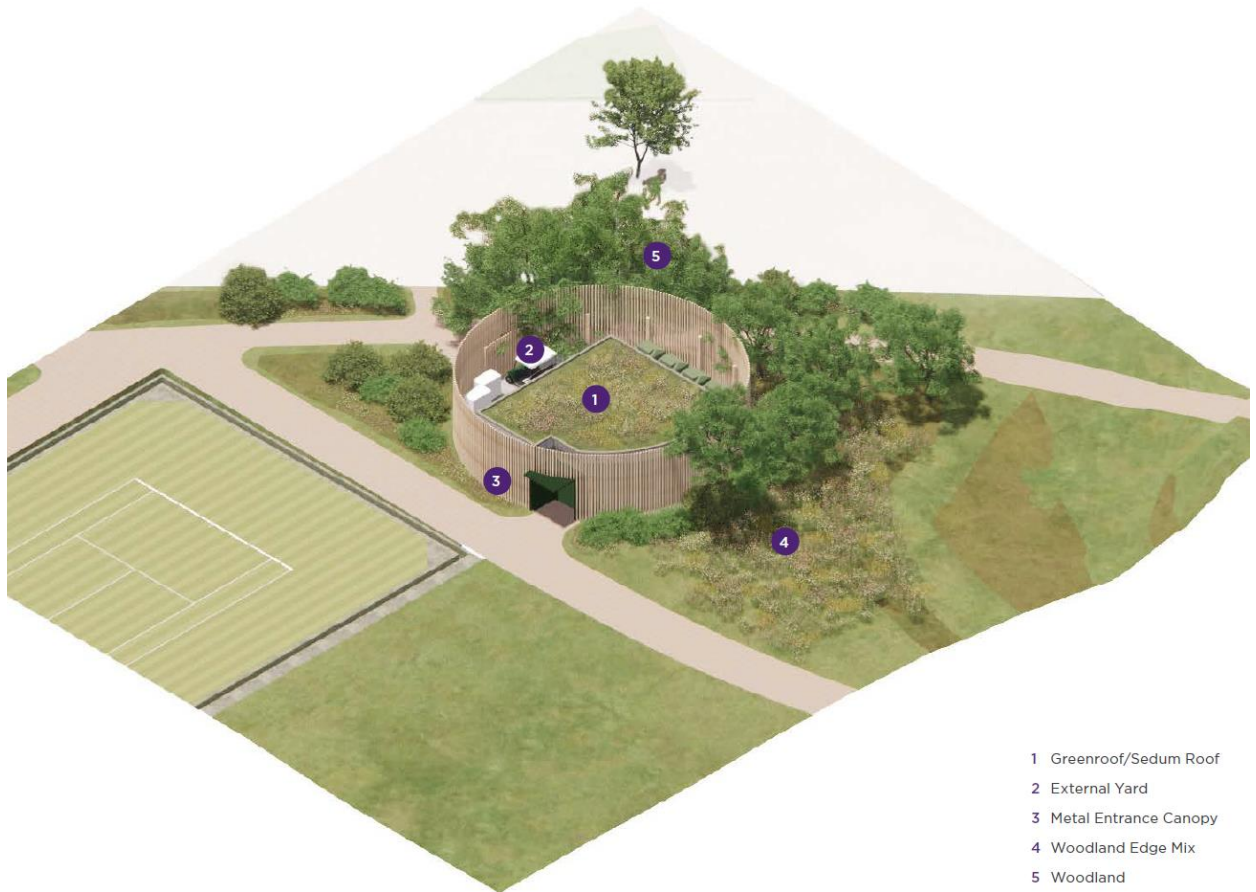


Figure 28: Image of Hub 04



Figure 29: Illustrative elevation of Hub 02

90. Figures 27, 28, and 29, above, illustrate the appearance of the maintenance hubs as they would appear within the heavily landscaped context.

38 grass tennis courts

91. 38 grass tennis courts are proposed (not including the Parkland Show Court). This total number has been calculated based on the following:
- Transfer of the match and practice courts from Roehampton (18 and 8 respectively);
 - 6 temporary practice courts which currently take over the croquet lawns (north of Bathgate Road);
 - 6 courts have also been added for Championships main draw practice so that each player can have a whole court on which to practice each day (as is expected at Grand Slam venues).

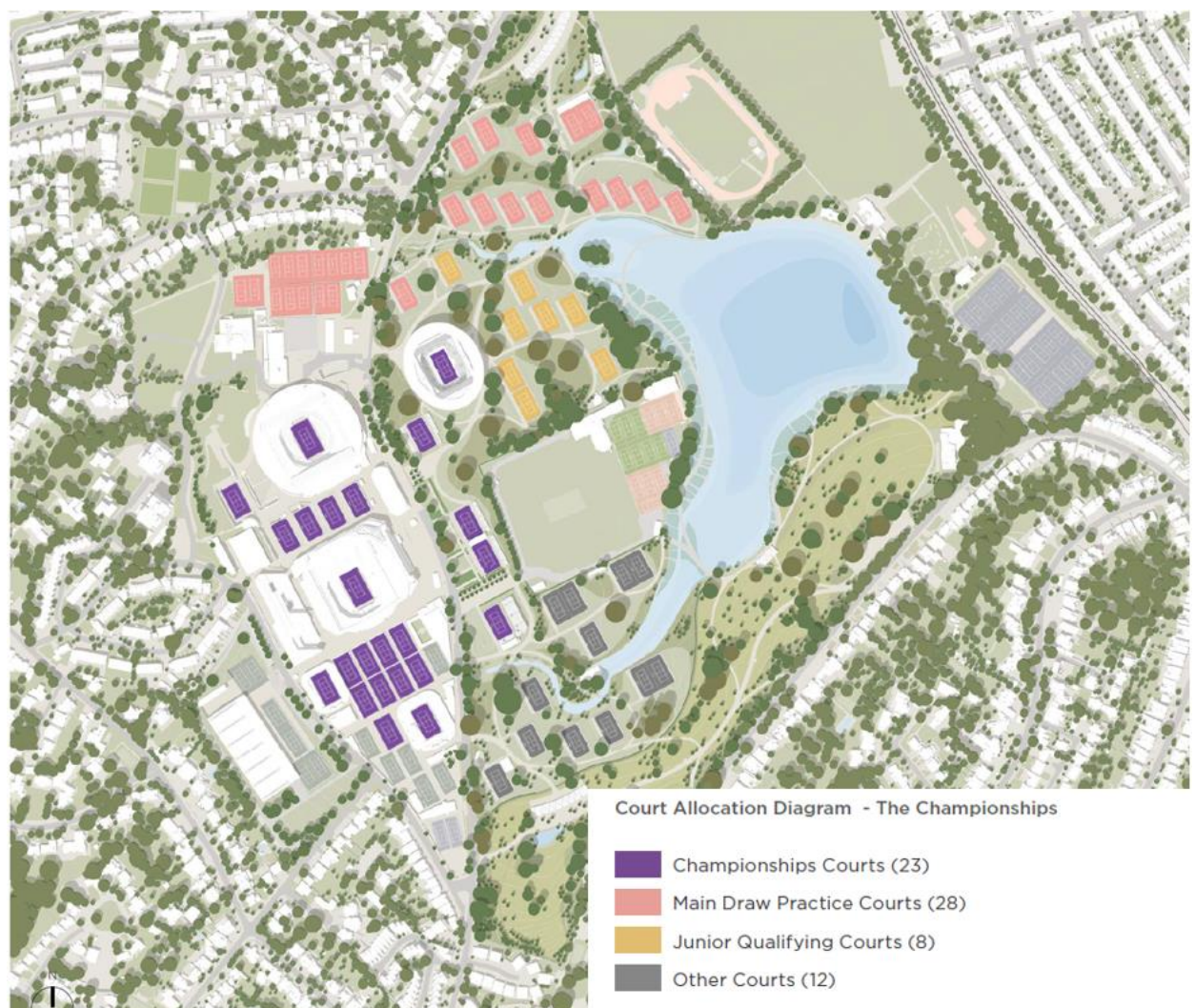


Figure 30: Court allocation – The Championships

92. The additional courts provided for the Qualifying Event can also be utilised during the Championships fortnight to increase the amount of tennis on offer. This

includes doubling the size of the Wheelchair Tennis draw. Bringing the Junior Qualifying Event on site and hosting the Under 14 Championships.

93. Figure 30, above, illustrates the proposed usage of the new courts during The Championships.
94. The grass court season means that the courts would be in use from May to late September. Within this period and outside of The Championships and Qualifying Event, they would be available for wider tennis use such as organised events in conjunction with local schools, and other community tennis programmes. Seven courts would also be available for the local community to hire for private tennis play.

Landscaping

95. The proposal has been conceived as a 21st century re-imagining of an 18th century (Capability) Brownian English estate. One of the primary aims in the landscaping proposal is to protect the heritage of the landscape building on the Brownian tradition and design, thereby supporting its removal from the 'Heritage At Risk Register' through well researched and carefully implemented design proposals as well as the production of a long-term Conservation Plan.
96. Broadly, the landscape proposals include:
 - Restoration of the Capability Brown landscape including removal of unsympathetic interventions associated with the golf course and providing permissive public access to this new 11.1ha parkland;
 - Better integration with adjacent Wimbledon Park via improved access and an extension of the existing public park. This includes a 1.7ha extension at the northern end directly adjacent to Wimbledon Park Road as well as 9.4ha at the southern end of the site. This would provide a interconnected parkland with a cumulative area of 29.1ha.
 - Desilting and restoration of the lake including southern tail;
 - De-culverting two on site brooks feeding the lake; and
 - Provision of an ecological nature reserve at the southern end of the site.
97. The landscaping proposal also involves re-profiling the landscape and the construction of grass tennis courts, hard-surface pathways and significant planting. Wimbledon Park Lake would be de-silted with the lake tip being restored and north-western (Margin Brook) and south-western (Bigden Brook) culverts being opened.
98. Detailed landscaping proposals include a comprehensive strategy for trees. Some tree removal is required to facilitate the development but this predominantly focuses on Category C and U trees of poor quality, with all Category A trees and most Category B trees to be retained wherever possible. All Veteran trees on site would be retained. Considerable tree planting is proposed through a net addition of at least 1,500 new trees.



Figure 31: Landscaping proposal and features

99. The large site has been broken up into eight landscaping areas, including:
 1. The Tea Lawn
 2. Parkland Tennis (North)
 3. Parkland Tennis (South)

4. Public Parkland
5. Wimbledon Park Lake & Lake Edge
6. Northern Gateway
7. Southern Gateway
8. Church Road

The Tea Lawn

100. The Tea Lawn sits directly across Church Road from Centre Court and incorporates two of the more notable grass courts on the subject site. These courts include stepped seating, with viewing plinths on upper level for wheelchair users. There would be opportunities for gathering and observing on the lawns.
101. To the north and south, The Tea Lawn is completed by a pair of plazas with seating and feature tree groves in grid planting, providing shade. These are important circulation spaces.



Figure 32: Layout of The Tea Lawn

102. Temporary spectator stands would be installed during the Events Period, although this is not part of this planning application.

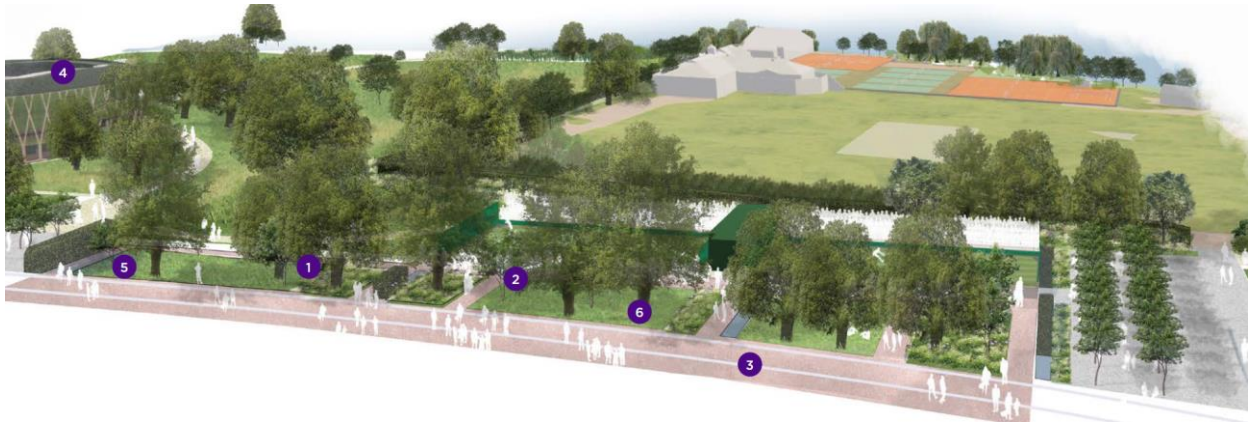


Figure 33: View looking east across The Tea Lawn (during The Championships)

103. The boundary railings between the Tea Lawn and Church Road would be removable, forming a secure boundary line year-round that can be removed during the Championships.

Parkland Tennis (North & South)

104. The Parkland Tennis (North) area contains mature and veteran trees. Amongst the trees, lawn tennis courts would be grouped and surrounded by grass, including species-rich meadow. The 'tennis in an English Parkland' concept is reflected through careful placement of courts to avoid impacting mature trees. Paths would be the minimum required width and follow winding routes through the natural landform.
105. Spectators would be on grass beside the courts, with wheelchair accessible viewing and court maintenance access provided via a porous bound path on the west side of each court.
106. Outside the summer lawn tennis season, the courts would be clear of temporary structures therefore allowing this space to contribute to an open, rolling parkland feel.



Figure 34: Layout of the Parkland Tennis (North) area

107. The culverted Margin Brook would be de-culverted and naturalised, enhancing biodiversity and amenity. The brook would be a continuous channel from close to Wimbledon Park Road. This is illustrated in Figure 35 below.



Figure 35: Design of Margin Brook

108. The Parkland Tennis (South) area would provide a setting for a further 13 grass courts that have been placed between existing mature and veteran trees. New tree planting would follow Capability Brown's design expressions of scatters, clumps and specimens and use many of his signature species including Plane, Scots Pine and Lime.
109. This area of 'tennis in an English Parkland' provides opportunities to rebuild some of the lost heritage features of the RPG. The 'tail' of Brown's lake was filled in many decades ago and this southern tip would be restored to the original shape.



Figure 36: Layout of the Parkland Tennis (South) portion of the Championships site

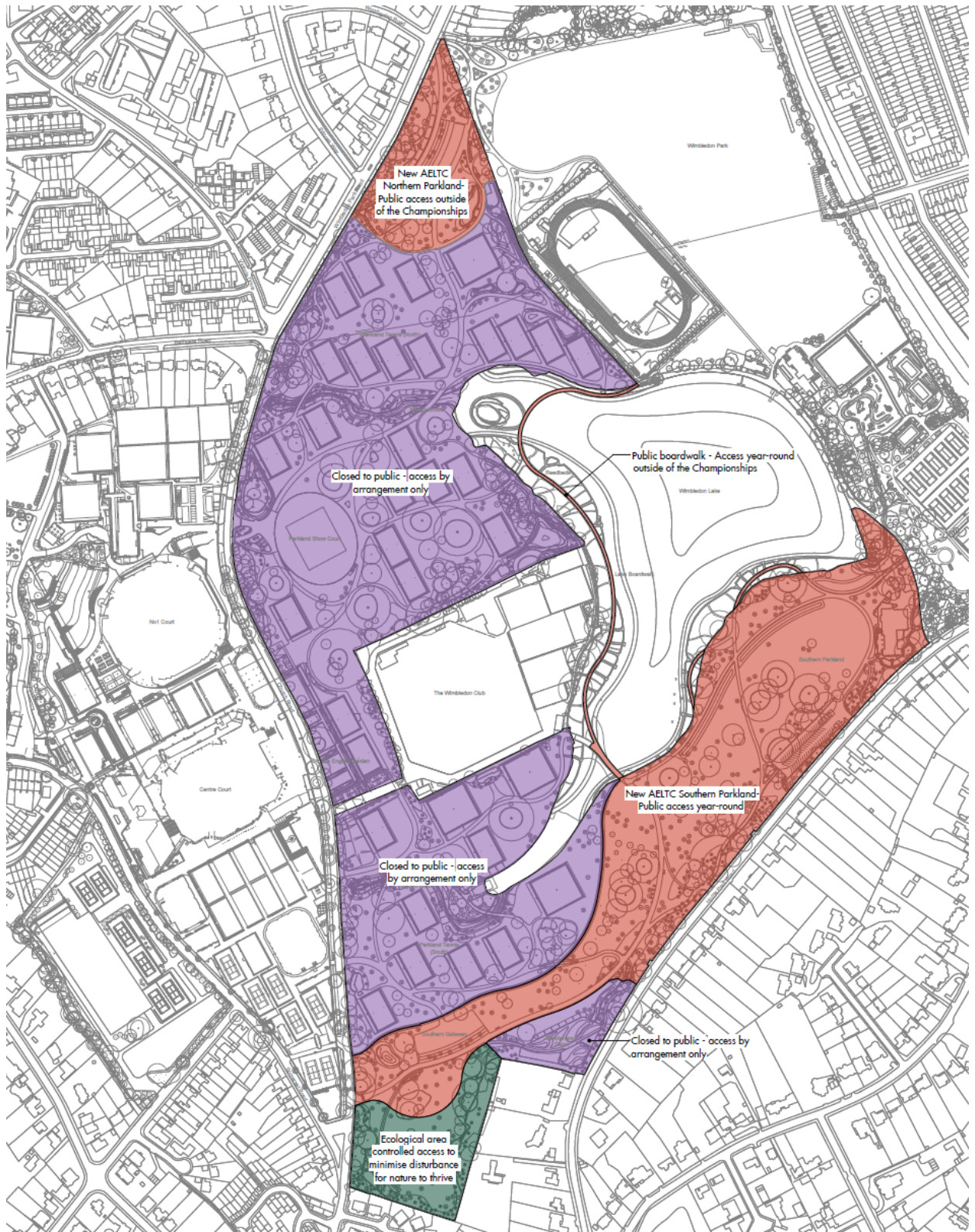
110. Bigden Brook, the southern water course used by Brown to create the lake, would also be de-culverted. As with Margin Brook in the north, the addition of river boulders, aquatic and marginal planting would provide ecological habitats and aerate and clean the water.



Figure 37: Bigden Brook

Public park

111. The proposal (as amended) includes the provision of 11.1ha (27 acres) of permissive public park.
112. 9.4ha (23.2 acres) of this land would be within the southern parkland, sitting adjacent to Home Park Road and includes the former Wimbledon Park Golf Course clubhouse. The remaining 1.7ha (4.2 acres) is a triangular piece of land at the northern end of the site that would sit in between the Athletics track and Wimbledon Park Road.



Entrances (Northern Gateway and Southern Gateway)

114. The Northern Gateway would be the new arrival point for the majority of visitors arriving from Southfields Underground Station. This area would be predominantly restored to open parkland with native woodland edge planting to the boundaries. There would be an area of permanent hard standing required to ensure a functional surface for queuing, security, and ticket checks during the events (temporary structures are discussed further below).
115. The Southern Gateway and entrance, located within the southern parklands, would provide permanent hard standing required for the queuing, security, and ticket checks. This area would also incorporate a ha-ha and the sunken hedge that form the secure boundary to the parkland tennis.

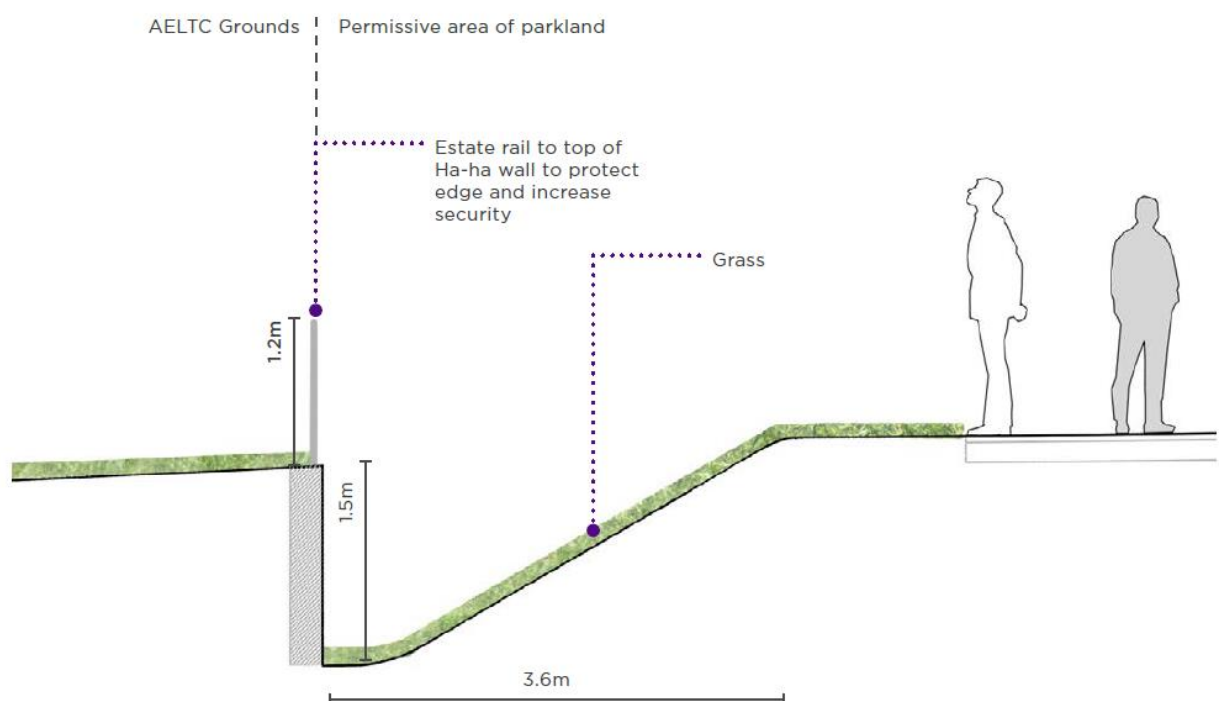


Figure 39: Typical elevation of estate railing and Ha-Ha

Wimbledon Park Lake and Lake Edge

116. The Proposed Development seeks to enhance the ecological, functional and heritage aspects of the Lake including de-silting. As it is owned by the LBM these proposals would be undertaken in collaboration and via formal agreement with the Council.



Figure 40: Lake and lake edge enhancements

117. As shown in Figure 40, above, an accessible circular lake walk will be provided through a combination of lakeside paths and timber boardwalks.

Works to Church Road

118. Church Road forms the key north-south highway link that separates the subject site from the rest of the AELTC land to the west. The proposal seeks to upgrade Church Road with works new paving materials, lighting and crossing points.

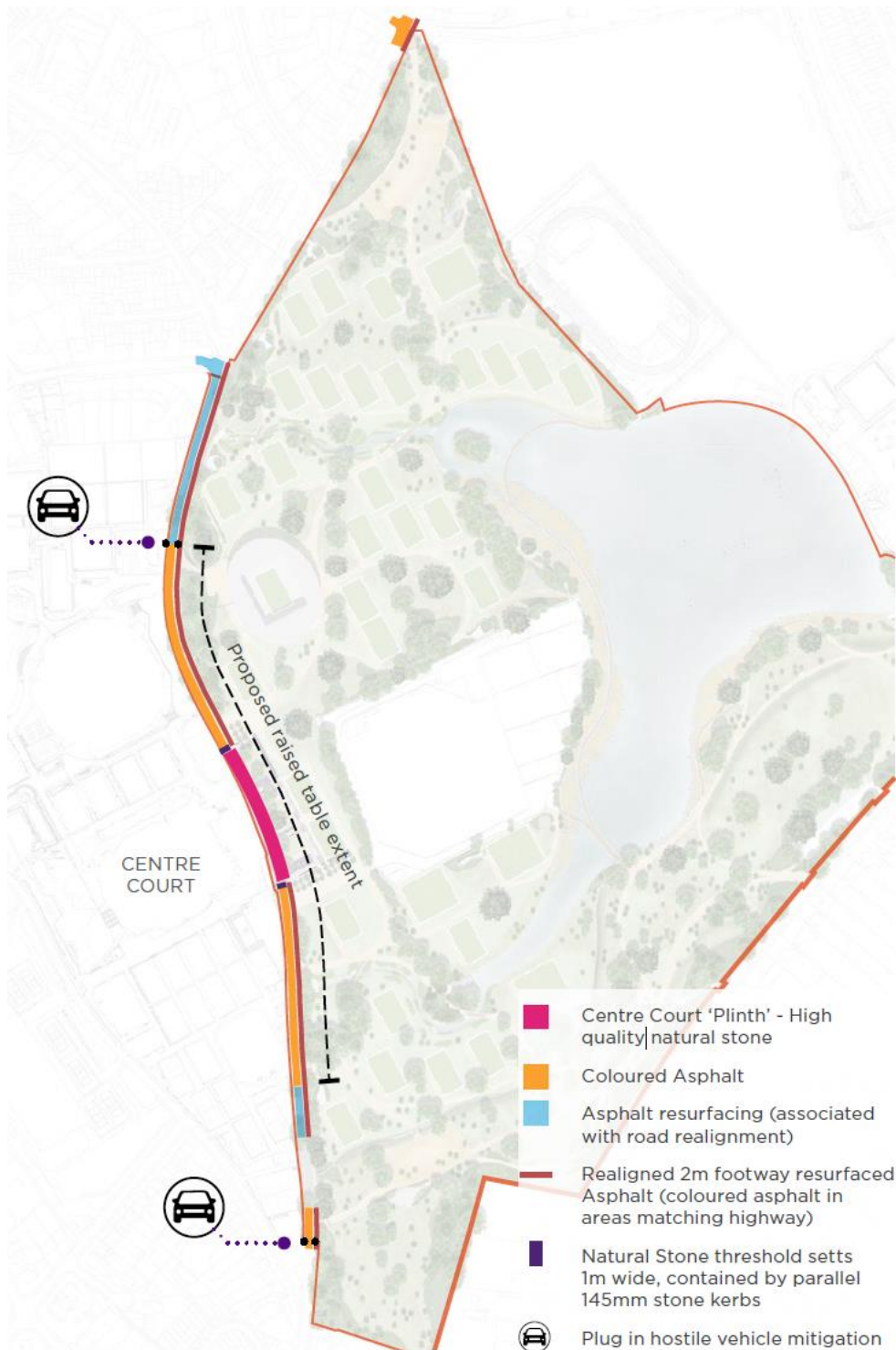


Figure 41: Proposed works to Church Road

119. The purpose of these works is to unify the landholdings, linking Centre Court to the Tea Lawn and parkland tennis courts. It would also serve as a pedestrian promenade for guests during The Championships.

Temporary Structures

120. In order to minimise the amount of permanent infrastructure and reduce the visual impact, a careful balance of permanent infrastructure and temporary overlay will

be utilised to transform the Parkland from Year- Round to Qualifying and The Championships.

121. The temporary structures consist of temporary seating stands for the four Parkland Outer Show Courts and security screening structures for the three Parkland entrances. These are shown in Figure 42 below.



Figure 42: Temporary structures associated with Qualifying and The Championships

Proposed phasing

122. Construction documentation provides an indicative timeframe of 8 years to construct the scheme.
123. Condition 2 requires the submission of a detailed phasing plan prior to the commencement of works which amongst other things will require the delivery of certain elements prior to the use of the playing courts or completion of the development.

Amendments

124. Prior to the GLA call-in, the application was amended on two occasions, in May 2022 and 2023. These amendments were relatively minor and were outlined in full within both Council Committee reports. The description of the development proposed that has been set out above reflects the application scheme as amended on those two occasions, and subsequently following the Mayoral call in, as explained below.

125. On 29 April 2024, the applicants made further amendments to the proposed development and submitted a set of revised documentation to the GLA. Specifically, the following revisions were made to the application plans:

- Creation of a new northern parkland providing an additional 1.7ha of publicly accessible parkland; and
- Re-alignment of the estate rail located within the AELTC's southern parkland, adjacent to the ecology zone, to provide an additional area of accessible parkland (0.3ha).



Figure 43: Extent of revisions following the inclusion of new northern public parkland

126. In addition to the revised set of plans illustrating the above amendments, the following documentation was updated and re-submitted:

- GLA Landscape Addendum Report (prepared by LUC).

- Updated 'Social, Community and Economic Benefits – Addendum Report' (April 2024) prepared by Quod.
- Arboricultural Impact Assessment Addendum – Wimbledon Park Project (April 2024) - prepared by TEP and LUC.
- Updated Biodiversity Net Gain Assessment Metric 3.1 Update (April 2024) - prepared by LUC.
- Community Benefits Statement - Update April 2024 - prepared by the AELTC and Rolfe Judd Planning.
- Car Park Management Plan Addendum, an updated Travel Plan and Transport Assessment Addendum (all dated April 2024) - prepared by Buro Happold.
- An ES Statement of Conformity (April 2024) – prepared by LUC.
- The Wimbledon Park Project – CGI Compilation (April 2024) – prepared by Allies & Morrison.

127. Following receipt of the revised documentation, the application was re-consulted for a period of 30 days from 09 May 2024 – 08 June 2024.

Covenants

128. The Wimbledon Park Golf Course land is subject to restrictive covenants that were imposed in a transfer of the land in 1993. In substance, the covenants require the owner to use the golf course land only for leisure and recreation or as an open space, and restricts the erection of buildings, other than those ancillary to recreational or open space uses and which building, or buildings, will not impair the appreciation of the general public of the extent or openness of the land transferred. The covenants are expressed to be for the benefit of the land retained by the London Borough of Merton.
129. In addition, the 1993 transfer of land contains a positive covenant requiring the provision of a lakeside walkway open to the public once golfing use has ceased permanently, subject to relevant leases ceasing to subsist.
130. In general, whether or not a restrictive covenant impacts an applicant's ability to implement a planning permission is irrelevant to the decision to whether to grant permission. It is often the case that an applicant for planning permission will need to resolve matters of land ownership and/or rights affecting a development site before a development can proceed and there is no legal requirement that planning permission be refused unless the developer commits itself to implementing a proposal. GLA Officers are satisfied that the existence of the restrictive covenants are not of themselves matters to which regard must be had nor are the restrictive covenants in and of themselves considered to be material to the determination of the current planning application.
131. Ordinarily, potential difficulties of implementation are not relevant to the planning merits of the decision, but in some circumstances deliverability can be a material

consideration. If, for example, the benefits relied on are particularly time-sensitive, potential delay to their realisation may affect the weight they are given in the planning balance. GLA officers do not consider that difficulties regarding implementation are relevant in this case. The benefits of the proposals are set out in paragraphs 795 - 833 of this report and they are not considered time sensitive, nor is weight being placed on the speed with which any of the benefits can be delivered. Further, there are no other potentially suitable and available alternative sites which could be less constrained in terms of deliverability. Alternative sites are considered further at paragraphs 294 and 337 of this report.

132. The restrictive covenants could impact the deliverability of all or some of the development and so it is possible that not all of the benefits would be delivered but GLA officers consider that it is likely any issues caused by the restrictive covenants would have to be resolved before the development is implemented. Further, if not all of the development is carried out some of the harms will not arise. As such the restrictive covenants are not considered to be a material consideration. For the same reasons, even if they were material, they would attract only minimal weight.
133. With regard to the positive covenant within the 1993 transfer to provide a lakeside public walkway which is open to the public, the enforcement of this covenant is a matter for the parties to the 1993 transfer. No walkway has been provided at this point in time and there is no certainty as to whether it ever would be provided, and if so when or in what form. The route of this walkway is not currently open to the public and it is not part of the public highway. A new publicly accessible lakeside boardwalk is part of this proposal and its delivery can be secured if planning permission is granted, as can its future maintenance. The proposals for a lakeside boardwalk are covered in more detail later in this report. GLA Officers are satisfied that the existence of this positive covenant is not a material planning consideration and that even if it was material, it is considered that it would attract only minimal weight for the same reasons.
134. GLA officers note that both Merton and Wandsworth councils reached substantively the same conclusions in relation to the covenants.

Existence of a Statutory Trust and Shropshire v Day

135. A number of objections have suggested that the Wimbledon Park Golf Course is subject to a statutory trust for its use for public recreation. Specifically, it is suggested that, on the basis of a decision of the Supreme Court in the case of *Day v Shropshire Council (R(Day) v Shropshire Council [2023] UKSC 8; [2023] 2 WLR 599)*, the existence and effect of this statutory trust is a material planning consideration.
136. Legal opinions were provided to both Councils by objectors as well as by the applicant. Additionally, both LPAs have sought their own legal advice on this matter. All submissions have been considered and assessed by GLA Officers.
137. LBM specifically considered the matter on 31st March 1993 and concluded that: "As the public have no general right to enter upon the land due to the lease to the Golf Club, the land is not open space and it is not necessary to advertise the

proposal to dispose of it in accordance with the provisions of s 1234 of the Local Government Act”.

138. LBM, who were the owners of the land, definitively stated within their planning report that:

‘It is leading counsel’s view that on all the evidence the golf course land is not and has at no point been subject to a statutory trust for the purpose of public recreation pursuant to section 164 of the 1875 Act or otherwise. Leading Counsel has advised that the Council was under no obligation pursuant to section 123(2A) of the 1972 Act or otherwise to advertise its proposals to dispose of the golf club land, including when the freehold ownership golf course land was transferred to the AELTG in 1993. Officers accept this advice.’

139. Furthermore, Merton and Wandsworth officers, within their respective committee reports agreed that:

‘No part of the golf course land is now held subject to a statutory trust for the purpose of public recreation pursuant to section 164 of the 1875 Act nor is therefore the existence of such a trust a material consideration for the purposes of the determination of this application’.

140. GLA Officers have noted the differing legal opinions expressed by various counsel and sought their own independent legal advice from Leading Counsel. While, in Leading Counsel’s opinion, the land is held subject to a statutory trust for its use for public recreation, the matter is far from clear cut, and there are arguments pointing in both directions. Ultimately the matter can only be resolved by the court. The advice has been made publicly available on the GLA’s website and can be accessed following this [link](#).

141. If the land is held subject to a statutory trust, GLA Officers consider that is in principle capable of being a material consideration. Even if the public rights are not currently exercised, the lawful use has a public value and an adverse impact on that lawful use is capable of being a material consideration. The existence of the right may also affect how some planning policies apply to the proposed development, and the weight that attaches to certain harms and benefits. In some cases, deliverability can also be a material planning consideration. As explained in paragraph 131 above, ordinarily, any potential difficulties the developer might face in implementing the development would be an immaterial consideration when determining whether what is proposed is acceptable in planning terms. In this case there is nothing to indicate that any deliverability implications would be a material consideration. GLA Officers do not consider any of the benefits relied on are particularly time-sensitive, or that there are other potentially suitable and available alternative sites which could be less constrained in terms of deliverability.

142. Given the uncertainty as to the correct legal position, and that the issue of whether the land is the subject of a statutory trust may have a bearing on some of the planning issues, GLA Officers have assessed this application on the basis of a precautionary approach, assuming that the land is subject to a statutory trust. In the rest of the report this is described as the Precautionary Approach. Where relevant, a separate assessment will also be undertaken to identify whether the

analysis would be different if it was assumed that a statutory trust does not exist. This is referred to below as the Alternative Approach. These two approaches will be reflected within the open space assessments below, including the open space and recreational balanced assessment, and in the assessment of compliance with the development plan and the overall planning balance.

143. Leading Counsel also advised that if the land is held to be subject to a statutory trust, the AELTC are under no obligation to maintain the land as a golf course or manicured parkland. The right of the public to use the land would be a right to use it as it is kept by the landowner.

Referral to the Secretary of State

144. The power of the Secretary of State to call-in an application also exists where the Mayor of London (the Mayor) has called-in an application.

Relevant planning history

Merton applications

145. The following applications have recently been determined by Merton Council (post 2008). The full list of determinations has been outlined within the Merton Planning Committee Report.

Wimbledon Park Golf Course

146. The following is a list of the recent applications at the Wimbledon Park Golf Course site:

Table 1: Historical planning applications on the Wimbledon Park Golf Course site

Reference	Proposal	Determination Date	Status
21/P1709	Request for a scoping opinion under regulation 15 of the town and country planning (environmental impact assessment) regulations 2017 in relation to the proposed redevelopment of The Wimbledon Park Golf Club	16/07/2021	EIA required
19/P0173	Alterations to maintenance compound	22/03/2019	Permission granted.
18/P4425	Installation of 75 metre x 50mm subterranean mole ducting and associated temporary structure (cabinets, speakers and tvs)	05/04/2019	Permission granted.
18/P1808	Temporary erection of marquees and bridge for use in connection with the annual Wimbledon lawn tennis championship	13/08/2018	Permission granted.
14/P1126	Erection of temporary marquee for private hospitality purposes, annually for a period of 5 years, during the Wimbledon lawn tennis championship (temporary construction)	16/05/2014	Permission granted.

13/P3466	Replacement of 1200mm high concrete panel fence with 1800mm x 20mm diameter bar railings with finials and back arches for 340 metres along the eastern side of church road. replacement of single 1200mm high x 900mm wide pedestrian access gate with 1800mm x 900mm wide x 20mm diameter bar railing pedestrian access gate with finials.	10/01/2014	Permission granted.
13/P0306	Erection of replacement fencing and gates along church road.	17/05/2013	Permission granted.
13/P0472	Formation of 115 metres long x 1.2 metres wide footpath along western boundary		Pending decision.
12/P0442	Replacement of existing boundary treatment along church road (parallel with Wimbledon Park Golf Course) with new 1.8m high railings/gates and widening of northern entrance road (behind proposed new gates c and d) from 4m to 6m.	04/04/2012	Permission granted.
08/P0686	Erection of steel vehicular access/exit gates in existing concrete perimeter fence to home park road frontage of golf course for use during Wimbledon tennis championships including associated works to adjoining footway and kerb.	06/06/2008	Permission granted.

Wimbledon Park Lake

147. The following is a list of the previous applications relating to Wimbledon Park Lake:

Table 2: Historical planning applications on the Wimbledon Park Lake site

Reference	Proposal	Determination Date	Status
21/P1930	Engineering works to the lake, spillways and embankment to improve lake safety, in accordance with the reservoir act 1975 as amended.	14/10/2021	Permission granted.
21/P0708	Screening opinion request for works to the lake, including alterations to surroundings.	09/04/2021	EIA not required
11/P1164	Erection of temporary marquee and floating pontoon on Wimbledon Lake for private A1, A2 and D2 use, for a period of one day (Friday 01/07/2011) with no public access - to be erected the day before and removed the day afterwards. Sections of lake to be roped off for private swimming.	17/06/2011	Permission granted.

AELTC main grounds

148. The AELTC site itself has been subject to the following decisions recently:

Table 3: Historical planning applications on the AELTC main grounds site

Reference	Proposal	Determination Date	Status
20/P3635	Reconfiguration/alteration/extension of the existing millennium building including new/alterd plant, new atrium, link to existing somerset road tunnel, provision of a roof level extension and associated new landscaping.	22/07/2022	Permission granted.
20/P0420	Erection of a two-storey media pavilion, replacement of temporary cabins with a dedicated technical services room (tsr), and reconfiguration of gate 20 including the relocation and widening of existing access/egress, relocation of existing gatehouse building, new accreditation hut and gatehouse building, landscaping and associated works.	01/08/2022	Permission granted.
19/P0681	Application for variation of conditions 2 (approved plans) and 37 (BREEAM) attached to variation of condition 18/p3731 (attached to LBM planning permission 16/p4651) relating to the erection of 6 x internal and external tennis courts and associated facilities. the changes relate to installation of PV panels on flat roof section of building and condition 37 amended to reflect updated CO2 emissions).	02/01/2020	Permission granted.
18/P3731	Application for variation of condition 2 (approved drawings), 31 (noise), 39 (chp) & 41 (plant) attached to LBM planning application 16/p4651 (6 x indoor and outdoor courts and associated facilities). Changes relate to plant (replacement of 9 existing chillers with 6 new chillers), additional landscaping, enlargement of basement to create energy centre (including reduction of 8 parking spaces), two air sourced heat pumps within basement energy centre to replace chp system, internal alterations, altered car parking layout, and amendments to conditions 31, 39 and 41.	10/01/2019	Permission granted.
18/P2667	Non-material amendments to LBM planning permission 16/P4651 (6 indoor and 6 outdoor tennis courts and associated facilities). Changes relate to internal alterations, omission/new/relocated doors, windows & stairs, relocated/new flues, amended lifts & lift over-run and changes to louvres & timber cladding.	25/07/2018	Permission granted.
18/P0971	Extension and alterations to ground floor of the millennium.	11/05/2018	Permission granted.
16/P4651	Demolition of existing 5 x covered tennis courts and erection of a new building comprising of 6 x indoor courts and associated facilities, 6 x outdoor tennis courts, single storey basement for	29/05/2018	Permission granted subject to conditions and S106 agreement.

	parking (up to 338 vehicle spaces and 60 cycle spaces), 9 external covered car parking spaces, relocation of chiller plant (which services centre court roof) and associated equipment, associated landscaping, hardstanding, access roads, boundary enclosures and amended access arrangements.		
16/P2302	Elevation alterations at level 3 on North West section of Centre Court building and removal of enclosures on the existing bridge link.	12/08/2016	Permission granted.
14/P3481	Provision of a new retractable and fixed roof over no.1 court and associated plant. alterations to the existing seating bowl, improvements to seating arrangements; modernisation of corporate hospitality facilities; removal of court 19 and creation of a new public plaza with associated landscaping and extension to existing light well; improvements to ground level concession areas; extension of new officials canteen; alterations to create new facades; installation of new temporary screen (for use during The Championships) and living green walls facing aorangi terrace. Associated hard and soft landscaping and removal of an external spiral staircase from North west of the site.	10/06/2018	Permission granted.
13/P1812	Application for discharge of conditions 3, 6, 9 and 10 attached to LBM planning application 11/P2864 dated 10/01/2012 relating to the pedestrian tunnel between car park 3 and the millennium building, erection of a new single storey front extension with canopy to the millennium building and associated works connecting the tunnel with the player entrance at ground level.	06/11/2013	Permission granted.
13/P1352	Application for discharge of condition 5 attached to LBM planning permission 11/P2864 relating to the formation of a pedestrian tunnel between car park 3 and the millennium building, erection of a new single storey front extension with canopy to the millennium building and associated works connecting the tunnel with the player entrance at ground level.	22/07/2013	Permission granted.
12/P0729	Erection of external canopy at main entrance to players' facility at the millennium building, facing Somerset Road.	06/06/2012	Permission granted.
11/P2865	Erection of a new covered court facility over three levels containing six new indoor tennis courts to replace the existing building containing 5 indoor courts to be demolished, formation of new access to Somerset road, car	18/02/2014	Permission granted.

	parking facilities at ground floor / undercroft levels, replacement bar/lounge/changing facilities and new tree planting and landscaping		
11/P2864	Pedestrian tunnel between car park 3 and the millennium building, erection of a new single storey front extension with canopy to the millennium building and associated works connecting the tunnel with the player entrance at ground level.	10/01/2012	Permission granted.
10/P2300	Alterations and extensions to east and west elevations of millennium building to refurbish and improve facilities including provision of new internal staircase, alterations and two storey extension on eastern side of building above part of competitors garden to form improved lounge and larger reception area, construction of a covered outdoor plant space to service the new extension and relocation of the press writing room into an extension along the western facade above competitors drop off point, involving removal and replacement of two trees.	21/10/2010	Permission granted.

Wandsworth applications

149. Within the London Borough of Wandsworth boundaries, the following applications have recently been determined (post 2008):

Table 4: Historical planning applications on Wimbledon Park Golf Course, within the London Borough of Wandsworth

Reference	Proposal	Determination Date	Status
2018/0898	Non-material amendment to planning permission dated 26/06/2013 ref 2013/0863 (Installation of a 270m x 1.2m wide footpath set in but running parallel to Wimbledon Park Road, which forms the western boundary of Wimbledon Park Golf Club) to allow the extension of the existing footway running along the western boundary and the construction of a small services chamber beneath.	12/03/2018	Permission granted.
2013/4947	Replacement of existing boundary treatment (concrete panel) along Wimbledon Park Road, parallel with Wimbledon Park Golf Club, with new 1800mm high railing with finials and back arches for distance of 360metres. Replacement of two no. existing chain link vehicle access gates with new 1800mm high railing with finials gates.	19/11/2013	Permission granted.
2013/0863	Installation of a 270m x 1.2m wide footpath set in but running parallel to Wimbledon Park Road, which forms the	26/07/2013	Permission granted.

	western boundary of Wimbledon Park Golf Club.		
2013/0740	Details of landscaping and grass grid platform/structure pursuant to conditions 2 and 4 of permission dated 20.12.12 ref. 2012/4673 for construction of 10m long x 7.5m wide structural base and permanent foul drain connection for use to install temporary portacabin toilets for the Wimbledon Championships. Felling of one Field Maple tree and planting of two Oak trees.	02/04/2013	Permission granted.
2012/4673	Construction of 10m long x 7.5m wide structural base and permanent foul drain connection for use to install temporary portacabin toilets for the Wimbledon Championships. Felling of one Field Maple tree and planting of two Oak trees.	20/12/2012	Permission granted.

Current application

Pre-application discussions

150. The scheme was subject to extensive pre-application discussions with GLA officers as well as LBM and LBW officers. On 10 December 2020 a pre-application in-principle (Stage 1 pre-app; Ref: 202/6808) meeting was held with GLA officers. A written response was issued to the applicant on 5 February 2021 with the following advice provided to the applicant:

“The principle of extension of the AELTC in order to host tournament qualifying rounds at the Wimbledon site and reinforce the function and status of this world-renowned sporting venue is strongly supported in strategic planning terms. Notwithstanding this, give the proposal would include ‘inappropriate development’ on MOL, very special circumstances must be demonstrated that would clearly outweigh harm to MOL openness and any other harm. GLA officers are of the view that landscaping enhancements to the Grade II Registered Park and Garden could form an important part of the public benefits package of the scheme.”*

151. On 28 April 2021 a formal pre-application meeting (Stage 2 pre-app; Ref: 2021/0388) was held with GLA officers and a written response issued on 7 July 2021. In summary, the applicant was advised:

“The principle of redevelopment of the site to provide tennis and tennis related infrastructure could be acceptable in strategic planning terms; however, it would constitute inappropriate development on MOL and would therefore need to be robustly justified by very special circumstances which clearly outweigh and harm to the MOL by way of openness or otherwise per the NPPF and London Plan Policy G3. The applicant should also demonstrate how the benefits of the proposed tennis facilities would clearly outweigh the loss of the existing golf facilities and accord with both boroughs’ needs for sport and recreational facilities and open space in line with London Plan Policy S5. Development of this site would provide an excellent opportunity to celebrate the site’s historic landscape; however, the

scale and nature of the proposals would have an unmistakable impact on the site and its surrounds, creating a very different sense of place from what is there currently.”

Stage 1

152. On 25 August 2021, the Mayor of London received documents from Merton Council notifying him that a planning application has been submitted that was of potential strategic importance, referring it under the following Categories to that Order:

- **Category 1B(c):** Development which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres
- **Category 1C(c):** Development which comprises or includes the erection of a building... more than 30 metres high and is outside of the City of London
- **Category 3D:** Development on land allocated as Green Belt or Metropolitan Open Land in the development plan.... And which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.

153. On 1 November 2021, the Deputy Mayor for Planning, regeneration and Skills (hereafter, Deputy Mayor) considered the application and report prepared by GLA officers. The report advised Merton and Wandsworth Councils that the application did not yet comply with the London Plan for the following reasons:

- **Land use principles:** Whilst the redevelopment of the site to provide tennis infrastructure and a new publicly accessible park is supported in strategic planning terms, the proposal constitutes inappropriate development on MOL which must be robustly justified by very special circumstances. At this stage a VSC justification which clearly outweighs the potential harms to the MOL has not yet been fully demonstrated. Further information is required, and the benefits must be secured (paragraphs 16 to 36).
- **Urban design:** The provision of a new public park is welcomed, and details should be secured in line with London Plan Policy D8. Additional information is requested with respect to the proposed layout. The aspiration to incorporate English garden character through the build form is positive. Further consideration of the proposed design and impact of the buildings on the openness of the site will be required at reserved matters stage (paragraphs 38 to 50).
- **Transport:** Further details relating to the trip generation, highway and public transport impact assessment are required, as is justification for the on-site staff car parking. Mitigation to support a shift towards active travel should be secured, including a contribution towards the future expansion of the Cycle Hire scheme (paragraphs 50 to 56).
- Other issues on **sustainable development** and **environment** also require resolution prior to the Mayor's decision-making stage.

154. Following Stage 1, and prior to the consideration of the proposal at the Merton Development and Planning Applications Committee and Wandsworth Planning Applications Committee, minor amendments were made to the scheme, as outlined further above.

Council resolutions

155. On 26 October 2023 Merton Council decided that it was minded to grant permission for the application subject to planning conditions and conclusion of a s106 agreement.

156. On 21 November 2023, the application was considered by Wandsworth Planning Applications Committee. Members resolved to refuse planning permission in line with officers recommendation. The draft decision notice cited the following reasons for refusal:

- **Reason 1:** By reason of the substantial harm to and loss of visual and spatial openness identified to Metropolitan Open Land, the development would constitute inappropriate development. It is not considered that there are any Very Special Circumstances that clearly outweighs this harm, contrary to London Plan policy G3 and NPPF paragraphs 147, 148 and 149 (now paragraphs 152, 153, & 154).
- **Reason 2:** The proposed development would result in the net loss of open space/green infrastructure by reason of the development of substantial areas of parts of the site that are primarily grass, with no replacement provision provided, contrary to Policy LP53. It is not considered that the benefits of the development clearly outweigh the harm caused by the loss of open space, contrary to Local Plan Policy LP53 and the NPPF (2023) paragraph 99 (now paragraph 103).

Stage 2

157. On 16 January 2024, both Merton and Wandsworth Council advised the Mayor of their decisions. On 22 January 2024, the Deputy Mayor, acting under delegated powers, considered the GLA report (References 2021/1136/S2 (Merton) and 2024/0011/S2 (Wandsworth)). The report concluded that, having regard to the details of the application:

- a) The development would have a significant impact on the implementation of the London Plan because the expansion of the Wimbledon Tennis Championships, would enhance London's global competitiveness by promoting and supporting one of its key cultural assets. The proposal could also improve access to green, open space and sporting facilities for the community. At the same time, the subject site is MOL, which is afforded the same level of protection as Green Belt in the London Plan. Therefore, the application is considered to be of a nature and scale which would have a significant impact on the implementation of London Plan, as set out in the attached report.

- b) The development would have a significant effect on more than one London Borough as set out in the attached report. In summary, the Wimbledon Tennis Championships are one of the most prestigious sporting tournaments in the world and, as a result, the visitation and economic impacts associated with the event are significant with effects felt well beyond the boroughs of Merton and Wandsworth.
- c) There are sound planning reasons for the Mayor's intervention as set out in the attached. In summary, the expansion of the Wimbledon Tennis Championships site would enhance London's economy and global competitiveness by promoting and supporting one of its key cultural assets. Furthermore, in addition to the expansion of the AELTC the proposal would deliver significant benefits through the new public parkland, a boardwalk around the lake, desilting of Wimbledon Park Lake, a range of off-site enhancements to Wimbledon Park as well as other community and public benefits.

158. The Stage 2 report outlined outstanding issues including the Very Special Circumstances, urban design, heritage, transport, energy, whole-life cycle carbon, circular economy, air quality, and biodiversity.

Stage 3

159. Following the Deputy Mayor's decision to call in the application, assessment of the proposed development continued to progress. Between 22 January 2024, when the application was called in, and 29 April 2024, when the applicant submitted revised documentation, the applicant engaged in a series of discussions with GLA officers on revisions to the scheme, including the publicly accessible open space, car parking, travel plan and active travel measures.

160. On 29 April 2024, the applicant submitted a revised set of documents in support of the application, which comprised the following revisions:

- Creation of a new northern parkland providing an additional 1.7ha of publicly accessible parkland; and
- Re-alignment of the estate rail located within the AELTC's southern parkland, adjacent to the ecology zone, to provide an additional area of accessible parkland (0.3ha).

161. Re-consultation on amended plans: 09 May 2024 – 08 June 2024.

162. Two revised documents were received in July 2024, being:

- Revised Fire Statement (Rev 04; dated 09/07/2024); and
- Updated Car Parking Management Plan addendum (Rev 04; dated 04/07/2024).

163. Site visit: The Deputy mayor undertook an accompanied site visit on 11 September 2024 with GLA and TfL officers, representatives of the Councils, and the applicant team.

Relevant legislation, policies, and guidance

164. The Deputy Mayor must determine the application for planning permission in accordance with the requirement of Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004. The Deputy Mayor is required to determine the application in accordance with the development plan unless material considerations indicate otherwise. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan consists of the London Plan (2021), Merton Core Planning Strategy 2011-2026, Merton's Sites and Policies Plan (2014) (Merton SPP), and the Wandsworth Local Plan (2023).
165. Paragraph 225 of the NPPF states that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the NPPF, and that due weight should be given to them, according to their degree of consistency with the NPPF. All relevant policies in the adopted development plan are considered to be consistent with the NPPF.
166. The Deputy Mayor is also required to have regard, as material considerations, to national planning policy and guidance, as well as supplementary planning documents and, depending on their state of advancement, emerging elements of the development plan and other planning policies.
167. The relevant planning policies and guidance at the national, regional and local levels are noted in the following paragraphs.

Planning policy and guidance

168. The National Planning Policy Framework (NPPF) provides the Government's overarching planning policy framework. First published in 2012, the Government published a revised NPPF in July 2018 and further revised in February 2019, July 2021, September 2023 and December 2023. The National Planning Practice Guidance and National Design Guide are also a material considerations.
169. A written Ministerial Statement, for the ongoing consultation on the revised NPPF, was issued on the 30 July 2024 by Angela Rayner.
170. The London Plan (2021) is the Spatial Development Strategy for Greater London. London Plan Guidance (LPG) has also been developed to provide further information about how the current London Plan should be implemented. Some Supplementary Planning Guidance (SPG) documents also remains relevant to the application.
171. The Merton Core Planning Strategy was adopted by the full Council on 13 July 2011. The Merton SPP was adopted on 9 July 2014. A number of Merton Supplementary Planning Documents (SPD) are material considerations to the application.
172. Merton Council are in the process of producing a new Local Plan. Merton's Local Plan was submitted to the Secretary of State on 2 December 2021. Most recently, Planning Inspectors permitted the council to publish the Main Modification for

consultation between 2 February 2024 – 22 March 2024. A further 4-week consultation was undertaken between 5 July 2024 – 5 August 2024.

173. Together with the evidence, the Plan is a material consideration for the purposes of decision-making on planning applications. At this stage, given the New Local Plan is still under consideration by the Planning Inspectorate, the plan is given limited weight by officers in this planning assessment. The current adopted development plan forms the principal basis for assessing this planning application.
174. The Wandsworth Local Plan 2023-2038 was adopted by the full Council on 19 July 2023. Some Supplementary Planning Guidance (SPG) documents also remains relevant to the application.
175. Wandsworth Council is currently undertaking a partial review of the Wandsworth Local Plan (2023-2038). The partial review includes a review and update of Policy LP23 Affordable Housing. Wandsworth Council went out to consultation (Regulation 18) between 23 October to 4 December 2023. It is considered that the draft Wandsworth Local Plan, in that it relates purely to a review of affordable housing policy, is not relevant to this application.

Community infrastructure levy

176. Local planning authorities in London are able to introduce Community Infrastructure Levy (CIL) charges which are payable in addition to the Mayor's CIL.
177. In this instance the proposed development is liable to pay the Merton and Mayoral Community Infrastructure Levy (CIL). Merton's Community Infrastructure Levy was implemented on 1st April 2014. The Wandsworth Committee report confirmed that no borough CIL was payable as part of this application.

Table 5: CIL estimate

LPA	Borough CIL	Mayoral CIL
Merton	To be confirmed by LBM	£25,362.06 (estimated)
Wandsworth	£0	

178. If this development received planning permission, it would be liable for the above estimated amount of Mayoral and Merton CIL which would be subject to change upon approval of relevant details and relief claimed.

Response to consultation

Statutory consultee responses to Merton and Wandsworth Council's (including updated responses to GLA Stage 3 re-consultation)

179. The statutory responses were typically copied and issued to both Councils. The key issues raised are summarised as follows:

180. **Greater London Authority (including Transport for London):** The Mayor's initial consultation stage comments (GLA report ref: 2021/0914/S1) and the Mayor's Stage 2 decisions (GLA report ref: 2021/1136/S2 (Merton) and 2024/0011/S2 (Wandsworth)) are set out in aforementioned reports and are summarised in the 'Relevant planning history and current planning application' section above.
181. **Transport for London (TfL):** At Stage 1, TfL officers recognised the benefits offered through public realm improvements on Church Road and the public access to the southern parklands. However, it was noted that there are limited improvements for cycle access incorporated into the design. Further details relating to the trip generation, highway and public transport impact assessment were required, as was justification for the on-site staff car parking. Mitigation to support a shift towards active travel should be secured, including a contribution towards the future expansion of the Cycle Hire scheme.
182. Further discussions were undertaken with TfL Officers throughout the assessment process with both local authorities. On 12 January 2024, TfL Officers issued comments prior to the issuing of the Stage 2 decision. These noted:
- Transport issues raised at Stage 1 required details pertinent to the proposed highway works on Church Road and cycle infrastructure, along with concerns about parking, reliance upon private car travel and the associated network impact. Further information was provided on these matters and the scope of highway works has been agreed, subject to detailed design and the provision of a bus shelter with lighting.
 - Concerns raised around the planned closure of Church Road to pedestrians and cyclists during future events, which enables secure access between the site and the existing grounds to the west for ticket holders, are subject to a separate Temporary Traffic Order which is separate to the planning process. No suitable alternative routes for pedestrians and cyclists were agreed, therefore TfL maintains these concerns. However, it was agreed that a S106 obligation for the applicant to provide an annual Access Management Plan would be secured to confirm these details.
 - A contribution of £250,000 has been agreed to improve cycle infrastructure.
 - The proposals include a site-wide reduction in car parking for the Championship and Qualifying events, and the S106 will include a clause capping the amount of parking to 550 spaces within the site. Outside of the events a total of 66 car parking spaces are proposed. London Plan policy T6 does not provide specific parking standards for this use, however there is little evidence that the car parking would support a shift away from private car travel in favour of sustainable modes. The applicant is encouraged to further reduce car parking.
 - Highway works delivered via a Section 278 agreement with TfL will be secured to install CCTV infrastructure on the A24 in the vicinity of the existing Park & Ride (P&R) at Morden Park.

- A further contribution of £177,120 will be secured towards measures to manage the impact of additional demand at Southfields and Wimbledon Park London Underground stations during the events.
- Details of the cycle parking, along with a Parking Design and Management Plan, Delivery and Servicing Plan and Construction Logistics Plan will be secured by condition.

183. **Historic England:** Three responses were received from Historic England (HE). Overall, HE considered the proposed development would result in less than substantial harm to the Wimbledon Park Registered Park and Garden (RPG).

184. Furthermore, HE recognised that there are benefits with opportunities to reduce harm. Therefore, they noted that if the planning authority was minded to approve the current application, they note it is essential to secure public benefits. They note the planning authority should weigh heritage harm against such benefits as required under NPPF.

185. On 7 June 2024, HE issued an updated response to the GLA's re-consultation. This provided the following advice:

- Wimbledon Park is an important survival of a multi-phased designed landscape, including notable elements surviving from Lancelot 'Capability' Brown's involvement in the mid-18th century. The very high degree of significance is recognised in its designation as registered park and garden at grade II*, and as the focus for two Conservation Areas and Archaeological Priority Areas. However, the condition of the Park has deteriorated due to a number of localised problems, and as a result it has been included on Historic England's Heritage at Risk (HAR) Register since 2016.
- The proposed amendments involve minor changes to the originally submitted designs, altering the layout and boundary treatments within the northern and southern areas of the application site. This would create a new northern parkland providing public access to an additional 1.7 hectares of the registered park and garden and decrease the area of the proposed southern parkland's ecology zone to increase the publicly accessible area by an additional 0.3 hectares.
- The proposed amendments would increase the amount of the RPG accessible to the public while also enabling improvements and softening of the physical and visual treatment of existing land ownership boundaries that divide and fragment the designed landscape. This would help to address issues related to the registered park and garden's inclusion on the HAR Register.
- Additionally, the applicant proposes that the amendments would lay the groundwork for a larger landscape improvement scheme extending into the public park to more effectively integrate the areas under separate ownership in the north of the registered park and garden. Securing such a scheme via a S106 agreement or similar would enable addressing the registered park and garden's HAR status even further.

- Given the above, Historic England broadly welcomes the applicant's proposed amendments, which we see as contributing additional heritage-related public benefits procured by the proposed development. This would accord with the requirements of National Planning Policy Framework (paragraphs 208 and 212), National Planning Policy Guidance, the London Plan (policy H1), Merton's Core Planning Strategy (policies CS14 and DM D4), and Wandsworth's Local Plan (policy DMS 2).
 - Nevertheless, our position remains that the overall scale and extent of the proposed new structures and associated infrastructure within the registered park and garden would cause harm to its significance as well as to the special character of the conservation areas. Accordingly, we stand by the advice as set out in our consultation responses to both Merton and Wandsworth Council's dated 24 September 2021.
 - **Recommendation:** Historic England welcomes the applicant's proposed amendments, but we continue to have concerns about the application on heritage grounds.
186. **Natural England:** Three responses were received from Natural England during the application. They raised no objection based on the plans submitted. Natural England considered that the proposed development would not have significant adverse impacts on statutory designated sites.
187. Natural England were consulted on the re-consultation plans. No comments were received.
188. **Network Rail:** A response from Network Rail confirmed they had no comments to make on the proposal.
189. Network Rail were also consulted on the re-consultation plans. No comments were received.
190. **Sport England:** Two responses were received from Sport England who raised no objection to the proposed development.
191. Sport England were consulted on the re-consultation plans. No comments were received.
192. **The Gardens Trust:** The Gardens Trust provided three responses to the planning application. Overall, they raised concern to elements of the proposal whilst also noting the benefits of other aspects of the proposal. They point to the need to establish clarity that public access to the AELTC Parkland is free of charge in perpetuity, and to secure maintenance funding for the Registered Park and Garden.
193. The Gardens Trust issued an updated response on 5 June 2024 which states that they are in support of the planning application. Furthermore, the letter stated:
- We also support the proposed amendments for the Northern and Southern Parklands set out in the recent Landscape Planning Addendum.

- The amendments suggest that there could be related and potential enhancement opportunities that would provide tangible heritage, leisure and recreation benefits to Wimbledon Park (ie outside the ALTEC boundary and current planning application). These would apparently be funded from 106 agreements. We also support these proposals which would better integrate the Northern Parkland proposals with the existing Wimbledon Park.
- However, we stress that we see these as an essential part of the scheme and not just a possible "add on". We would appreciate being further consulted as the 106 conditions are formulated.
- It is clear from the Addendum that the changes suggested are also beneficial to the operation of the ALTEC court uses and Championship period in which public access to the ALTEC parkland grounds will be limited. As in our previous comments we acknowledge and accept that this is part of the compromise to achieve the establishment of the new public park to the East of the Lake together with a range of heritage benefits, restoration measures which respect the remnant Brownian landscape.

194. **Environment Agency:** Three responses were received from the Environment Agency (EA). Their responses noted that the EA had no comments on the planning application. However, it was noted that the applicant may be required to apply for other consents directly from the EA.

195. Environment Agency were re-consulted and no comments were received.

196. **Save Britain's Heritage:** Objects to the above planning application on the grounds that the complex of 38 tennis courts and show court stadium proposed will cause substantial harm to the character and significance of Wimbledon Park, a grade II* listed Registered Park and Garden whose survival from the 18th century and beyond, even in remnant form, is remarkable.

197. Whilst strongly supporting the principal of restoring this historic landscape, this application in its current form fails to comply with national and local policy for preserving Wandsworth and Merton's historic environment.

198. Save Britain's Heritage were consulted on the re-consultation plans. No comments were received.

199. **London Wildlife Trust:** Supports the proposed development, which would provide biodiversity net gain in accordance with the DEFRA metric.

200. On 7 June 2024 an updated response was received from the London Wildlife Trust

- In late 2021 London Wildlife Trust ('the Trust') undertook a review 'The Wimbledon Park Project', the proposals by the All England Lawn Tennis Club (AELTC) to reconfigure part of Wimbledon Park Golf Course and lake, which lies adjacent to the AELTC Wimbledon facilities.

- Since then, we have reviewed the suite of documents submitted as part of the planning application, including the latest planning addendum submitted to the GLA. We have also visited the site on a number of occasions, including the area that is now proposed as a northern parkland outside of The Championships period. With the AELTC's support we have worked closely with the ecology and landscape design team from Land Use Consultants (LUC), who are leading the design of the proposals, to help establish an accurate assessment of the current condition of habitats on site and the potential condition of habitats created and enhanced through these proposals.
- Over the course of the past 6 months this has involved utilising DEFRA's Biodiversity Net Gain Metric (3.0) in order to assess whether the scheme meets the objectives of achieving at least 10% uplift from the baseline assessment. We have scrutinised LUC's evaluation of the proposals using BNG Metric 3.1 and are confident that they reflect an accurate assessment of the baseline value of habitats and a pragmatic, if not conservative, assessment of the net gains for biodiversity that can be achieved if the proposals are delivered as planned.
- The updated proposals continue to project a higher net gain for biodiversity score according to DEFRA's current metric and methodology. This score is predicated on achieving habitat enhancements and gains in a practical time-scale, and that the losses of some habitats are primarily those of poor and/or highly degraded value. We endorse LUC's assessment using the BNG metric, recognising that it is a tool to inform the design of the proposals and to highlight where and what to focus on in terms of habitat creation and enhancement, in particular: daylighting of the brooks, the reedbeds alongside the lake, and the expansion of neutral/acid grassland on the eastern flank.
- As stated in our previous correspondence, the Trust's ambition is to see all suitable land in London managed as sympathetically as possible for wildlife and to maximise opportunities for local people to experience and enjoy nature as close as possible to where they live. We acknowledge that our ambitions have to be achieved in the context of a dynamic, ever-changing city with multiple legitimate and sometimes conflicting uses of land. We want to collaborate with landowners who are actively seeking to improve the ecological value of their land by integrating it with their primary purpose for owning and managing their land.
- Having had the opportunity to extensively review all of the AELTC project documentation and for the Trust's staff to visit the site on many occasions and understand the context and ambition of the proposals, I can confirm that LWT fully supports this ambitious and complex project and we will continue to explore further how we can work with the AELTC to showcase how other such schemes can deliver for nature.

201. **Lawn Tennis Association:** Supports the proposals: AELTC makes a significant and valuable contribution to British tennis through the surplus allocated to the LTA each year, which is based directly on the financial success of The Championships,

Wimbledon. The surplus provides crucial support to the LTA's funding, and helps to develop tennis in Britain, from grassroots participation through to the professional levels of the sport.

202. The Lawn Tennis Association issued a revised response on the 13 May 2024 in response to the re-consulted application. They noted:

- The LTA wishes to formally support proposals put forward by The All England Lawn Tennis Club (AELTC) for the planning application concerning Wimbledon Park Golf Club (ref: 21/P2900) - the Wimbledon Park Project.
- The AELTC makes a significant and valuable contribution to British tennis through the surplus allocated to the LTA each year, which is based directly on the financial success of The Championships, Wimbledon. The surplus provides crucial support to the LTA's vision to make tennis welcoming, enjoyable and inspiring for all, and helps to develop tennis in Britain, from grassroots participation through to the professional levels of the sport.
- We believe the project proposals will allow the AELTC to take the steps necessary to safeguard the future of The Championships, by moving the Qualifying event on-site and improving the player and practice facilities, to ensure they keep pace with the standards expected from a Grand Slam tournament. An increase in capacity, brought about by showcasing The Championships and Qualifying matches across a wider site, will allow even more tennis fans to enjoy this world-class event, and we hope, inspire the stars of tomorrow to pick up a racket.
- There will be community benefits from the scheme, including new access to Championships standard courts, newly accessible green space through the public parkland and a boardwalk around the lake.

203. The proposed Wimbledon Park Project will play a vital role in ensuring The Championships retains its place at the pinnacle of the sport, and in turn, the future success of tennis in Britain through its support for the LTA in the years to come

204. **Thames Water:** Thames Water provided comments to Merton in relation to surface water, water supply and waste water (sewerage). Specific comments included:

- The application indicates that surface water will not be discharged to the public network and as such Thames Water has no objection.
- Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.
- With regards to the proposed daylighting of the public surface water sewers, we support the reintegration of watercourses with nature and the reduction of flood risk.

205. Thames Water recommended a number of conditions. GLA Officers note that these matters have been secured by condition.
206. Thames Water were consulted on the re-consultation plans. No comments were received.
207. **Metropolitan Police (Secured by Design Officer):** Merton Council received a response from the Metropolitan Police Secured by Design (SBD) team which raised a number of questions to be addressed. The questions raised by the Metropolitan Police SBD are suitably covered off by management strategies and conditions that would be applicable to the site once operational. A condition has been recommended, and secured, to ensure that secured by design principles are adhered to and informed by advice from SBD officers.
208. The Metropolitan Police were consulted on the re-consultation plans. No further comments were received.
209. **Metropolitan Police (Protection Security Operations):** Merton Council received a consultation response from the MET's Protective Security Operations team dated 19 August 2022. This response was confidential for security reasons however it has been passed on to GLA Officers. The relevant parts that are not considered sensitive have been integrated into assessment of the closure of Church Road.
210. The Metropolitan Police were re-consulted and no further comments were received.

Individual neighbourhood responses

211. As part of the public consultation process, both Merton and Wandsworth Councils undertook three rounds of public consultation and publicised the application by sending notifications to local addresses, issuing site and press notices and consulting relevant statutory bodies.
212. Merton Council undertook formal consultation on three occasions during the application process as follows:
- 21-day consultation administered in August 2021 by way of letter, erection of site notice and press advert.
 - A 30-day consultation administered in June 2022 by way of letter, erection of site notice and press advert. This was carried due to material changes to the planning application comprising the May 2022 updates.
 - A 30-day consultation was administered in October 2022 by way of letter, erection of site notice and press advert. This was carried out due to the 'October 2022 updates' to the Planning application.
213. Wandsworth Council undertook formal consultation on three occasions during the process in the following manner:

- August/September 2021: Letters were sent out to residents giving residents over 30 days to respond. Site notices were erected in three locations giving residents 21 days to respond.
 - June 2022: Letters were sent out to residents giving residents over 21 days to respond. Site notices were erected in three locations giving residents 21 days to respond.
 - January 2023: Letters were sent out to residents giving residents 30 days to respond. Site notices were erected in three locations giving residents 30 days to respond.
214. Following the neighbourhood consultation process Merton Council received a total of 1,006 responses (894 in objection, 32 in support, and 80 comments). Wandsworth Council received a total of 1184 responses (1084 in objection, 83 in support, and 17 comments).
215. At the time of taking over the application, a change.org petition of objection from 'Save Wimbledon Park' containing 14,122 Signatures (at the time of the Wandsworth Committee report) was received whilst a third-party petition containing 2,046 Signatures was also received. Lastly, a total of 1479 letters (from 1298 households) of support were submitted by consultation firm 'Your Shout'.
216. Copies of all responses to public consultation, and any other representations made on the case, have been made available to the GLA.
217. In addition, as explained above, the Deputy Mayor has carried out consultation on revised plans submitted subsequent to him taking over the application, and comments received are outlined below. The Deputy Mayor has been briefed on the amount and content of all consultation responses, including the comments and any issues raised.

Representations made to the Mayor of London

218. The Deputy Mayor took over the planning application for his own determination on 22 January 2024. Letters outlining that the Deputy Mayor of London would be responsible for determining this planning application instead of the Council were sent on 22 January 2024 to both Merton and Wandsworth Councils. All consultees, as well as everyone who responded to the planning application, were reconsulted on the application on the 9 May 2024.
219. A re-consultation exercise took place on 9 May 2024 for 30 days in relation to the revisions to the scheme submitted by the applicant. Letters were sent to all those consulted by both Councils, in addition to all those who had responded to the planning application thus far. A press notice was posted in the Wimbledon Guardian and the Wandsworth Guardian. Site notices were also erected.
220. At the time of writing, more than 7,500 responses have been received through the GLA's planapps website, approximately broken down as: 4,330 responses objected to the application, 2,840 responses were in support, whilst approximately 330 were labelled as a representation or a neutral representation. It is noted that there were a high number of duplicate representations made through the system,

however the above represents the number of comments received through the website. There were also a number of emails and letters, both supporting and objecting to the planning application, submitted to the Mayor of London, Deputy Mayor for Planning, Regeneration and Skills, Jules Pipe MP, and GLA Planning Officers during the consultation of the revised application.

221. The petition that was submitted to both LPAs, objecting to the proposal, was also submitted to the Mayor in January 2024 and again in July 2024 by Hina Bokhari AM. The most current version of this petition, with a total of 20,400 signatures, was submitted to the Mayor in July 2024.
222. All these responses have been made available to the Deputy Mayor and have been taken into account in this report. They are summarised below.

Statutory consultees and organisations

223. The following statutory consultees and organisations were re-consulted on the proposal:

- **London Borough of Merton:** response received 14 June 2024; summarised in Paragraph 228 below.
- **London Borough of Wandsworth:** response received 07 June 2024; summarised in Paragraph 230 below.
- **Transport for London:** response received 12 July 2024; incorporated into Transport section below.
- **Historic England:** response received 07 June 2024; summarised in Paragraph 184 above.
- **Natural England:** no response received.
- **Network Rail:** no response received.
- **Sport England:** no response received.
- **The Gardens Trust:** response received 05 June 2024; summarised in Paragraph 193 above.
- **Environment Agency:** no response received.
- **Save Britain's Heritage:** no response received.
- **London Wildlife Trust:** response received 07 June 2024; summarised in Paragraph 200 above.
- **Lawn Tennis Association:** response received 17 May 2024 (dated 13 May 2024); summarised in Paragraph 202 above.
- **Thames Water:** no response received.
- **Metropolitan Police:** no response received.

Objections

224. The issues raised in objection to the revised scheme are similar to those raised to both LBM and LBW during their assessment of the application. These objections have been broadly summarised under relevant subheadings, as follows:

Impact to MOL

- This would set a poor precedent for permitting building on MOL.
- The building of an 8,000 seat stadium would completely destroy the MOL and green space.
- The park is MOL and is protected by government legislation.
- The 8,000 seat stadium, 38 tennis courts, 10 ancillary buildings and 9km of pathways would result in the destruction of green space.
- Green spaces in London must be preserved.
- The desire to expand cannot take precedence over MOL/Green Belt policy.

Open space

- Loss of access to open space.
- Loss of green space through the building on MOL.
- The space should be returned to parkland for all to use.
- The maintenance hub and staff parking area which could be relocated into the AELTC private grounds to create more space for public use in the southern parkland.
- Before the developer closed the golf course, the whole of it was available to some 900 members, and all Merton residents (paying 25% green fees).

Permissive parkland

- The permissive nature of the parkland was raised as a concern.
- Concern that AELTC could revoke access to the parkland at any time. How can AELTC be trusted to retain this as publicly accessible open space?
- The s106 must secure appropriate detail on management, maintenance, and total number of days access to the parkland. Otherwise, there is a risk that public access could be restricted or revoked.
- Access to the Northern parkland is not a year round substantial public benefit. Access in the southern parkland area would also be significantly restricted during the Championships.
- The amount of parkland provided is insufficient.

- Concern that the parkland would be closed for too long and during the best times of the year.

Covenants

- Concern that the application represents a breach of 1993 covenant signed between the AELTC and Merton Council.
- The covenant prevents AELTC from building on the site.
- Concern that Merton Council is not enforcing the obligations of the covenant which would prevent this development from being delivered.
- Concerns that deliverability should be taken into account in the planning assessment.
- The golf course freehold was sold for a fraction of its value given the covenant requiring AELTC not to build on the land.
- Covenant requires the provision of a lakeside walk so no weight should be given to the provision of a boardwalk.

Statutory trust

- The land is protected by trust, and this should be respected.
- The Public Trust status of the land, and of the Covenants given by the developer should be given weight sufficient to stop this development.
- There is genuine dispute over whether a statutory trust exists. This is not an issue that the GLA can or needs to resolve, rather a condition should be imposed on any planning condition requiring the application to obtain a declaration from the High Court that the 1875 Act does not affect the site.

Alternatives and need for the development

- It is totally unnecessary to develop 39 additional grass courts. The applicant has not sufficiently justified is no need for this number of courts.
- The Qualifying Event should be kept at Roehampton. There is nothing wrong with that venue.
- Wimbledon's history alone means that it will always retain its premiere Grand Slam status.
- It is not the scale and number of courts that define why Wimbledon is now, and always will be, the premier Grand Slam tournament.
- The 8,000 seat stadium would only be used for a few days a year. The applicant should explore an option with temporary seating/stands.
- The courts would only be used for 3 weeks a year.

- There is no need for a new stadium.
- The Qualifying Event is important because of its association with the Championships, not its physical location.
- This inappropriate development has not been appropriately justified on the basis of need.
- The AELTC and Wimbledon is in robust economic health and this expansion is not required to match competing venues/sports.

Amendments

- The April 2024 revisions are insulting and insufficient to demonstrating Very Special Circumstances.
- To make this revision so late in the process demonstrates very clearly that there is a recognition that the proposals fail to satisfy policy tests required to justify inappropriate development on MOL.
- The revisions do not address the previous objections.

Design and visual impact

- The Parkland Show Court is overdevelopment. The 28 metre tall building combined with all other elements fails to maintain the qualitative openness of the land and instead creates a manufactured and artificial landscape.
- the proposal is inappropriate and gross over-development. It would destroy the quintessential AELTC offer and turn 'Tennis in an English Garden' concept into 'Tennis in an Industrial Complex'.
- Permission to build a permanent show court structure should be refused and a temporary structure would have far less impact.

Boardwalk

- Oppose the boardwalk on/above the lake.
- The boardwalk should be located around the edge of the lake, as a lakeside path.
- The boardwalk around the lake should not constitute a public benefit given it is a requirement of the covenant.
- The proposed public access over the lake would disturb sensitive species. The preferable alternative of screened access around the lake has not been explored.

Central Grounds Maintenance Hub

- It is inappropriate to locate the CGMH next to a residential road.

- Concern that the Central Grounds Maintenance Hub is located within the permissive parkland.

Neighbour amenity

- The area is too busy during the Championships and this will worsen the impact.
- Diverting traffic onto smaller residential streets (during the closure of Church Road) raises concerns regarding increase noise, pollution, and quality of life.

Construction impacts

- Significant numbers of objections highlighted concerns regarding the construction impacts on the local area, especially in terms of the highway impacts, noise, air quality, potential impact of children and schools, and the general length of construction.
- The disruption and pollution which the proposed development would incur would be dangerous to thousands of local children and other people.
- Eight year construction timeframe is not acceptable and would have a detrimental impact on the local community.
- Questions and concerns regarding the proposed routing of construction vehicles. Impacts of this routing on Wimbledon Village and Southfields towns and residents.
- Local residents have already been subject to years of construction because of previous AELTC developments such as Court No. 1 and the roof to Centre Court.
- Questions raised as to how noise and air pollution shall be managed during construction phase.
- Concerns that construction traffic would have an adverse safety impact on school children, pedestrians, and cyclists.

Heritage

- The land is Grade II* Listed RPG and its loss would represent a major detriment to the environment and ecology of the area.
- This scheme would destroy the Capability Brown landscape.
- The application seeks to take advantage of the degradation to the historic landscape, contrary to NPPF 202.
- It fails to quantify the full impact of such extensive development on the Grade II* Wimbledon Park Registered Park and Garden (RPG) and this failure has led to confusion as to the level of harm the asset would receive as a result of the proposed development.

- It fails to explore the full potential to enhance the RPG's significance in order to balance the harm done to the asset as a result of the development.

Transport impacts

- Congestion at Southfields has always been an issue and this is another reason why expansion should be refused.
- TFL has discussed with the AELTC the opening of the turnstiles in the mornings to get people out of Southfields station on arrival. This does not allow for a much more dangerous scenario where the main stadium matches all finish at the same time.
- The closure of Church Road would impact traffic flow and accessibility in the local area.

Community benefits and impacts

- The proposal is not in the interest of the local community.
- The benefits are inadequate and inappropriate.
- The proposed benefits do not outweigh the harm to MOL or to the heritage asset, or the loss of open space.
- There is a lack of clarity as to the likely availability and scope of offsite 'enhancements' to be funded by the developer.
- The community should be given an opportunity to assist in identifying the necessary priorities and projects for improving Wimbledon Park.

Environmental impacts

- There would be a loss of biodiversity.
- Wimbledon Park is part of the 'lungs' of London and this proposal would detrimentally impact that, resulting in poor air quality and environmental outcomes.
- The proposal requires cutting down mature trees and replacing them with saplings that would take decades to grow.
- The proposals would cause the Urban Greening Factor (UGF) to decline from the present 0.99 down to between 0.82 and 0.7, so failing to meet the London Plan Guidance.
- The water quality in Wimbledon Park Lake is threatened by the proposed method of sediment removal, potentially harming protected species.

Ecology and biodiversity

- Object to 300 trees being cut down.

- The developer's Biodiversity Net Gain (BNG) calculation fails six of the nine checklist tests for compliance with the statutory BNG guidance
- The developer's BNG calculation was invalid because it failed to recognise that the ex-golf course is an Irreplaceable Habitat.
- Independent, expert calculations show that the developer's claimed 23% BNG is, in fact, a 36% Biodiversity Net Loss.
- Given this significant harm to biodiversity, and given Wimbledon Park Golf Course is Irreplaceable Habitat, planning policy requires the planning decision-maker to refuse permission.

Sustainability

- During a climate crisis the carbon footprint of this development is unacceptable.
- Employment and economic impact
- This proposal is purely driven by AELTC's and LTAs motivation to make more money.
- London's global competitiveness would not be measurably improved if the proposals are approved.
- We do not accept the premise that creating employment within the construction industry should be planning justification in itself on MOL.
- Increased funding for the LTA and the Wimbledon Foundation should not be used to leverage or influence the planning decision.

Other

225. A number of other matters were also raised within the objections including:

- Not all visitors are respectful of the community.
- The proposal represents continued development creep by Wimbledon / AELTC.
- Questions regarding the process following GLA call in and the need to respect the decision made by Wandsworth Council.

Support

226. The matters raised in support to the revised scheme are summarised as follows:

- Supportive of the expansion of Wimbledon to ensure it retains its place as the premier Grand Slam.
- Wimbledon is a cultural institution and a British icon of sport. This proposal is significant for London and the UK and it should be supported.

- The current facilities and infrastructure at Wimbledon need improvement, especially to keep up with other Grand Slam venues.
- Supportive of the economic and employment benefits offered by the expansion of the Wimbledon Championships.
- The relocation of the Qualifying Event, extension of tennis on site to three weeks, as well as the increase in attendees would provide increased commercial benefits and employment opportunities.
- Increased public access to open space. The new 11.1ha of public parkland recognised as a key benefit for locals.
- The de-silting of the lake by the AELTC is strongly supported for financial, ecological, and recreational reasons.
- Very supportive of the overall public benefits package.
- The proposed tennis use and parkland represents a significant improvement compared to the existing context, being a golf course.
- The design and layout is considered to be appropriate with the tallest element located well away from the closest residential properties.
- The proposal would incorporate significant environmental, ecological and biodiversity improvements.
- The 'daylighting' of the two tributaries is welcomed.
- The improvements to Wimbledon Park, including increased public facilities are supported.
- Concerns that opposition to the project is not representative of the views of the whole neighbourhood.
- Whilst the proposal is not perfect it represents a significant public and community benefit.

Other consultation responses

227. In addition to the submissions outlined above, responses were received from both boroughs as well as local representatives. These are summarised below:

Merton Council

228. On 14 June 2024, Merton Council issued their response to the GLAs re-consultation. This letter is summarised as follows:

- Metropolitan Open Land and Open Space: Officers do not consider the proposed landscaping changes to the northern and southern parkland would result in any appreciable change in terms of openness and associated harm to MOL. There is a need for public toilet facilities in the northern part of Wimbledon Park and officers raise no objection in principle

to this additional facility. Officers consider the increased access to the northern parkland is consistent with London Plan policy which supports proposals to enhance access to MOL.

- Townscape, visual impact, design and neighbour amenity: Officers note there would be no additional buildings within the red line resulting from the amendments. The proposals to create a more integrated and enhanced entrance to Wimbledon Park would also be a benefit visually in terms of the Wimbledon Park Road street scene. The most significant change visually would be the new removable east-west railing which will form a new park boundary outside the Championships. However, the visual impact of this is not considered harmful. Officers consider the amended design of the northern parkland well considered. The proposed amendments do not give rise to concerns in relation to neighbour amenity.
- Heritage: Generally, officers consider the amendments provide further heritage related public benefit. The increased public access to the northern parkland would enable a greater appreciation of the RPG.
- Transport and Highways: Officers are supportive of any further measures to further promote walking and cycling during and outside the Championships.
- Ecology biodiversity and green infrastructure: The proposals continue to deliver significant uplift in BNG and UGF.
- Trees: Officers note that in order to accommodate new links between Wimbledon Park and AELTC's northern Parkland, 4 additional trees are proposed to be removed. No objection is raised to these removals.
- Climate change, Waste, Flooding and drainage, Air Quality, Noise and Vibration, Light Pollution, Contaminated Land, and Economy: The proposed amendments do not give rise to any changes to these matters.
- Community, open space, sport, and recreation:
 - The enhanced access to the northern parkland provides further opportunities for walking in the local area and do not impinge on the existing recreational use of the northern events field. The use of the northern gateway area presents an opportunity to deliver events that instil a sense of local community.
 - Merton's Sport and Leisure team welcome the additional green space provided. The inclusion of additional toilet facilities and benches is also important in making sure young families, older people and those with disabilities are able to access this additional open space year-round.
- Implications of changes for s106 agreement and conditions: The key to the success of the more integrated parkland would be a coordinated approach between AELTC and Merton in terms of the management of these spaces. It is expected that under the s106 agreement, details of management would be secured.

- Under the s106 Merton would also seek to ensure that access to the northern parkland is maximised with timings of such access aligned with the Council owned Wimbledon Park as far as practicable.
- The provision of new landscaping and toilet facilities in the north of Council owned Wimbledon Park is considered positive. Merton seek to ensure there are suitable mechanisms in place for ongoing maintenance.

229. Overall, Merton Officers welcome the proposed amendments to the planning application being considered by the Greater London Authority. In particular, the proposed enhanced access to the northern parkland serves to increase the level of public benefit to local residents. The indicative proposals in the north of Council owned Wimbledon Park would improve the landscape and heritage recreational value of this area.

Wandsworth Council

230. On 7 June 2024, Wandsworth Council issued a formal written response to the GLA's re-consultation. This response is summarised as follows:

- The Council welcomes the proposed amendments to the application, which would include additional public access to the Northern and Southern parts of the site and an eventual further reduction in event car parking. It is acknowledged that these amendments would have additional benefits to the public. These amendments would help the development to accord with elements of Local Plan Policies LP54 (Open Space, Sport and Recreation), by increasing public access to open space, and the aims of Policy LP50 (Transport and Development) by reducing the amount of car parking on the site.
- However, it is not considered that these benefits are sufficient to tip the balance clearly in favour of the application, and it remains the Council's view that the applicant has not demonstrated that Very Special Circumstances exist that clearly outweigh the substantial harm to Metropolitan Open Land openness that this development would cause. Furthermore, it is considered that the submitted amended documents raise additional concerns in relation to Ecology.
- It is considered that the amendments would have a public benefit, by opening up more of the site to permissive public access, but this benefit is reduced by the limited area of additional public access and the uncertainty over the quality and use of this additional publicly accessible space. Furthermore, it is our assessment that the amendments would cause additional harm to MOL openness by virtue of the additional areas of paths proposed. Furthermore, it appears that additional harm would be caused by the loss of further trees and a potential reduction in the ecological benefits of the scheme.
- Given that it is considered that the amendments would only have a limited additional public benefit and would also cause additional harms, it is clear in our view that the amendments fall far short of overcoming the Council's

reasons for refusing the application. The Council reasons for refusal therefore remain in their entirety.

231. Overall, it remains the Council's view that the proposed development would cause substantial harm to MOL openness, both visually and spatially, the applicant has failed to sufficiently justify the need for the scale of development or that the benefits of the scheme clearly outweigh the harm identified. Despite some of these welcome though minor revisions, the GLA is urged to refuse this application.

Fleur Anderson MP

232. Fleur Anderson objected to the revised scheme noting the following:

- These new plans now include a small amount of extra public land, but this seems an insult compared to the extensive development size.
- I am worried about not only the disruption the development would bring to residents, but the public access to green spaces, wider impact on the environment and knock-on impact in Roehampton.
- Proposals would result in a net loss of open space/green infrastructure. There will be a substantial net loss to biodiversity and to urban greening.
- The AELTC Park will belong to the AELTC who will control public access, meaning that visitors access can be withdrawn at any time.
- Worry about the air pollution that construction traffic will bring with 40,000 lorry movements over eight years.
- Concerned about plans to close Church Road.
- Investment in Roehampton will be removed.

London Chamber of Commerce and Industry

233. The London Chamber of Commerce and Industry wrote a submission in support of the planning application stating:

- We request that approval is granted for the development proposals for the former Wimbledon Golf Course.
- The Wimbledon tennis tournament is critical to the capital as a whole. The sports industry research centre at Sheffield Hallam University identified that the tournament's total economic impact on our city in 2022 was £198.9 million, and it supported economic activity worth £222.4 million across the capital.
- While Wimbledon is the world's premier grass court tennis tournament, this status can not be taken for granted. London is facing competition from other international venues and we need to ensure the tennis tournament retains its global status.

- Sheffield Hallam University has projected that if the All England Club gains planning permission for its development plans this could increase the economic boost for London to £268 million and economic activity to £296.3 million by 2031.
- The proposals also meet the net zero objectives of the Mayor. The London Chamber of Commerce and Industry strongly backs the Mayor's objective that the capital should be net zero by 2030.
- 1500 new trees would be planted with at least a 10% measurable net biodiversity gain. There would also be a restoration of the rapidly deteriorating lake with the recreation of some of the lake's original eighteenth century features.
- It should also be added that this development will mean that the area will be opened up for the enjoyment of all Londoners. In this case, parkland and seven new grass courts will be available for all Londoners to enjoy. We welcome the steps made in this application to ensure the various community projects are integrated so that this application supports the needs of local residents.

Principal planning issues

234. Having regard to the site and the details of the proposed development, relevant planning policy at the local, regional and national levels; and, the consultation responses and representations received, the principal planning issues raised by the application that the Deputy Mayor must consider are:

- Land use principles (including policy designations, MOL, open space, sport and recreation use);
- Urban design (including design scrutiny, surrounding character, layout & public realm, height & massing, protected views, residential amenity, fire safety, designing out crime and inclusive design);
- Heritage (including the significance of the existing buildings on site, and impacts to the significance of designated and non-designated heritage assets including archaeology, which may be affected by development within their setting);
- Surrounding amenity impacts (including daylight, sunlight & overshadowing, privacy, light pollution, noise & vibration, basement development and wind microclimate);
- Green infrastructure and the natural environment (including trees, biodiversity & ecology and urban greening);
- Sustainability and environment (including sustainability strategy, energy, waste & the circular economy, air quality, and flood risk & drainage);

- Transport (including healthy streets and vision zero, vehicle access and parking, cycle parking, deliveries and servicing, demolition and construction, travel plan, environmental impacts);
- Socio-economic impacts;
- Environmental Impact Assessment (EIA);
- Mitigating the adverse impacts of the development through planning obligations; and,
- Very Special Circumstances, planning balances, compliance with the development plan and overall conclusion.

235. These issues are considered in the following sections of this report having regard to both the Precautionary Approach and Alternative Approach to the status of the land.

Land use principles

236. This section considers the key land use principles for the proposed development.

237. The land use principles primarily relate to the development on Metropolitan Open Land (MOL), the impact on openness, building on designated open space as well as the loss of the golf course for alternative sport and recreational use.

Current lawful use

238. The lawful use of the site is as an 18-hole golf course, (which includes a Golf Course Club House, a maintenance compound, and a number of smaller outbuildings) as well as Wimbledon Park Lake as well as a very small part of Wimbledon Park (being the small section of land required to enable the proposed boardwalk connection the existing lakeside path).

239. The lawful use of land has been confirmed by both LBM and LBW within their respective Committee reports. This land use is supported by a history of planning permissions that have granted approval for ancillary uses associated with the golf course use (as outlined above).

Metropolitan Open Land (MOL)

240. The application site is located within designated MOL. London Plan Policy G3 requires that MOL is afforded the same status and level of protection as the Green Belt.

241. The NPPF attaches great importance to Green Belts, and by extension MOL. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and the essential characteristics of Green Belts are their openness and their permanence.

242. The London Plan describes MOL as strategic open land within the urban area that protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity.
243. London Plan Policy G3 requires that MOL should be protected from inappropriate development in accordance with policy tests set out in the NPPF that apply to the Green Belt. NPPF paragraph 152 states inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (VSC).
244. Paragraph 154 of the NPPF regards the construction of new buildings in Green Belt (MOL) as inappropriate, unless they meet one of the exception tests including, but not limited to, the provision of facilities for outdoor sports and outdoor recreation so long as the facilities preserve the openness of the Green Belt (MOL), and do not conflict with the purposes of including land within the Green Belt (MOL).
245. Paragraph 155 of the NPPF states that certain other forms of development, such as material changes of use for outdoor sport or recreation, are also not inappropriate in the Green Belt provided the development "preserves the openness of the Green Belt and do not conflict with the purposes of including land within it.
246. As such, the assessment needs to consider whether the proposed development preserves the openness and/or conflicts with the purposes of Green Belt (MOL) and this is assessed below.
247. It is noted that VSC features in the first of Wandsworth Council's reasons for refusal, which reads:
- **Reason 1:** By reason of the substantial harm to and loss of visual and spatial openness identified to Metropolitan Open Land, the development would constitute inappropriate development. It is not considered that there are any Very Special Circumstances that clearly outweighs this harm, contrary to London Plan policy G3 and NPPF paragraphs 147, 148 and 149 (now paragraphs 152, 153, & 154).

Impact on openness

248. The effect on openness is a matter of planning judgment based on the circumstances of the case. Planning Practice Guidance on Green Belt (published 22 July 2019; updated 19 December 2023) identifies the factors that can be taken into account when considering the potential impact of development on the openness of the Green Belt. This guidance states:

'Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.'*

249. The Parkland Show Court, with a height of 28 metres, would be the part of the proposal which would have the most significant visual impact on openness, given its height, scale and prominence. Whilst the siting of this element has sought to reduce its impact, the large building would be located in an area of open space. Therefore, the visual impact and massing/volume of this structure would result in a clear and definitive impact on the openness of this site and it would be visible from both within the site and from the surrounding area.

250. There are also seven single storey maintenance hubs and the two single storey player hubs which have been designed to blend into the landscape. Individually, GLA Officers consider that they would not significantly impact the openness of such a large site. However, they do contribute to the cumulative level of development that, when combined with the Parkland Show Court, does result in a harmful impact to the openness of the site.

251. The 38 grass tennis courts (excluding temporary structures discussed below), the fencing, boardwalk and all other landscaping elements are not considered to impact the general openness of the site as they would create a similar feel to the current design of the site.

252. In the month leading up to the Championships and Qualifying Event, infrastructure would be installed on site including entrance structures, nets and screening surrounding the tennis courts, and temporary stands needed to facilitate the Championships and Qualifying Event. Whilst these elements would only be temporary, they are associated with the increased degree of activity on site and would reduce the openness of the site for approximately 2 months of every year. GLA Officers consider that there would be an impact on openness associated with the temporary overlay associated with the operation of the Wimbledon Championships.

253. The Parkland Show Court, the cumulative impact of all buildings, as well as the seasonal temporary structures would result in a noticeable increase in built form on the site that would fail to preserve the openness of the MOL.

Purposes of Green Belt (MOL)

254. Paragraph 143 of the NPPF sets out that Green Belt (MOL) serves five purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;

- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns;
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

255. Given the locational characteristics of this urban site, GLA Officers consider that the proposed development would not result in sprawl, would not merge neighbouring towns, would not encroach on the countryside, or impact the setting of a historic town. GLA Officers have considered the role of this MOL in encouraging the recycling of derelict or other urban land, but in this case it has been demonstrated that the need for the development cannot be met elsewhere, and in particular there is no derelict or other urban land on which it might be developed instead. In those circumstances it is considered that this factor should not be given significant weight.

256. In addition to the above, London Plan Policy G3(b) is applicable which indicates the general purposes of MOL by outlining the criteria for the extension or designation of MOL. The four criteria are as follows:

1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area.
2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.
3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.
4. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

257. Presently, Wimbledon Park Golf Course and Wimbledon Park Lake are clearly distinguishable from the nearby built-up area. The proposed Parkland Show Court, by itself, would have a significant impact on the ability to distinguish the land from the built-up area. Additionally, the Parkland Show Court when combined with all other smaller proposed structures (including the two player hubs, the seven satellite hubs and the central grounds maintenance hubs) as well as new fencing, pathways, and temporary seasonal structures would diminish the ability of the land to be distinguished from the neighbouring built up areas. In this regard, the proposal is considered to be contrary to purpose no. 1.

258. The proposal would accord with purpose 2 given that a large proportion of the proposal would be open air facilities (one with an operable roof) for the purposes of sport and recreation, which would serve either the whole or significant parts of London.

259. Purpose 3 identifies sites that contain important features or landscapes. In this case, the designation of the Registered Park and Garden (Grade II*) would be retained and the works undertaken would seek to remove the site from the at-risk

register. Whilst some harm is identified to the RPG (see heritage assessment below), the proposal is not considered to be contrary to this purpose.

260. Having regard to purpose 4, the site would remain a strategic green corridor and the provision of new publicly accessible parkland would provide a qualitative improvement to this green network with 11.1ha of publicly accessible, managed, and maintained open space with improved pathways and connections across the site. This assessment is consistent across both the precautionary and alternative approach.
261. Therefore, the proposal is contrary to one of the general purposes of MOL, as set out under Policy G3 of the London Plan, but not the other three. This assessment is considered to be the same across both the precautionary approach and the alternative approach.

Summary

262. The proposed development would fail to preserve the openness of the MOL; would be contrary to one of the general purposes of MOL and, as such, constitutes inappropriate development. By reason of the proposal's inappropriateness, the proposal is, by definition, harmful to MOL. It would result in harm to the MOL, a loss of visual and spatial openness which would diminish the ability for the land to be distinguished from the built-up areas nearby. **Very significant weight** is attributed to the harm to MOL.
263. Therefore, in accordance with paragraph 152 of the NPPF, planning approval must not be granted except in Very Special Circumstances (VSC). Consideration as to whether VSC exist is set out towards the end of this report.
264. Notwithstanding the above, the applicant has developed a scheme that has sought to provide compensatory improvements to offset the impacts on MOL.

Open space

265. Paragraph 103 of the NPPF states existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless one or more of three exceptions are met. These are:
- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
266. GLA Officers are of the view the proposed tennis use comprises development that is substantially for alternative sports and recreational provision. Additionally, the GLA Officers consider that proposal would result in a qualitative improvement to

the current public open space provision. Therefore, the proposal would accord with two of the exceptions listed under paragraph 103 of the NPPF.

267. Development on open space is also governed by local planning policy, including:

- Policy G4 of the London Plan states that development proposals should not result in the loss of protected open space. Additionally, it encourages the creation of publicly accessible open space, particularly in areas of deficiency.
- Policy CS 13 of the Merton Core Strategy aims to protect and enhance the borough's public and private open space network including MOL. Merton SPP Policy DM O1 expands on this policy by stating that the council will continue to protect MOL and designated open spaces from inappropriate development in accordance with the London Plan and government guidance. The site is designated as Open Space in the Merton SPP.
- Wandsworth Local Plan Policy LP54 states that public access to open space and sports and recreation facilities on private land will be supported, particularly in areas with an identified deficiency in open space. Policy LP20 requires that major developments provide new open space on site and make improvements to the public realm. Wimbledon Park is shown as MOL under the Wandsworth Local Plan policies map.

268. As MOL, the site is considered to represent protected open space.

269. The potential for a loss of open space was discussed by both Councils in their assessment reports. Merton considered that the development would not result in any quantitative loss of open space overall. On the other hand, the loss of open space formed the second of Wandsworth Council's reasons for refusal, which read:

Second Reason: *The proposed development would result in the net loss of open space/green infrastructure by reason of the development of substantial areas of parts of the site that are primarily grass, with no replacement provision provided, contrary to Policy LP53. It is not considered that the benefits of the development clearly outweigh the harm caused by the loss of open space, contrary to Local Plan Policy LP53 and the NPPF (2023) paragraph 99 (now paragraph 103).*

270. The Merton Green Infrastructure Biodiversity and Open Space Study 2020 (Merton Open Space Study) identifies the former Wimbledon Golf Course site as 'other open space not included in area of deficiency calculation'. This essentially positioned the site's status as private, inaccessible open space that does not contribute to addressing open space deficiencies. The Merton Open Space Study identifies open space deficiencies directly to the west of the subject site, including many residential homes.

271. The Wandsworth Open Spaces Report (May 2021), identifies that both the Southfields and West Hill Wards are deficient against combined recommended standards for open space provision. In particular, the Southfields Ward experiences a deficiency in natural/semi natural open spaces, and also amenity

green spaces. The West Hill Ward is identified as experiencing deficiencies in parks and gardens, as well as natural and semi natural open space.

272. Applying the Precautionary Approach (see paragraphs 139-142 above), this land is assumed to be held in statutory trust, and the owner would therefore be under an obligation to make the land available for access by the public for recreation. Assessed on this basis, the proposal would represent the loss of approximately 18.6ha of the former golf course (with a total area of 29.7ha) as publicly accessible open space as a result of the expansion of the Championships. Whilst this would be partially offset through the provision of significant qualitative benefits associated with the proposed 11.1ha of publicly accessible, managed, and maintained open space it would still technically represent a loss (albeit that there has been no access available for the past 120 years (outside of the golfing use) and no alternative proposals to grant and secure ongoing public access).
273. No replacement publicly accessible open space has been provided to an equivalent amount, contrary to the London Plan and local planning policies. Therefore, this proposal would result in harm to the publicly accessible open space. This represents harm to the protected open space.
274. However, it is noted that a statutory trust would not create an obligation for AELTC to maintain the land to any particular standard. In this regard, the provision of the 11.1ha of publicly accessible, managed, and maintained land would result in a substantially more usable, functional, and better designed parkland than would otherwise be available on the assumption that a statutory trust does exist. That is considered a significant qualitative benefit.
275. Applying the Alternative Approach, whereby it is assumed that no statutory trust exists, the proposal would not result in any quantitative loss of publicly accessible open space. On this approach the quantum of publicly accessible open space would be increased through the provision of the new 11.1ha parkland that would sit directly adjacent to, and interconnect with, Wimbledon Park. Paragraph 8.3.4 of the London Plan aims to enhance access to MOL and to improve poorer quality areas to provide a wider range of benefits for Londoners. The proposal would significantly enhance access to this site especially in an area where deficiencies have been identified.
276. In addition, on the Alternative Approach the proposal would also represent a quantitative increase in access to open space and reduce the deficiency in access to open space for nearby residential areas. This would represent a very significant public benefit of the scheme.
277. In summary, it is considered that applying the Precautionary Approach the proposal would result in a net loss of publicly accessible open space, and this harm would be given **very significant weight**. If the Alternative Approach is applied there would be an increase in the quantum of publicly accessible open space. This would be a very significant public benefit, attracting **very significant weight**.

Sport and recreational use

278. Turning to the land which would not be publicly accessible open space, the site would be used for the purposes of Lawn Tennis with 39 courts in total provided. These will be developed primarily for the purposes of semi-professional and professional tennis with the Wimbledon Championships to be held on the site for two weeks every July. An additional week of Qualifying would be held on site prior to the Championships.
279. London Plan Policy S5 states that existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:
1. An assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or
 2. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 3. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
280. All three tests are considered to be relevant and met and these will be analysed and assessed further below. Most notably exception 3 which states 'the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use' is particularly relevant to this case. Furthermore, it is noted that London Plan paragraph 5.5.5 acknowledges the role of specialist sporting venues and stadiums in providing facilities and enabling wider access to sport, as well as having an important cultural value.
281. Merton Core Strategy Policy CS 13 aims to promote opportunities in culture, sport and recreation based on the assessment of need and capacity. These would be promoted by safeguarding the existing viable cultural, leisure, recreational and sporting facilities and supporting proposals for new and improved facilities.
282. The Draft Merton Local Plan includes Policy N8.1 (Wimbledon Park) aims to support the park's sport, recreation, play, and amenity uses and enhance access to them, ensuring their successful integration with historic and biodiversity designations.
283. Policy LP54 of the Wandsworth Local Plan states that: Proposals for new, or improvements to existing, sports facilities should:
- Be developed in accordance with and meet the needs of the Playing Pitch Strategy;
 - Increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling;

- maximise the multiple use of facilities, and encourage to co-location of services between sports providers, schools, colleges, universities and other community facilities; and
- Support the provision of sports lighting within reasonable hours, where there is an identified need for sports facilities, and lighting is required to increase their potential usage, unless the lighting gives rise to demonstratable harm to the local community, open space, local amenity or biodiversity.

Loss of golfing use

284. The Golf Course use ceased on site in 2023. Nevertheless, as the lawful use of land, it is essential to consider and assess the principle of the loss of the golfing use.
285. Merton's Playing Pitch Strategy does not consider the need and supply of golf courses within the local area. Similarly, the Wandsworth Playing Pitch Strategy & Action Plan does not consider the need or demand for golf courses.
286. The applicant conducted analysis to show that there are 19 golf courses within 10 miles of the application site. Many of these courses offer pay and play to non-members. In lieu of any evidence of a deficiency within a local strategy, GLA Officers consider that the evidence shows there are sufficient opportunities to play golf in the wider area.
287. Therefore, we note the loss of the golfing use on site but it is considered that there is ample opportunity to play at other golf courses within a reasonable distance of the site and there is no identified shortage within local pitch strategy documents.

Provision of tennis use

288. The Merton Playing Pitch Strategy (2019) has analysed demand for tennis within the borough and determined that there is need for an additional 4-7 floodlit tennis courts, or alternatively 6-12 additional non-floodlit tennis courts, by 2035.
289. The Wandsworth Playing Pitch Strategy (2021) states that there is insufficient capacity for tennis within the Wandsworth stock to meet current and future demand. There is insufficient capacity both within formal club environments and to meet existing and latest demand at sites pitched at public use. There is a need to increase capacity of existing provision through a combination of floodlighting existing courts, increased covering of courts, as well as increasing the quantitative supply. To address these issues, the Playing Pitch Strategy recommends along with numerous other measures: 'to explore the opportunity to develop new tennis offers linked to existing tennis environments, such as courts for padel tennis'.
290. The provision of a tennis use on this site provides an alternative sport and recreational use that is in accordance with local demand strategies and would expand on the successful tennis use on the adjacent AELTC Main Grounds.
291. The use of seven (7) of these grass tennis courts would be secured for public use following the completion of the Wimbledon Championships. This has been

secured within the s106 for use during the grass tennis season. A Parkland Grass Tennis Courts Community Use Plan has also been secured which would detail how these courts will be available for use from the first weekend of August until the second weekend of September each year.

Need for the development

292. The applicant has outlined the key reasons underpinning the need for the development. It is recognised that the Championships are a key cultural and sporting fixture in the British summer and world sporting calendar. However, the applicant has identified a risk that The Championships fall behind other tennis Grand Slam tournaments due to the inadequacies of the AELTC grounds and operations, citing the following reasons:

- Inadequacy of facilities at the Bank of England site in Roehampton for hosting the Qualifying Event and its location away from the main AELTC site;
- The need for additional tennis courts, including a larger, third show court;
- Event capacity; and
- Inadequacy of practice courts for the main draw tournament.

293. The applicant also identifies risks from competition, both alternative sports competitions held during the British summer but also other tennis events held across Europe and the world.

294. GLA Officers acknowledge that the Wimbledon Championships are the only Grand Slam tournament that doesn't provide qualifying on site. This is considered critical to raising the profile of the Qualifying Event, improving the experience for players and bringing the Championships in line with all other Grand Slams. In this regard, no other alternative sites would be capable of appropriately meeting the need for the development.

295. Furthermore, GLA Officers acknowledge that the existing Roehampton site does not provide appropriate facilities for a Qualifying Event. This is because the existing tennis courts are smaller than The Championships size courts; there is a lack of changing facilities onsite, and the site infrastructure would not allow for an increased number of spectators.

296. The applicant states that new courts would also serve to improve circulation and spectator comfort within the AELTC Main Grounds during The Championships. As illustrated in Figure 44, below, the current AELTC Main Grounds experience constrained space in terms of spectator circulation during the Championships. The additional capacity created through this application could enable the removal of existing tennis courts on the AELTC Main Grounds.

297. As such, across the longer-term, some of the proposed courts would act as replacements for existing facilities, to improve the operation of The Championships. It should be noted that alterations to facilities in AELTC's Main Grounds would be dealt with under separate planning permissions.

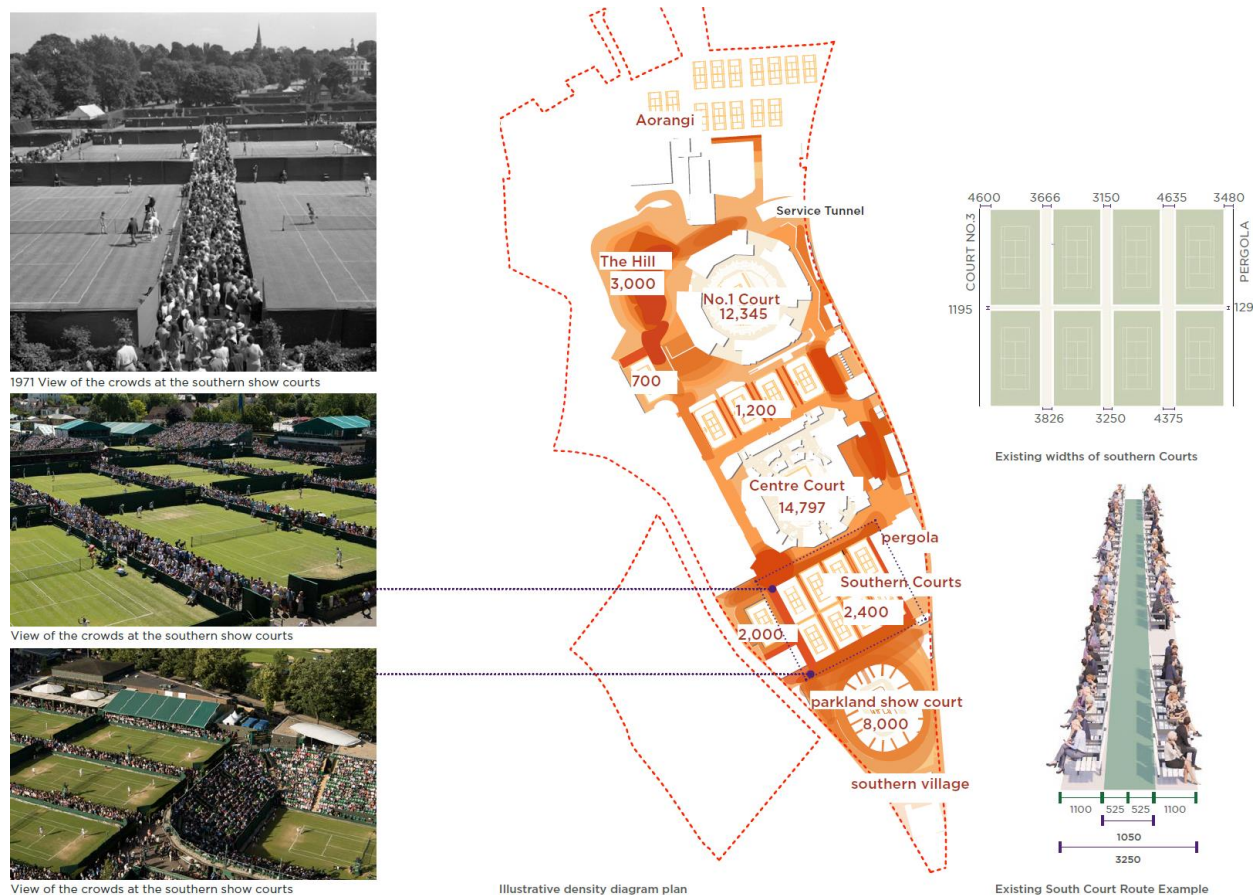
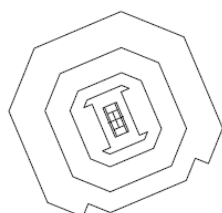


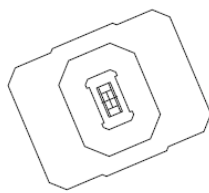
Figure 44: Illustration of the crowds on the AELTC Main Site

298. GLA Officers also recognise the need for additional tennis courts, including a larger, third show court. The current third show court is smaller than all other Grand Slam Tournaments (see Figure 45 below). This is also directly interlinked with the event capacity, which is well below the other Grand Slam Championships.

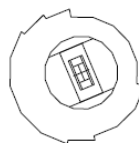
Flushing Meadows (US Open)



Arthur Ashe Arena
23,771



Louis Armstrong Arena
14,053

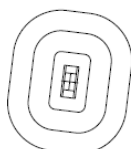


Grandstand
8,125

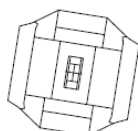


Court 17
2,500

Melbourne Park (Australian Open)



Rod Laver Arena
14,820



Melbourne Arena
10,500

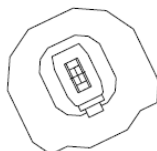


Margaret Court Arena
7,500

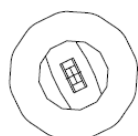


Show Court 3
3,000

Wimbledon



Centre Court
14,979



Court No.1
12,345

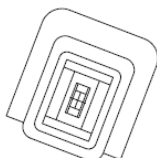


Court No.2
4,000

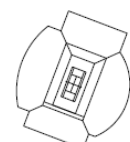


Court No.3
2,000

Roland-Garros (French Open)



Court Philippe Chatrier
15,225



Court Suzanne Lenglen
10,068



Court Simone Mathieu
5,000



Court 18
2,200

Figure 45: Comparison of Show Courts against other Grand Slam events

299. Lastly, it is accepted that the existing courts at AELTC Main Grounds do not offer essential practice court facilities for the main draw tournament. The players are often unable to access or need to share the small number of grass courts that function as practice court facilities which is not considered to be acceptable for a tournament of Wimbledon's standing.
300. For the reasons above, GLA Officers acknowledge and accept the need for the development, through the expansion of the AELTC Main Grounds, the provision of a new Show Court including the justification for the total number of courts on site.

Summary

301. Whilst the proposal would result in the loss of the golfing use on site, there are other golf courses within a reasonable distance and no identified shortage within local pitch strategy documents. Therefore, this loss would be assigned **very limited weight** in the planning balance.

302. The proposed use of the land for lawn tennis is supported in accordance with local demand strategies. GLA Officers acknowledge and accept the need for the development.

Conclusion on land use principles

303. The development comprises the provision of facilities in connection with outdoor sport and recreation. Development of the proposed facilities would fail to preserve the openness of the MOL and would conflict with one of the purposes of MOL. As such, it constitutes inappropriate development and, by definition, represents harm to the MOL. This harm is attributed **very significant weight** in the planning balance and VSC are required to justify such harm.
304. Applying the precautionary approach, the proposal would result in a net loss of publicly accessible open space calculated to be 17.8ha (albeit with no current access available) partially offset through the provision of 11.1ha of publicly accessible, managed and maintained parkland. This represents harm to the protected open space and will be given **very significant weight** in the VSC planning balance. If the Alternative Approach is applied there would be an increase in the quantum of publicly accessible open space, representing a very significant public benefit and attracting **very significant weight**.
305. The provision of the alternative tennis use, with seven courts available for community use, is in line with local demand strategies, local planning policies, and there is a clear, identified need for the development to ensure that the Championships maintain their position as a key cultural and sporting fixture in the British summer and world sporting calendar.

Equalities

306. London Plan Objective GG1 highlights the diverse nature of London's population and underscores the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs of specific groups and communities. More generally, the Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.
307. The proposed design adopts inclusive design principles that promote protection of those with protected characteristics, including:

- Step free access across the majority of the site and accessible washrooms throughout the site.
- Where designated spectator seating is proposed, facilities would be provided in accordance with Sport England's Accessible Sports Facilities, whereby at least 6 designated wheelchair spaces, or 1%, whichever is greater would be provided. Where informal viewing is provided, wheelchair viewing spaces would be sized at a minimum of 900mm wide by 1400mm deep.
- The proposed landscape and public realm are designed to create a series of spaces which are to be easily accessible to all users. There would be step-free access throughout much of the site and the landscaping has been designed to ameliorate level changes.
- The proposed development incorporates 7 maintenance hubs which would provide suitable unisex sanitary facilities including wheelchair accessible washrooms. In addition, hub 02 would provide larger sanitary provision with unisex and separate sex facilities with wheelchair access baby changing facilities.

308. The AELTC's role as an employer and institution has a duty to comply with the requirements of the Equality Act, and compliance is largely dependent on appropriate management regimes which fall outside the scope of the planning application.

309. In conclusion, equalities implications arising from the proposed development have been considered by GLA Officers the development addresses the needs of those with protected characteristics.

Urban design

310. The NPPF (at paragraph 131) states that good design is a key aspect of sustainable development. Paragraph 139 states that, in determining applications, significant weight should be given to outstanding designs which promote high levels of sustainability or help raise the standard of design more generally in the area, so long as they fit in with the overall form and layout of their surroundings.

311. London Plan Policy D4 sets the overarching design principles for development in London. Other relevant design policies in this chapter include specific design requirements relating to optimising site capacity (Policy D3); inclusive design (Policy D5); public realm (Policy D8); tall buildings (Policy D9); basement development (Policy D10); designing out crime (Policy D11); and fire safety (Policy D12).

312. At the local level, Merton Core Strategy policy CS14, and Merton SPP policies DM D1 and DM D2 support the need for design quality. Policy LP1 of the Wandsworth Local Plan echoes strategic objectives and states that development proposals must use a design led approach to ensure that the layout and arrangement of buildings ensure a high level of physical integration with their surroundings.

Design scrutiny (design review)

313. Policy D4 sets out that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made.
314. During the preparation of the planning application, the applicant team met with the following panels and their feedback is summarised below:
- Merton Design Review Panel (MDRP) – 17 May 2021 and 21 July 2021.
 - Wandsworth Design Review Panel (WDRP) – 24 June 2021.

Merton DRP

DRP meeting: 17 May 2021

315. This DRP provided feedback on the different elements of the proposal, including the Parkland Show Court, the landscaping approach, public access provision, operational considerations during The Championships and the wider masterplan.
316. Panel members felt it was important that the Championships should have the opportunity to improve and maintain its status as a premier tournament. The panel felt that the proposals needed to be part of a wider masterplan for the whole AELTC, Championships, MOL and 'at risk' designated park. A more thorough and balanced assessment and justification for the site of the new show court was needed.
317. The balance of landscape and tennis was too much in favour of the new practice courts and the landscape needed to be more evident. The issue of public access and activities outside the championships was vague and needed much more clarity.

DRP meeting: 21 July 2021

318. In general, the DRP supported the design approach of the proposed landscape. The retention of Veteran trees, de-silting of the lake and the increase of biodiversity were all highlighted as positives.
319. The extent and number of proposed paths across the site was questioned due to their impact on the landscape. The number of tennis courts and their impact on the landscape remained an issue.
320. Panel members were split on the general principle of building on protected MOL land. Some panel members praised the efforts of the design team, however expressed that they thought the brief should be revisited to minimise the development impact on the site.
321. The DRP reinforced the need to justify exceptional circumstances for building on an at-risk park, conservation area and MOL, as this would not normally be permitted. Panel members felt that the design team were aiming to achieve what was required, rather than investigating what can be accommodated comfortably.

322. Some panel members supported the scheme and explained that providing public access to the site has great public benefits and that should not be overlooked. However, it was expressed that the current proposal did not explore or propose how the Show Court will be used outside of the Championship period.
323. There was some concern that permanent hard landscaped areas were being proposed for the entrances within the park but would only be used during the three weeks of the tournament.
324. The DRP acknowledged that the scheme is a long-term project and as such strongly recommended that the design codes are aspirational and work towards something exemplary that go beyond today's targets.
325. All DRP members, in principle, supported the landscape approach. However, there were concerns over the extent of publicly accessible space, the quantity and impact of tennis courts on the landscape and the principle of building on MOL and 'at risk' designated park.

Wandsworth DRP

326. A meeting with the Wandsworth Design Review Panel (WDRP) was held on the 24 June 2021. The response from the WDRP to the applicant was issued on 20 July 2021.
327. The WDRP acknowledged that the Wimbledon Lawn Tennis Championship is the premier tennis tournament in the world and they supported the AELTC's vision and ambition to retain their World Class status for the nation. However, they recognised the constraints posed by expansion into Wimbledon Park, an important Registered Historic Park and Garden, which also sits within MOL and the Wimbledon North Conservation Area.
328. They acknowledged the thorough work undertaken by the project team in assembling the justification for the significant intervention into the Historic Park and Garden. When combined with the vision for the future of AELTC, it is clearly a compelling one given the importance of the tennis Championships to the UK internationally and this vision was therefore supported in principle. However, it was acknowledged that as part of the mitigation comes a responsibility to the local communities of both boroughs by the project team to deliver a lasting legacy.
329. Panel members acknowledged that the project team has explored options for siting the new show court and based on this analysis, a majority of the Panel members were comfortable with the location of the Parkland Shoe Court.
330. Furthermore, the WDRP fully supported the vision for the masterplan in:
- Making the southern part of the park available to the public all year round, establishing a stronger east – west connection;
 - Enhancing the lake to re-envision the Brownian concept;
 - Protect existing woodland and veteran trees and introduce significant new planting,

- Enrich the biodiversity of the lake and park;
- Making the intervention into the park to retain and enhance the status of the tennis Championships, and
- Mitigating the impact of additional visitor numbers through moving towards making the event serviced entirely by public transport and reducing car dependency.

331. The WDRP supported the importance of landscape driving the interventions in this project. They applauded the thorough analysis and research of the landscape heritage of the site and the significance of the Historic Park and Garden. They acknowledged that the park is on Historic England's Heritage at Risk Register and the proposals represent an opportunity to restore much of the landscape, which over the years has been unsympathetically altered or allowed to decline. The Parkland Show Court is quite a dominant feature with a large expanse of hard landscape surrounding it within a very important part of the open space. They were not convinced the mitigation measures proposed are sufficient and considered its impact to have substantial harm on the parkland.

332. The WDRP were pleased with the long-term strategy for moving towards a public transport orientated event over the three weeks Championships period. They agreed in principle the closure of Church Road to motor vehicles.

333. The WDRP were pleased to see the scheme coming forward and supported the principle of siting the show court in the park. However, they also felt that the community benefits were not sufficient at present to mitigate the harm of placing the structure in the park. Much more outreach could be undertaken to ensure that it not only fulfils AELTC's ambition to retain Wimbledon as the premier tennis tournament internationally but also to make it a multi-functional and inclusive facility as a year-round attraction.

Summary

334. Having regard to the above the proposal has been subject to design scrutiny by undertaking three design reviews across the two boroughs. The matters raised by the DRPs have been appropriately responded to by the applicant, as discussed below and as such, the proposal has been subject to an acceptable level of design scrutiny in accordance with Policy D4.

Masterplan and site layout

Parkland Show Court

335. The Parkland Show Court has been located to form a group with the existing Centre Court and Court No.1 in AELTC's main grounds across Church Road. Its location close to the western edge of the parkland is successful in reducing its impact on the landscape and is logically positioned to extend and complete the group of key buildings at the heart of the venue. The position also takes advantage of the low topography of the site at this location, further reducing the impact.

336. The exact placement of the building within the selected area has been carefully determined by understanding the existing topography and the extent of the roots of existing veteran trees that will surround the building which will also make an important contribution to the natural screening.
337. The Design and Access Statement (DAS) has outlined the alternative options which were explored for the siting of the Parkland Show Court. Whilst these alternative sites may have been less challenging in terms of impact on MOL, they would not have provided an optimum or feasible layout for operational purposes, whilst also impacting more considerably on existing neighbours. Therefore, the conclusion is that the position selected is the preferred solution, being both functional and enhancing the visitor experience whilst not impacting on existing neighbours.

38 grass tennis courts

338. The other 38 new grass courts are arranged individually and occasionally in pairs throughout the landscape. The approach means that excavation is minimised, thereby limiting damage to the existing landscape.
339. The applicant has sought to locate the courts to minimise level changes and reduce impact on tree roots. Additionally, the court locations have been informed by the Club's brief to provide fully accessible courts and access paths. The resultant layout works well with the undulating contours of the land, minimising visual and physical intervention on the parkland.

Satellite buildings (maintenance hubs and player hubs)

340. The proposed satellite buildings, being the maintenance hubs and player hubs, have been located to be unobtrusive in the landscape and the footprints have been kept to the minimum functional dimensions. Their positions close to the boundaries of the development site are discreet, minimising their impact on the open nature of the parkland.



Figure 46: Proposed building locations

341. The seven maintenance hub satellite buildings are circular or conjoined circular in plan, with the organic form successfully minimising their impact on the surroundings. The strategy of providing essential maintenance facilities in a number of discreet locations around the development site rather than closely grouped or in one large building is appropriate and provides a sensitive response to the parkland landscape.
342. The northern player hub would sit at the northeastern boundary of the site and the approach to its design follows the same discreet placement and organic form as the seven maintenance hub satellite buildings. The southern player hub is located away from the boundaries, sitting at the southern tip of the lake. It is more visible in the parkland than the others because of this and responds to its specific location by taking the rectilinear form of a boathouse.
343. The CGMH has been located in the south-eastern most corner of the site. This building is to be extensively subterranean to address concerns about its visibility on the historic parkland landscape. This is considered appropriate as it

successfully reduces the visibility of the building whilst still providing the floor area required for functionality.

The routes

- 344. The proposals include eight new fully accessible public access points into the site, increasing the permeability by provision of safe high-quality pedestrian and cycle paths that connect to existing networks beyond the site boundaries. Two further stepped access points are also provided.
- 345. The proposed boardwalk and circular walk provide public access to the lake, completing a circular route that also takes in the restored southern parkland. This would provide a high-quality, nature-rich experience of water and reedbeds at the edges of the de-silted lake in line with the aims of London Plan Policy G6.
- 346. The varied treatment of the proposed routes though the site establishes a hierarchy of primary and secondary routes allowing for different characteristics to develop. The routes work with the topography of the site to minimise impact on the established landscape and maximise accessibility. Seating has been included at regular intervals throughout the publicly accessible areas, providing an inclusive environment in line with London Plan Policies D5 & D8. The flexible approach to lighting the parkland will prioritise nature except for limited times of greater activity when enhanced lighting levels will be necessary for safety and inclusion.
- 347. During the Championships access to the southern AELTC parkland would be reduced and access across the site limited. Nevertheless, a public route would always be retained throughout the Championships maintaining site permeability.

The boundaries

- 348. Church Road intersects the subject site and the AELTC main grounds. This interrupts the connectivity between the two sites and weakens the ability of the existing and proposed buildings to form a coherent new whole. The proposed additional openings in the boundary railings along with upgraded road treatment to Church Road itself would help to integrate the two sites during the Championships. It is anticipated that these changes would also enhance the pedestrian and cycle experience of Church Road throughout the year in accordance with London Plan Policy T2.
- 349. The boundary between Wimbledon Park and the new north public access open space within the site would be softened by the proposed introduction of planted screening, reducing its visibility and providing a more organic appearance.
- 350. Elsewhere the boundaries within the development site have been designed to have minimal visual impact on the landscape whilst still maintaining the necessary security. This approach has helped reduce the impact of the proposed development on the open nature of the parkland.

Summary

- 351. The masterplan layout has been carefully considered to assess how proposed development can be incorporated into an open parkland setting, whilst ensuring

that the quality of the public open space is enhanced, not reduced, by that change.

352. The layout has responded practically and sensitively to the multiple physical constraints of the site to balance the needs of an international sporting venue with the desired restoration of, and public access to, the parkland landscape.

Tall buildings

353. London Plan Policy D9 (Part B) states that tall buildings should only be developed in locations identified as suitable in development plans. Part C of Policy D9 also states that tall buildings must address their visual, functional, environmental, and cumulative impacts.

354. Policy D9 of the London Plan states that a tall building is not less than 6 storeys or 18 metres. Merton defines a tall building as any building that has a significant impact on the existing scale and character of an area (Merton Tall Buildings Background Paper, 2010) and the emerging Local Plan (Policy D12.6) defines a tall building as a minimum of 6 storeys or 18 metres from the ground level to the top of the uppermost storey. Wandsworth Local Plan 2023-2038 defines a tall building as any buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower). In this regard, the proposed 28-m tall Parkland Show Court would constitute a tall building (as defined by both the draft Merton Local Plan and the current Wandsworth Local Plan).

355. All proposed building heights are outlined in Table 6 below.

Table 6: Proposed building heights

Plot	Maximum height AOD	Storey heights	GIA (SQM)
Parkland show court	28m (49m AOD)	4 storeys (plus basement)	22,743sqm
Hub 1	4m (up to 28.3m AOD)	1 storey	66
Hub 2	4m (up to 26.4m AOD)	1 storey	174
Hub 3	4m (up to 26.35m AOD)	1 storey	54
Hub 4	4m (up to 26.1m AOD)	1 storey	65
Hub 5	4m (up to 23.2m AOD)	1 storey	87
Hub 6	4m (up to 22.5m AOD)	1 storey	73

Hub 7	4m (up to 25.65m AOD)	1 storey	63
Northern Player Hub	5m	1 storey	263
Southern Player Hub	6.5m	1 storey	160
Central Grounds Maintenance Hub	1.5m (31m AOD) Mostly subterranean structure with 11m height (FFL to roof)	2 storeys	2,790

356. The site is not located within a tall building zone and therefore it fails to meet the locational requirements of Policy D9 (b) therefore the proposed Parkland Show Court must be assessed against Policy D9(c), relating to the visual, environmental, functional, and cumulative impacts of tall buildings.

Visual impacts

357. In terms of visual impacts, the abovementioned policies seek to ensure that the height of tall buildings are proportionate, reinforce the spatial hierarchy of an area and are located at a point of landmark significance. Tall buildings should make a positive contribution to surrounding character and townscape, within immediate, mid-range and long-range views. The tall building must have a positive relationship with the public realm, provide a functional space and opportunities for new street trees and widened pedestrian routes. Both London Plan and local policy include the requirement to deliver an exemplary standard of design and materials. Tall buildings must avoid harm to strategic views and the significance of London's heritage assets and their settings, the latter being discussed in the Heritage Impact section of this report. The impacts of reflective glare and light pollution must also be considered.

358. The applicants prepared a Townscape Visual Impact Assessment as Chapter 11 of the Environmental Statement. This has assessed the visual impact of the proposed development from various points around the site and surrounding area.

359. GLA engaged consultants Arup to undertake a review of the townscape and visual impact assessment. This review has concluded that:

- Generally, the TVIA is considered sound, and the approach reasonable.
- All relevant receptors appear to have been considered.
- Generally, the methodology and production of the visualisations appear sound.
- The visual assessment and the impacts on the whole seem reasonable. Whilst all operational effects are reported as beneficial, we would note that there will be some adverse effects as a result of the show court lending an urbanising influence in views which are currently characterised by green and openness of the golf course.

- We generally agree with the reported effects on views and that the proposed show court has been well-sited to minimise visual impacts from the surrounding areas.



Figure 47: View of the proposed development, including Parkland Show Court, from the south (along Church Road)

360. The Parkland Show Court represents the only tall building on site and would be visible on the site and from a number of views in the surrounding area. Whilst the siting of this element has sought to reduce its visual impact, the large building would be in an area of open space and would have a moderate urbanising effect with the building being visible from both within the site and from the surrounding area and would change the open parkland character.
361. Nevertheless, the building has been designed carefully to mitigate this through several design decisions. The overall form is organic and is a response to the topography and surrounding mature landscape and veteran trees as well as the function of the building. The proposed height at the eaves has been carefully considered to ensure that the perceived height has been kept as low as possible.



Figure 48: View of the Parkland Show Court from Wimbledon Park Lake

362. The long sections submitted indicate that the height remains below that of the existing show courts and that the new building would sit comfortably within the existing context. The CGI views provide further reassurance that the new building would not dominate the cluster of show courts or the parkland landscape but would be a high-quality addition to the built form.
363. The submitted information shows an elegant built form, with the main ‘bowl’ of the building resting lightly within an open lattice support structure. This approach maximises the permeability and transparency of the building, and at the lower levels allows visitors to continuously see the surrounding parkland whilst approaching and entering the building. Having regard to the design code and parameter plans, the height, scale, form, and massing of the Parkland Show Court is acceptable. Furthermore, whilst a sizable structure, the built form (incorporating living wall) would fit in with the parkland context and would not appear overbearing in the landscape and therefore the proposed built form is considered acceptable from a townscape and design perspective.
364. In terms of views and visibility the Mayor has identified a list of strategic views within Table 7.1 of London Plan Policy which include significant buildings or urban landscapes which help to define London at a strategic level. London Plan Policy HC4 seeks to preserve, enhance, and protect these strategic views and requires proposals to make a positive contribution to the composition of the views and their landmark elements.
365. The proposal is not located within close proximity to any strategic views and there would be no impact to the protected views identified within Table 7.1 of the London Plan. At a local level, the Merton Core Planning Strategy (2011) Policy DM D1 seeks to maintain important local views, panoramas and prospects and their settings. The Merton Tall Buildings Topic Paper (2010) identifies several strategic views across Merton. The following locally strategic views are relevant to the proposal:

- Vistas towards the City of London and Westminster from key western vantage points of the borough (represented by assessment viewpoints 6, 7 and 9); and
- Two protected views towards the Wimbledon Ridgeline described as *“travers[ing] into Merton through Wimbledon Park, linking with Merton’s highest point”* - from Wandsworth (Earlsfield) Cemetery (represented by assessment viewpoint 14) and Springfield Hospital (represented by assessment viewpoint 15).

366. The Wandsworth Local Plan lists the local views to be protected in Table 14.1. None of these views are applicable to the subject site. The Wandsworth Local Views SPD (2014) identifies six views considered to have the greatest borough wide importance. This includes ‘Views upstream and downstream from bridges over the River Thames’; and ‘Views of heritage assets and landmarks’. None of these views would not be affected by Proposed Development.

367. Figure 49, below, illustrates how key views have been taken into consideration in the layout and design of the proposal.

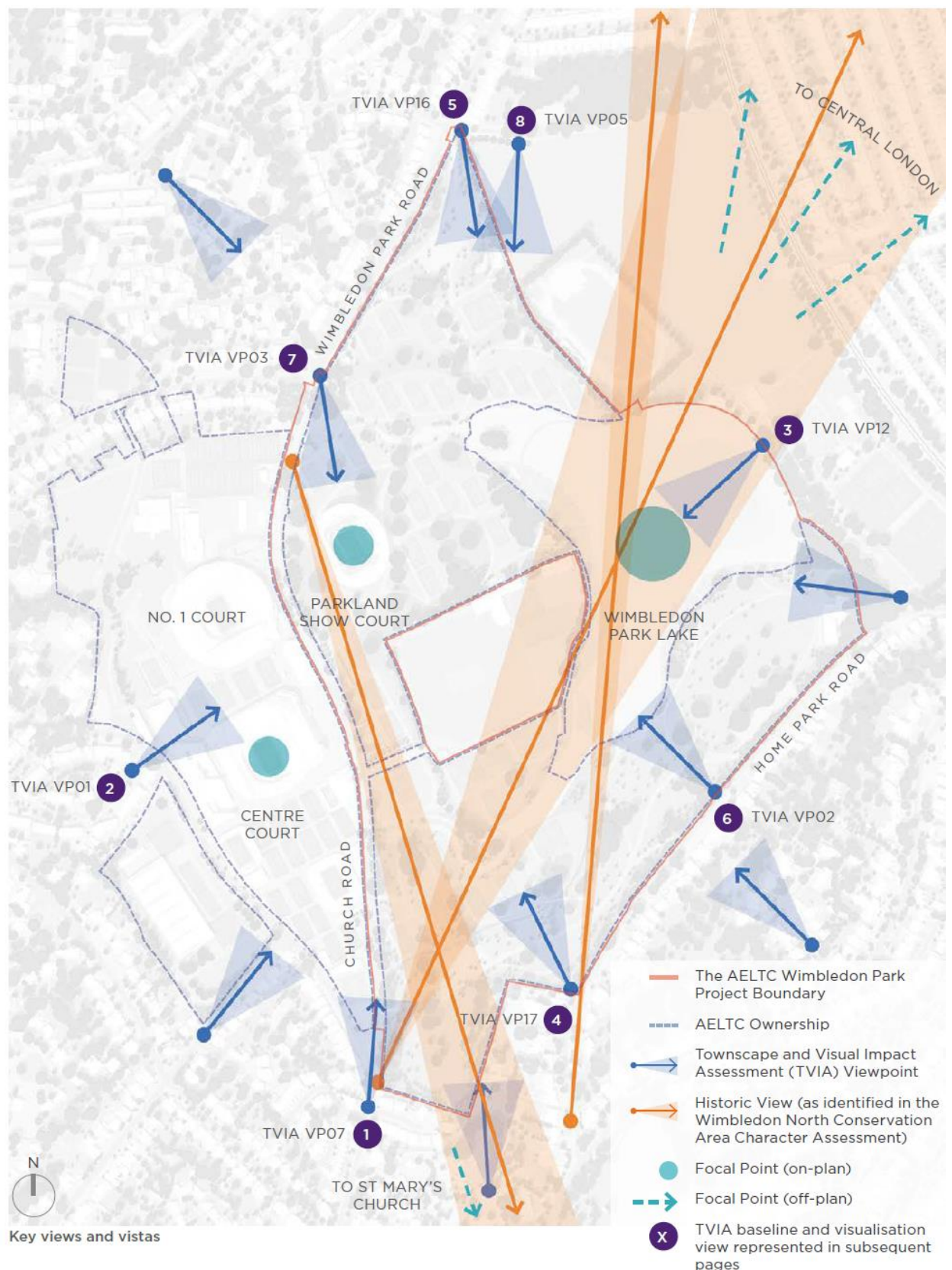


Figure 49: Key views and vistas

368. In summary, the proposal would not impact any strategic views or Wandsworth local views. Merton's strategic local views have been taken into consideration in the design and layout of the proposal and are considered to be acceptable. Therefore, the application complies with London Plan Policy HC4, Merton Core

Strategy (2011) Policy DMD1, Wandsworth Local Plan Policy LP3, and the London View Management SPG.

Functional impacts

369. In accordance with Policy D9(C)(2), the Parkland Show Court has been designed to respond to the functional requirements and having regard to the proposed use of the buildings across the site, these are generally considered acceptable.
370. Further consideration is discussed in relation to transport matters below.

Environmental impacts

371. A full assessment of the environmental impacts is provided in the Wimbledon Park ES (including addendums) and is discussed in greater detail in later sections of this report. Matters relating to daylight, sunlight, overshadowing, outlook, sense of enclosure, light pollution, noise, flood risk, drainage, air quality, and contamination have been fully considered against London Plan and local policies. In summary, officers consider that the proposed development would result not result in an unacceptable environmental impact and appropriate management plans and mitigation measures would be secured to ensure an acceptable level of impact.

Cumulative impacts

372. London Plan Policy D9(C) requires development proposals to address the cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in an area.
373. In this circumstance, the tall building is located on MOL, and the site context means that no other tall buildings are proposed or likely in the vicinity of the Parkland Show Court. Therefore, the cumulative impacts are limited to those associated with the Parkland Show Court alone.
374. Overall, GLA officers are satisfied that the cumulative impacts are acceptable and are in line with London Plan Policy D9 Part C.

Public access

375. Part D of Policy D9 states that free to enter publicly accessible areas should be incorporated into tall buildings where appropriate. It is noted that the tall building constitutes a sporting venue, and the provision of a high-level viewing gallery would not be appropriate in this instance. Nevertheless, a significant amount (11.1ha) of publicly accessible open space would be provided at ground level at the northern and southern ends of the site.

Tall buildings conclusion

376. The site is not located within an area that is identified as suitable for tall buildings and, as such, does not comply with the locational requirements set out in Part B of Policy D9. Nevertheless, an assessment of the visual, functional, environmental, and cumulative impacts has been undertaken above and has found that the proposal generally complies with Policy D9(c). The policy conflict is discussed in the planning balance section of this report.

Satellite buildings

377. The seven satellite maintenance hubs have been designed to be unobtrusive in the landscape. Their organic form and limited height are successful in minimising the impact they make, so attention is not drawn to them. Each hub's specific size and shape is unique to its location, but they read as family through common form and materials. This is considered an appropriate response with the buildings sitting comfortably within their respective settings and not detracting from the quality of landscape.
378. All the hubs would be single storey with flat roofs up to 4m high. The height and scale of these hubs is low impact and entirely appropriate for their context.
379. The CGMH takes advantage of the steeply sloping topography of the site in the corner location to provide an unobtrusive earth sheltered building that is hidden in the landscape. The most visible part of the building would be the 'roof', which forms part of the hillside, and windows part way up the slope.
380. The northern players hub is a similar built form to the small maintenance hubs. Although larger, the same principles of unobtrusive location and natural screening mean that the larger building form does not cause excessive impact on the parkland setting.
381. The southern players hub takes on a completely different form from the other satellite buildings. This is due to its location adjacent to the southern tip of the lake which, although screened by trees, makes it potentially more prominent than the others. This building takes the form of a boat house at the water's edge as a 'familiar' form in the landscape, echoing the Brownian boathouse that was located and the southern lake edge in the past.

Architectural quality

382. Paragraph 135 of the NPPF sets requirements for developments to achieve high quality design. This includes requiring developments to function well, be visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Additionally, NPPF paragraph 139 gives significant weight to developments which reflects local design policies and government guidance on design outstanding or innovative designs which promote high levels of sustainability.
383. This importance of design quality is supported by London Plan Policies D3, D4, D5 and D8, Merton Core Strategy Policy CS14, Merton SPP Policies DMD1 and DMD2 as well as Wandsworth Local Plan Policy LP1.

Design Code

384. An Updated Design Code (the Design Code) document (dated May 2022) accompanied the application covering all elements of the scheme that are in Outline.
385. The Design Code covers the aspiration of the applicant and the conceptual design for the key building. These give a very clear picture of the design intent. Retention

of the architect has been secured within the s106 to ensure that this design intent is delivered in practice.

386. As stated above, the Parkland Show Court, through its sensitive location and its design, is key to demonstrating that a world class international sports venue and a protected parkland landscape can co-exist successfully. This building would provide a world class sporting experience for visitors and achieve multi-level engagement with the external parkland landscape and MOL so that the visitor experience includes an appreciation of the venue within the naturalistic parkland setting.
387. The architectural language of the building has been developed to firmly ground the building and then to maximise the permeability and lightness of its appearance. The structure is expressed strongly and partially forms the building enclosure, and natural living finishes are proposed to ensure the building reflects the seasons as well as its parkland setting.
388. The Design Code highlights that landscape is the inspiration for the design which references a clump of trees. The structural elements are reminiscent of trunks of a tree clump. This will help integrate into the landscape. The concept of the façade finish as a living wall that changes with the seasons, in the same way as the surrounding landscape, is in keeping with existing Wimbledon aesthetic and is supported.
389. The four parameter plans clearly set out the proposed scale and massing of the outline elements of the hybrid application, providing the maximum permissible footprint and envelope. Through the Design Code, the elements proposed in Outline can deliver a high-quality scheme at Reserved Matters stage and compliance with this control document will be secured via condition.
390. The 38 grass tennis courts are proposed across the site in the same manner as those on the AELTC Main Grounds. During the grass court season (from May to late September), they would be surrounded by demountable fencing and green canvas. Outside of the grass court season, these courts would be 'undressed' without permanent fences or seating structures. These 38 courts would not include floodlights. During the Championships, four of the courts would have temporary seating erected around them.

Satellite buildings (maintenance hubs and player hubs)

391. The seven maintenance hubs would be clad in common materials. Therefore, although each is unique in its setting within the landscape and its functional needs, together they make a discreet family of buildings. This approach is successful in minimising their impact as the architectural language becomes familiar in the landscape.
392. The northern player hub would also provide a materiality consistent with the maintenance hubs. However, it would be more noticeable in landscape as it has a partially glazed 'outward' facing aspect. The location, form and materials selection are an acceptable balance between function and locational response.

393. The southern player hub has a different form to the other satellite buildings and is located more prominently, at the lakeside. The building sits on a timber deck that overhangs the lake and the proposed timber structure finish to the building is in keeping with its setting and relates well to the finishes of the other satellite buildings. This approach is appropriate and should deliver a high-quality building that enhances the parkland landscape.

Summary

394. Having regard to the above, GLA Officers consider that the proposals would achieve outstanding standard of design in accordance with the NPPF, London Plan Policies D3, D4, D5 and D8, Merton Core Strategy Policy CS14, Merton SPP Policies DMD1 and DMD2 and Wandsworth Local Plan Policy LP1.
395. This proposal represents outstanding design which would promote high levels of sustainability, and which would help raise the standard of design in the area. The satellite buildings are low in scale and would blend in with their surroundings whilst the Parkland Show Court has been designed to fit in with the overall design, form and layout of the adjoining Centre Court and Court No. 1. The Design Codes are robust, and the ongoing retention of architects has been secured.

Basement development

396. Policy D10 of the London Plan recommends that boroughs establish policies to address the negative impacts of large-scale basement development beneath existing buildings. Merton SPP Policy DMD2 sets criteria for basement proposals to be acceptable including requiring an assessment of basement impacts on drainage, flooding, groundwater conditions and structural stability. Wandsworth Local Plan Policy LP6 outlines similar criteria for where basement proposals would be permitted.
397. In accordance with local policy, a Basement Impact Assessment was prepared by Buro Happold to accompany the planning application.
398. The Parkland Show Court would incorporate a basement level as well as access tunnel beneath Church Road that would interconnect with the existing AELTC Main Grounds. The access tunnel beneath Church Road would be approximately 8.7m wide, 2.7m high and extend for approximately 100m from west to east.

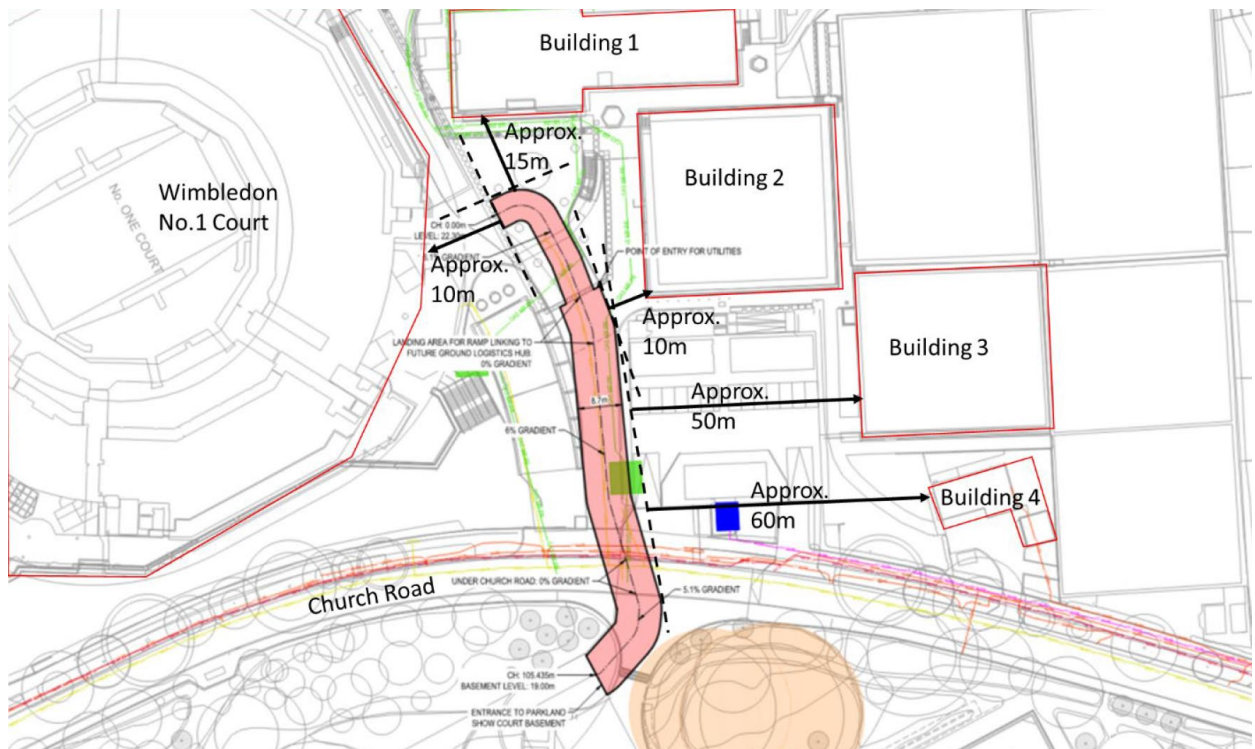


Figure 50: Indicative Church Road access tunnel

399. Additionally, the CGMH would consist of two below ground levels. The only built form visible would be the windows part way up the slope, which are appropriate in the context.
400. The basement impacts associated with climate change, heritage, trees and flooding are addressed within those relevant sections of this report.
401. GLA officers recognise the necessity for the proposed basement structures and consider the principle to be acceptable for operational reasons. Further details of the basement design and an updated Basement Impact Assessment would be submitted at Reserved Matters stages and any impacts would be determined and addressed at this stage.

Landscaping and public realm

Landscaping

402. The landscaping proposals include:

- The introduction of new woodland areas and grassland habitat – in place of the heavily managed golf course grass.
- Remove the bunkers, tees and greens – along with the man-made golf features located around the site and replace this with a more natural topography.
- Restore 'Capability' Brown's serpentine lake to its original form.

- Open up the Margin Brook and Bigden Brook – the two streams which flow across the site (in culverts) and supply Wimbledon Park Lake.
 - Improve existing views and open up of the former historic views (including towards the Wimbledon Park Lake and St Mary's Church).
 - 11.1ha of publicly accessible parkland.
 - The protection of existing important habitats and creation of new habitats.
 - Securing significant enhancements (including new tree planting) within the neighbouring Wimbledon Park – delivering a range of recreational and heritage benefits whilst providing a more unified landscape across the RPG.
403. Cumulatively, GLA Officers consider that the proposed changes to the landscape are transformational, providing a significant enhancement of the quality of the parkland as well as the area available for public use. The proposals are considered to respond well to London Plan Policy G6 which relates to biodiversity and access to nature and seeks opportunities to improve these through new development.
404. Notably this proposal would deliver 11.1ha of publicly accessible parkland that would be available to the wider community to enjoy free of charge. It would directly adjoin, interconnect with and be open for the same hours as Wimbledon Park. This would essentially provide a cumulative public park of 29.1ha as well as improved around the 9.6ha Wimbledon Park Lake which also offers recreational value. This represents a significant enhancement to the existing site context with additional publicly accessible, managed, and maintained parkland at the north-western and southern ends of the site. This would reduce local deficiencies in access to open space and recreation.
405. A number of objections have raised concern regarding the permissive nature of the publicly accessible parkland. Public access to the parkland would be secured through the s106 agreement and this has sought to reduce the closure periods of this area to a minimum. Additionally, it has been agreed that the parkland would operate under the following parameters:
- The opening hours would align with Wimbledon Park.
 - In the month prior to the Qualifying Event, necessary parts of the Southern Parkland would be closed for three weeks. However, the entire Southern Parkland may be closed for one week immediately prior to The Championships.
 - During The Championships and Qualifying Event, parts of the Southern Parkland may be closed however a publicly accessible route between Church Road and Wimbledon Park would be maintained at all times.
 - The entirety of the Southern Parkland would be closed for the two weeks after the Championships to allow for derigging.

- the Northern Parkland may be closed in its entirety from no earlier than 4 weeks prior to the Start Date until no later than two weeks immediately following the End Date to facilitate the setup, operation and dismantling of the Qualifying Event and/or Championships.
- Further detail regarding public access would be detailed in a Public Access Plan submitted to and approved by the Council.

406. The desilting of Wimbledon Park Lake represents a significant undertaking by the applicant, with the works estimated to cost £7.5 million. These are long overdue, with the lake not having been desilted or upgraded since it was originally constructed. This would provide ecological benefits through the improved water quality, heritage benefits through the re-establishment of the historic shape of Wimbledon Park Lake, as well as open space benefits through improvements to access and enhancement of the recreational and amenity value of the lake for sailing, angling, walking around the new boardwalk as well as other recreational activities in accordance with London Plan Policies SI16 and SI17.
407. The applicant has worked extensively with LBM tree officer as the design has developed to ensure the proposals do not harm Veteran, ancient or Category A trees in the parkland in line with Policy G7 Trees and Woodlands.
408. The extensive tree planting that the proposals include are aligned with Part A of this policy and the Mayor's desire to increase tree canopy cover in London by 10 per cent by 2050 (Paragraph 8.7.2 of the London Plan). The proposed tree types and sizes have not yet been defined specifically but will be confirmed at detail stage (as secured by condition) and will balance Historic England's focus on restoring historic landscape with climate resilience, bio-diversity issues for future ecological security.
409. Overall, the landscape design proposals are considered acceptable. The vision for achieving a restored parkland character is ambitious given the extent of development proposed, including 38 tennis courts, a show court and numerous smaller buildings. GLA Officers acknowledge that the design has undergone a considerable amount of work, with due consideration for the sensitivities of the site and surroundings.

Public realm

410. According to London Plan Policy D8, proposals involving the creation of new public realm should be well designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. They should maximise the contribution that public realm makes to encourage active travel and discourage travel by car. Public realm should create a sense of place and function day and night and throughout the week/ year, reflective of desire lines and a mutually supportive relationship between the space, surrounding buildings and their uses to enhance amenity and vibrancy.
411. Appropriate management and maintenance arrangements should be put in place to maximise public access and minimise rules in accordance with the Public London Charter; incorporate green infrastructure and sustainable drainage; use

street furniture to complement the space and avoid create clutter; explore innovation.

412. The landscape proposals include new areas of hardstanding in the northern and southern park areas. During the Championships this would house the ticket gates and public entry point into the venue. Whilst there is a substantial amount of hard standing in these locations, they would provide functionality beyond the Championships by facilitating social, community and economic uses.
413. Extensive hard surface pathways would provide new connections through the site as illustrated in Figure 51. New benches are proposed at the edge of the northern hard standing, ensuring the amenity is inclusive for all in line with London Plan Policy D5 which requires developments to provide high quality people focused spaces that are designed to facilitate social interaction and inclusion. The proposed future provision of public WCs close by in Wimbledon Park, would also respond well to this policy requirement.

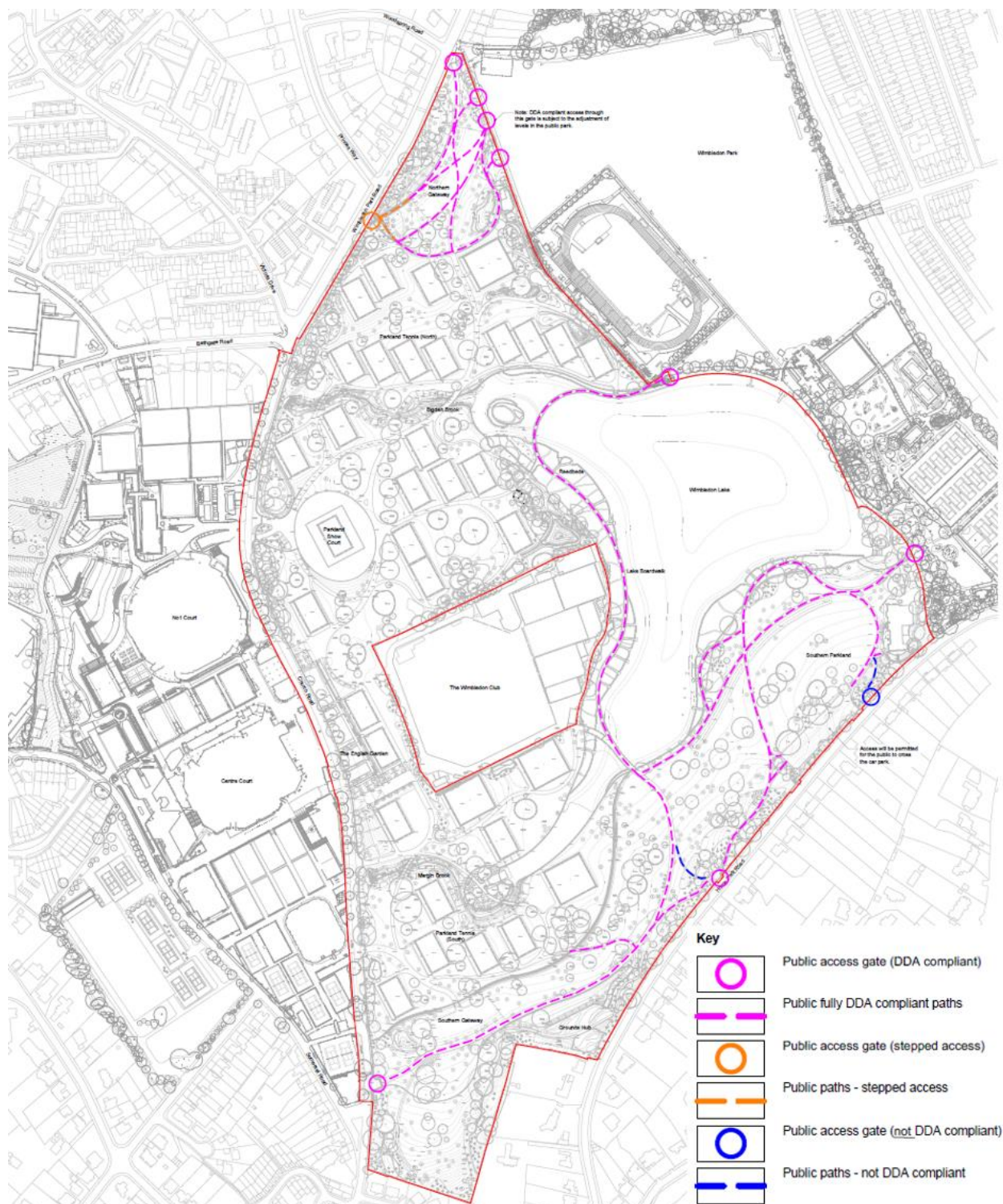


Figure 51: Public access gates and paths plan

414. Overall, the proposal would deliver significant public realm improvements through the provision of 11.1ha of publicly accessible, managed, and maintains parkland which would be inclusive of hard surface pathways and seating areas. The s106 would secure contributions towards active travel and public realm improvements beyond the site boundaries. Therefore, the proposal is considered to comply with Policy D8.

Secured by Design

415. London Plan Policy D11 relates to safety, security and resilience to emergency. This policy requires new development to provide legible, convenient and well-maintained movement routes and spaces which are well-overlooked and benefit from an appropriate level of activity, with private and communal spaces clearly defined to promote a sense of ownership. Similar requirements are detailed within Merton SPP Policy DM D2(a)(ii) however there is no local policy within the Wandsworth Local Plan.
416. Given the high-profile nature of the Championships and the level of security and management required in the ongoing operation, safety and secured by design principles represent a key consideration in the design rationale.
417. The physical security features include the proposed boardwalk (and adjoining soft landscaping). These would act as a natural security perimeter between the AELTC estate and Wimbledon Park. In addition, the Ha-Ha proposed to delineate the boundary between the AELTC Parkland and the AELTC estate to the north would also provide an unobtrusive and effective security barrier.
418. The Metropolitan Police Secured by Design officers were consulted by LBM, and GLA Officers have secured appropriate conditions in accordance with their response. These conditions require the development to adhere to Secured by Design principles and ascertain certification of this by the Metropolitan Police following completion.
419. The proposal is therefore acceptable as it is in accordance with Policy D11.

Fire safety

420. In accordance with Policy D12 of the London Plan, the applicant has submitted a Fire Statement which has been prepared by suitably qualified fire engineering consultants at Buro Happold. This Fire Statement describes the key strategic fire safety measures that would need to be considered during design development and demonstrates how the proposal would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
421. Given that the Parkland Show Court, CGMH and players hubs are in Outline, further details of fire safety measures associated with these buildings would be considered at Reserved Matters stage. A condition has been secured requiring the submission of a Fire Statement with each Reserved Matters application.
422. Policy D12(A) of the London Plan states that applications for major development 'must include a commitment that the development will not incorporate combustible materials in its external walls'. It is noted that this guidance would be followed except for:
- Maintenance hubs (timber screening).
 - Parkland Show Court (timber structure and a 'green wall')

423. It is noted that the use and size of each individual Maintenance Hub building means that they would not constitute a 'major development' in their own right. This classification is achieved only by virtue of the overall site area, and the buildings are well separated from one another by distance. Nevertheless, the timber screening around the hubs will be treated to achieve Euroclass B-s3,d2 fire rating or better.
424. The Parkland Show Court is submitted in outline with the final details to be confirmed under Reserved Matters. The applicant has confirmed that the baseline approach would be to use traditional steel or concrete construction for the primary bowl superstructure, supporting the stands and concourses, and timber only for the perimeter structure. Any timber structure would meet at least Euroclass B-s3, d2, fire rating or better.
425. Furthermore, it has been clarified that the 'green wall' is not a vertically built structure in this instance but climbing plants (such as Virginia Creeper or similar), planted at the base of the structure, and as such are easily irrigated from the bottom; supporting plant health. As such, this element would be better classified as a living wall. Timber lattice may be used as part of the system and would be treated to achieve Euroclass B-s3, d2, or better. Any additional materials used to allow the plants to climb will achieve A2-s1, d0. This is a similar arrangement to the long-established planting arrangement on Centre Court.
426. A planning condition has been secured requiring that any green, living wall (if approved at Reserved Matters stage) must be appropriately irrigated and maintained long-term. Officers also note the development would be subject to separate Building Regulations applications.
427. In summary, the suite of Fire Safety strategies and statements demonstrate that the proposal would generally comply with London Plan Policy D12.

Planning Gateway One

428. As this application was submitted to both Merton and Wandsworth Councils prior to 1 August 2021, there is no legal requirement to consult the Health and Safety Executive in respect of Planning Gateway One.

Inclusive access

429. Policy D5 of the London Plan requires that all new development achieves the highest standard of accessible and inclusive design and, among other requirements, can be entered, used and exited safely, easily and with dignity for all. This is reflected in local policies including Policy CS 14 within the Merton Core Planning Strategy and Policy LP1 of the Wandsworth Local Plan.
430. The Design and Access Statement (DAS) details how the proposal seeks to deliver an accessible and inclusive scheme. This includes a principle of delivering a scheme that can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity, or economic circumstances.

431. It is recognised that the site is undulating, and careful consideration has been given in the design of the Championships site, the new public parkland, and all areas of public realm to ensure that the proposal would be inclusive for everyone.
432. All 38 new grass tennis courts would be fully wheelchair accessible. The Parkland Show Court would incorporate accessible viewing area with local facilities.
433. As the Parkland Show Court, Player hubs and CGMH are part of the outline planning elements, further details of the accessibility of these buildings would be assessed as part of subsequent reserved matters applications. The design codes have incorporated a number of key principles for accessibility with a stated desire that the Parkland Show Court be the most accessible stadium on AELTC grounds.
434. The provision of wheelchair accessible (blue badge) car parking is considered in the transport section of this report, below.
435. In summary, the proposal is considered to achieve the highest standard of accessible and inclusive design in accordance with London Plan Policy D5, Policy CS 14 within the Merton Core Planning Strategy and Policy LP1 of the Wandsworth Local Plan.

Conclusion on urban design

436. The proposals have been subject to independent design scrutiny by Design Review Panels. The Parkland Show Court, whilst being the only tall building within the proposal (with all other structures very low in height) has been sited in the most appropriate location and the conditioning of the Design Code will ensure a building of outstanding design quality. The design of hard and soft landscaping would be respectful of the heritage context and allow for the establishment of high-quality and accessible areas of public open space.
437. In light of the above the proposal is in accordance with policies relating to urban design, open space, landscaping, public realm, townscape, and visual impact. The proposal is considered to accord with London Plan Policies D4, D5, D8, D11, and D12; Merton Policies Merton Core Strategy policy CS14, and Merton SPP policies DM D1 and DM D2 and Wandsworth Local Plan Policy LP1. Despite non-compliance with the locational requirements of Policy D9(B) of the London Plan, GLA Officers consider that the proposed Parkland Show Court has an acceptable visual, functional, environmental, and cumulative impact.
438. This assessment of urban design is considered to remain consistent, and unchanged, across both the Precautionary Approach and Alternative Approach.

Heritage and archaeology

Legislation, policy, and guidance

439. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with certain designated heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “have special regard to the desirability of preserving the building or its setting or any

features of special architectural or historic interest which it possesses” and, in relation to conservation areas, special attention must be paid to “the desirability of preserving or enhancing the character or appearance of that area”. Registered Parks or Gardens (RPG) are also designated heritage assets, designated under the Historic Buildings and Ancient Monuments Act 1953 because of their special historic interest.

440. The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to ‘substantial harm’ or total loss of the significance of a designated heritage asset, consent should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development would lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal. The effect of development on the significance of any non-designated heritage assets should also be taken into account.
441. The NPPF makes clear that when considering the impact of a scheme, any conflict with a heritage asset’s conservation should be avoided or minimised (Paragraph 201). Paragraph 205 and caselaw indicate that great weight should be given to a heritage asset’s conservation. Harm should be clearly and convincingly justified and, if less than substantial, weighed against any public benefits (Paragraphs 206 and 208).
442. Policy HC1 of the London Plan requires development proposals to conserve significance by being sympathetic to the assets’ significance and appreciation within their surroundings and avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process. HC1 applies to designated and non-designated heritage assets.
443. Policy D3 of the London Plan requires development proposals to respond to the existing character of a place and respect, enhance and utilise the heritage assets that contribute towards local character. Policy D9 requires development proposals for tall buildings to take account of and avoid harm to London’s heritage assets and their settings and that clear public benefits outweigh any harm.
444. The following London Borough of Merton adopted local plan policies are relevant: Local Development Framework, Core Planning Strategy (Adopted July 2011), Policy CS 14 Design; Sites and Policies Plan and Policies Maps (Adopted July 2014), Policy DM D4 Managing heritage assets. The following London Borough of Merton draft local plan (Regulation 19, 2024) policies are relevant: Strategic objective 5; Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods; Policy D12.5 Managing heritage assets and Site Allocation Wi3.
445. The following London Borough of Wandsworth adopted local plan policies are relevant: Environmental Objective 4 and LP3 Historic Environment (Strategic Policy).

Heritage context

446. Most of the site is within the London Borough of Merton (LBM). Part of the site to the north is in the London Borough of Wandsworth (LBW). All the site is within the Wimbledon Park RPG, Grade II*.

447. The Wimbledon Park RPG is on the Heritage at Risk Register due to:

- Uncertainty about its future;
- The long-term effects of divided ownership leading to areas of differential management;
- The lack of a coherent site-wide strategy for conservation and on-going management;
- Impacts to designed views; and
- The condition of the lake.

448. All of the site is within the Wimbledon North Conservation Area, which is designated in two areas by both LBM and LBW. There are no separately listed buildings or other designated structures within the site.

449. The Parish Church of St Mary and the associated Old Rectory (both Grade II) to the south of, and in the setting of, the site and have strong visual and/or historical links with to the site. The site is also in the setting of the Victoria Drive, Bathgate Road and Vineyard Hill Road Conservation Areas.

Designated heritage assets

450. The designated heritage assets include:

- The Grade II* Wimbledon Park RPG.
- St Mary's Church, Grade II* listed building.
- The Old Rectory (of St Mary's), Grade II* listed building.
- Wimbledon North Conservation Area.
- Bathgate Road Conservation Area.

Non-designated assets

451. The non-designated heritage assets include:

- Archaeological remains.
- The Wimbledon Golf Clubhouse.
- 121 and 123 Home Park Road.

- 103 Home Park Road.
- 57 Home Park Road.
- Wimbledon Park Water Sports Centre.
- All England Lawn Tennis Club Centre Club.
- The White Pavilion.
- Queensmere House.
- 62-74 Bathgate Road (evens).

452. The following heritage assets have been scoped out of the assessment for the reasons given:

- Stag Lodge (Grade II Listed): This listed building has no clear historical links with the site. The principal view of the building's most significant elevation is away from the site.
- The Artesian Well (Grade II Listed): This listed building is historically linked with the site. However, its context has changed considerably and is now a wholly developed setting.
- The Parish Church of St Mary has a charming historic churchyard. The significance of these is mainly historic and artistic. There is no intervisibility between them and the site.
- Entrance Gates to Wandsworth Cemetery (Grade II) and the nearby Magdalen Park and Wandsworth Common CAs. There are no historical links between these assets and the site.
- The following locally listed buildings in the London Borough of Wandsworth to the northwest of the site:
 - Southfields Underground Station, Wimbledon Park Road;
 - 54 Princes Way;
 - 90 Princes Way;
 - Linden Lodge School, 61 Princes Way;
 - 27 and 29 Inner Park Road;
 - East Lodge, 39 Inner Park Road;
 - South Lodge, 45 Inner Park Road;
 - 1-62 Claudia Place; Chivelston, 78 Wimbledon Park Side;
 - Remains of a garden at Whitlock Drive;

- Former gardens of Fairlawns.

These are all located at some distance from the site and there are no historical links between these assets and the site.

Heritage assets, designations, significance and direct impacts (on site)

Wimbledon Park Registered Park and Garden

453. The Wimbledon Park Golf Course was part of a much larger park, once landscaped by Lancelot “Capability” Brown in the 18th century. This related to a series of large houses forming the manor house of Wimbledon, which were historically located to the south, outside the current site, near St Mary’s Church. The first of these was a Tudor prodigy house known as Wimbledon Palace, built for Sir Thomas Cecil circa 1576 and demolished around 1717 to be replaced by Belvedere House for Sir Theodore Janssen and designed by Sir Colin Campbell. The replacement was Marlborough House for the eponymous duchess, built in 1731. This house was later owned by the 1st Earl Spencer and renamed Spencer House. Spencer House was in turn replaced by Wimbledon Park House, a more modest villa constructed in 1802 by Henry Holland. None of these houses survive, the last being demolished in 1949.
454. Between 1740 and 1764 the park was enlarged and redesigned by Lancelot “Capability” Brown. When Brown had completed his work, the park featured a newly created lake, set amongst open grassland (only a small area of fields remained in the north-east of the park), with a structure at the southern tip that is later marked on maps as a boat house. The earlier woods were retained, including Horse Close Wood to the north of the RPG, alongside remnants of the trees that formed the Great Avenue, and the trees and pond to the east of it. New scattered and clumped trees had been planted around the lake and part of a new pathway that led to it from Marlborough House through Vineyard Wood/Ashen Grove Wood extended into the RPG area.
455. In the later 19th and early 20th century large areas at the edges of the park were sold off for housing. In 1898 part of the park was sold and laid out as a new course for the Wimbledon Park Golf Club. In 1914 an area to the north was bought by the local council and became, and remains, a local public park with facilities, including a Water Sports Centre and an athletics track, being added in the 20th century. Part was sold to the Wimbledon Club, which remains. An area of land to the west was sold in 1920 to the AELTC.
456. The RPG draws its significance primarily from the elements of the designed landscape which were put in place by Capability Brown, and which survive. The RPG is of high heritage significance derived from a combination of heritage values. Key surviving features of the parkland of artistic and historic value include:
 - The Brownian lake recognisably survives. However, it has been impacted by sedimentation, with depths decreased to between 2.5m and 1m in most areas. Its shape has also been slightly modified by the in-filling of the southern tip and the culverting of the two streams.

- Remnant areas of historic planting at Ashen Grove Wood and Horse Close Wood remain.
 - 41 veteran and ancient trees, which are the result of historic planting. The majority are oak with several willow and one ash which are scattered to the south and west of the lake.
 - Some succession planting maintains some of Capability Brown's historic planting design, including trees at the original location of the lake's southern lake tip in the southern part of the application site.
 - Remnants of designed views in and around the lake remain. Notable viewpoints would have been looking northwards from the south-eastern lake tip and the view looking south and southwest towards Home Park Road and St Mary's Church. The sightlines of these lakeside views remain clear today, although their design composition has been partly eroded.
457. Although dating back to 1898 the golf course is not considered to be a heritage asset. The golf course was not laid out by a noted designer, and it detracts from Brown's design and therefore the significance of the RPG.
458. Unfortunately, Wimbledon Park has seen harmful changes over the years, and these have eroded Capability Brown's work. The RPG comprises only around a fifth of the original designed landscape. It has lost its focal point (Marlborough House). The sports and recreational uses, most notably the layout and significant management for the golf course use, have tended to erode significant features. The legibility of the remnant historic planting, including designed planting, has been eroded by later planting relating to the RPG's use as a golf course. This has affected the naturalistic form and siting of the planting (which also changes the canopy cover) and introduced inappropriate species; it has also affected the views that form a key part of how the RPG is experienced. The grassland habitats of the parkland have also changed, formerly being carefully manicured in the application site due to its use as a golf course. Particular elements of the park's setting have eroded the historic character, including buildings, hard landscaping, inappropriate planting and strong boundaries. Despite this, the RPG is relatively undeveloped which allows for appreciation of the historic valley topography, which is important to understanding the character of the park and the views in, out, and across it.
459. Most of the parkland's historic value is derived from it being a work of the famous and prolific landscaper, Lancelot "Capability" Brown. Wimbledon Park RPG also has evidential value derived from the potential for archaeological remains relating to the evolution of the park since the 16th century.
460. The following elements of the park's setting make a positive contribution to the appreciation and understanding of the historic and artistic value of Wimbledon Park RPG. These include:
- The Parish Church of St Mary (listed Grade II*), a borrowed historic feature potentially used as an eye-catcher. The church and the Old Rectory (listed Grade II*) have an historical association with Wimbledon Park.

- The survival of part of the former main approach through the park to the manor house (as Church Road and Victoria Drive), as well as an ancillary parkland path (as Wimbledon Park Road).
- The greenery within the surrounding areas, such as along Home Park Road, which is beneficial in softening the suburban setting and providing a loose semblance of the historic rural landscape.
- There are remnants of historic views which allow the RPG to be experienced including:
 - Views from Victoria Drive (part of the former approach to the manor house) across the parkland.
 - A view from the site of the original manor house(s), or more likely the ha-ha, towards the lake, Horse Close Wood and Central London. The former vista from the house can now only be perceived from Home Park Road, just beyond the RPG. The legibility of this view has however been eroded by the golf course, the water sports centre and athletics track.
 - A view from the northern end of the former driveway approach (Church Road) towards the church. This experience has been eroded by the conversion of the route to a public road, development along the road, the golf course, and development around the church.
 - The view from the southern end of Church Road looking north towards central London: views east from it through the trees allowing for glimpses of the lake.

461. The following elements of the proposed development are considered to cause harm to the RPG through harm to its artistic and historic values:

- The construction of permanent new buildings within the park. These include a 4-storey (28 metre high) Parkland Show Court, CGMH, seven subsidiary maintenance hubs and two player hubs. There would be other new hard infrastructure within the park including surfaced paths and new boundary treatments. Overall, these interventions, together with the intensification of the use of the park would result in the park having a more developed feel. This has a limited urbanising effect and detracts from the naturalistic approach of Brown, resulting in harm to the significance of the RPG.
- The scale and positioning of the Parkland Show Court would further erode views to the north and south between the park and St Mary's Church, which are significant since they reflect the historic link between park and manor house. The Parkland Show Court may also obscure current eastward glimpses towards the lake from Church Road.
- The introduction of the boardwalk around the lake would negatively affect the ability to perceive the lake as a natural body of water as intended by Capability Brown. Furthermore, where the boardwalk cuts across the lake tips, this would also interrupt the naturalistic design.

- There will be extensive earthmoving including to remove golf course features and recontour the site to create the 38 new grass tennis courts, create the basement for the Parkland Show Court, dig the ha-ha, and to reprofile natural contours in the re-created parkland south of the lake. The proposed groundworks would result in a topography that would be read as being more developed and less natural than it is presently.
- The works to provide temporary infrastructure needed for the Championships, including ticketing and security structures at the two entrances zones, court fencing and court dressing would have a further urbanising effect.

462. The following elements of the proposals are heritage benefits, which are public benefits:

- Removal of the golf course features (tees, bunkers and greens);
- Opening-up historic views through the removal of inappropriate golf-related tree planting;
- Removing inappropriate and poorly placed trees;
- Protecting existing ancient and veteran trees and implementing individual management plans, plus identifying future veteran trees;
- Celebrating the historic open-grown trees and tree clumps;
- De-silting and enhancing the appearance of the lake, with it partially returned to its 18th century extent through restoration of the southern tip;
- De-culverting two brooks (Bigden Brook and Margin Brook);
- New planting to enhance the parkland, including the planting of scattered and clumped trees in a more Brownian manner than existing;
- Restoring open acid grassland, a more Brownian feature than the former closely mown golf turf;
- Improving boundaries;
- The removal of the existing permanent and non-historic fence between the permissive northern parkland and the public Wimbledon Park, increasing the connectedness of elements of the 18th century landscape;
- Improvements to the northern entrance to the site;
- The production of a Conservation Management Plan (CMP) for the whole RPG;
- Celebrating the history of the site through leaning and interpretation boards and trails; and

- A heritage room within the former Golf Clubhouse depicting the history of the landscape and the local area and the significance of “Capability” Brown and his impact.

463. The proposals also include the following heritage-related public benefits:

- Moving the RPG closer to removal from the HAR Register;
- Providing the Optimum Viable Use for this part of the RPG;
- Enhanced public access to the newly accessible, managed, and maintained parkland (11.1ha), restored as parkland;
- Blurring of the landownership boundaries between the public Wimbledon Park and the permissive southern and northern areas of parkland, reducing the fragmentation of the RPG as it appears on the ground;
- Enabling public access around the edges of lake, which also has the effect of joining the public park at Wimbledon Park to the north with the permissive parkland to the south of the lake.

464. The proposals include the following heritage-related public benefits outside the site (through the s106 Agreement):

- Establishing a working/coordination group with the landowners and develop an improvement strategy for the entire RPG;
- The resurfacing of all the paths within Wimbledon Park to provide a common surface treatment within the RPG;
- The creation of new pathway connections between Wimbledon Park and the AELTC parkland – both at the northern and southern ends – to ensure public access connections between both landholdings;
- The resurfacing of Wimbledon Park northern car park, Revelstoke Road car park and new entrance gates to the car parks for the purposes of establishing a common surface, boundary and gates treatment throughout the RPG;
- The refurbishment of stairs to the Wimbledon Park Pavilion to improve accessibility into Wimbledon Park and the wider RPG;
- Provision of new wayfinding signage for the purposes of a common signage throughout the RPG;
- Installation of new entrance gates to Home Park Road from Wimbledon Park for the purposes of establishing a common boundary and gates treatment throughout the RPG reflecting the history of the site;
- The potential replacement of the existing boat house and provision of enhanced multi-purpose sports and leisure facility;

- The removal of the Leylandii surrounding the Athletics Track and replacement with new tree planting within the public Wimbledon Park (consistent with the character and historic interest of the site);
- Areas of additional new planting within Wimbledon Park to provide a common landscape treatment around the edges of the park to reflect a common heritage led landscape approach throughout the RPG;
- The opportunity for wider ecology and habitat enhancements within Wimbledon Park arising from new tree planting and landscape treatment;
- Developing management and maintenance strategies for the remaining remnant ancient woodland and veteran trees located within Wimbledon Park.

465. Overall, considering the existing condition and that proposed, GLA officers consider that the proposed development would cause less than substantial harm to the significance of the RPG at the low to middle extent of the spectrum. A number of heritage benefits, which are public benefits and heritage-related public benefits have been proposed and secured.

Wimbledon North Conservation Areas

466. The Wimbledon North Conservation Area is legally two areas. The northern section lies in the London Borough of Wandsworth and covers only the northern part of the Wimbledon Park RPG. The southern more extensive part lies in London Borough of Merton, and covers:

- The remainder of the Wimbledon Park RPG and core area of the Wimbledon Park Estate (e.g. the area of the houses and gardens);
- The historic core of Wimbledon Village; and
- The site of Wimbledon House and Belvedere House.

467. The significance of Wimbledon North Conservation Area is as a spacious and verdant residential suburb of the 19th century and later, including two examples of 20th Century estate development, wrapped around one of London's oldest hilltop villages, the ancient historic core. The topography together with the way the area has developed over time have resulted in a particularly varied townscape, including many shades of architecture and a mixed palette of building materials.

468. The Wandsworth part of the Wimbledon North Conservation Area consists of the northern tip of the golf course, the public Wimbledon Park and Horse Close Wood. The significance of the area is stated to be "derived from the mature trees and large-scale open space and the history of the ornamental park of which it is a part" (Wimbledon North Conservation Area Appraisal, circa 2007).

469. Certain historic views of the RPG are identified in the Conservation Area Character Assessment as contributing to the significance of the conservation area.

470. The following elements of the proposed development are considered to cause harm:

- There would be a temporary impact on the verdancy of the conservation area due to removal of trees to facilitate the development. However, in the longer term, as planting and landscaping works mature, this verdancy is expected to return, and potentially exceed, its former level. The introduction of smaller buildings (i.e. all those other than the Parkland Show Court) and more formal hardstanding across the site and tennis courts would reduce the semi-rural feel of the site. However, the soft landscaping works would help to mitigate this to a degree and planting within the site will screen this perceived change from beyond the application site.
- The impact on the conservation area would derive principally from the Parkland Show Court which would have an impact on perceived openness. The impact on the conservation area is limited to a degree by the positioning of the Show Court adjacent to the existing AELTC complex which means it will read to some extent in the context of the existing larger show courts on the main site.
- The proposed development would also have an impact on the historic value of the conservation area. There would be harm to the site's legibility as a former historic parkland and the designed landscape would be diminished by the additional built form introduced by the proposed development.

471. Overall, considering the existing condition and that proposed, GLA officers consider that the proposed development would cause less than substantial harm to the significance of the conservation area at the low to middle extent of the spectrum.

Wimbledon Park Golf Clubhouse

472. The existing golf clubhouse was built circa 1935, partially rebuilt after war damage in 1944, and subject to extensions in the 1990s. It is a two-storey brick structure in a loosely Arts and Crafts manner, with deep tiled roofs, terraces, gable ends with hanging tiles. The heritage significance of this asset is derived from its architectural, artistic, and historic value as a good example of a purpose-built interwar Golf Clubhouse. For the purposes of this assessment, it is considered to be a Non-Designated Heritage Asset, located within the conservation area.

473. This building is retained meaning that the architectural, artistic, and historic value within its form and fabric will be unchanged. It would be repurposed as a community facility. This use is appropriate to its current form, layout and significance. The current application includes no proposals for development.

474. Overall, considering the existing condition and that proposed, GLA officers consider that the proposed development would cause no harm to the Non-Designated Heritage Asset.

Heritage assets, designations, significance and indirect impacts (off site)

475. This section considers the designated and non-designated heritage assets whose settings may be affected by the proposed development. This includes consideration of their designations, their significance, the contribution made by setting to significance, the contribution made by setting to the ability to appreciate the significance, as well as the impact of the proposed development on that contribution.

*Parish Church of St Mary, listed Grade II**

476. The chancel of this parish church is late medieval, although rebuilt in 1860 by George Gilbert Scott. The Cecil chapel to south of the chancel dates from 1626-36 and contains a monument to Sir Edward Cecil, Viscount Wimbledon (d1638). The nave, west tower and spire were rebuilt and enlarged in 1843 by George Gilbert Scott and Moffat, in a late Gothic Revival style. The needle-like spire is a local landmark, particularly since it is located on high ground.

477. The heritage significance lies in its architectural, artistic and historic value as a fine example of a Gothic Revival church, with a medieval core. The church also carries archaeological value in its medieval fabric and construction methods. The church has a functional relationship with its churchyard which contributes to the archaeological, artistic and historic value of church, particularly because it contains 24 Grade II listed tombs and memorials.

478. The church spire is visible across wide parts of the local area, including (but not limited to) parts of the site, the AELTC Main Grounds, Home Park Road and Wimbledon Park Road. When viewed from locations to the south, Wimbledon Park can generally be seen in combination with the church. The church therefore has a large wider setting, its spire illustrating its function as a landmark denoting an historic settlement in a rural setting.

479. The following elements of the proposed development are considered to cause harm:

- The key impact on St Mary's Church will be on the views of the church tower and spire which form part its setting and allow its significance to be appreciated. Most of the proposed development incorporates single storey buildings and re-landscaping works which are unlikely to challenge the ability to appreciate the Church as a local landmark. However, the Parkland Show Court will challenge the ability to appreciate the church when viewed in combination with it. This challenge would be most apparent when viewed from the north within the application site due to the scale and prominence of the Show Court. Views impacted also include longer range views from the north (e.g. Victoria Road and Princes Way) however this is to a lesser extent as topography and tree cover will help diminish the perception of the Show Court. This will create an element of severance of the church from the parkland, detracting from the appreciation of the historical links between the parkland the location of its former manor house.
- The more developed landscape proposed including the single storey buildings, hard landscaping, lighting, and furniture will diminish the open

and undeveloped semi-rural setting from which the church can be appreciated.

480. Overall, considering the existing condition and that proposed, GLA officers consider that the proposed development would cause less than substantial harm to the significance of the church at the low extent of the spectrum.

*Old Rectory, listed Grade II**

481. The Old Rectory was previously known as the Parsonage House and stands about 60m to the south of the site (at a higher elevation). The Old Rectory is a large, detached house, the core of which dates to around 1500 making it the oldest surviving dwelling in Wimbledon. There are substantial additions in a Tudor Revival style from the 19th century. The interior contains fine late C16 or early C17 panelling and a former chapel with a painted barrel-vaulted roof with decorative plasterwork.
482. The significance of the Old Rectory is derived primarily from its architectural, artistic and historic value as a fine example of a high-status Tudor house. As a surviving component of the Wimbledon Manor, the house also has an important historical association with Wimbledon Park.
483. The Old Rectory has a historical connection with the park, since it is located near the sites of the various manor houses, functionally relates to the church and was part of the Wimbledon Estate. The site is therefore part of the setting of the Old Rectory, although the link is now quite weak.
484. Visual links are also quite weak, since much of the grounds of the Old Rectory are tree-lined and this acts to limit visibility of the house. From the site it is barely possible even to perceive the roof of the Old Rectory because of the intervening vegetation. Views from the Old Rectory towards the site, even on upper floors are likely to be limited.
485. The historical linkage between the site and the Old Rectory does not relate to the golf use and it is not considered that the change to permissive public parkland and the tennis venue harm what remains of this relationship. There does not appear to be any impact on views of or from the Old Rectory, given the high level of tree cover.
486. Overall, considering the existing condition and that proposed, GLA officers consider that the proposed development would cause no harm to the significance of the Old Rectory.

Victoria Drive Conservation Area (LBW)

487. The Victorian Drive Conservation Area Appraisal and Management Strategy (Wandsworth, 2009) defines the significance of the conservation area:

“The special interest of the conservation area is that it represents a slice of quintessential 1930’s, inter-war comfortable suburbia. Large, detached family houses on wide plots set back from quiet roads were built between 1927 and 1939. Many streets are lined with grass verges and mature trees which are the

remnants of grand avenues of the Victorian and Georgian parkland that formed the landscape before these houses were built.”

- 488. The 1930s houses are good examples of the English Domestic manner and the conservation area is highly verdant, with large gardens and extensive tree cover.
- 489. The proposed development has the potential to be visible in views from Princes Way and Victoria Drive towards the southeast. The Parkland Show Court will be visible at some distance and in the context of existing development and extensive tree cover. This change is very slightly harmful since it tends to urbanise the view, although the extent of harm is minimal (and both the London Boroughs of Merton and Wandsworth considered there was no harm).
- 490. Overall, considering the existing condition and that proposed, GLA officers consider that the proposed development would cause less than substantial harm to the significance of the conservation area at the very low extent of the spectrum (de minimis).

Bathgate Road Conservation Areas (LBM and LBW)

- 491. The conservation area land once formed part of the Wimbledon Park Estate but was sold for development in the mid-19th century. Bathgate remained largely undeveloped until the early 20th century when many of the existing houses that line it were built. The conservation area has a heavily planted character with houses well set back from the narrow-curved street. The significance of the conservation area derives from its architectural, artistic and historic value derived from its buildings and verdant feel.
- 492. There are views towards the boundary of Wimbledon Park RPG at the bottom of Bathgate Road which add to a sense of verdancy with some glimpses through the boundary into the application site and lake. Bathgate Road has a densely planted nature which combined with its street alignment gives an introverted character with few long-range views from the public street.
- 493. There would be some change to views into the site at the bottom of Bathgate Road (at the corner of Church Road). The Parkland Show Court would be visible and could obscure glimpses of the spire of St Mary's Church in the distance, as well as glimpses of the lake. However, vegetation along the site boundary would mean the sense of verdancy would not significantly alter the setting of the Conservation Area from this location.
- 494. Overall, considering the existing condition and that proposed, GLA officers consider that the proposed development would cause no harm to the significance of the conservation area.

Vineyard Hill Road Conservation Area (LBM)

- 495. The Vineyard Hill Road Conservation Area Appraisal (Merton, 2007) states that the significance of the conservation area derives from the views along Vineyard Hill Rd towards central London and the West End; the grand scale and form of the street and the quality of the street materials, architecture, construction materials and detailing and planting within the frontages of the properties. The street is a

good example of well-preserved late Victorian and Edwardian suburban area with houses generally in the Arts and Crafts manner.

496. The conservation area forms part of the setting of the site because of the historical links between the two parcels of land. However, because of the topography and the orientation of the street, visual links and views towards the site are surprisingly limited.
497. The proposed development has the potential to be marginally visible in some views from Vineyard Hill Road towards the northeast. The Parkland Show Court will be marginally visible at some distance and in the context of existing development and extensive tree cover. This change is very slightly harmful since it tends to urbanise the view, although the extent of harm is minimal.
498. Overall, considering the existing condition and that proposed, GLA officers consider that the proposed development would cause less than substantial harm to the significance of the conservation area at a very low extent.

Non-designated heritage assets

103 Home Park Road

499. Number 103 is a locally listed building located within the Wimbledon North Conservation Area and is a two and a half storeys high building, dating from 1932. The building carries some architectural, artistic and historic value as a good example of Tudor Revival suburban architecture.
500. The building faces towards the site and benefits from views towards Wimbledon Park. These views would change from golf course to landscaping and buildings, however the outlook would remain largely green and open. The architectural, artistic and historic value of the building would remain unchanged. GLA officers consider that no harm would be caused by the proposed development to the significance of the Non-Designated Heritage Asset.

121 and 123 Home Park Road

501. These two houses are locally listed buildings in the Wimbledon North Conservation Area. Number 123 features characteristic of the Queen Anne Revival manner and is a good example of the type. Number 121 is similar in appearance.
502. Numbers 121 and 123 Home Park Road stand adjacent to one another on the southern side of Home Park Road, around 20m away from the site on the eastern side of the road, facing towards the site. These views would change from golf course to landscaping and buildings, however the outlook would remain largely green and open. The architectural, artistic and historic value of the building would remain unchanged. GLA officers consider that no harm would be caused by the proposed development to the significance of the Non-Designated Heritage Asset.

57 Home Park Road

503. This locally listed house is in the Wimbledon North Conservation Area. It has the appearance of being architect designed, in a modernist manner, with an unusual and striking use of brown brick and expressed concrete structure. Limited information is available, but it is understood to be locally listed for its architectural, artistic, and historic value as an interesting example of modernist suburban architecture.
504. The building faces directly towards the site and benefits from views of Wimbledon Park. These views would change from golf course to landscaping and buildings, however the outlook would remain largely green and open. The architectural, artistic and historic value of the building would remain unchanged. GLA officers consider that no harm would be caused by the proposed development to the significance of the Non-Designated Heritage Asset.

Wimbledon Park Water Sports Centre

505. The Wimbledon Park Water Sports Centre is located within the Wimbledon North Conservation Area. The building stands to the east of the lake, within the public park and is immediately adjacent to the site boundary. It is not nationally or locally listed however it has some significance due to its architectural and artistic value as an example of a purpose-built modernist sailing club building.
506. In terms of setting, it has an important functional relationship with the lake. The proposed development will de-silt and reshape the lake, as well as improve circulation around it by installing board walks. This would not affect the heritage value of the building or its relationship with the lake. It is likely that the increased usability of the lake will lengthen the design life of the building and ensure its ongoing use. GLA officers consider that no harm would be caused by the proposed development to the significance of the Non-Designated Heritage Asset.

All England Lawn Tennis Club – Centre Court

507. Centre Court is not located within a conservation area and it not nationally or locally listed. However, this asset was identified in the Historic England (2014) Directory of Historic Sporting Assets in London as a building of 'special historical, architectural, or 'sporting significance'. The building dates from 1922, is constructed from reinforced concrete and was designed by Stanley Peach. It has been extended and altered over the years. Its main significance lies in its global fame as the home of The Championships for over 100 years. Its value is therefore mainly historic, although it has some architectural and aesthetic value. For the purposes of this assessment, it is therefore considered to be a Non-Designated Heritage Asset.
508. Wimbledon Park RPG on the opposite side of Church Road to Centre Court adds visually to the aesthetic of The Championships as 'tennis in an English Garden'. The proposed development would not diminish the understanding of the historic association of the building and its grounds. The new facilities would not change the understanding of the Centre Court as the principal Show Court. GLA officers consider that no harm would be caused by the proposed development to the significance of the Non-Designated Heritage Asset.

The White Pavilion

509. The White Pavilion is a locally listed building in the Wimbledon North Conservation Area. The building dates from 1925 and is probably one of the oldest structures in the public park. The building is an elongated octagon in a style which defies description but is probably loosely based on a Georgian orangery. It was originally intended as a tea pavilion and was to have a pitched roof with chimneys, but now has a flat roof with a balustrade, which is accessible to the public. It has significance due to its architectural, artistic and historic value as an unusual purpose-built park building from the earliest days of the public park.
510. The rooftop balcony allows for northwards views into the existing public park and views towards the south-eastern boundary of the site defined by Ashen Grove Wood. Due to the intervening woodland, views towards the site are not possible. It is unlikely that the proposed development would have any visual impact on the setting of the building. GLA officers consider that no harm would be caused by the proposed development to the significance of the Non-Designated Heritage Asset.

Bowls Pavilion

511. The Bowls Pavilion is a locally listed building within the Wimbledon North Conservation Area. It is a mainly single storey brick building under a pitched and hipped tiled roof, with a first floor dormer window and an unusual small tower with a clock. It was purpose-built as a bowls pavilion and is probably late 1920s or early 1930s in date. Its significance lies in its architectural, artistic and historic interest as a good example of purpose-built 1930s sports architecture and its association with the long-standing Bowls Club.
512. The entrance front of the Bowls Pavilion faces away from the site and the building is positioned on relatively lower ground. This orientation, level and the blockage of any potential view by the Water Sports Centre means that there is no visual connection with the site. GLA officers consider that no harm would be caused by the proposed development to the significance of the Non-Designated Heritage Asset.

Queensmere House, 19 Royal Close

513. Queensmere House is a locally listed building in the Bathgate Road Conservation Area. It is a substantial late Victorian mansion, built in rustic stone. The building is a tour de force of the late Victorian "Elizabethan" manner with the characteristic E plan, gables, projecting crenelated oriel bay windows and a curious external corner stair. Its significance is derived from its architectural, artistic, and historic values as a late Victorian mansion.
514. The building's setting includes long views towards the site due to its position on relatively higher ground. The Parkland Show Court would be visible from this building. However, the proposed development would not change the ability to appreciate the building's significance and would not have a discernible impact on its setting given the distance (circa 300m) away from the site and the intervening vegetation. GLA officers consider that no harm would be caused by the proposed development to the significance of the Non-Designated Heritage Asset.

62-74 Bathgate Road (evens)

515. These buildings are locally listed and located within the Bathgate Road Conservation Area. They are interesting examples of 1920s and 1930s detached family dwelling with Arts and Craft influences in their design. Their significance therefore lies in these architectural, artistic and historic values.
516. The rear of these buildings back on to the main AELTC Grounds. Further, their gardens are positioned on lower ground to the main AELTC Grounds. Nevertheless, their setting is characterised by views towards the rear, particularly at an upper level towards the site. The Parkland Show Court is likely to be visible from the upper floors of these properties. However, the proposed development would not change the ability to appreciate the buildings' significance, given the distances involved and the nature of the topography and intervening development. GLA officers consider that no harm would be caused by the proposed development to the significance of the Non-Designated Heritage Assets.

Positions of other parties

517. The scale for extents of harm on the spectrum of less than substantial harm that has been used is very low, low, low to middle, middle, middle to high, high, and very high. A summary of each relevant party's positions is summarised below.

Table 7: Heritage assessments of LPAs and Historic England

Designated heritage assets	Historic England assessment	LB of Merton assessment	LB of Wandsworth assessment
Wimbledon Park, Registered Park and Garden, Grade II*	Less than substantial harm (lower half of the range)	Less than substantial harm (upper half)	Less than substantial (extent not stated)
Parish Church of St Mary, listed Grade II*	No comment	Less than substantial harm (lower half)	No comment
Old Rectory, listed Grade II*	No comment	No harm	No comment
Wimbledon North Conservation Area	No comment	Less than substantial harm (lower half)	Less than substantial (extent not stated)
Victoria Drive Conservation Area	No comment	No comment	No comment
Bathgate Road Conservation Area	No comment	No harm	No comment
Vineyard Hill Road Conservation Area	No comment	No comment	No comment
Non-designated heritage assets	Historic England assessment	LB of Merton assessment	LB of Wandsworth assessment

Archaeological remains	"the development could cause harm to archaeological remains": Conditions recommended	Potential to result in substantial harm or total loss	No comment
Wimbledon Golf Clubhouse	No comment	Less than substantial harm (lower half)	No harm
121 and 123 Home Park Road	No comment	No harm	No harm
103 Home Park Road	No comment	No harm	No harm
57 Home Park Road	No comment	No harm	No harm
Wimbledon Park Water Sports Centre	No comment	No harm	No harm
All-England Lawn Tennis Club Centre Court	No comment	No harm	No harm
The White Pavilion	No comment	No harm	No harm
Bowls Pavilion	No comment	No harm	No harm
Queensmere House	No comment	No harm	No harm
62 to 74 (even) Bathgate Road	No comment	No harm	No harm

518. The Gardens Trust provided comments on three occasions. In their initial letter they stated that "...this is the best chance for landscape improvements (as far as is now possible) of this rare, urban Capability Brown C18th parkland" and they remain supportive of the proposals.

519. GLA officers have reviewed and noted the objections received from both SAVE and The Capability Brown Society.

Summary table

520. Overall, GLA officers consider that the categories and extents of harm in the table below are caused by the proposed development (in all cases the assessment is based on the cumulative scenario).

Table 8: Summary of heritage harm

Designated heritage assets	Category of harm	Extent of harm	View reference
Wimbledon Park, Registered Park and Garden, Grade II*	Less than substantial	Low to middle	EIA Views 1 to 18, PAIV Views 1 to 10, CGI Views 1, 2, 3, 4, 5, 6 and 7
Parish Church of St Mary, listed Grade II*	Less than substantial	Low	EAI Views 1, 6, 10, 11, PAIV View 3, CGI View 1 and 2
Old Rectory, listed Grade II*	No harm	No harm	EIA View 6
Wimbledon North Conservation Area (LBW and LBM)	Less than substantial	Low to middle	EIA Views 1 to 18, PAIV Views 1 to 10, CGI Views 1, 2, 3, 4, 5, 6 and 7
Victoria Drive Conservation Area (LBW)	Less than substantial	Very low (de minimis)	EIA Views 10, 11 and 16
Bathgate Road Conservation Area (LBW and LBM)	No harm	No harm	EIA View 12
Vineyard Hill Road Conservation Area (LBM)	Less than substantial	Very low (de minimis)	EIA View 8
Non-designated heritage assets	Category of harm	Extent of harm	View reference
Archaeological remains	Not applicable	Potentially high or total loss	Not applicable
Wimbledon Golf Clubhouse	Not applicable	No harm	Not applicable
121 and 123 Home Park Road	Not applicable	No harm	Not applicable
103 Home Park Road	Not applicable	No harm	Not applicable
57 Home Park Road	Not applicable	No harm	Not applicable

Wimbledon Park Water Sports Centre	Not applicable	No harm	Not applicable
All-England Lawn Tennis Club Centre Court	Not applicable	No harm	Not applicable
The White Pavilion	Not applicable	No harm	EIA View 4
Bowls Pavilion	Not applicable	No harm	Not applicable
Queensmere House	Not applicable	No harm	Not applicable
62 to 74 (even) Bathgate Road	Not applicable	No harm	Not applicable

Archaeology

Archaeological designations

521. The site is located within two Archaeological Priority Areas. The Merton part of the site is within the Wimbledon Park House APA (Merton APA 2.12). The Wandsworth part of the site is within the Wimbledon Park APA (Wandsworth APA 2.15). Between them they cover an area of 102 ha including the whole of the RPG. The APAs cover the whole of the subject site except Church Road.
522. An APA is not a heritage asset. It is a defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries.
523. APAs are assigned Tiers from 1 (high) to 4 (low). The tiers vary depending on the archaeological significance and potential of a particular area. Wimbledon Park House APA is designated at Tier 2 because “it covers the site of a heritage asset of archaeological and historic interest and a Grade II* Registered Park and Garden with archaeological interest.” Wimbledon Park APA is designated at Tier 2 because “its grounds are a Grade II* Registered Park and Garden with archaeological interest.”
524. A Tier 2 APA is defined as “a local area within which the GLHER holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest. Planning decisions are expected to make a balanced judgement for non-designated assets considered of less than national importance considering the scale of any harm and the significance of the asset”.

Archaeological significance

525. The significance of the Wimbledon Park House APA (Merton) is stated to be: “From the late 16th century until the mid-20th century one of three [actually four] different manor houses occupied the area to the south of the APA. Each house

was a fine example of a country house which would have reflected the architectural themes of the time they were built and were visited by various famous people. The first Wimbledon Park House was the first grand country house to be built in the area and further country houses were located in the Wimbledon area in subsequent centuries. The size of Wimbledon Park further demonstrates the scale of Wimbledon Park House's grounds even though the current park is smaller than the grounds would have been. The tunnel found in 2004 demonstrates how remains associated with the houses may still be present while the remains of garden features may survive within the park.

526. Wimbledon Park APA (Wandsworth) is significant because it: "has potential for finds relating to the extensive estate of Wimbledon Park House. The estate was one of the largest in this part of Greater London and the first Wimbledon Park House had an influence on the development of the local area... Wimbledon Park retains a certain degree of the estate's character and any remains found in the APA would have an association with Wimbledon Park House and have the potential to be significant."
527. The heritage significance of any below ground archaeological remains associated with Wimbledon Park Estate will be derived primarily from their archaeological (evidential) value and ability to inform understanding of the development of the parkland, including its changing economic and ornamental use.
528. Some remains may have additional historic (associative) value if they can be identified as being created by a particular landscaper and/ or for a particular owner and the level of significance would be based on their contribution towards understanding the development of what a nationally important parkland.
529. The applicant's HEA considers there may be some archaeological remains relating to the sports and recreational function of Wimbledon Park dating from the latter half of the 19th Century. The heritage significance of these features may be low based on their ability to inform our understanding of the more recent sports and recreational use of Wimbledon Park.
530. The applicant's HEA considers that the potential for hitherto unknown archaeological remains within the Site is estimated as follows:
 - Prehistoric – low
 - Roman – low
 - Early medieval – low
 - Medieval – no remains are anticipated beyond those discussed above.
 - Post-medieval – no remains are anticipated beyond those discussed above.
 - Modern – no remains are anticipated beyond those discussed above

Potential archaeological impacts

531. Since both APAs are Tier 2 and the development covers more than 10 ha, the proposed development is considered to be high risk and “likely to cause harm to heritage assets of archaeological interest and fairly likely to cause significant harm.”
532. The applicant’s HEA considers that ground disturbance from the post-medieval period is likely to be relatively limited. The creation and adaptations of the golf course since 1898 may have had an adverse effect on buried remains. There may be localised loss from the extent and previous golf buildings on site. Other impacts are likely to include landscaping, planting, excavation of bunkers, drainage, and services.
533. The following proposed works have the potential to cause ground disturbance and to impact on potential archaeology:
- Removal of golf course landscaping and demolition of associated structures;
 - Works to the lake and streams;
 - Tree planting and felling;
 - New SUDS features; and
 - New paths, lighting, boundary treatments, tennis courts, road, and all building works.
534. The Applicant’s HEA identifies that it is likely that a significant part of the application site would be subject to a level of ground disturbance that would completely remove or truncate any archaeological features within its footprint. At worst, this could result in total loss or substantial harm to any archaeological deposits present.

Consultee responses

535. The Greater London Archaeological Advisory Service (GLAAS) commented in detail on the proposals in September 2021. GLAAS considers the development could cause harm to archaeological remains.

Extent of harm and mitigations

536. GLA officers consider that there could be harm to archaeological assets which could equate to substantial harm or total loss of heritage assets of archaeological interest. If such assets exist and are found, they would be Non-Designated Heritage Assets unless considered to be of national importance, in which case they would be regarded equivalent in significance to Scheduled Monuments (and may be designated as such in due course).
537. GLAAS proposed three conditions, which have been secured, to mitigate the potential harm to archaeology caused by the proposals, requiring:

- A Stage 1 Written Scheme of Investigation and programme and methodology of site evaluation and nomination of competent person.
- If heritage assets of archaeological interest are identified at Stage 1, a Stage 2 WSI with a statement of significance and research objectives, programme and methodology of site investigation and nomination of competent person, details of a programme for delivering related public benefits, and a programme for post-investigation, publication and dissemination and deposition of resulting material.
- An appropriate programme of public engagement with a timetable.

Conclusion of heritage impacts

538. The proposed development has sought to avoid and minimise harm during design development. Nevertheless, less than substantial harm has been identified to five designated heritage assets in a manner that does not comply with Policy HC1 of the London Plan. Furthermore, there is potential harm to Non-Designated Heritage Assets in the form of archaeological assets. For the reasons set out in paragraphs 835-840 below, GLA Officers consider that the harm caused is clearly outweighed by the public benefits of the scheme, so that only limited weight attaches to the identified conflict with the relevant development plan policies.

539. The Reserved Matters, proposed conditions, and draft s106 Agreement have been reviewed in detail, in discussion with Historic England. They are appropriate and adequate in terms of mitigating against further heritage harm and securing the heritage and heritage-related benefits.

Surrounding amenity impacts

540. This section assesses the impact of the proposals on the living conditions at neighbouring properties, including impacts on daylight/sunlight, overshadowing, sense of enclosure and privacy, light and noise as well as construction impacts.

541. A core principle of the NPPF is to seek to secure a good standard of amenity for all existing and future occupants of land and buildings. London Plan Policy D3 states that the design of new buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings in relation to privacy, overshadowing, wind, and microclimate. Noise and light pollution impacts around the building should also not detract from the enjoyment of these spaces. London Plan Policy D14 specifically seeks to reduce and manage noise associated with development.

542. At a local level, Merton SPP Policy DMD2 requires that developments:

- Ensure provision of appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens.

- Protect new and existing development from visual intrusion, noise, vibrations or pollution so that the living conditions of existing and future occupants are not unduly diminished.

543. Additionally, Policy LP2 of the Wandsworth Local Plan states that development proposals must not adversely impact the amenity of neighbouring properties or prevent the proper operation of the uses proposed or of neighbouring uses.

Daylight, sunlight, and overshadowing

544. The structure within the Proposed Development with the greatest potential to result in impacts in terms of Daylight, Sunlight and Overshadowing is the new Parkland Show Court, which has a maximum height of approximately 28m above ground level.

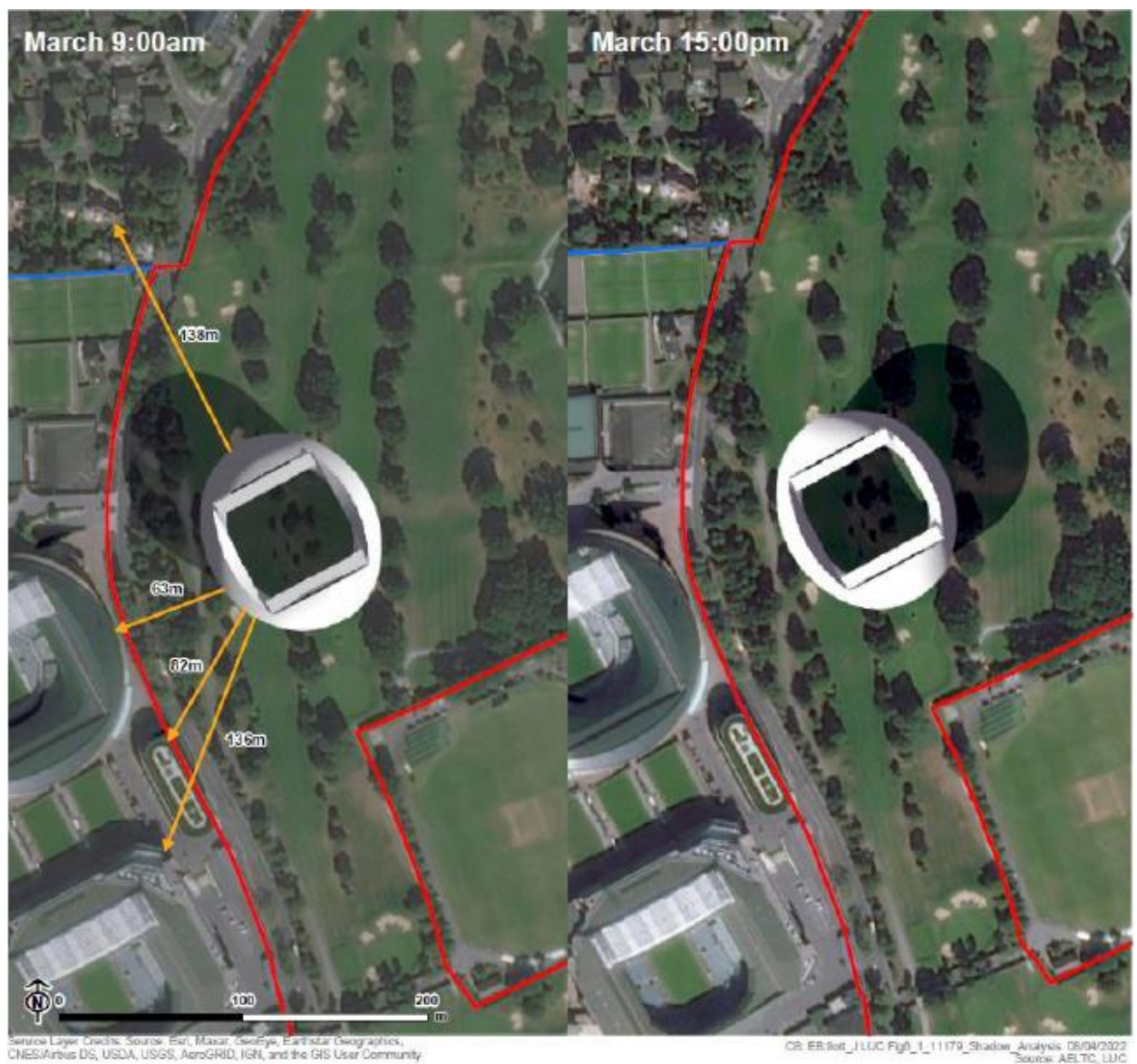


Figure 52: Overshadowing impacts of the Parkland Show Court

545. As illustrated within Figure 52 above, the location of this element within the site is isolated from neighbouring buildings and sufficiently distant from these receptors

to ensure there is no potential for impacts associated with increased shadow on nearby occupants. The closest residential building is approximately 138 metres away from the Show Court and, as such, would not reduce the daylight or sunlight available to any neighbouring properties.

- 546. The proposed Show Court would be visually prominent when viewed from the grounds of the Wimbledon Club. However, there is considered sufficient separating distance to the Show Court that there would be no detrimental impact in terms of daylight, sunlight, or overshadowing.
- 547. The overshadowing diagram above also clearly shows that there would be no overshadowing of neighbouring properties (including The Wimbledon Club).
- 548. All other structures would be low in scale, with the maintenance hubs have a maximum height of 4 metres, the northern player hub 5 metres and the southern player hub 6.5 metres. The CGMH would be subterranean. These structures are low in height and well setback from neighbouring properties and, as such, would have no impact on the amenity of neighbouring properties in terms of daylight, sunlight, and overshadowing.
- 549. The limited impact of the proposal on these matters was recognised early during the process with the topics of daylight, sunlight and overshadowing not considered likely to give rise to significant effects and it was agreed that they could be scoped out of detailed assessment within the Wimbledon Park ES.
- 550. As such, the proposal is acceptable in terms of its daylight, sunlight, and overshadowing impacts.

Privacy, sense of enclosure and outlook

- 551. Similar to the above, the privacy and outlook impacts would be limited due to the significant separation distance between the proposed development and nearby residential properties.
- 552. The Parkland Show Court is located approximately 138 metres away from its closest neighbour. Therefore, even at a height of 28 metres, this building would not have any material impact on privacy, outlook, or create a sense of enclosure for any of the closest residents.
- 553. The single storey structures would be well setback from neighbouring properties and low in height, resulting in no material privacy or outlook impacts to neighbouring properties. The CGMH has been located below ground to limit impacts on its immediate neighbours.
- 554. Therefore, the proposed development would have no unacceptable impact on the privacy, sense of enclosure or outlook for any neighbouring properties.

Light pollution impacts

- 555. Paragraph 191 of the NPPF requires development to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and

nature conservation. This policy is supported by London Plan Policy D8 and D9, Merton SPP policy DM EP4, and Wandsworth Local Plan Policy LP2.

556. An External Lighting Strategy has been submitted as part of Wimbledon Park ES. This assesses the impacts evaluates the impact of the artificial lighting strategies on the natural environment and its potential effects on the identified sensitive receptors. The Wimbledon Park ES considers that with mitigation, there would be no significant effects from light pollution during operation.
557. GLA Officers are satisfied that the impacts of light pollution have been appropriately limited and would not give rise to any unacceptable impact to local amenity, an intrinsically dark landscape or nature conservation.
558. A condition has been secured requiring details of an external lighting strategy to be submitted to and approved by the LPA prior to operation of the development. Additional details of sensitive lighting, to protect ecology and biodiversity, will be provided under Condition 32.
559. Having regard to the above, the lighting details are considered to comply with the NPPF, Merton SPP Policy DM EP4, and Wandsworth Local Plan Policy LP2.

Noise impacts

560. NPPF Paragraph 191 requires development to mitigate and reduce the potential adverse impacts resulting from noise, and to prevent noise giving rise to significant adverse impacts on health and the quality of life. This is supported by London Plan policy D14, Merton SPP policy DM EP2 & DM EP4, and Wandsworth Local Plan Policy LP2.
561. The relocation of the Qualifying Event to the site would extend spectator access at the subject site to three weeks per year as opposed to the current two-week tournament. As a result, there would be the potential for noise disturbance to local residents to increase. However, the Qualifying Event would be limited to a capacity of 10,000 people per day, which is significantly lower than the current daily capacity (42,000) and the proposed capacity (50,000). Given the comparatively limited attendance, and the control on hours of operation (as conditioned), it is not considered that the noise levels produced by people attending the qualifying tournament would cause significant detriment to amenity.
562. The Championships would continue to operate in a similar manner as at present, with an additional 8,000 attendees. Whilst there would be an increased number of spectators they would be further spread out across a larger site and access would be gained via specifically designed entrances and for these reasons there would be no unacceptable increase in the noise impact compared to that which is experienced than at present.

Construction

563. Many objections have raised concern with the extent of construction, the lengthy timeframe of construction (~8 years) and the level of construction traffic on the local road network. noise, dust, pollution and vehicle movements.

564. Chapter 7, 8 and 9 of the submitted Environmental Statement indicate potential adverse effects to neighbours in relation to vehicle movements, air quality and noise and vibration during construction. Additionally, the applicants have submitted an Outline Construction Logistics Plan which outlines measures for the management of impacts on neighbours, including details of vehicular movements and hours of construction.
565. The Wimbledon Park ES concludes that the construction activities associated with the proposed development will not cause a significant adverse noise effect to occur at any receptor for the vast majority of construction activities. However, the Significant Observed Adverse Effect Level (SOAEL) for noise may be exceeded at certain receptors by both tree removal and highway works on Church Road. However, the period for which the SOAEL would be exceeded is limited, such that no significant adverse effect is expected to occur.
566. A Construction Logistics Plan (CLP) would be secured which sets out strategies to reduce the impact from vehicles during construction of the development. This will include, but is not limited to, the use of delivery scheduling and timing outside of the peaks (including school peaks), use of designated routes and signage, re-use of materials, use of local suppliers and collaboration with other sites. A commitment to the use of vehicles registered with the Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS) initiative are welcomed.
567. The following mitigation measures and management plans have been secured by way of condition:
- Phase-specific Construction Logistics Plan.
 - Construction Travel Plan.
 - Overarching Construction Environmental Management Plan & Ecological Mitigation Plan.
 - Phase-specific Construction Environmental Management Plan & Ecological Mitigation Plan.
568. In addition, a s106 obligation including a monitoring contribution to the Council would be secured and subject to the conditions outlined above, the construction impacts associated with the proposal are considered to be acceptable and the proposal complies with London Plan Policies T4 and T7.

Conclusion on amenity impacts

569. Having regard to the above, GLA Officers consider that the amenity impacts including daylight, sunlight, overshadowing, privacy, outlook, light and noise would not result in any unacceptable adverse impact on neighbouring properties. Similarly, construction impacts have also been considered and, subject to conditions, would not unacceptably impact neighbourhood amenity. Therefore, the proposed amenity impacts are compliant with the NPPF, London Plan Policies D3

and D14, Merton SPP Policy DMD2 as well as Wandsworth Local Plan Policy LP2.

570. This assessment of amenity impacts is considered to remain consistent, and unchanged, across both the Precautionary Approach and Alternative Approach.

Green infrastructure and the natural environment

571. The GLA engaged consultants Arup to review all green infrastructure and natural environment matters, with a focus on trees, ecology, Biodiversity Net Gain (BNG), and Urban Greening Factor (UGF). Many of the comments below are reflective of the feedback issued by Arup.

Trees

572. Paragraph 186 of the NPPF provides that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

573. Policy G7 of the London Plan requires development proposals to ensure that, wherever possible, existing trees of value are retained. This covers both category A and category B trees. Where planning permission is reliant on the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees which are removed. New development should include the planting of new trees, particularly large-canopied species. These aims are reflected in Policy DM 02 of the Merton SPP and Policy LP56 of the Wandsworth Local Plan.

574. The subject site contains 1112 trees, 41 of which are Veteran trees. All Veteran trees are proposed to be retained, and the applicants have drawn up a tree protection plan for each retained Veteran tree. A Veteran Tree Management Plan has been secured by condition.

575. However, 300 trees will be lost (28% of existing trees on site), including 28 category B trees, 256 category C trees, and 16 category U trees. The four additional tree removals (proposed within the April 2024 amendments) are Category C trees. A further 18 trees would be transplanted.

576. A substantial level of tree planting is proposed including:

- 1,500 new trees proposed between 2yr old trees and extra heavy standards (500 heavy trees 12-14cm girth and extra heavy trees- 14-16cm girth, 1000 trees of at least 2 years in age).
- Approximately 1,000 whips (tree and shrub seedlings of approximately 0.5-1m in height).
- 18 existing trees which sit either within proposed building or court locations have been identified as viable for relocation via transplanting.



Figure 53: Tree planting proposals

577. The LBM appointed an independent tree consultant to review the proposals for tree removal, retention, relocation, and planting. They concluded the proposed tree removals were modest and *'the value of the replacement planting an obvious*

improvement on the existing planting.’ To ensure that this value is achieved, further details on the proposed tree removals and proposed replacement species (size/level of maturity on planting and type) are required prior to the commencement of works and this has been secured by condition.

578. In addition to the above Arup reviewed the tree proposals and provided the following feedback:

- The approach to protecting the most valued veteran and category A trees is welcomed. Nevertheless, it is important that the approach to the remaining trees is qualitative as well as quantitative and a condition has been secured to ensure that the value of the trees lost would be at least replaced if not exceeded.
- Some tree loss appears to be required beyond that of simply facilitating the proposed development. This is partly due to the applicants aim to restore the original Capability Brown landscape.
- As recommended by the LBM tree consultant, it is expected details of further design work to develop the precise specifications for soil volumes, exclusion zones, removal methodologies, will be provided for each tree prior to the commencement of works. Arup has reviewed the proposed planning condition wording and made recommendations to ensure it requires a sufficient level of information.
- Precise specification of the proposed trees (reported as heavy or extra heavy standard (EHS)) has been secured by planning condition.
- The proposal would result in predominantly same level canopy height across the proposed development on day one. Consideration should be given in the discharge of conditions to providing a range of planting to enhance the look and feel of the proposed development.

579. In general, a more detailed set of planting plans (in particular, tree planting), with clearer definition of species location and sizing, is required and this will be secured through condition.

580. An appropriate planning condition has also been proposed requiring the submission of a detailed arboricultural method statement, along with a suitable watching brief and associated monitoring arrangements throughout felling and construction works.

581. Whilst tree loss is regrettable it is recognised that this is required to facilitate the development and to restore the original Capability Brown landscape. Overall, the scheme is considered to strike a successful balance in applying a heritage-led approach to the landscape. GLA Officers consider that due to the substantial level of tree planting and replacement and the protection of all Veteran and Category A trees, the loss of the existing trees is acceptable.

Ecology and biodiversity

582. London Plan Policy G6 states sites of importance for nature conservation (SINCs) should be protected and any mitigation measures required to protect SINCs from indirect/ direct impacts should be clearly set out. If it is not possible to avoid impacts, the applicant should set out how they have followed the mitigation hierarchy to minimise development impacts. Policy G6 also states that development should also aim to secure net biodiversity gain. These policies are covered locally by Merton CS policy CS13, and Merton SPP policy DMO2 and Policy LP55 and LP57 from the Wandsworth Local Plan.

583. Wimbledon Park is identified as a SINC with both the LBM and LBW parts of the site.

584. The following ecological measures are proposed:

- The long-term use of the site as a golf course has weakened the important habitats and biodiversity and the proposed development offers the opportunity to repair sections of the landscape and significantly enhance ecology/biodiversity value.
- The proposals include the retention/protection of all veteran trees and the planting of 1,500 new trees at a variety of standards and ages. This would more than double the number of trees on-site and would significantly improve onsite biodiversity.
- Whilst 2.8 ha of the parkland trees (typically low grade ornamental trees of lower biodiversity value, in poor to moderate condition) would be removed, 4.6 ha of new scattered tree canopy within the parkland, comprising a species rich mix of trees, and 1.35 ha of broadleaved woodland in the periphery woodland areas would be planted, along with a further 1.34 ha of newly planted species rich native mixed scrub which will form an extended woodland boundary.
- The proposals target net improvement to biodiversity through enhancement works to the site, the Lake and potentially within Wimbledon Park. The proposals will also include a detailed management strategy for the ongoing stewardship of the land and its environmental assets.
- The submitted BNG assessment has assumed that all baseline grassland habitats within the site would be lost through permanent or temporary construction impacts (including 1.51ha of lowland acid grassland) but proposes creating 3ha of medium distinctiveness grassland in the northern section of the Site and 5.9ha of very high distinctiveness lowland acid grassland in the southern section.
- The proposals include an increase to the lake footprint of approximately 1ha and the commitment to enhance the water quality of Wimbledon Park Lake to a target condition of 'Fairly Good' within 7 years (it is currently assessed as being 'Fairly poor').

- Several wildlife ponds would be created across the site (approximately 0.04 ha in size).

585. The ecology and biodiversity improvements identified are achieved via the following key interventions:

- New and enhanced, connected and diverse habitats for biodiversity including a range of local and European notable and protected species.
- Creation of new and enhanced broadleaved woodland and woodland edge to provide better structural diversity. Enhanced planting of understorey and woodland floor species to increase ecological value, whilst also supporting general population assemblages for birds and invertebrates.
- The planting of significant numbers of trees to bolster local climate resilience and provide multiple green infrastructure services such as carbon sequestration, air cooling and air cleaning.
- Management of existing remnant veteran and ancient woodland through Management Plans. Conservation of all 41 Veteran and Ancient trees, managed via individual management plans to maximise their health and longevity.
- Creation of large contiguous area of acid/neutral grassland (a Local Priority habitat) across the Southern Parkland and establishment of species-rich meadow and grasslands to attract a diversity of invertebrates, amphibians, reptiles, small mammals, bats and birds across the wider site.
- De-silting the lake in collaboration with the LBM to restore water depth, enhancing the open water habitat and water quality. Additionally, create lake and lakeside habitats including shelves, reedbeds, marginal and aquatic planting to increase diversity of habitats for a range of notable and protected species fish, invertebrates, and wetland birds.
- De-culverting of two natural water courses and creation of ponds, swales and wet ditches, planted with marginal and aquatic habitats to support and diversify species.
- Provision of species-specific ecological interventions, including creation of a sand martin bank (along lake edge), a bat cave (within lake island), kingfisher tunnels (within restored brooks), floating bird platforms (within lake), and bird and bat boxes (within trees and structures).

Ecological impact and mitigation

586. Assessment of ecological impacts and the approach to following the mitigation hierarchy is detailed within Chapter 12 of the ES and supported by Technical Appendices. In summary, habitats of high ecological value, including ancient/veteran trees, woodlands and wetlands would be retained, protected, and enhanced.

587. As detailed within the Wimbledon Park ES, direct impacts on the woodland SINCs would be avoided entirely, however whilst construction phase impacts on the lake will be avoided and/or reduced as far as possible through appropriate mitigation and avoidance measures, they cannot be avoided entirely in order to successfully deliver the significant ecological benefits predicted for both the lake, and the wider site.
588. The ecological mitigation strategy sets out the measures taken within the final design that have avoided, reduced, and compensated for predicted ecological impacts. It is positive that the strategy has documented the early design advice provided by the applicant's consultant team and acknowledged those measures that have not been taken forward, in addition to the majority that have, within the final design proposals.
589. The significant ecological improvements, outlined above, would be fully realised in the medium and long-term and would off-set the short-term impact resulting from the remodelling of the site and landscape and the associated construction works.
590. The success or otherwise of some of the specific measures cited for different species or species groups is dependent on receiving the right specialist advice in the development of the detailed design and installation of those features. Accordingly, suitably worded planning conditions have been secured to ensure this detail is provided.
591. GLA Officers consider that the valuation of the individual species and species groups within the assessment (termed 'ecological importance of the site') appears to be broadly appropriate and logical. Although replacing intensively managed areas of the golf course with large numbers of highly maintained grass courts may not result in much change in ecological value, it does create a very different form to the environment. Whilst the lake and the mature trees would remain and the parkland and large swathes of grassland would be enhanced, the tennis site would be transformed from an open golf course environment into a site with a far higher ratio of built structures than is currently the case.
592. In the case of bats, it has been acknowledged within the Wimbledon Park ES that reduced levels of lighting and enhancements to these retained habitats will allow for (and could improve conditions for) continued bat activity into the future.
593. Proposed replanting of trees should give a little more weight to native/naturalised species of greater age and biodiversity value (currently a range of native and non-native proposed, some of which will be of limited or lesser biodiversity value).
594. Whilst further detail is needed around the longer-term protection of the retained (particularly ancient and veteran) trees a condition would be secured requiring details to be provided to ensure that the health and condition of the trees is not under threat during intense periods of activity and visitor pressure on the site, including through indirect effects such as soil compaction. Further a condition requiring a CEMP, is recommended to mitigate activities, including desilting the lake, and lighting etc.
595. Having regard to the above, GLA Officers are satisfied that the potential effects of both construction and operations on the ecological value of the site has been

appropriately considered with several measures proposed and secured. The success of these measures is dependent on the detailed design and installation of those features. As such, prescriptive conditions have been secured for ongoing ecological monitoring.

Biodiversity Net Gain

596. The applicant is committed to securing significant biodiversity gains. All biodiversity units exceed the 10% net gain sought in the Environment Act. Specifically, the BNG assessment, completed by LUC, identified the following scores for the proposal:
- A 22.95% increase in habitat units
 - A 19.09% increase in hedgerow units.
 - A 100% increase in river units.
597. The biodiversity net gain (BNG) assessment comprises two parts. The first is the evaluation of the baseline value of the existing site and the second is the predicted valuation of the future built site. The robustness of the assessment is therefore dependent on both those conditions being accurately captured.
598. Concerns relating to a perceived under-estimation of the current baseline ecological value of the site have been raised. However, many of these relate to the under-recording of species on the site, rather than questioning the valuation of habitats, where BNG assessments only consider habitats (as a proxy for overall biodiversity value). Species are considered within the ES (and ecological impact assessment) process and so are not addressed here.
599. Representations have been received stating that much of the golf course area should have been classified as a remnant ancient Parkland, which would constitute irreplaceable habitat and mean that any claims of net gain would be invalid. Noting that the London Wildlife Trust (LWT) have independently evaluated the baseline and have not suggested that it warrants such a classification, GLA Officers are not convinced by these representations.
600. Notwithstanding the above, the applicant's BNG assessment captures a point in time early in the process of the golf course use ceasing, there are now areas of longer, unmanaged grassland that have been left to become 'wilder' but those do not appear to demonstrate a significantly greater level of diversity. It is therefore reasonable to assume that a history of intensive management (including applications of fertilisers and herbicides) is likely to significantly limit the potential of the existing grassland. In this way, it does not seem to be the case that the existing (grassland habitat) baseline has been undervalued in either BNG or ecological impact assessment contexts.
601. There is evidence that the assessors have erred on side of caution in determining both existing and future values. Where committed management is likely to achieve fairly good condition habitats, these have been classified as being of moderate future value, in order to account for any risk or uncertainty in their delivery.

602. Concerns around future values have referenced the reliability of predictions that high distinctiveness acid grassland communities can be created on the golf course site. GLA Officers consider that the proposed approach to grassland creation (and management) and the soil testing carried out to date should provide enough surety that even if a comprehensively acidic grassland community were not to be achieved, another grassland of equal distinctiveness and condition could be created. The resultant potential variation would not have a significant impact on future biodiversity value.
603. It is important to recognise that, in addition to this review of the assessment, the LWT have themselves evaluated the net gain assessment work and concurred with its conclusions in full. Their specific comments also recognise that the assessment has been amended over time to take on views presented to the assessors by the LWT, which has resulted in the assessment being more precautionary than was originally the case.
604. Arup also noted the following:
- Broadly speaking, the ecological data collection, assessment and reporting provided in support of the planning application is considered to be appropriate, robust and sufficient to inform decision making.
 - We suspect that many of the objections made have overstated the likely level of ecological impact, particularly in the context of the longer-term opportunities, where the benefits of better, more sensitive management should start to outweigh the shorter-term costs of disturbance to existing resources (to both habitats and species).
 - The baseline condition assessment for the aquatic habitats on site appears to be robust.
 - Several outputs that have not yet been provided, such as CEMP, Landscape and Environmental Management Plan (LEMP) and detailed lighting strategies would be fundamental in determining the actual ecological impact of the proposals in the short and long-terms. Whilst the production and agreement of these outputs will be conditioned, it is essential that the condition wording is as prescriptive as possible in setting minimum targets and aspirations to be achieved. Arup has reviewed the potential planning conditions to ensure that beneficial outcomes for biodiversity can be delivered at the next stage. There is no reason to suggest that these beneficial outcomes cannot or will not be achieved.
 - It is the case that the delivery of any level of gain in terms of ecological and biodiversity value is wholly contingent on the full implementation of all the measures set out and their continued monitoring and management across the 30-year period and beyond. However, there is no reason to suggest that these beneficial outcomes cannot or will not be achieved.
605. In summary, whilst there are some questions relating to the true biodiversity value of the existing site, GLA Officers consider that a gain is achievable especially in the longer term given a fully committed and implemented set of management and monitoring plans over a 30-year period and beyond.

Urban greening

606. As set out in Policy G5, the Mayor has developed an Urban Greening Factor (UGF) model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. The proposed land use does not have a prescribed target under the London Plan. Nevertheless, predominantly commercial developments are required to achieve a target score of 0.3. This score (0.3) is repeated within Merton's emerging Local Plan (Policy O15.5) for commercial development. Wandsworth does not have a specific UGF policy.
607. The applicant prepared an UGF note stating that the proposal would result in an UGF of 0.90. This is reflective of the level of landscaping, tree planting, and sustainable urban drainage features that have been incorporated into the proposal.
608. Several objections raised concern that the UGF may not be as high as reported. Consultants Arup noted that all proposed trees have been given a factor of 1 which aligns with the delivery of woodland. However, GLA UGF guidance (February 2023) recommends trees being planted to be a factor of 0.8 or 0.6 (depending on the relationship between canopy and soil volume) rather than 1.
609. Nevertheless, it is acknowledged that even applying this more conservative approach to planted trees, the proposed development would still clearly surpass the UGF target score (of 0.3) to achieve compliance against Policy G5.
610. Furthermore, the proposal has responded to UGF priorities (outlined within the UGF London Plan Guidance) through:
- The delivery of green routes that promote active travel where current opportunities are limited;
 - Delivering a sustainable drainage system scheme that reduces surface water run-off; and
 - Delivering publicly accessible, managed, and maintained public parkland to reduce local deficiencies in access to open space.
611. So as to ensure that the proposed UGF is met a condition has been secured requiring a detailed set of planting plans (and in particular tree planting), with definition of species location and sizing as well as demonstration of soil volume for each tree. A post-completion certification report, confirming that the proposal meets the agreed UGF score, has also been secured by condition.
612. In summary, the proposal, even taking into account a more conservative approach to calculating UGF, would comply with Policy G5.

Sustainability and environment

613. This section assesses the sustainability and environmental impacts of the proposals, including the proposed energy strategy, flood risk and drainage mitigation, air quality, and contamination.

614. Sustainable infrastructure policies within the London Plan are set out in chapter 9 and require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, minimise carbon dioxide emissions and meet the highest standard of sustainable design. The policies set stringent standards regarding air quality, greenhouse gas emissions, energy infrastructure, water infrastructure, waste and the support for the circular economy.

Energy

615. Paragraph 162 of the NPPF requires new development to comply with local policies for decentralised energy supply unless deemed unfeasible or unviable and take account of landform, layout, orientation massing to minimise energy consumption.

616. Policy SI2 of the London Plan requires development proposals to minimise carbon dioxide emissions to meet the Mayor's targets, in accordance with the energy hierarchy as follows:

- **Be Lean:** use less energy;
- **Be Clean:** supply energy efficiently;
- **Be Green:** use renewable energy; and
- **Be Seen:** monitor and report on energy performance.

617. Policy SI2 of the London Plan requires all major developments (residential and non-residential) to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered. The policy requires that a minimum on-site reduction of at least 35% improvement beyond Part L 2020 Building Regulations and also includes the expectation that energy efficiency measures alone should account for a minimum of 15% of the reductions in carbon dioxide emissions for non-residential development.

618. At the local level, the national and strategic messages are supported by Merton Core Strategy (2011) Policy CS15 which requires CO2 reduction in line with the London Plan. Additionally, Policy LP10 of the Wandsworth Local Plan requires that all new major development should achieve zero carbon standards, with a minimum on-site reduction of 35%.

619. The applicant prepared and submitted an Energy Statement (Ref: (51365-BHE-XX-XX-RP-Y-00006; dated X) as well as an Energy Statement Addendum (Ref: (51365-BHE-WXX-XX-RP-E-0000; dated 09 May 2022) which outline how the proposal would accord with relevant energy policies. In summary, the energy strategy for the proposal would:

- The proposal would be net zero carbon as defined by the energy targets in the London Plan.

- The buildings on site would be designed to minimise energy consumption. A combination of passive design measures, highly efficient plant and equipment and advanced controls would ensure that energy use is reduced by at least 15%.
- An assessment of the suitability of a range of low and zero carbon technologies was undertaken and determined that electric heat pumps and building-integrated solar photovoltaics are the most suitable technologies for the site. This means that the new buildings would use no fossil fuel for their normal use.
- The site will make use of ground or air-coupled heat pumps for heat (subject to more detailed assessment). Details of these proposals will be included at the reserved matters stage alongside detailed energy and carbon modelling results.
- As part of the wider estate strategy, AELTC are exploring options for heat networks and low carbon energy sources.

620. Energy modelling for the new Parkland Show Court, Central Grounds Maintenance Hub and Player's Hubs will not be undertaken at the outline planning stage. This information will be provided as part of a package of information specific to each building at the reserved matters stage.

621. The Energy Strategy is generally compliant with the London Plan. However, the applicant would be required to submit additional information at the Reserved Matters stage.

622. The Energy Statement and Energy Statement Addendum have been secured as approved documents. Additionally, the s106 has secured the provision of additional energy documentation, including:

- Final Energy Strategy (Schedule 12).
- RMA Energy Strategy (Schedule 12).

623. Having regard to the above, and subject to conditions and s106 mitigation measures being secured, GLA Officers consider the proposal complies with London Plan Policy SI2, Merton Core Strategy (2011) Policy CS15 and Policy LP10 of the Wandsworth Local Plan.

Whole life-cycle carbon (WLC)

624. Policy SI2 of the London Plan requires that development proposals referable to the Mayor should calculate whole lifecycle carbon (WLC) emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA) and demonstrate actions taken to reduce life-cycle carbon emissions.

625. The applicant submitted a WLC Statement, prepared by Buro Happold (Ref: 51365-BHE-XX-XX-RP-Y-00007; dated 11 May 2022). A WLC memo was also prepared by the applicant in response to GLA comments (submitted 24/08/2022). The WLC strategy incorporated the following measures into the proposal:

- The design of pathways and Church Road have been further optimised to deliver carbon savings.
- ~80,161m³ of cut would be generated and ~51,442m³ of fill material will be required, to facilitate access but also deliver services such as flood protection. It is intended that a proportion of the cut would be used to meet fill demand.
- Rainwater would provide an average of 30%, 44% and 64% of the irrigation demands in the North, Central and Southern master plan zones respectively. An extensive sustainable urban drainage network will enable this. This will reduce demands on mains water networks and subsequently reduce carbon emissions.

626. Additionally, the applicant team have identified a number of additional opportunities that will be explored in subsequent stages (i.e. Reserved Matters stage). These include:

- The Parkland Show Court would be a priority focus area for reducing WLC. Key opportunities include:
 - reducing loads and placing larger loads at lower levels so to allow for a more structurally efficient roof system requiring fewer materials.
 - The use of materials efficiently and appropriately (e.g. use of Façade systems as structural elements to avoid secondary structures, or application of alternative materials which can reduce embodied carbon).
 - Reducing column spacing and avoiding transfer loads as far as possible, reducing overall quantities of concrete and steel.
- Early discussions with contractors will cover opportunities for modern methods of construction and material specifications, de-risking future fabrication and procurement of such materials at later stages of the project.
- Optimisation of court ring beams has demonstrated the potential to reduce the embodied carbon of tennis courts.

627. The applicant has provided all required information within the project details section of the GLA's WLC template under the Detailed planning stage tab, in line with the GLA WLCA guidance document. Within the detailed application, no major buildings are proposed and, as such, the WLCA requirements are not particularly relevant to this aspect of the proposal.

628. The applicant has submitted acceptable detail on the Outline element and the proposal exceeds all GLA benchmarks by some margin. A condition is recommended to undertake an updated WLC assessment at the reserved matters stage to assess this exceedance further.

629. The WLC Statement has been secured as an approved document. Additionally, conditions have been secured for:

- Whole Life Carbon Statement Compliance.
- Whole Life Carbon Statement - Reserved Matters Updates.
- Submission of Whole Life-Cycle Carbon - Post-Construction Assessment.

630. Having regard to the above, the proposal is considered to comply with the objectives for Whole Life-Cycle Carbon and is compliant with Policy SI2 of the London Plan.

Circular economy

631. Policy D3(d)(13) of the London Plan states that development proposals should aim for high sustainability standards and take into account the principles of circular economy, and London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement.

632. Merton SPP Policy DMD2 requires developments to ensure that construction waste is minimised and promote sustainable management of construction waste on-site by managing each type of waste as high up the waste hierarchy as practically possible.

633. Wandsworth Local Plan Policy LP13 states that Circular Economy Statements will be required for all referable applications which set out how the proposed development promotes circular economy outcomes and the aim for net zero waste. Developers will be expected to reuse, recycle, or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste.

634. London Plan Policy SI 7 and the accompanying London Plan Guidance: Circular Economy Statements have been established primarily with respect to the built environment. However, the development proposals consist largely of external works and landscaping with minimal structures with treated floor area, particularly as part of the detailed component.

635. The applicant has submitted a Circular Economy Statement, prepared by Buro Happold (Ref: 51365-BHE-XX-XX-RP-Y-00008; dated 11 May 2022), as required by Policy SI7 of the London Plan. This has addressed all comments raised by GLA Circular Economy Officers, including in relation to the strategic approach, key circular economy commitments, bill of materials, recycling and waste and reporting and operational waste.

636. The Circular Economy Statement has been secured as an approved document. Additionally, conditions have been secured for:

- Circular Economy Statement Compliance.
- Circular Economy Statement - Reserved Matters Updates.
- Submission of Circular Economy - Post-Construction Monitoring Report.

637. Subject to compliance with the recommended conditions, the proposal complies with Policy SI7 and D3 of the London Plan, Policy DMD2 of the Merton SPP and Policy LP13 of the Wandsworth Local Plan.

Water

Flood risk

638. Policy SI12 of the London Plan seeks to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water. Furthermore, it is recommended that natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitats. This is supported by local policies DS 16 in the Merton Core Planning Strategy, DM F1 in the Merton SPP, and LP12 of the Wandsworth Local Plan.

639. The site is in Flood Zone 1 with a low probability of flooding. A Flood Risk Assessment (FRA), prepared by Buro Happold, has been submitted as required by the NPPF.

640. There are two main surface water flood flow routes through the site. The FRA includes a range of mitigation measures, including daylighting the existing Thames Water surface water culverts and creating an open watercourse, which is supported.

641. The following flood risk conditions have been secured:

- Flood Risk Assessment Compliance.
- Watercourse Landscape Method Statement.
- Method details for below ground works.

642. This FRA adequately assessed the risk of flooding from pluvial, sewer, groundwater, and reservoir flooding. When mitigation measures are considered, the residual flood risk to the site is low. Therefore, subject to conditions, the FRA submitted for the proposed development complies with Policy SI12 and the flood risk is acceptable.

Sustainable drainage

643. Policy SI13 of the London Plan seeks to ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy set out within the London Plan. Furthermore, drainage should be designed and implemented in ways that promote multiple benefits including increased water efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

644. The proposed drainage strategy proposes to restrict runoff to the greenfield runoff rate for the 100-year event plus 40% climate change. Furthermore, the drainage strategy proposes green roofs, ponds, basins, rain gardens, wetlands, and

swales, which is welcomed. Active rainwater harvesting is proposed, linking each attenuation tank to Met Office weather data so that they can also be used for irrigation. This is supported.

645. The following drainage conditions have been secured:

- Details of the design of a site-wide surface water drainage scheme.
- Site-wide Sustainable Drainage Management and Maintenance Plan.
- Phase-specific drainage verification report.
- Site-wide drainage verification report.

646. The requirement to meet BREEAM 'Excellent' requirements for water efficiency as per the London Plan has also been secured by condition.

647. The surface water drainage strategy generally complies with Policy SI13 and is considered acceptable.

Air quality

648. Paragraph 192 of the NPPF states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA) and Clean Air Zones, with further guidance provided in the Government's Planning Practice Guidance (PPG).

649. London Plan Policy SI1(B) sets out that to tackle poor air quality, protect health and meet legal obligations, a number of criteria should be addressed, including requiring development proposals to not create unacceptable risk of high levels of exposure to poor air quality. London Plan Policy SI1(C) requires that masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. These air quality policies are reiterated at a local level through Merton SPP policy DM EP4 and Wandsworth Local Plan policy LP14.

650. In accordance with Policy SI1, an Air Quality Assessment (AQA) has been undertaken by Buro Happold, forming part of the ES (Chapter 8). This chapter of the ES considers potential effects of proposed development on local air quality and includes mitigation measures required to prevent, reduce, or offset any significant adverse effects.

651. GLA Air Quality Officers have assessed the proposed AQA. The proposed development is air quality neutral as the proposal incorporates an emissions free strategy (for the proposed buildings) and involves a reduction in private vehicle trips. Furthermore, no harmful air quality effects are expected from construction subject to mitigation secured by condition and s106 obligations.

652. Conditions and obligations have been secured to mitigate air quality impacts including:

- Construction Management Plan / Dust Management Plan.
- Submission of PM10 Monitoring Plan.
- Restriction on emissions standards for Non-Road Mobile Machinery.
- Contribution of £15,000 towards air quality monitoring equipment – this monitoring equipment would be installed adjacent to the site and would provide the Council with their own dataset which could be cross-referenced to the Applicant's data.
- Contribution of £15,000 for 5 years to fund Merton Officer time to monitor air quality impacts during the construction period.
- An additional lump sum of 4k to fund Merton's Air Quality Action Plan.

653. Subject to the conditions listed above being secured, GLA officers consider that the application would comply with the NPPF, Policy SI1 of the London Plan and Merton SPP policy DM EP4 and Wandsworth Local Plan policy LP14.

Contamination

654. Paragraph 189 of the NPPF requires decisions to take account of any risks arising from land instability and contamination and remediate land where necessary. Furthermore, Paragraph 190 of the NPPF notes that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

655. London Plan Policy SD1 requires that appropriate measures should be taken through Development Plans and decisions to deal with contamination that may exist. This is supported by Merton SPP Policy DM EP4 and Wandsworth Local Plan Policy LP14 which both seek to ensure that contaminated land is appropriately identified, investigated and, where necessary, remediated to avoid potential risk of adverse impacts on people and the environment.

656. A Geotechnical and Geoenvironmental Desk Study (prepared by Buro Happold) was undertaken by the application and included within the Environmental Statement (EIA Technical Appendix 13.1). This established the environmental, geological, hydrological and hydrogeological conditions present on site, and confirmed those which may result in potential contamination risks.

657. The following conditions have been secured:

- Preliminary Risk Assessment(s).
- Site Investigation.
- Remediation Method Statements.
- Remediation Verification.

658. Subject to the imposition of conditions, GLA Officers are satisfied that the proposal would be acceptable from a contamination perspective. Any contamination that is identified can be addressed within the condition approval process and will ensure that the site is made safe prior to any construction or demolition works taking place.

659. This is in line with the conclusions arrived at by the local authorities. Merton officers considered the contaminated land matter and noted:

The Council's Environmental Health Officer specialising in matters of contaminated land has raised no objection to the development subject to conditions requiring an appropriate site investigation and remediation based on investigations. These conditions would be attached to any permission.

660. Wandsworth considered the matter of contaminated land within their assessment report and stated, amongst other things that:

'The statement identifies several potential adverse effects in relation to ground contaminants during construction and at operational phase. These include most notably during construction and operational phase, the risks associated with the build-up of ground gas. The assessment recommends further investigation and mitigation measures, which would sufficiently mitigate against this risk. These measures can be secured by way of conditions, if planning permission were to be granted.'

Conclusion on sustainability and environment

661. GLA Officers consider that the proposal is acceptable from a sustainability and environmental perspective in accordance with Policies D3, SD1, SI1, SI2, SI6, SI7, SI12 and SI13 of the London Plan; Policy CS15 of the Merton Core Strategy, Policies DM D2 and DM EP4 of the Merton SPP, as well as Policies LP10, LP13 and LP14 of the Wandsworth Local Plan.

Transport

National policy context

662. Chapter 9 of the NPPF sets out the Government's aim to promote the use of sustainable modes of transport. When considering the transport implications of development proposals, the NPPF states that decision-makers should ensure that opportunities available to promote sustainable transport modes have been taken up; safe and suitable access to the site would be achieved for all users; and any significant impacts from development on the transport network (in terms of capacity or congestion) or highway safety can be mitigated to an acceptable degree. Paragraph 115 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or where residual cumulative impacts on the road network would be severe. Paragraph 116 of the NPPF sets out additional criteria which should be addressed which includes pedestrian, cycle, and inclusive access.

Strategic London policy context

663. London Plan Policy T1 sets out a strategic approach for transport in London. This seeks to ensure the most effective land use to reflect connectivity to sustainable travel. Development proposals must demonstrate how they will deliver improvements to facilitate the Mayor's Healthy Streets Approach, by prioritising walking, cycling and public transport in accordance with Policy T2. Policy T5 requires development to remove barriers to cycling and support the delivery of a London-wide network of cycle routes. Regarding car parking, Policy T6 states that new development should be designed to provide the minimum necessary parking ('car-lite') except for disabled persons parking in line with Policy T6.5. Other relevant transport policies are Policies T3, T4, and T7 which cover transport demand and mitigating development impacts to the transport network, deliveries, servicing and construction. Policy T9 of the London Plan sets out the Mayor's priorities for planning obligations which may include contributions towards public transport and cycle network or making improvements in line with the Healthy Streets Approach.
664. The Mayor's Transport Strategy (2018) (MTS) seeks to promote sustainable mode shift, reduce road congestion, improve air quality, and assist in the development of attractive, healthy and active places. The MTS aims to ensure that by 2041, 80% of all Londoners' trips will be made on foot, by cycle, or by public transport.

Local policy context

665. Merton Council's Core Strategy (2011) seeks to prioritise active travel and deliver high quality links to enhance the walking and cycle networks (policy CS18 – Active Travel). Policy CS18 also requires the submission of Travel Plans to accompany development proposals and encourages the provision of suitable cycle parking.
666. Policy CS19 (Public Transport) of Merton's Core Strategy encourages development that is well connected to public transport services and reduces the need to travel by car. This includes assessment of the impact of development to public transport and supports the use of sustainable transport contributions to enhance services through planning obligations.
667. Merton Core Strategy policy CS20 deals with parking, servicing and deliveries, and also seeks to ensure planning obligations to mitigate the impact of development proposals on the transport network are secured, including improvements to the public realm.
668. Merton Sites and Policies Plan (2014) gives further support for sustainable transport and active travel. Policy DMT1 (Support for sustainable transport and active travel) requires development to provide cycle parking in accordance with the London Plan and improve access for walking and cycling, including enhancements to existing route or providing new connections.
669. Policy DMT2 (Transport impacts of development) of Merton's SPP seeks to reduce the impact of development on transport and supports the use of Travel Plans. SPP policy DMT3 (Car Parking and Servicing Standards) ensures that car parking provision takes account of the site's access to public transport and local circumstances along with suitable loading facilities for deliveries and servicing.

670. Chapter 20 of Wandsworth's Local Plan (2023) sets out policies for sustainable transport. Policy LP49 (Strategic Policy) supports proposals that reduce car dominance and facilitate high proportions of walking, cycling and public transport trips and improving local connections, where necessary.
671. Policy LP50 (Transport and Development) of Wandsworth's Local Plan requires proposals that will generate a large volume of trips to ensure sufficient access to public transport, avoid harm to highway safety and ensure improvements within the transport network to mitigate significant impacts can be secured. This policy also supports the requirement for Travel Plans.
672. Policy LP51 (Parking, Servicing and Car Free Development) of Wandsworth's Local Plan sets out the requirements for cycle parking and car parking in accordance with the London Plan. This includes the provision of a minimum number of disabled persons car parking spaces and electric vehicle charging. Policy LP52 (Public Transport and Infrastructure) expects development to meet all Healthy Streets objectives.

Transport context

673. Issues with respect to transport were considered by both Councils as having been satisfactorily addressed, subject to agreement of appropriate planning conditions and s106 obligations to secure necessary mitigation measures. Neither Council raised any objections on transport matters and no transport reasons for refusal were given by Wandsworth Council. The Mayor's Stage 1 comments concluded that some further work on transport was required prior to determination by the Council. These matters have been satisfactorily resolved subject to planning conditions and s106 obligations.

Transport assessment

674. This section considers the transport and highways impacts associated with the development, both during the operation of the Championships as well as outside of the Championship times.

Access

675. The site can be accessed using District Line London Underground (LU) services from Southfields or Wimbledon Park stations. Southfields station is 1.3km (approximately an 18-minute walk) from the AELTC Main Grounds entrance, and Wimbledon Park station is 1.9km (26-minute walk) via Wimbledon Park. Wimbledon station is also 1.9km of the site from Church Road, providing access to National Rail services in addition to LU and London Trams. Bus services can be accessed from stops on Church Road (routes 39 and 493). The site has a Public Transport Access Level (PTAL) ranging between 1b and 3, on a scale of 0 to 6b, where 6b is highest. The AELTC also provide year-round shuttle services for staff to Wimbledon Station.
676. The proposed development would increase pedestrian permeability through the site by creating new entrances from Church Road and Home Park Road. Permissive public access via the southern parkland would connect Church Road

and Wimbledon Park, improving the connection with Wimbledon Park station. This would reduce the walk distance to the Championships from Wimbledon Park station to 500m (around 7 minutes). The new northern gateway entrance would also shorten the walking route from Southfields Station to the Championships site via Wimbledon Park Road to 600m (around 8 minutes).

677. For past Championships a temporary Traffic Management Order (TMO) has been secured to restrict vehicle access on Church Road, including bus services. This has been agreed annually with diversions in place for the 493 bus route as part of the AELTC's 'Zone Ex Planning Arrangements' which is prepared each year and discussed with a range of stakeholders, including TfL. With the proposed development it is intended to operate the Championships and Qualifying event with a temporary TMO on Church Road that may also restrict non-ticket holder walking and cycling to create a secure boundary between the development and the Main site. This is discussed further below.

Travel demand

678. The Transport Assessment (TA) set out the travel demand for the existing and proposed year-round use and event period. Further detail and adjustments were provided in the subsequent Transport Assessment Addendum (TAA). Concerns relating to the methodology were satisfactorily addressed, subject to the required mitigation and planning conditions.

Year-round trip generation

679. For the year-round use the trip generation would predominantly be associated with access to the 11.1ha parkland, the AELTC tennis courts, and maintenance activity. The proposed CGMH, within the southern parkland, would comprise the main location for the AELTC's maintenance and horticulture team. This currently employs around 30 permanent staff, which is proposed to double to approximately 60 to serve the proposed development. Car parking associated with the existing golf club will be retained for staff and maintenance vehicle access only.
680. Existing lakeside activity, water sports, and use of the Outdoor Centre are not expected to increase significantly above existing levels. The proposed AELTC tennis courts would have limited use in August and September, after the Championships, and there would be additional smaller tournament events during this time (with up to 500 attendees). No additional public parking is proposed for these uses. Public access to the proposed parkland would largely comprise local walking and cycling trips.
681. The net vehicle trip generation for the year-round use is therefore negligible, with most additional trips on the network made by sustainable travel modes and unlikely to have a significant impact.

Qualifying and Championship event trip generation

682. Trip generation analysis for the event period in the TA considers the whole site, based on the current 42,000 spectator capacity. The AELTC collect travel data from staff, contractors, and spectators which has been used to inform existing travel patterns. It is acknowledged that over the course of the current two-week event period the number of spectators fluctuates, therefore the assessment

assumes a worst case based on the full spectator capacity. Data presented in the TA suggests that by the second week of the event, spectator attendance reduces to 70% as fewer matches are played.

683. Data from the 2019 Championships has been used for the baseline travel demand, as the last event that was not affected by the Covid-19 pandemic at the time. Trips by mode are set out for queue spectators (non-ticket holders), non-queue spectators (ticket holders), and staff and contractors. Trips have been assigned by main mode of travel to the site, and last mile trips to capture linked trips (i.e., by National rail then walking to the AELTC grounds, or Park & Ride and shuttle services). The AELTC have advised that there are currently up to 11,000 staff and contractors each day during the Championships. The maximum number of spectators has been split assuming 11,000 queue spectators and 31,000 non-queue spectators.
684. To forecast the proposed travel demand, adjustments have been applied to the current mode shares to reflect a reduction in car parking for spectators and a shift towards sustainable travel. This was refined in the TA Addendum (May 2022) following comments by TfL and to reflect a slight increase in staff and contractors to 11,256, and removal of Car Park 10. The outcome of this exercise is shown in Tables 5.3 and 5.4 of the TAA for main mode and last mile trips respectively.
685. Key travel characteristics have been presented to establish arrival and departure profiles and identify the development peak travel times. It is noted that during the Championships the grounds open at 10:30 in the morning and close 45 minutes after the end of the last game. Play starts on outside courts at 11:00 and on Centre Court and No.1 Court from 13:00 (except for the finals weekend when this begins at 14:00). As such, spectator peak arrivals are between 09:30 and 13:30, although many queue spectators will arrive early in the day. Staff and contractors' peak arrival is between 07:30 and 09:30.
686. The net trip generation by all modes is set out for the typical network peak hours (08:00-09:00 and 17:00-18:00) and the development peak hours (11:00-12:00 and 20:00-21:00). Due to the significant reduction in car parking on-site the number of vehicle trips is substantially reduced on local routes. However, there is anticipated to be an increase in vehicle movements associated with unofficial car parking (off-site) and use of the existing Park & Ride at Morden Park. Due to a mode shift towards sustainable transport modes, there is expected to be a significant increase in trips by walking, cycling and public transport.
687. As a main mode of travel, walking and cycling are not expected to make up a significant number of trips to the development. However, for last mile trips (i.e. connected trips with public transport services) it is envisaged there will be an additional 2,169 walking trips in the development peak 11:00-12:00 and 1,518 in the later peak 20:00-21:00. For cycling, it is expected that there could be a net increase by 287 trips in the development peak 11:00-12:00 and 336 in the later peak 20:00-21:00. Enhancements for walking and cycling routes to the development have been secured in the S106 agreement. These include public realm enhancements on Church Road and within the development site to provide a public route through the Southern parkland, and a financial contribution (£650,000) towards wider improvements identified through the Active Travel Strategy.

Car Parking

688. The development would retain 64 parking spaces for year-round access, associated with the CGMH. These are within the existing Golf Clubhouse car park, plus two (2) spaces provided for the Tea Lawn. While some spaces will be marked out and available to AELTC staff, the area is intended to allow space for maintenance vehicles and operations. The London Plan seeks to minimise car parking, but does not provide specific parking standards for this use. Given the operational requirements this amount is accepted. The year-round parking will include 4 spaces for disabled persons parking, and at least 20% will be equipped with electric vehicle charging, secured by planning condition.
689. Car parking on the eastern side of Church Road, for The Championships, would be significantly reduced from the existing provision by 90% (as demonstrated in Table 9 below). Only Car Park 6 and 8 are located within the site red line boundary. Car Park 5, which is currently used by debenture and hospitality ticket holders, is within the Wimbledon Club. Car Park 10 is public parking within Wimbledon Park. An obligation secured in the S106 sets out a phased approach to removing parking used during the Championships from Car Park 10, which will come into effect before the development is operational.
690. Car Park 6 is the only retained car parking within the development site. From initial operation of the development, it is proposed that parking in Car Park 6 will reduce from 1,100 spaces to 550 spaces. A further reduction to 275 spaces would be completed from 2036 following removal of existing debenture/hospitality contracts. This approach is set out in the Car Park Management Plan Addendum and is secured in the S106 agreement.

Table 9: Car parking provision on the eastern side of Church Road (post 2036)

Parking location	Current spaces	User groups	WPP spaces	User groups
Car Park 5 (Wimbledon Club)	550	Debenture, hospitality	0	None
Car Park 6	1,100	Public, suite holders	275	Staff and disabled
Car Park 8	800	Staff, contractors	0	None
Car Park 10	350	Public	0	None
Total	2,800		275	

691. Table 9 excludes the existing car parking provided on the main site to the west of Church Road. This includes the Indoor Tennis Centre car park providing 325 spaces for AELTC courtesy cars and members, along with Car Park 4 which provides 420 spaces used by staff and contractors during the Championships. When taking this parking to be retained on the main site into account, the overall reduction in parking during the Championships equates to 71% from 2036.

692. Further detail on the proposed use of Car Park 6 has been provided in the Car Park Management Plan Addendum (Buro Happold, June 2024). It is intended that the AELTC would allocate spaces flexibly between disabled persons as well as staff and media. The proposed minimum/maximum allowances for each user group are set out in the Table 10 below.

Table 10: Car parking allocation

User group	Opening Year Parking Allocation	2036 Park Allocation
Disabled persons parking, mobility issues and other visitors with accessibility requirements	250 (minimum)	Up to 250 (maximum)
Staff and media	100 (maximum)	100 (maximum)
Debentures and hospitality	300 (maximum)	Zero (0)
Total	550 (maximum)	275 (maximum)

693. A maximum of 250 spaces would be designated as disabled persons car parking. London Plan policy T6.5 (Non-residential disabled persons parking) recommends reference to Sport England Guidance and requires that these spaces are clearly marked for the intended use.
694. The allocation of up to 100 spaces for staff and media parking in Car Park 6 can be agreed to support operations during the Championships for access to the parkland.
695. A phased reduction to parking spaces for debenture and hospitality guests is secured in the S106 agreement. These spaces are tied to existing contractual arrangements but would be removed entirely so that by the 2036 Qualifying event and Championships there will be no public spectator parking available.
696. London Plan policy T6 (Car Parking) requires development to provide the minimum necessary parking ('car-lite' approach). Where there are no specific policy standards for car parking for the proposed use, this should be determined on a case-by-case basis and ensure that the quantum of car parking has regard to the need to promote active travel and public transport.
697. To support a 'car-lite' approach to parking, surrounding areas are already subject to Controlled Parking Zones (CPZ) as identified in the TA. These are enforced by both Councils and enhanced during the Championship period. To ensure that the CPZ restrictions continue to be suitable once the development is operational, the Councils have secured contributions towards CPZ mitigation (up to £70,000 for each authority) and a further £25,000 for each to undertake a CPZ review.
698. The applicant currently operates a Park and Ride (P&R) service during the Championships which is expected to continue once the development is operational. This is currently located at Morden Park Car Park (approximately 6km south of the site) and provides up to 1,000 parking spaces. However, data from

recent Championships suggests that current occupation is between 300-400 spaces.

699. Overall, given the significant reduction to car parking and removal of public spectator car parking for the Qualifying event and Championships from 2036, the proposals for car parking meet the strategic transport policies. Supported by contributions towards enhancements for walking and cycling and on-street parking restrictions, the proposals support a shift away from car-use which represents a public benefit which is supported.

Public transport

700. The TAA forecasts that the development would generate demand for up to 2,420 peak trips by Rail or London Underground (LU) services in the development peak (20:00-21:00), and over 300 trips by public bus services.
701. Baseline distribution of trips (2021 data) suggested that 67% of trips would use Southfields station, 32% via Wimbledon and 1% using Wimbledon Park. The proposed development would improve connectivity to Wimbledon Park station, particularly to ticket holders where the proposed entrance will be to the east. As such this is anticipated to increase in the future, however Southfields station will still be the main point of access.
702. An assessment of station utilisation and line loading for LU services from Southfields and Wimbledon Park stations was completed in the TA. To capture existing demand TfL provided data for Wednesday 3 July 2019 (during the busier first week of the Championships). This confirms the peak between 20:00-21:00 as play across the courts starts to conclude. The TA demonstrates that the increased demand during the Championships would result in a high-capacity utilisation of the north bound District line during the evening peak. As this is based on 2019 data, the impact could be worse once background growth is factored.
703. Owing to the fact that the development impact is for a temporary duration during the Championships, it is not appropriate to provide additional service capacity or significant alterations to LU infrastructure. Instead, TfL has secured a contribution to support additional staff at Southfields and Wimbledon Park stations to help manage safe access at peak times. This includes a contribution of £177,120 to be paid in instalments over 5 years following the first use of the development for the Qualifying Event or Championships. This would be supported by the AELTC's 'Zone Ex Planning Arrangements' document that is prepared each year to agree management of the event with key stakeholders, including TfL.
704. Wimbledon Station provides the nearest national rail services, alongside LU and London Trams. The station is managed by South Western Railway. No objections were raised by Network Rail regarding the impact to Wimbledon station or national rail services.
705. No further assessment of bus demand was completed, however given the temporary uplift in demand and provision of the shuttle services, no additional public bus service capacity is considered to be required. The Travel Plan will monitor demand for shuttle bus services with measures to increase service capacity and/or frequency as required to meet sustainable travel targets.

706. With the proposed mitigation and management for public transport services, the application is considered to accord with London Plan Policies T3 and T4, along with Merton Core Strategy Policy CS19 and Wandsworth Local Plan Policy LP52.

Highways

707. The wider site currently provides up to 3,545 car parking spaces during the Championships and since around 71% of these would be removed, the vehicle impact in the direct vicinity of the site is expected to reduce. Based on assumed average vehicle occupancies for staff and spectators, the removal of on-site car parking will reduce vehicle trips to the site by 791 between 11:00-12:00 and 1,348 between 20:00-21:00. This is strongly supported by transport policy, however, the removal of car parking from the site would lead to an increase in vehicle parking off-site or using the Park & Ride. It is forecast that even with a mode shift, there could be some 2,743 vehicles parking in other locations to access the Championships (TAA, May 2022).
708. The applicant has undertaken an extensive highway modelling exercise to ascertain the wider network impact from additional vehicle movements. This concluded that whilst there would be some localised impact due to the closure of Church Road, this only slightly increases journey times on some routes by up to 2 minutes compared with the current base. The base year traffic flows are from 2019 survey data, and although some time has passed since, TfL's strategic model (MoTiON) forecasts marginal changes to background traffic growth (by 4% in Merton and 1% in Wandsworth) by 2026 as a worst case. This would be unlikely to significantly impact the conclusions of the modelling. Furthermore, any impact would be for a temporary duration for the Championships and would be outside of the typical network peak hours.
709. The removal of public spectator car parking on-site would increase demand for the P&R services from Morden Park. This is evidenced by the trip generation calculations in the TAA (May 2022) which forecasts that there would be a future demand of 2,285 person trips using P&R services. Based on average vehicle occupancies this would increase vehicle demand from current levels of between 300-400 during the Championships to 974, close to the 1,000-space capacity. Morden Park Car Park is accessed by vehicles from a signalised junction on the A24 London Road. The A24 is a busy strategic route, which forms part of the Transport for London Road Network (TLRN) and is a key bus corridor into Morden town centre. The significant uplift in demand during the Championships could impact junction capacity, create delays to bus services and increase road danger. Since the impact is for a temporary duration, significant alterations to the junction would not be appropriate. Instead, TfL has secured works to provide CCTV coverage on the A24 corridor in the vicinity of the P&R. It is anticipated that this would comprise around three new cameras that would enable TfL Network Management Control Centre to monitor safe operation of the junction and adjust traffic signal timings where necessary. This would be delivered by the applicant via a S278 agreement with TfL.
710. The proposed development is anticipated to generate up to 4,730 trips per day by taxi or Private Hire Vehicle (PHV) during the Championships. GLA officers consider that the impact is offset by the reduction in car parking and the Travel Plan seeks to reduce taxi use in favour of sustainable travel modes. Improved

access to LU stations from the proposed development and enhancements to cycle routes could reduce reliance on taxis and PHVs. Details with regard to pick-up and drop-off by taxi and PHV will be secured by condition.

711. Despite a reduction in car parking on site, it is clear there is a further need to achieve a mode shift away from car travel, including taxis and PHVs. The TAA sets ambitious mode shift targets, accompanied by the Travel Plan, and to provide assurance that the forecast mode shares will be met a 'monitor and manage' mechanism with associated funding will be secured within the S106 as a Travel Plan Fund of £350,000. The fund would be held by Merton Council who will, based on the site's travel data, spend it on appropriate sustainable transport measures, should the development mode share targets not be met.
712. Based on the mitigation secured and reduction in car parking, the development is not considered to have a significant impact on highways and is considered to comply with the NPPF, London Plan Policy T4, Merton Core Strategy CS18 and CS19, and Wandsworth Local Plan LP49 and LP50.

Active travel

713. The applicant is proposing to provide 34 long-stay and 60 short-stay cycle parking spaces for year-round use. Long-stay spaces are proposed at the CGMH (24 spaces) and Parkland Show Court (10 spaces), and the short-stay spaces would be within the public realm. The amount of cycle parking proposed is considered acceptable in line with London Plan Policy T5 and local transport policies, acknowledging that cycle parking standards are not directly applicable to the use. These spaces are designed in accordance with the London Cycling Design Standards and include the provision of changing and locker facilities for staff. A planning condition requiring details of the year-round cycle parking to be provided prior to occupation will be secured.
714. During the Championships and Qualifying Event, the applicant has committed to provide up to 1,500 temporary cycle parking spaces, comprising 750 spaces at the northern access and 750 spaces at the southern access. The amount of cycle parking is accepted and would be monitored via the Travel Plan. Details of the temporary arrangements for cycle parking will be submitted annually prior to the events as secured by planning condition.
715. On-street cycle infrastructure in the vicinity of the site is reviewed in the TA. This indicates that there are some sections of existing cycle network connecting the site, and the updated Travel Plan (April 2024) demonstrates an uplift in cycling to the Championships in the most recent past years. To facilitate a further shift towards walking and cycling, an Active Travel contribution of £650,000 is secured in the S106 agreement. This contribution would be spent towards local enhancements to the walking and cycle networks, as identified through the Active Travel Strategy (secured within the s106). Enhancements for walking and cycling would help to encourage a mode shift towards active travel and meet strategic and local policies in accordance with London Plan T5, Merton Core Strategy CS18, Merton SPP DMT1 and Wandsworth Local Plan LP49 and LP52.

Church Road enhancements

716. The proposals include a package of highway works for Church Road, which divides the existing Main site with the development. This is proposed to include sections of footway widening, resurfacing, traffic calming, renewal of street furniture and lighting and security features to create a high-quality public realm. The works also require repositioning of the existing northbound bus stop and removal of bus laybys, which is agreed subject to the provision of a new bus shelter with lighting. These works are expected to be delivered via a section 278 agreement with Merton Council. These enhancements would enhance the amenity and appearance of this area and would support the Mayor's Healthy Streets approach outlined in Policy T2 of the London Plan, and Merton Core Strategy Policy CS18.
717. Merton Council highway officers considered that the benefits of these public realm works would significantly enhance Church Road during and outside of the Championships. The Merton Planning Committee Report noted:

'the public realm works to Church Road would significantly enhance the amenity of Church Road both during and outside The Championships. This view is supported by the Applicant's 'healthy streets' assessment which demonstrates a 9% improvement compared to the existing situation (see Figure 3.6 of TA). The Church Road enhancements are therefore consistent with London Plan policy T2 (d,1) which outlines "proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators'.

718. Additionally, Wandsworth officers noted that:

In terms of the design of the scheme, these alterations form an important function in linking the application site with the existing AELTC site, as the proposed road surface would reflect the appearance of the hard surfacing within the application site and the existing AELTC grounds. The proposed road surfaces would be of a high quality, that would enhance the appearance of the existing streetscene by introducing surfaces of greater visual interest. These works, if the application were to be approved, would be subject to a separate legal agreement between the applicant and Merton.

719. These works have been secured through a Section 278 within the s106 legal agreement.

Church Road closure

720. The AELTC propose to temporarily close a segment of Church Road during The Championships to allow free flow of ticket holders between the AELTC Main Grounds and the application site.
721. However, approval for the road closure would be sought under a separate Traffic Management Order. Therefore, the closure does not form part of the planning application and would require separate permission, such as a Traffic Management Order agreement or Anti-Terrorism Traffic Regulation Order (ATTRO) enforced by the MET Police.

722. If this restriction is agreed, the applicant has proposed two alternative routes for cycling via Bathgate Road/Burghley Road and via Wimbledon Park/Burghley Road, which would increase cycle journey times by around 4 minutes compared with using Church Road. For pedestrians, the applicant has suggested diversions via Wimbledon Park and the proposed Southern parkland, or via Wimbledon Park and Home Park Road which would increase journey times by around 6 minutes and 5 minutes respectively. To ensure that these routes are safe and suitable, a s106 obligation has been secured requiring the applicant to submit an annual Access Management Plan which details how they will provide safe routes for pedestrians and cyclists on Church Road, or via alternative routes, during the Qualifying event and the Championships.
723. If the closure of Church Road were to be refused later under the TMO procedure, then pedestrians and cyclists would continue to use Church Road. The applicant has prepared a note which outlined the potential fallback options including:
- Operational controls to take pedestrians through Church Road, e.g. a secure marshalled walking route along Church Road, or a shuttle service to transport pedestrians along Church Road between Somerset Road and Bathgate Road.
 - Temporary infrastructure solutions that would provide a secure route through Church Road, e.g. an elevated bridging structure between Gates 1 and 5.
724. These fall-back options are likely to be acceptable if the TMO were not accepted.

Travel Plan

725. A site wide Travel Plan would be secured for each development phase, from construction and operation of the Main site during the Championships, and on operation of the proposed development. Triggers and review mechanisms for each Travel Plan phase are set out in the S106 agreement, supported by monitoring contributions.
726. The Travel Plan sets out targets for reducing travel by private car during construction of the development, for year-round AELTC operations, and during the Qualifying Event and the Championships. A Operational Travel Plan (OTP) Fund is also secured in the S106 agreement, which provides incentive for the applicant to meet Travel Plan targets. This includes a payment of £350,000 that will be used to enhance access by walking, cycling or public transport should the Travel Plan targets not be met.
727. In 2022 the Mayor refreshed his Violence Against Women and Girls Strategy. In line with this, the applicant has confirmed that since visitors and staff are likely to travel in the evening, particularly during the Championships after the last matches end, they will sign up to the Women's Night Safety Charter. The Travel Plan and the Travel Plan Fund could also be used by the Councils if issues are identified that suggest travel by women and girls is being hindered by safety concerns.

728. The Travel Plan accords with the NPPF, London Plan policy T4 as well as Merton Core Strategy CS18, Merton SPP Policy DM T2, and Wandsworth Local Plan Policy LP50.

Construction traffic impacts

729. The development construction programme has an estimated duration of 8 years from initial site preparation to completion of the Parkland Show Court. The London Plan policies T4 and T7 require the submission of a Construction Logistics Plan (CLP) to reduce impacts from construction vehicle activity and is supported by TfL guidance. An outline CLP has been prepared to support the planning application and a planning condition secures the phase-specific detailed CLP for approval prior to commencement.

730. The outline CLP recognises the challenges for construction access to the site and local sensitivities. Designated routes for construction vehicles would use strategic corridors where possible, via the A3 and A205, to avoid residential streets. Direct access to the site would be from Wimbledon Park Road or Church Road, with limited access from Home Park Road since this is less suitable for construction traffic.

731. The greatest impact from construction traffic is expected during the initial phases of construction, which include the lake de-silting works. A Supplementary Design Note (October 2022) submitted by the applicant has updated the initial forecast Heavy Goods Vehicle (HGV) movements following amendments to the de-silting process. At most, this phase of works is forecast to generate 400 HGV trips per month, plus 200 trips per month by Light Goods Vehicles (LGVs), equating to 600 total construction vehicle movements per month (on average 27 per day). This peak demand is anticipated for a short duration of the construction programme (approximately one month). For the remainder of the works HGV movements would be considerably less, tailing off during the final fit-out phases where mostly smaller vehicles would be used. The impact of construction throughout the programme would fluctuate depending on the nature of works and to account for seasonal constraints.

732. The CLP sets out strategies to reduce the impact from vehicles during construction of the development. This includes, but is not limited to, the use of delivery scheduling and timing outside of the peaks (including school peaks), use of designated routes and signage, re-use of materials, use of local suppliers and collaboration with other sites. A commitment to the use of vehicles registered with the Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS) initiative are welcomed. Further investigation into measures including the use of holding areas will be considered as part of the detailed CLP secured by planning condition and submitted prior to commencement of each phase.

733. A Construction Travel Plan is also secured by condition to promote sustainable travel to the site for employees during the construction programme when car parking for site operatives will be limited. This is accompanied by a S106 obligation including a monitoring contribution to the Council.

734. Subject to conditions, the management of the construction impacts of the development meet the requirements set out in London Plan policies T4 and T7, and the local transport policies to reduce traffic impacts.

Delivery and servicing

735. The development would be serviced from a series of off-street locations mainly accessed from Church Road. Servicing access from Home Park Road would be possible but limited to minimise disruption to residents. On-site distribution of goods will be via a network of localised hubs, from a centralised logistics hub. These will be stored and distributed to designated locations within the site by electric vehicle or forklifts and utilising the network of underground servicing tunnels. Since some of the local hub buildings are proposed in outline, the detailed strategy will become available with approval of the Reserved Matters.
736. Year-round deliveries are relatively minor and comprise mostly of goods to the maintenance hub. For the Qualifying Event and the Championships most delivery and servicing activity would take place at night, as is currently operated for the AELTC Main Grounds. However, this would only be possible once the underground tunnel connecting No.1 Court with the Parkland Show Court is available. This would also mean that some larger deliveries can take place from the existing servicing area for No.1 Court and increase opportunities for consolidation of goods. It is estimated that there could be around 12-14 vehicles per day servicing the Parkland Show Court, of which 75% would comprise light goods vehicles and 25% medium and heavy goods vehicles.
737. Waste collection is expected to take a similar approach with localised collection points where waste is stored. This would be moved to a centralised collection point with access from Church Road. To reduce waste the AELTC already have strategies for recycling and reusables and is exploring opportunities for on-site composting.
738. A Delivery Servicing Waste and Recycling Plan was prepared to support the application. This includes measures to reduce the impact of servicing, deliveries, and waste activity. Measures will include consolidation and a 'just in time' approach using a third-party distribution centre, implementing a delivery booking system and supply chain management to improve efficiencies. The Delivery Servicing Waste and Recycling Plan will be secured by condition, with further detail provided prior to occupation.
739. The development strategy for deliveries and servicing is in line with TfL's Delivery and Servicing Plan guidance, London Plan Policy T7 and local transport policies.

Conclusion on transport

740. Subject to a suitable framework of controls and mitigation as identified above being secured through the S106 agreement and use of appropriate planning conditions, the transport impacts of this development are in accordance with strategic and local transport policies in the London Plan, Merton Core Strategy policies CS18, CS19 and CS20 as well as the Wandsworth Local Plan policies LP49, LP50, LP51 and LP52.

Socio-economic impact

Policy context

741. NPPF paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
742. This objective for supporting economic growth is echoed by the London Plan, which seeks to strengthen London's economy and increase its employment opportunities. Objective GG5 aims to enhance London's global economic competitiveness by promoting the strength and potential of the wider city region and to also promote and support London's rich heritage and cultural assets.
743. Policy E8 seeks to promote employment opportunities for Londoners across a diverse range of sectors whilst Policy E10 states that London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, visitor experience and management and supporting infrastructure. Paragraph 6.10.1 of the London Plan states that the Mayor wants to spread economic and regeneration benefits to promote tourism across the whole of the city, including outside central London.
744. Tourism, economic growth, and employment are broadly outlined as priorities for both LBM and LBW within their local plans. Specifically:
- Merton Core Planning Strategy and SPP:
 - Merton CS policy CS 12 broadly seeks to increase the overall number and range of jobs in Merton. Furthermore, it encourages and support the provision of employment in Merton that results in higher levels of productivity and gross value added.
 - Merton SPP policy DM E4 encourages all major development to provide opportunities for local residents and businesses to apply for employment and other opportunities.
 - Policy N9.1 of the Draft Merton Local Plan recognises the importance of Wimbledon Tennis Championships, support the continued upgrade and improvement of AELTC's facilities in Wimbledon and at Raynes Park to maintain its global position as a world class sporting venue of national and international significance and to provide economic, community and sporting benefits locally.
 - Wandsworth Local Plan:
 - Includes an economic objective which recognises that development for employment purposes will be supported in order to increase job and business opportunities.

- Policy SDS1 states that the council will support growth in the tourism industry and visitor economy.
- Policy LP39 requires that all new major development will be required to enter into a Local Employment and Enterprise Agreement which will provide jobs, training and apprenticeship places for Wandsworth residents.

Socio-economic impact and analysis

745. The Applicant has submitted an Economic, Social and Community Benefits report (Economic Report) (Ref: 51365-QUO-XX-XX-RP-Z-00001; dated July 2021) and subsequently a Social, Community and Economic Benefits – Addendum Report (Economic Report – Addendum) (Ref: 51365-QUO-XX-XX-RP-Z-0001 P05; dated April 2024).

746. The updated Economic Report – Addendum outlines the most up to date data and expected economic and employment benefits, including:

- Modelling by Sheffield Hallam University suggests that the total economic impact of the Championships, with the new proposals are projected to be £326.10m for London and £336.02m for the UK (2028 prices) on an annual basis. These estimates are considered conservative as they do not account for the additional revenue that will be generated for AELTC through increased ticket sales, which is expected to boost economic activity in the local, regional, and national economies. It is also expected that these figures will be greater in 2033, upon completion, given inflation and other factors including changing trends in consumer spending.
- The proposals would bring more visitors to the site during the course of The Championships, including visitors associated with the Qualifying event as well as year round via visits to the Wimbledon Lawn Tennis Museum and Tour of the Grounds.
- The expanded Championships site is anticipated to be able to accommodate approximately 50,000 spectators per day from 2033 onwards. Over the course of the event that represents an increase of nearly 135,000 admissions relative to the 2022 Championships.
- The AELTC is a significant employer in the local area. Currently there are 484 staff employed by the AELTC (or through onsite contractors) year-round. It is estimated that the proposal would generate 40 new full time equivalent roles across the year as well as 256 new jobs during The Championships. This is in addition to the existing roles transferred across from the existing site of qualifying at Roehampton.
- The project would employ approximately 50 construction workers for the new grass courts and 400 for Show Court construction workers per day (between 2025 – 2033).

747. These new jobs can create opportunities and the opportunity to gain or improve skills for local residents including training. In addition, the delivery of the proposals will also create employment within the construction sector.
748. The s106 would also secure £127,806 (either in cash terms or provision in kind or a mix of the two) towards employment and training opportunities for local people during the construction and operation phase.
749. The Economic Report and Economic Report – Addendum also describes some of the key community and social benefits associated with the increased economic output of the proposal.
750. The AELTC plays a significant role within the local community, either directly or via the Wimbledon Foundation, which collectively support a wide range of community initiatives across LBM, LBW as well as across London and the UK.
751. The proposals would increase the level of revenue and would create additional funding to be channelled back into The Wimbledon Foundation, the Lawn Tennis Association (LTA) and other initiatives supported by AELTC.
752. Over the past decade, the Wimbledon Foundation has expended a total of £18.9 million on grants and donations to 382 organisations, reaching over 9 million people. Almost half (45%) has been invested locally: £4.5 million in LBM distributed to 151 organisations, and £4 million in LBW distributed to 172 organisations.
- Between 2019 and 2023, contributions to the LTA were £210.8 million, with £48.8 million in 2023 alone.
 - the Wimbledon Foundation runs an extensive gifts-in-kind programme donating items from The Championships. Over the past ten years, 142,000 items have been donated to charities and community groups.
 - The Wimbledon Junior Tennis Initiative (WJTI) was set up in 2001. Every year it introduces children in LBM and LBW state primary schools to tennis, teaching them tennis skills and improving fitness levels through fun exercises. In the autumn and spring terms the WJTI coaches work with schools with higher pupil premium levels across the two boroughs offering coaching for six-week periods. In the summer term, they deliver weekly taster sessions.
- The AELTC run the Ball Boys and Girls (BBGs) programme. Approximately 250 BBGs are recruited from secondary schools across Southwest London and beyond, giving young people a fantastic opportunity to be part of The Championships
 - the AELTC together with the Wimbledon Foundation have a 'Work at Wimbledon' Initiative which supports local people facing barriers to employment to access job opportunities at The Championships;

753. The economic benefits outlined within the Economic Report and Economic Report - Addendum have been assessed by Arup. The main conclusions from their assessment can be summarised as follows:

- Economic impact: The economic impact projections for The Championships in 2028 (with the proposals) include both direct and indirect/induced impacts and are considered to be reasonable for a project of this scale.
- Employment and training: The breakdown of existing jobs and estimated uplift in construction and operational (year-round and events) jobs is provided. The figures provided seem reasonable for a project of this scale.
- Social and community importance: The reports provide a qualitative commentary around the range of training opportunities, initiatives and programmes which will be made possible as a result of increased funds through ticket sales. Furthermore, the reports highlight the community benefits including a significant increase in enhanced access to the managed and maintained parkland, improved public realm surrounding the lake, and new flexible spaces for the wider community to use for a range of activities. Enhanced opportunities for spectators and players are also highlighted. Overall, the reports provide a compelling case for a range of the social and community benefits.
- Knock-on impacts: Beyond the direct social and community impacts, the reports also provide a qualitative review of the potential for knock on impacts including the inspirational effects of the events (i.e. promoting physical health and wellbeing), social and community pride, promoting attendance at live sporting events and increased attendance at other venues (i.e. at local pubs and outdoor screens). Similar to above, the reports provide a compelling case for a range of the knock-on benefits.

754. Overall, Arup concluded that the Economic Report and Economic Report – Addendum provide a reasonable assessment of socio-economic benefits associated with the proposals at the local, London and national scales. The report demonstrates how the bringing together of these two prestigious events into a single location can maximise benefits during the events, but also year-round.

Conclusion on socio-economic impacts

755. The Wimbledon Championships are an internationally renowned event that provide a significant economic contribution at a local, London and national scale. This proposal would support strategic policy by delivering further economic growth, increased employment, facilitate a range of social and community benefits, as well as helping to protect the continued operation and success of the Championships.

756. The review of this data by GLA's consultants has determined that this provides a reasonable assessment of the socio-economic benefits and demonstrates how the bringing together of these two prestigious events into a single location can maximise benefits.

757. Therefore, in accordance with paragraph 85 of the NPPF, the economic impacts are substantial and are considered to represent a very significant public benefit and **very significant weight** is assigned to this element in the planning balance.

Environmental Impact Assessment (EIA)

758. Planning applications for development that are covered by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 are termed “EIA applications”. The requirement for an EIA is based on the likelihood of environmental effects arising from the development. The proposed development is considered to be Schedule 2 development likely to have significant effects on the environment by virtue of factors such as nature, size or location. Consequently, the application is considered to form an application for EIA development and it has been necessary that an Environmental Statement (ES) be prepared in accordance with EIA Regulations.

759. The applicants submitted a request for a Scoping Opinion (Scoping Report dated April 2021; submitted May 2021) to Merton Council (not Wandsworth Council). Following consultation with the relevant consultation bodies, Merton Council issued an EIA Scoping Opinion (Merton Ref: 21/P1709) on 16 July 2021 (prepared by JAM Consult Ltd). The Scoping Opinion considered the following topics were likely to result in significant effects and would require detailed assessment:

- traffic and transport;
- air quality;
- noise and vibration;
- historic environment;
- townscape and visual impact assessment (TVIA);
- ecology;
- soil and ground conditions;
- water resources and flood risk;
- socio-economics; and
- lighting.

760. In addition, the scoping opinion stated that the following topics should also be scoped in as some impacts associated with these disciplines were to be assessed but not all:

- major accidents and disasters;
- population and human health;

- waste and recycling;
- energy and sustainability; and
- climate change mitigation and adaption.

761. The topics of daylight, sunlight and overshadowing, wind microclimate, electronic interference and aviation were not considered likely to give rise to significant effects and could be scoped out of detailed assessment within the ES.

762. The applicant submitted a full ES with their original submission (Original ES, July 2021). This was subsequently amended on three occasions as follows:

- Revised ES (May 2022): revised ES (which replaced the July 2021 ES) submitted following statutory consultation and discussions with LPAs. Accompanying this revised ES was a series of new drawings, documents and addendums to various previously submitted reports.
- ES Addendum (October 2022): In response to the JAM review of the May 2022 Revised ES, the applicant prepared a clarification note and an ES Addendum. The ES Addendum (October 2022) included two new ES chapters (Energy and Sustainability and Waste and Materials) and supporting technical reports, as well as an updated Non-Technical Summary (NTS).
- Second ES Addendum (April 2024): revised documentation following GLA call-in. As part of the revised set of plans submitted to GLA Officers at Stage 3, an ES Statement of Conformity (ESoC) was submitted.

763. The Revised ES (May 2022), the ES Addendum (October 2022) and the Second ES Addendum (April 2024) all together comprise the 'Wimbledon Park ES'.

764. Both LBM and LBW officers concluded within their respective committee reports that the Revised ES and ES Addendum had been prepared in accordance with the EIA Regulations and was sufficient for the purposes of decision making.

765. GLA Officers appointed Arup & Partners Ltd. (Arup) to undertake a technical review of the Wimbledon Park ES, to consider the robustness of its conclusions.

766. Arup's review sets out the following points:

- The Wimbledon Park ES has been prepared in accordance with the EIA Regulations. The general scope of the topics to be scoped in/out of the ES is agreed.
- The ES has taken into account the requirements of the adopted London Plan (such as urban greening) and recent adoption of mandatory biodiversity net gain. If the changes to the policy, guidance and Regulations do not alter the findings of the ES or reported residual impact significance, then there is no requirement to fully update the ES documentation.

- Planning conditions for the future reserved matters applications should include a requirement for the applications to be accompanied by an appropriate level of environmental assessment to demonstrate the detailed design would not result in any new or different significant environmental effects beyond those reported in the Wimbledon Park ES. This could either be as an ES addendum, Supplementary ES or Environmental Statement of Compliance.
- Overall, it is considered sufficient information has been provided (on the Proposed Development section of the ES) at this stage and the detailed and outline elements have been presented clearly.
- The Second ES Addendum (April 2024) has been reviewed and in summary it is agreed that it is appropriate for the changes to be accompanied by a SoC, and that the overall conclusions of the report and the proposed amendments would not materially alter the conclusion of the submitted Wimbledon Park ES, which will remain valid for the purpose of decision-making.
- A review of each topic or type of effect (i.e. Traffic and transport, air quality etc) in the Second ES Addendum (April 2024) has confirmed that there would be no new or significant effects as a result of the proposed amendments.

767. GLA Officers agree with the above conclusions presented by Arup and do not consider there would be unacceptable effects on the environment that would warrant refusal of the application.

Mitigating the adverse impacts of the development through planning obligations

768. Under s106 of the Town and Country Planning Act 1990 (as amended, local planning authorities have the power to enter into planning obligations with any person interested in their area, for the purpose of restricting or regulating the development or use of the land.

769. Paragraph 55 of the NPPF provides that planning obligations should only be used where it is not possible to address unacceptable impacts through a condition.

770. It is considered that the obligations and the contributions set out below, meet the tests as set out in the Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 which states that an obligation may only constitute a reason for granting permission for the development if it is:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

771. Following on from extensive discussions with both Merton and Wandsworth prior to the GLA call-in, a number of planning obligations have been agreed between GLA officers and the applicant. These are outlined in Paragraphs 3-39, above.
772. The level of weight assigned to each of these elements is considered below as part of the VSC and public benefits planning balance.

Very Special Circumstances (VSC), planning balances, compliance with the development plan and overall conclusion

Very Special Circumstances (VSC) policy context

773. The proposal represents development for alternative sports and recreational use of the site located in MOL. As London Plan Policy G3(A) explains, MOL is afforded the same status and level of protection as Green Belt and should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt. The NPPF allows for exceptions to the general policy position that the construction of new buildings is inappropriate in such a location. These include the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, and outdoor recreation; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it (NPPF Paragraph 154). Similarly, the NPPF provides that certain other forms of development, such as material changes of use for outdoor sport or recreation, are also not inappropriate in the Green Belt provided the development preserves the openness of the Green Belt and do not conflict with the purposes of including land within it (NPPF Paragraph 155). Those policy tests therefore fall to be applied to proposed development in the MOL, having regard to the purposes of including land within MOL.
774. As outlined within the Land Use Principles section above, the proposal would fail to preserve the openness of the site and would conflict with one of the purposes of including land within the MOL, and therefore the proposal would represent 'inappropriate development' within MOL. Inappropriate development is, by definition, harmful to the MOL and should not be approved except in VSC. In addition to this 'definitional' harm, account must also be taken of the harm to openness and the conflict with one of the purposes of including land within the MOL. Very significant weight should be given to any such harm. VSC will not exist unless the potential harm to the MOL by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations (as per paragraphs 152 and 153 of the NPPF).
775. The perceived absence of VSC formed the first of LBW's reasons for refusal as follows:
- **Reason 1:** By reason of the substantial harm to and loss of visual and spatial openness identified to Metropolitan Open Land, the development would constitute inappropriate development. It is not considered that there are any Very Special Circumstances that clearly outweighs this harm, contrary to London Plan policy G3 and NPPF paragraphs 147, 148 and 149 (now paragraphs 152, 153, & 154).

776. By way of contrast, LBM considered the weight of the benefits would clearly outweigh harm identified in relation to MOL and other harm identified. Therefore, LBM concluded that VSC would allow for permission to be granted.
777. The assessment of whether VSC exist involves an exercise of planning balance. This is one of a number of such exercises that are required to determine the application. It is also necessary to undertake a balancing exercise to determine whether the public benefits of the proposed development outweigh the less than substantial harm to heritage assets (NPPF paragraph 208), and to determine whether the benefits outweigh the harm to designated open spaces and recreational provision (NPPF paragraph 103).
778. Given the requirement to undertake those individual balancing exercises, this section of the report will:
- Summarise all the harm, including harm to the MOL, identified within the planning assessment and consider what weight ought to attach to each element.
 - Summarise all the planning benefits identified within the planning assessment and consider what weight ought to attach to each element.
 - Assess whether the public benefits of the proposed development outweigh the less than substantial harm to the significance of heritage assets ('the heritage balance').
 - Assess whether the benefits of the proposed development outweigh the harm to the designated open spaces and sports and recreational provision ('the open spaces, sports and recreation balance').
 - Assess whether the benefits of the proposed development clearly outweigh the harm to the MOL and any other harm identified and amount to VSC.
 - Assess whether the proposed development is in overall accordance with the development plan.
 - Section 38(6) planning balance and overall conclusion.

Summary of harm

779. This planning assessment has identified harm in relation to the MOL, the protected open space, and heritage matters. These are discussed in further detail below.
780. The level of weight assigned to each of these elements includes (from lowest to highest): 'none', 'very limited', 'limited', 'moderate', 'significant', and 'very significant'.

Metropolitan Open Land

781. As outlined above, the proposed development represents inappropriate development as the new buildings for outdoor sport and outdoor recreation would

not preserve the openness of the site. The extent of this harm, including the definitional harm (as per paragraph 153 of the NPPF) as well as the impact of the proposals on openness and the purposes of Green Belt / MOL, is described in paragraphs 240-262 above. In accordance with paragraph 153 of the NPPF, GLA Officers assign **very significant weight** to the harm to MOL.

Protected open space

782. As discussed above, GLA Officers have identified that the proposal would result in harm due to the loss of protected open space. The site is identified as MOL within the London Plan and Wandsworth Local Plan. It is also identified as designated open space within the Merton SPP.
783. Applying the Precautionary Approach, the proposed development of the site would represent the loss of 18.6ha of protected open space that could otherwise be accessible to the public for the purposes of recreation. Therefore, notwithstanding the provision of 11.1ha of maintained publicly accessible open space, which represents a moderate qualitative benefit, the proposal would represent very significant harm to the protected open space on site. This very significant harm is assigned **very significant weight** in the planning balance. Harm would also be caused by the building works on the protected open space and this is not offset by the very limited benefit offered through the minor demolition works to the existing golf course service yard.
784. It is understood that the statutory trust (if it were to pertain) would not create an obligation for AELTC to maintain the land to any particular standard. In this regard, the provision of the 11.1ha of publicly accessible, managed, and maintained land would result in a substantially more usable, functional, more inclusive and better designed parkland than would otherwise be available on the assumption that a statutory trust does exist. That is a moderate qualitative benefit.
785. Applying the Alternative Approach, it is still considered that the proposal would result in a net quantitative loss of open space. However, given that the land has operated as a privately owned golf course to which there was significantly limited access and the 11.1ha publicly accessible parkland would substantially improve public access when compared with the former golfing use, the harm to the open space would be given **limited weight** in this approach.
786. The loss of the sporting use is given **very limited weight**, given there are other golf courses within a reasonable distance of the site and there is no identified shortage within local pitch strategy documents.
787. Overall, the proposal would provide significant benefits, improving current levels and quality of access to the MOL, and improving poor quality areas to provide a wide range of benefits to Londoners. Set against that, applying the Precautionary Approach, the proposal would result in a loss of protected open space, including building works on protected open space. Therefore, GLA Officers assign **very significant weight** to the loss of protected open space. Applying the Alternative Approach, this element would be granted **limited weight** given that the land has operated as a privately owned golf course over which there was significantly limited access, and the 11.1ha publicly accessible parkland would substantially improve public access when compared with the former golfing use.

Heritage

788. The heritage section (above) identified harm to several designated and non-designated heritage assets. Table 11 below summarises the category of harm, the extent of harm and additionally assigns planning weight to the harm to each asset. In the case of any material harm to a designated heritage asset the weight given to such harm must be considerable, to reflect the considerable importance and weight that is to be accorded to the desirability of preservation. Any such harm gives rise to a strong presumption against the grant of planning permission, albeit one which can be outweighed by public benefits associated with the proposed development. It is therefore important not to regard less than substantial harm as a less than substantial objection to the grant of permission. Nevertheless, within that context the weight to be given to harm to a designated heritage asset is not uniform and may vary with the degree of harm to the asset and the importance of the asset. In order to undertake the necessary heritage balance it is therefore helpful to consider the relative weight to be attached to the harm identified, in that context.

Table 11: Summary of heritage harm and planning weight assigned

Designated heritage assets	Category of harm	Extent of harm	Planning Weight
Wimbledon Park, Registered Park and Garden, Grade II*	Less than substantial	Low to middle	Significant
Parish Church of St Mary, listed Grade II*	Less than substantial	Low	Moderate
Old Rectory, listed Grade II*	No harm	No harm	None
Wimbledon North Conservation Area (LBW and LBM)	Less than substantial	Low to middle	Significant
Victoria Drive Conservation Area (LBW)	Less than substantial	Very low (de minimis)	None
Bathgate Road Conservation Area (LBW and LBM)	No harm	No harm	None
Vineyard Hill Road Conservation Area (LBM)	Less than substantial	Very low (de minimis)	None
Non-designated heritage assets	Category of harm	Extent of harm	Planning Weight

Archaeological remains	Not applicable	Potentially high or total loss	Limited
Wimbledon Golf Clubhouse	Not applicable	No harm	None
121 and 123 Home Park Road	Not applicable	No harm	None
103 Home Park Road	Not applicable	No harm	None
57 Home Park Road	Not applicable	No harm	None
Wimbledon Park Water Sports Centre	Not applicable	No harm	None
All-England Lawn Tennis Club Centre Court	Not applicable	No harm	None
The White Pavilion	Not applicable	No harm	None
Bowls Pavilion	Not applicable	No harm	None
Queensmere House	Not applicable	No harm	None
62 to 74 (even) Bathgate Road	Not applicable	No harm	None

789. Paragraph 205 of the NPPF states that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”
790. Given the above, GLA Officers accordingly consider it appropriate to assign **significant weight** in the planning balance to the impact on the significance of the Wimbledon North Conservation Area, and Wimbledon Park RPG. **Moderate weight** in the planning balance is assigned to the impact on the significance of the Parish Church of St Mary, listed Grade II*. Whilst still considerable, the allocation of moderate weight reflects the low level of less than substantial harm in this case. The harm to Victora Drive Conservation Area and Vineyard Hill Road Conservation Area is considered to be so low as to be ‘de minimis’ and accordingly **no weight** has been assigned to the harm to these heritage assets.
791. Paragraph 209 of the NPPF states that “in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be

required having regard to the scale of any harm or loss and the significance of the heritage asset.”

792. For non-designated heritage assets, GLA Officers give **limited weight** in the planning balance to the potential harm to these archaeological assets. This is due to the uncertainty regarding the presence of remains. A condition has been secured to ensure that archaeological remains are suitably recorded. No harm is identified to any other non-designated heritage asset.

Summary of harm

793. Having regard to the above, the proposal would result in a range of harm including very significant harm to the MOL, very significant harm (in the Precautionary Approach) through the loss of public open space, as well as less than substantial harm to various designated heritage assets. The level of weight that should be given to the harm of each heritage asset is identified above.

Public benefits

794. The level of weight assigned to each of these elements includes (from lowest to highest): ‘none’, ‘very limited’ ‘limited’, ‘moderate’, ‘significant’, and ‘very significant’.

Need for the development

795. The applicant has presented a VSC case based on three core principles as follows:

- There is a pressing need for the proposed development.
- This need for the proposed development cannot be met elsewhere.
- The proposed development will secure significant public, heritage, and other benefits.

796. In response to these core principles, GLA Officers accept that there is a need for the development and recognise that synergies and public interest benefits would be achieved by bringing qualifying onto the same site as the Championships. This would ensure that the Wimbledon Championships are in line with the other Grand Slam tournaments.

797. Furthermore, there is an identified need for additional Championship courts and the addition of 39 grass courts (Parkland Show Court plus the other 38 grass courts) would also provide built in flexibility during the Championships if other grass courts are damaged or unplayable. As mentioned above, the AELTC Main Grounds is constrained and spectator circulation during the Championships is challenging. The additional capacity created through this application could enable the reconfiguration of existing courts on the AELTC Main Grounds, thereby potentially improving circulation, spectator comfort and the operation of the Championships.

798. Consequently, GLA Officers accept that the need for the proposed development cannot be met elsewhere without fundamentally altering the nature of the Wimbledon Championships.

Public open space and recreational benefits

799. GLA Officers acknowledge that the proposal seeks to deliver increased access to open space whilst also improving the quality and usability of the other open space and recreational space on site.
800. The provision of 11.1ha of new publicly accessible parkland is stated as one of the key benefits of the proposal. The proposal would also deliver substantial benefits through the de-silting of Wimbledon Park Lake (valued at £7.5 million), various upgrades to Wimbledon Park (contributions valued at £10.7 million), as well as a boardwalk around Wimbledon Park Lake. All of these elements would have open space and recreational benefits.
801. Applying the Precautionary Approach, GLA officers would give **moderate weight** to the provision of 11.1ha of publicly accessible open space. Whilst it is recognised that the land has not operated as public open space for over a century, under the Precautionary Approach it is assumed that there is already a public right to use the land for public recreation. Nevertheless, any such right would be a right to use the land as kept by the landowner. There is, for example, no specific obligation on the landowner to keep the land as parkland or a golf course. In that context the provision of publicly accessible open space, that would be managed and maintained as parkland by the AELTC, still provides a public benefit because of the significant qualitative improvements, that can in itself be given moderate weight in the planning balance.
802. The 11.1ha of publicly accessible open space would interconnect with Wimbledon Park, providing a cumulative area of 29.1ha of qualitatively improved open space. Additionally, the 9.6ha Wimbledon Park Lake would be enhanced through improved accessibility and water quality, thereby increasing its recreational value. This combined area (38.7ha) would represent a very significant public benefit enabling the local community access onto land that has been utilised as a private member's golf course for over 100 years. The boardwalk around the lake would also increase access to open space and provide recreational angling opportunities.
803. Applying the Precautionary Approach, GLA Officers consider the provision of publicly accessible open space and other open space and recreational benefits to represent a very significant public benefit. Even discounting the weight attributable to the 11.1ha of publicly accessible open space (to which only moderate weight is given on the precautionary approach), **very significant weight** is attributed to the substantial public benefits offered by the lake de-silting works, the lake boardwalk, as well as the Wimbledon Park upgrade works/contributions alone (separate to the 11.1ha of publicly accessible open space). These elements alone would constitute a very significant public benefit.
804. Applying the Alternative Approach, and assuming that the land is not subject to a statutory trust, the provision of 11.1ha of publicly accessible open space as well

as all other open space benefits would also represent a **very significant** public benefit.

Community and cultural benefits

805. The Wimbledon Championships is a cultural asset to London (within the definition outlined in paragraphs under Policy HC5 of the London Plan), being an internationally significant spectator sporting event that provides an opportunity for all Londoners to experience world class tennis.

806. London's cultural sector delivers both economic and social benefits for the capital (paragraph 7.5.3 of the London Plan) and in this case, the Championships and AELTC support grassroots tennis and a range of community groups and charities, including:

- The Wimbledon Foundation champions opportunity for all. It supports a range of programmes and initiatives locally, nationally and internationally which tackle social disadvantage, promote healthy active lives, to inspire the next generation and support communities in times of need.
- The financial surplus of the Championships is passed to the LTA, which supports tennis from grassroots through to the professional game.
- the Wimbledon Foundation runs an extensive gifts-in-kind programme donating items from The Championships.
- The Wimbledon Junior Tennis Initiative which introduces children in LBM and LBW state primary schools to tennis.
- The 'Work at Wimbledon' Initiative (run by the Wimbledon Foundation) which supports local people facing barriers to employment to access job opportunities at The Championships.

807. The proposed development would support ongoing and increased revenue for AELTC to support the Wimbledon Foundation, the LTA, grassroots tennis, as well as a range of community and charitable initiatives.

808. The proposal would also deliver a range of community benefits, including:

- Community access to 7 grass tennis courts from mid-July and until mid-September each year.
- Allocation of community space within the Golf Clubhouse, as well as additional bookable community space in the Parkland Show Court.
- Free tours of the application site for Merton and Wandsworth residents.
- Allocation of Parkland Show Court tickets for local residents and community organisations. 450 tickets per day would be prioritised for Merton and Wandsworth residents at face value. 50 tickets per day would be distributed through the Wimbledon Foundation to charitable organisations, and community groups based in Merton and Wandsworth.

- Allocation of 1000 qualifying tickets to the Qualifying Event for school children (inclusive of support staff) in Merton and Wandsworth.
- Measures and contributions for supporting local Arts and Culture projects.
- The provision of new public toilets within the golf course club house and in Wimbledon Park (near the northern entrance).

809. These community benefits provide a particular focus on providing benefits for the local residents of LBM and LBW.

810. The expansion of a culturally significant venue, in the Wimbledon Tennis Championships, would enhance London's global competitiveness by promoting and supporting one of its key cultural assets whilst also facilitating the support of local community groups. The expansion of a key cultural asset, being the Wimbledon Tennis Championships is considered to represent a **moderate** public benefit. Furthermore, GLA Officers consider the community benefits to represent a **moderate** public benefit.

Economic and employment benefits

811. The Wimbledon Tennis Championships are one of the most prestigious sporting tournaments in the world and, as a result, the visitation and economic impacts associated with the event are significant with effects felt well beyond the boroughs of Merton and Wandsworth.

812. Survey data undertaken within the Economic Report indicates that 27.3% of spectators came from London (outside of Merton and Wandsworth), 55.9% from the rest of the UK and 8.3% from overseas.

813. The total economic impact of the Championships, incorporating this proposal, are projected to be worth £336.02 million to the UK economy on an annual basis, of which it is estimated that £326.1 million would occur within London. This proposal would support 40 new full time equivalent roles across the year as well as 256 new jobs during The Championships. Additionally, the proposal would employ an average of between 50 to 400 construction workers per day (between 2025 – 2033).

814. In accordance with Paragraph 85 of the NPPF, the proposal would support very significant economic growth and therefore GLA Officers consider the economic and employment benefits represent a **very significant** public benefit.

Heritage-related public benefits

815. A significant range of heritage related public benefits have been secured as outlined above in paragraphs 462 - 464. The more significant heritage related public benefits include:

- De-silting and enhancing the appearance of the lake with it partially returned to its 18th century extent through restoration of the southern tip;
- De-culverting two brooks (Bigden Brook and Margin Brook);

- Removal of the golf course features and poorly placed fairway trees;
- New planting to enhance the parkland, including the planting of scattered and clumped trees in a more Brownian manner than existing;
- Restoring open acid grassland, a more Brownian feature than the former closely mown golf turf; and
- The removal of the existing permanent and non-historic fence between the permissive northern parkland and the public Wimbledon Park, increasing the connectedness of elements of the 18th century landscape.

816. The proposals include the following heritage-related public benefits outside the site (secured through the s106 Agreement) with £10.5 million secured for a range of works to upgrade Wimbledon Park. Additionally, a Conservation Management Plan (CMP) for the whole RPG will be developed to ensure the site moves towards removal from the heritage at risk register.

817. The development is also considered to represent the optimum viable use for the site. NPPF Paragraph 208 'harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. Furthermore, Paragraph 214 states 'Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies'.

818. The following elements contribute to securing the optimum viable use of the land.

- Permissive public access for eleven months of the year to the southern area of parkland (9.4ha) and the northern area of parkland (1.7ha), a total of 11.1ha of currently private land, restored as parkland;
- Blurring of the landownership boundaries between the public Wimbledon Park and the permissive southern and northern areas of parkland, reducing the fragmentation of the RPG as it appears on the ground;
- Enabling public access around the edges of lake, which also has the effect of joining the public park at Wimbledon Park to the north with the permissive parkland to the south of the lake.

819. Whilst the proposal does depart from a number of London and local planning policies, the proposal is considered to deliver the optimum viable use of land that would secure the future conservation of the RPG. It is unlikely that another applicant, developer, or local authority that would deliver a scheme that provided 11.1ha of publicly accessible open space, whilst also securing the long-term conservation and enhancement of the Wimbledon Park RPG. This position is consistent across both the Precautionary Approach and Alternative Approach.

820. GLA Officers consider the heritage benefits to represent a very significant public benefit, to which **very significant weight** will be attributed, given they would

secure the conservation and enhancement of the RPG in a manner that is unlikely to be possible by any other land owner, developer or local authority.

Ecology and biodiversity benefits

821. Whilst there would be short-term ecological impacts associated with the development works, including tree removal and construction works, the ecological works over the longer term would not only mitigate these impacts but also deliver material net benefits. These include:

- The long-term use of the site as a golf course has weakened the important habitats and biodiversity and the proposed development offers the opportunity to move away from the closely managed golf course landscape and repair sections of the landscape and significantly enhance ecology/biodiversity value. The improvements to the Lake will also support this benefit.
- Overall, the proposals include the retention/protection of all veteran trees and the planting of 1,500 new trees at a variety of standards between 2year old trees and extra heavy standards. This will more than double the number of trees on-site and would improve onsite biodiversity.
- 4.6 ha of new scattered tree canopy within the parkland, comprising a species rich mix of trees, and 1.35 ha of broadleaved woodland in the periphery woodland areas will be planted, along with a further 1.34 ha of newly planted species rich native mixed scrub which will form an extended woodland boundary.
- The proposals will also target BNG of 22.95% for habitat units, 19.09% for hedgerow units, and 100.00% for river units. The proposals will also include a detailed management strategy for the ongoing stewardship of the land and its environmental assets.
- The proposals include an increase to the lake footprint of approximately 1 ha and the commitment to enhance the water quality of Wimbledon Park Lake to a target condition of 'Fairly Good' within 7 years (it is currently assessed as being 'Fairly poor').
- Several wildlife ponds would be created across the site (approximately 0.04 ha in size).
- The UGF would be compliant with London Plan Policy.

822. Wimbledon Park Lake would benefit from increased size and the creation and management of priority habitats including the daylighting of the connected brooks, provision of extensive reedbed and aquatic vegetation and the installation of bespoke habitat features including bat roosts, sand martin banks, kingfisher banks and tern nesting rafts. In addition, current negative influences including nutrient inputs, excessive silt build up and currently high levels of disturbance from lighting and water sport activities will be remedied through appropriate habitat design and management. This would provide significant ecological benefit and ecological enhancements.

823. The long-term management and monitoring of this site for a minimum of 30 years has been secured by way of condition.
824. GLA Officers consider the ecology and biodiversity benefits to represent **moderate** public benefit.

Transport benefits

825. The proposal has used the opportunity presented through this application to move towards a public transport orientated event. Car parking numbers have been significantly reduced, with a reduction by 71% from 3,345 down to 1,020 across the wider site. Notably, on the MOL to the east of Church Road (including Wimbledon Park and the Wimbledon Club), this reduction would be from 2,600 down to 275 total parking spaces (90% reduction), which in turn would have ecological and heritage benefits in addition to the transport public benefits.
826. A package of highway works is proposed for Church Road, including sections of footway widening, resurfacing, traffic calming, renewal of street furniture and lighting and security features to create a high-quality public realm.
827. The new 11.1ha of publicly accessible parkland would facilitate improved pedestrian and cycling links with a year-round east-west link providing a public route through the Southern parklands.
828. Additionally, contributions have been secured towards London Underground Mitigation (£177,120), Active Travel Strategy and Fund (£650,000), and Operational Travel Plan Fund (£350,000), as well as CPZ review and contributions towards mitigation measures (£190,000).
829. This movement towards an active travel and public transport oriented event represents a public benefit of the scheme. GLA Officers consider the transport benefits to represent a **moderate** public benefit.

Design benefits

830. The applicant has put forward an argument that the world class architecture represents a public benefit that should form part of the VSC case. It is noted that paragraph 139 of the NPPF states that, in determining applications, significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in the area, so long as they fit in with the overall form and layout of their surroundings.
831. In this regard, it is considered that the proposal demonstrates outstanding design quality. Furthermore, the s106 has secured the retention of architects in an ongoing manner and the Design Codes are robust and would ensure continued outstanding design quality across all buildings approved in outline.
832. GLA Officers consider that all other benefits outlined above represent a **significant** public benefit.

Summary

833. Having regard to the above, the weight GLA Officers apply to the main benefits of the proposed development are summarised as follows:

Table 12: Summary of public benefits and weight assigned to each

Benefits	Weight as VSC	
	Precautionary Approach	Alternative Approach
Public open space and recreational	Very significant	Very significant
Community	Moderate	
Cultural	Moderate	
Heritage	Very significant	
Ecology and biodiversity	Moderate	
Economic and employment	Very significant	
Transport	Moderate	
Design	Significant	

834. These are considered as part of the balanced assessments below.

Heritage balance

835. Whilst heritage harm has been identified, the applicant has also sought to deliver a range of heritage benefits through the design and the planning obligations secured.
836. GLA Officers have identified that there would be material but less than substantial harm to the Wimbledon Park RPG (grade II* listed), St Mary's Church (grade II* listed), and the Wimbledon North Conservation Area. As explained above, all harm to designated heritage assets should attract considerable weight. Within that context, GLA officers have attributed the greatest weight to the harm to the Wimbledon Park RPG (grade II* listed) and the Wimbledon North Conservation Area and a lesser degree of weight to the harm to St Mary's Church (grade II* listed) in the planning balance of the designated heritage assets and to the impact of the proposed development on their significance. The harm to Victoria Drive Conservation Area and Vineyard Hill Road Conservation Area is considered to be 'de minimis' and therefore not material. Accordingly, no weight has been assigned to the harm to these heritage assets.
837. Having regard to the public benefits summarised above, GLA Officers consider that the less than substantial harm is clearly outweighed by those benefits, and that the balance under Paragraph 208 of the NPPF falls strongly in favour of approval. Additionally, the public benefits of the proposal are also considered clearly to outweigh any potential harm to non-designated heritage assets, namely the archaeological remains (NPPF paragraph 209).

838. The proposed conditions and draft s106 Agreement have been reviewed in detail and discussed with Historic England. They are appropriate and adequate in terms of mitigating against further heritage harm and securing the heritage and heritage-related benefits.
839. In accordance with paragraphs 208 and 209 of the NPPF, the heritage related benefits outlined above are considered to be very significant and would clearly outweigh the harm to the designated and non-designated heritage assets.
840. Whilst the identified harm gives rise to conflict with development plan policies which do not provide for a balance of harm against benefit (London Plan Policy HC1, Merton SPP Policy DMD4, and Wandsworth Policy LP3), in circumstances where the benefits outweigh the harms only limited weight is attached to this conflict.

Open space and recreational balance

841. The harm identified to the publicly accessible open space is very significant (adopting the Precautionary Approach). The proposed development would on that assumption result in the effective loss of 18.6ha of open space that could otherwise be accessed by the public.
842. That said, it is noted that the statutory trust would not create an obligation for AELTC to maintain this land to the standard of a public park. Therefore, the provision of the 11.1ha of publicly accessible, managed, and maintained land would result in a more usable, functional parkland than would otherwise be available on the assumption that a statutory trust does exist. This is considered to provide a clear qualitative benefit (given moderate weight in the assessment above).
843. The 11.1ha of publicly accessible, managed, and maintained open space would provide a cumulative area of 29.1ha of parkland across the wider area when connected into Wimbledon Park. This would also directly interconnect with the 9.6ha Wimbledon Park Lake which would offer improved recreational value.
844. £10.7 million has been secured towards upgrade works to the adjoining Wimbledon Park with upgraded pathways, drainage, toilets and boat house all providing significant recreational improvements to the existing park. Furthermore, the recreational benefits offered by the de-silted Wimbledon Park Lake would be of great benefit to the area as a whole.
845. GLA Officers consider that the proposal is the only practical way in which these open space benefits would be secured as no other landowner, developer or local authority would be likely to be able to deliver this level of open space and recreational benefit to this site and across the wider area.
846. In summary, whilst the harm identified to the protected open space is very significant on the Precautionary Approach, the countervailing accessible, managed and maintained open space and many additional recreational related public benefits across the site and wider area are very significant. Under the Alternative Approach these benefits would also be regarded as very significant (to

a much higher level than the Precautionary Approach). Under either approach, these benefits are considered clearly to outweigh the identified harm.

Very special circumstances

847. Taking into account all planning harms and planning benefits outlined above, GLA Officers consider that the weight of benefits would clearly outweigh the harm identified to MOL and the other harms identified. This conclusion is reached for both the Precautionary and Alternative approaches to this assessment.
848. The public benefits are wide ranging and substantial. They could only be delivered by this applicant as no other individual, organisation, or local authority would be in a position to deliver this range of public benefits.
849. The open space and recreation, economic and employment, as well as heritage benefits alone would amount to VSC in this circumstance.
850. Therefore, the public benefits of the scheme amount to VSC that allow for permission to be granted.

Overall compliance with the development plan

851. As noted above, the proposals do not fully comply with development plan policies G4, D9, and HC1 of the London Plan, Merton Core Strategy Policy CS13, Merton SPP Policy DM 01 and DM D4, as well as Wandsworth Local Plan policies LP3 and LP53 although the NPPF paragraph 208 balancing act is favourable to the scheme on both the precautionary and alternative approaches.
852. In addition to the conflict with parts of the MOL, open space, tall buildings, and heritage policies identified above, there would be some minor conflict in relation to trees impacts although these must be weighed against the heritage considerations for the site and substantial tree planting and replacement is proposed to offset this loss.
853. The package of public benefits would be significant. Subject to conditions, the proposed development also meets all other relevant development plan policies including GG2, GG3, GG5, SD10, D1, D2, D3, D4, D5, D8, D10, D11, D12, D14, S1, S4, S5, S6, E10, E11, HC2, HC3, HC6, G1, G3, G5, G6, G7, SI1, SI2, SI3, SI4, SI5, SI6, SI7, SI12, SI13, SI14, SI15, SI17, T1, T2, T3, T4, T5, T6, T6.5, T7, T9, and DF1 of the London Plan (2021), Policies CS6, CS12, CS13, CS14, CS15, CS16, CS17, CS18, CS19, and CS20 of the Merton Core Planning Strategy, Policies DM R6, DM C1, DM E4, DM 02, DM D1, DM EP2, DM EP4, DM F1, DM F2, DM T1, DM T2, DM T3, DM T4, AND DM T5 of the Merton SPP, and Policies LP1, LP2, LP10, LP12, LP13, LP14, LP17, LP20, LP39, LP49, LP50, LP51, LP54, LP55, LP56, and LP57 of the Wandsworth Local Plan (2023).
854. Notably, the proposal demonstrates clear and definitive compliance with development plan policies relating to:
- Enhance London's global economic competitiveness, promote employment opportunities and strengthen London's visitor economy (GG5 and Policies E8 & E10 of the London Plan);

- Deliver good design (Policy D4);
- Promote Healthy Streets through a shift from car use to active travel (Policy T1 & T2);
- Avoid unacceptable harm to the amenity of surrounding land and buildings (Policy D3); and
- Protect, enhance, and improve access to waterway infrastructure (Policy SI16 & SI17).

855. Overall, the proposed development is judged to be in accordance with the development plan when read as a whole.

856. Overall compliance with the development plan would generally remain the same under the Alternative Approach with the balancing act even more favourable to the development.

Section 38(6) planning balance and overall conclusion

857. Taking into consideration the planning harms and planning benefits outlined above and applying the Precautionary Approach, GLA Officers consider that the weight of the benefits would clearly outweigh the harm identified in relation to MOL, open space, heritage, as well as other harm identified. The benefits amount to Very Special Circumstances that allow for permission to be granted. If the Alternative Approach was adopted the balance would be even more clearly in favour of the grant of consent.

858. Overall, notwithstanding the existence of some degree of conflict with some policies identified above, having regard to the extent and importance of the policies complied with and the relatively limited extent of breach the proposed development is considered to be in accordance with the development plan when read as a whole. GLA Officers do not consider there are any material considerations that justify the refusal of permission.

Legal considerations

859. Under the arrangements set out in Article 7 of the Order and the powers conferred by Section 2A of the Town and Country Planning Act 1990 the Mayor, acting under delegated authority, is the Local Planning Authority (LPA) for the purposes of determining these planning applications ref: 21/P2900 (LBM) and 2021/3609 (LBW).

860. Section 35 of the Greater London Authority Act 2007 inserts section 2F into the Town and Country Planning Act 1990 which includes a requirement that for applications the Mayor takes over, the Mayor must give the applicants and the borough the opportunity to make oral representations at a hearing. He is also required to publish a document setting out.

- who else may make oral representations;

- the procedures to be followed at the hearing; and,
 - arrangements for identifying information, which must be agreed by persons making representations.
861. The details of the above are set out in the Mayor's Procedure for Representation Hearings which reflects, as far as is practicable, current best practice for speaking at planning committee amongst borough councils.
862. In carrying out his duties in relation to the determination of this application, the Mayor must have regard to a number of statutory provisions. Listed below are some of the most important provisions for this application.
863. Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that in dealing with such an application the authority shall have regard to:
- a) The provisions of the development plan, so far as material to the application;
 - b) Any local finance considerations, so far as material to the application; and
 - c) Any other material consideration.
864. Section 70(4) defines "local finance consideration" as:
- a) A grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
 - b) Sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.
865. Furthermore, in determining any planning application and connected application, the Mayor is required by section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine the application in accordance with the Development Plan (i.e. the London Plan and the adopted Local Plan) unless material considerations indicate otherwise.
866. Other guidance, which has been formally adopted by Merton Council, Wandsworth Council and the GLA (e.g. Supplementary Planning Documents and Supplementary Planning Guidance), will also be material considerations of some weight (where relevant). Those that are relevant to this application are detailed in this Representation Hearing report.
867. Officers are satisfied that the current report to the Deputy Mayor has had regard to the relevant provision of the Development Plan. The proposed s106 package has been set out and complies with the relevant statutory tests, adequately mitigates the impact of the development and provides necessary infrastructure improvements.
868. As regards to the Community Infrastructure Levy (CIL) considerations, Mayoral CIL payments, Merton CIL payments and Wandsworth CIL payments are expected to be made in association with this development.

869. In accordance with his statutory duty in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Mayor shall have special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess. The Mayor is also required to give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by the proposed development (section 72 of the of the Planning [Listed Buildings and Conservation Areas] Act 1990). These matters have been addressed within earlier sections of the report.

870. Where the Mayor takes over an application, he becomes responsible for the s106 legal agreement, although he is required to consult the relevant borough(s). In this instance, there have been a series of lawyer led meetings to discuss the s106 content, and it has progressed on a number of key issues. Both the Mayor and the borough are given powers to enforce planning obligations.

871. When determining these planning applications, the Mayor is under a duty to take account of the provisions of the Human Rights Act 1998 as they relate to the development proposal and the conflicting interests of the applicants and any third party affected by, or opposing, the application, in reaching his decision. Planning decisions on the use of land can only be taken in line with the Town and Country Planning Acts and decided in accordance with the development plan unless material considerations indicate otherwise.

872. The key Articles to be aware of include the following:

- Article 6 - Right to a fair trial: In the determination of his civil rights and obligations... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.
- Article 8 - Right to respect for private and family life: Everyone has the right to respect for his private and family life, his home and his correspondence.
- Article 1 of the First Protocol - Protection of property: Every person is entitled to the peaceful enjoyment of his possessions.

873. It should be noted, however, that most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted i.e. necessary to do so to give effect to the Town and Country Planning Acts and in the interests of such matters as public safety, national economic well-being and protection of health, amenity of the community etc. In this case this Representation Hearing report sets out how this application accords with the Development Plan.

874. Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a s106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are now statutory tests.

875. The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
876. The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.
877. GLA Officers are satisfied that the application material and officers' assessment has taken into account the equality and human rights issues referred to above. Particular matters of consideration have included provision of accessible housing, and the protection of neighbouring residential amenity, as well as matters addressed in the Equalities section of this report, above.

Conclusion

878. As detailed above, Section 38(6) of the Planning and Compensation Act 2004 requires the application to be determined in accordance with the development plan unless material considerations indicate otherwise.
879. When assessing the planning application, the Deputy Mayor is required to give full consideration to the provisions of the development plan and all other material considerations. He is also required to consider the likely significant environmental effects of the development and be satisfied that the importance of the predicted effects and the scope for reducing them, are properly understood.
880. GLA officers consider that the proposal complies with most relevant planning policies at national, regional and local level, and whilst there are some adverse impacts and conflicts with policy resulting from the scheme, with regards to the loss of open space, harm to MOL, and less than substantial harm to a number of heritage assets, nevertheless, and as set out in paragraph 2 above, GLA officers consider that the proposal is in overall conformity with the development plan and that where it is necessary to undertake a balance of benefits against harms the balance is clearly in favour of the grant of consent. There are no material considerations that are considered to justify the refusal of consent.
881. Accordingly, it is officers' recommendation that planning permission should be granted for planning applications reference 21/P2900 (Merton) and 2021/3609 (Wandsworth), subject to the obligations set out under 'Section 106 legal agreement' and 'Conditions' at the start of this report.

For further information, contact GLA Planning Unit (Development Management Team):

Rohan Graham, Principal Strategic Planner (case officer)

email: rohan.graham@london.gov.uk

Neil Smith, Senior Projects Officer

email: neil.smith@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

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Drawing numbers and documents

Drawing Reference	Document or Drawing Name	Produced by
51365-LUC-XX-XX-RP-L-02002-S2-P01	GLA Landscape Addendum Report (April 2024)	LUC
51365-LUC-XX-XX-RP-YE-00010-S2-P02	Biodiversity Net Gain Assessment (Metric 3.1 Update – inc Tool Kit)	LUC
51365-TEP-XX-XX-RP-X-00005-S2-P01	Arboricultural Impact Assessment Addendum	LUC and TEP
51365-BHE-XX-XX-RP-Y-00021 P03	Updated Travel Plan	Buro Happold
51365-BHE-XX-XX-RP-Y-06000 P04	Transport Assessment Addendum	Buro Happold
51365-BHE-XX-XX-RP-Y-06001 P04	Car Park Management Plan Addendum	Buro Happold
51365-AEL-XX-XX-RP-T-00001 P02	Community Benefits Statement (Updated April 2024)	AELTC and RJP
51365-QUO-XX-XX-RP-Z-00001 P05	Social, Community and Economic Benefits – Addendum Report	Quod and Sheffield Hallam
51365-LUC-XX-XX-RP-T-10004-S2-P01	ES Statement of Conformity	LUC

51365-AAM-XX-XX-RP-A-00400	Wimbledon Park Project – CGI Compilation (April 2024)	Allies and Morrison
51365-LUC-XX-XX-DR-L-02131 P03	Demolitions Sheet 1	LUC
51365- LUC-XX-XX-DR-L-02062 P03	General Arrangement Plan	LUC
51365-LUC-XX-XX-DR-L-02211 P05	Hard Landscape General Arrangement Sheet 1	LUC
51365- LUC-XX-XX-DR-L-02213 P04	Hard Landscape General Arrangement Sheet 3	LUC
51365-AAM-WXX-XX-DR-A-00071 P03	Operational Plan Championships Mode	Allies and Morrison
51365-AAM-WXX-XX-DR-A-00070 P04	Operational Plan Year-Round	Allies and Morrison
51365-AAM-XX-XX-DR-A-00080 P02	Phasing Contract Zones	Allies and Morrison
51365- BHE-XX-XX-SU-C-01300 P05	Proposed Cut and Fill Site Plan	Buro Happold
51365-LUC-XX-XX-DR-L-02301 P05	Proposed Earthworks Sheet 1	LUC
51365- LUC-XX-XX-DR-L-02401 P05	Proposed Tree Planting & Transplants Sheet 1	LUC
51365-LUC-WXX-XX-SK-L-21006 P03	Public Access Gates and Paths Plan	LUC
51365-AAM-WXX-XX-DR-A-00051 P04	Site Context Section BB – Existing and Proposed	Allies and Morrison
51365- AAM-XX-XX-DR-A-00002 P05	Site Layout Plan	Allies and Morrison

51365- LUC-XX-XX-DR-L-02411 P05	Soft Landscape General Arrangement Sheet 1	LUC
51365-LUC-XX-XX-DR-L-02311 P05	Soil Works Sheet 1	LUC
51365-TEP-XX-XX-DR-L-02151 P02	Tree Protection Plan Sheet 1	Treework Environmental Practice
51365-LUC-XX-XX-DR-L-02121 P03	Tree Removals Sheet 1	LUC
51365-LUC-XX-XX-DR-L-02140 P03	Grass & Soil Stripping Works	LUC
51365-LUC-XX-XX-DR-L-02067 P01	GA Planning Apr 22 vs Planning Apr 24	LUC
51365-AAM-WXX-XX-DR-A-01012 P01	Existing Site Ownership and Use Plan	Allies and Morrison
51365-AAM-WXX-XX-DR-A-01013 P01	Proposed Site Ownership and Use Plan	
51365-BHE-XX-YY-DR-C-02001 P04	Church Road General Arrangement Sheet 1 of 4	Buro Happold
51365-BHE-XX-YY-DR-C-02002 P04	Church Road General Arrangement Sheet 2 of 4	Buro Happold
51365-BHE-XX-YY-DR-C-02003 P05	Church Road General Arrangement Sheet 3 of 4	Buro Happold
51365-BHE-XX-YY-DR-C-02004 P05	Church Road General Arrangement Sheet 4 of 4	Buro Happold
51365-AEL-XX-XX-RP-T-00002 P01	Wimbledon Park Project Road Closure Security Parameters	AELTC
51365-BHE-WXN-YY-DR-0001 P01	Borehole Site Plan	Buro Happold

51365-BHE-WXX-XX-SH-H-00001 P01	GLA Energy Memo Response	Buro Happold
51365-BHE-WXL-XX-RP-U-00007 P01	Lake De-Siling Strategy Statement	Buro Happold
51365-LUC-XX-XX-DR-L-18002 P02	Boundary and Ashen Grove Railing Detail	LUC
51365-LUC-XX-XX-DR-L-18001 P03	Boundary and Ashen Grove Path	LUC
51365-LUC-XX-XX-DR-L-18011 P02	Boardwalk Wimbledon Park Interface	LUC
51365-LUC-XX-XX-DR-L-02642 P01	Tea Lawn Details – Bleacher Seat Section	LUC
0044623 8 th November 2022	Management of Church Road during The Championships	Buro Happold
51365-RJP-XX-XX-RP-T-00004 P01	Planning Statement Addendum	Rolfe Judd Planning
51365-BHE-WXX-XX-RP-C-00011 P01	Surface Water Drainage Statement Addendum	Buro Happold
51365-BHE-WXX-XX-RP-C-00010 P01	Foul Water Drainage Statement Addendum	Buro Happold
51365-BHE-WXX-XX-RP-C-00012 P01	Utilities Statement Addendum	Buro Happold
51365-BHE-WXX-XX-RP-E-00001 P01	Energy Statement Addendum	Buro Happold
51365-AAM-WXX-XX-RP-A-00201 P01	Planning Addendum: Illustrative Views	Allies and Morrison
51365-LUC-XX—XX-RP-T-10003 P01	JAM Review Responses 23/05/2022	LUC
0044623 Rev 01 (dated 21/10/2022)	Construction Traffic – Estimated Vehicle Movements	Buro Happold
51365-LUC-XX-XX-RP-T-10003	Environmental Impact Assessment Addendum [Chapters 20 and 21 – October 2022]	Buro Happold
51365-AAM-XX-XX-DR-A-	Parameter Plan 01 Outline	Allies and Morrisons

00010 P04	Development Zones	
51365-AAM-XX-XX-DR-A-00011 P04	Parameter Plan 02 Building Lines	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00012 P04	Parameter Plan 03 Maximum Below Ground Extent	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00013 P04	Parameter Plan 04 Maximum Building Heights	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00060 P05	Proposed Court Layout Plan Single	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00061 P04	Proposed Court Layout Plan Double	Allies and Morrisons
51365-AAM-XX-XX-RP-A-00200 P04	Design Code	Allies and Morrisons
51365-BHE-XX-XX-RP-C-00014 P07	Flood Risk Assessment	Buro Happold
51365-BHE-XX-XX-CA-Y-00018 _P05	GLA Whole Life Carbon Spreadsheet	Buro Happold
51365-BHE-XX-XX-RP-Y-00007 P07	Whole Life Carbon Statement	Buro Happold
51365-BHE-XX-XX-RP-Y-00008 P08	Circular Economy Statement	Buro Happold
51365-BHE-XX-XX-RP-Y-00009 P06	Sustainability Statement	Buro Happold
51365-LUC-XX-XX-RP-T-10002 P02	Environmental Impact Assessment (Vol One and Two)	LUC
51365-LUC-XX-XX-RP-T-10002 P03	Environmental Impact Assessment (Vol Three (Non-Technical Summary))	LUC
51365-LUC-XX-XX-DR-L-02212 P03	Hard Landscape General Arrangement Sheet 2	LUC
51365-LUC-XX-XX-DR-L-02214 P03	Hard Landscape General Arrangement Sheet 4	LUC
51365-LUC-XX-XX-DR-L-02302 P03	Proposed Earthworks Sheet 2	LUC
51365-LUC-XX-XX-DR-L-02303 P03	Proposed Earthworks Sheet 3	LUC
51365-LUC-XX-XX-DR-L-	Proposed Earthworks Sheet 4	LUC

02304 P03		
51365-XX-XX-DR-L-02312 P03	Soil Works Sheet 2	LUC
51365-XX-XX-DR-L-02313 P03	Soil Works Sheet 3	LUC
51365-XX-XX-DR-L-02314 P03	Soil Works Sheet 4	LUC
51365-LUC-XX-XX-DR-L-02402 P03	Proposed Tree Planting & Transplants Sheet 2	LUC
51365-LUC-XX-XX-DR-L-02403 P03	Proposed Tree Planting & Transplants Sheet 3	LUC
51365-LUC-XX-XX-DR-L-02404 P03	Proposed Tree Planting & Transplants Sheet 4	LUC
51365-LUC-XX-XX-DR-L-02412 P03	Soft Landscape General Arrangement Sheet 2	LUC
51365-LUC-XX-XX-DR-L-02413 P03	Soft Landscape General Arrangement Sheet 3	LUC
51365-LUC-XX-XX-DR-L-02414 P03	Soft Landscape General Arrangement Sheet 4	LUC
N/A	Application Form	Rolfe Judd Planning
51365-AAM-XX-XX-DR-A-00006 P04	Site Location Plan	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00200 P01	Maintenance Hubs Location Plan	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00201 P03	Maintenance Hub 1	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00202 P03	Maintenance Hub 2	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00203 P03	Maintenance Hub 3	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00204 P03	Maintenance Hub 4	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00205 P03	Maintenance Hub 5	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00206 P03	Maintenance Hub 6	Allies and Morrisons
51365-AAM-XX-XX-DR-A-00207 P03	Maintenance Hub 7	Allies and Morrisons
51365-AAM-XX-XX-DR-A-	Site Context Section AA – Existing	Allies and Morrisons

00050 P03	and Proposed	
51365-AAM-XX-XX-RP-A-00100	Design and Access Statement	Allies and Morrisons
51365-BHE-XX-YY-SU-C-01401 P01	Wimbledon Park Lake Proposed Lake Bed and Lake Depth Layout Plan	Buro Happold
51365-BHE-XX-YY-SU-C-01402 P01	Wimbledon Park Lake – Proposed Lake Bed and Cut & Fill Layout Plan	Buro Happold
51365-BHE-XX-YY-SU-C-01400 P01	Existing Lake and Lake Depth Layout Plan	Buro Happold
51365-BHE-XX-XX-RP-U-00001 P01	Geotechnical and Geo-Environmental Desk Study	Buro Happold
51365-BHE-XX-XX-RP-U-00002 P03	Basement Impact Assessment	Buro Happold
51365-BHE-XX-XX-RP-Y-00006 P06	Energy Statement	Buro Happold
51365-BHE-XX-XX-RP-D-00010 P05	Surface Water Drainage Statement	Buro Happold
51365-BHE-XX-XX-RP-M-00011 P04	Utilities Statement	Buro Happold
51365-BHE-XX-XX-RP-Y-00012 P02	Delivery, Servicing, Waste and Recycling Plan	Buro Happold
51365-BHE-XX-XX-RP-D-00013 P05	Foul Water Drainage Statement	Buro Happold
51365-BHE-XX-XX-RP-C-00016 P01	Irrigation Strategy Design Note	Buro Happold
51365-BHE-XX-XX-RP-C-00017 P03	Water Resource Management Design Note	Buro Happold
51365-BHE-XX-XX-RP-Y-00020 P02	Transport Assessment	Buro Happold
51365-BHE-XX-XX-RP-Y-00022 P02	Outline Construction Logistics Plan	Buro Happold
51365-BHE-XX-XX-RP-Y-00023 P04	Exterior Lighting Strategy Report	Buro Happold
51365-BHE-XX-XX-RP-Y-00024 P02	Car Parking Management Plan	Buro Happold

51365-BHE-XX-XX-RP-YF-00001 P03	Fire Statement	Buro Happold
51365-LUC-XX-XX-DR-L-02132 P02	Demolitions Sheet 2	LUC
51365-LUC-XX-XX-DR-L-02133 P02	Demolitions Sheet 3	LUC
51365-LUC-XX-XX-DR-L-02134 P02	Demolitions Sheet 4	LUC
51365-LUC-XX-XX-DR-L-02011 P02	Existing General Arrangement Sheet 1	LUC
51365-LUC-XX-XX-DR-L-02012 P02	Existing General Arrangement Sheet 2	LUC
51365-LUC-XX-XX-DR-L-02013 P02	Existing General Arrangement Sheet 3	LUC
51365-LUC-XX-XX-DR-L-02014 P02	Existing General Arrangement Sheet 4	LUC
51365-LUC-XX-XX-DR-L-02001 P02	Existing General Arrangement Site Wide	LUC
51365-LUC-XX-XX-DR-L-02601 P02	Lake Edge Reed Bed Sections	LUC
51365-LUC-XX-XX-DR-L-02122 P02	Tree Removals Sheet 2	LUC
51365-LUC-XX-XX-DR-L-02123 P02	Tree Removals Sheet 3	LUC
51365-LUC-XX-XX-DR-L-02124 P02	Tree Removals Sheet 4	LUC
51365-LUC-XX-XX-RP-YE-00011 P01	Ecological Mitigation Strategy	LUC
51365-LUC-XX-XX-RP-YE-00001 P01	Extended Phase 1 Habitat Survey	LUC
51365-LUC-XX-XX-RP-YL-00001 P02	Outline Landscape Management Plan	LUC
51365-LUC-XX-XX-RP-YL-00002 P01	Badger Survey Baseline	LUC
51365-QUO-XX-XX-RP-Z-00001 P04	Economic, Social and Community Benefits Final Report	Economic, Social and Community

		Benefits Final Report
N/A	CIL Form	Rolfe Judd Planning
51365 – RJP – XX – XX – RP – T – 00001 P01	Statement of Community Involvement	Rolfe Judd Planning
51365 – RJP – XX – XX – RP – T – 00002 P01	Planning Statement	Rolfe Judd Planning
51365-TEP-XX-XX-DR-L-02111 P01	Tree Constraints Plan Sheet 1	Treework Environmental Practice
51365-TEP-XX-XX-DR-L-02112 P01	Tree Constraints Plan Sheet 2	Treework Environmental Practice
51365-TEP-XX-XX-DR-L-02113 P01	Tree Constraints Plan Sheet 3	Treework Environmental Practice
51365-TEP-XX-XX-DR-L-02114 P01	Tree Constraints Plan Sheet 4	Treework Environmental Practice
51365-TEP-XX-XX-DR-L-02152 P01	Tree Protection Plan Sheet 2	Treework Environmental Practice
51365-TEP-XX-XX-DR-L-02153 P01	Tree Protection Plan Sheet 3	Treework Environmental Practice
51365-TEP-XX-XX-DR-L-02154 P01	Tree Protection Plan Sheet 4	Treework Environmental Practice
51365-TEP-XX-XX-RP-X-00001 P01	Arboricultural Impact Assessment	Treework Environmental Practice
51365-TEP-XX-XX-RP-X-00002 P01	Outline Arboricultural Method Statement	Treework Environmental Practice
51365-LUC-WXX-XX-RP-YE-00013 P01	LUC Ecology GLA Response	LUC

51365-LUC-XX-XX-RP-L-02001 P01	Landscape Addendum Report	LUC
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