

Wimbledon Park Golf Course

Local Planning Authorities: Merton and Wandsworth

Local Planning Authority references: 21/P2900 and 2021/3609

Strategic planning application stage 1 referral

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

The proposal

A cross-boundary (Merton/Wandsworth) hybrid planning application for expansion of the All England Lawn Tennis Club grounds onto Wimbledon Park Golf Course with the introduction of new tennis course, tennis related infrastructure, and new buildings.

The applicant

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

Strategic issues summary

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.

Recommendation

That Merton and Wandsworth Councils be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 78. Possible remedies set out in this report could address these deficiencies.

Context

1. On 25 August 2021 the Mayor of London received documents from Merton Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
 - 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
 - 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
 - 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.
3. Once Merton Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

6. The site comprises the Wimbledon Park Golf Club, which is designated Metropolitan Open Land (MOL). The site straddles the borough boundary between Merton and Wandsworth with the bulk of the site being in Merton. The irregular shaped site is bounded by Church Road, Wimbledon Park, and Home Park Road; is adjacent the existing All England Lawn and Tennis Club grounds; and envelops the Wimbledon Club – a private club which does not form part of the site or the proposals.
7. The site dates to the 16th century, when it was known as Wimbledon Palace, and was significantly relandscaped in the 18th century by Lancelot 'Capability' Brown for the 1st Earl of Spencer. The garden site was then converted into a

golf course in the early 20th century. The existing site is subject to several strategic designations as a Grade II* Registered Park and Garden (although it is on Historic England's 'At Risk' Register owing to erosion of the 18th century design through more modern landscaping), a Site of Importance for Nature Conservation (SINC), National Priority Habitat, and Ancient Woodland. The site also forms part of the Wimbledon North Conservation Area. The site is also home to several veteran trees including 200-year-old oaks.

8. The site has a Public Transport Accessibility Level ranging from 1a to 3 on a scale of 0-6b where 6b is the highest. The site is within 1 kilometre of Wimbledon Park station (District Line) and Wimbledon station (South Western Railway, Thameslink, and Tram service). There is one bus route within walking distance of the site and it is approximately 1.5 kilometres from the A217 Garratt Lane, which forms part of the Strategic Road Network (SRN).

Details of this proposal

9. The applicant is seeking to remove the golf course template features (such as the bunkers, tees, greens, fairways, and ancillary structures) and introduce tennis infrastructure to support the Championships and Qualifying Event as well as enable hosting Junior Qualifying and 14-and-Under tournaments on site. The new tennis infrastructure would include:
 - A new Parkland Show Court (8,000-spectator capacity)
 - 38 additional new grass tennis courts
 - Ground maintenance hub
 - Two players' hubs
 - Seven small maintenance hubs
10. The application also seeks to reconfigure the existing event entrances, consolidating them into a northern and a southern entrance, as well as provide several landscape enhancements to the parkland to create a new public park.
11. This is a hybrid application. Full planning permission is sought for the 38 grass tennis courts and associated infrastructure, landscaping, 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 permission is sought for the development of the new buildings and structures, including the parkland show court, guest facilities, associated event operational facilities, central grounds maintenance hub, and two players' hubs. Detailed consideration of matters of appearance, means of access, landscaping, and scale reserved.

Case history

12. A pre-application 'in principle' meeting was held with the GLA and an advice note was issued on 5 February 2021. Subsequently, a full pre-application meeting was held with the GLA on 28 April 2021 and a second advice note was issued on 7 July 2021. The advice from both meetings was that 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 the harm to the MOL by way of openness or otherwise. The applicant was also advised to 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.

Strategic planning issues and relevant policies and guidance

13. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Merton Core Planning Strategy 2011-2026 (2011), Merton Estates Local Plan (2018), Wandsworth Core Strategy (2016), Wandsworth Development Management Policies Document (2016), Wandsworth Site Specific Allocations Document (2016), and the London Plan.
14. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - Wandsworth Draft Local Plan (Regulation 18) (November 2020); and
 - Merton New Local Plan (Regulation 19)
15. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

• MOL	London Plan
• Sports facilities	London Plan; Social Infrastructure SPG
• Urban design	London Plan; Character and Context SPG; Public London Charter LPG
• Heritage	London Plan
• Inclusive access	London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG

- Sustainable development London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; Mayor's Environment Strategy
- Transport and parking London Plan; the Mayor's Transport Strategy
- Biodiversity London Plan; the Mayor's Environment Strategy

Land use principles

Metropolitan Open Land

16. London Plan Policy G3 affords Metropolitan Open Land (MOL) the same status and level of protection as the Green Belt, directing the refusal of development proposals except ancillary facilities for appropriate uses where they maintain the openness of the MOL or where they have been robustly justified by very special circumstances. This policy emphasises that, among other functional characteristics, MOL should contribute to the physical structure of London by being clearly distinguishable from built up area and form part of a strategic corridor, node, or link in the network of green infrastructure.
17. Paragraph 149 of the NPPF establishes that all development on the Green Belt (and therefore MOL) is inappropriate and, therefore, harmful subject to a limited range of specific exceptions. In this instance, exceptions test (b) should be considered:

The provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

18. Fundamentally, the applicant is proposing the development of facilities for outdoor sport; however, owing to its scale the proposed show court would not preserve the physical and visual openness of the MOL. Moreover, in their submission the applicant indicated that during the tournament the proposed facilities would attract circa 10,000 spectators per day to the grounds for the Qualifying Event as well as an additional 8,000 spectators to the Championships in addition to tournament staff and participants. The cumulative impacts of the increased traffic to the site would also inevitably compromise the site's openness during tournament time. For these reasons, exceptions test (b) is unlikely to apply in this instance. The application will therefore need to be robustly justified by very special circumstances. The NPPF states that when considering applications, substantial weight should be given to any harm to the Green Belt (and therefore MOL) and that very special circumstances will not exist unless the potential harm is clearly outweighed by other considerations.

Very Special Circumstances case

19. The applicant has put forward a Very Special Circumstances (VSC) case which centres on the special and unique value provided by the AELTC and The Championships, as well as additional benefits which would be provided by the development. The key components of the VSC case as proposed by the applicant can be summarised as follows:
- The Championships economic impact: Following the delivery of the proposals it is estimated that total economic activity generated by the Championships would increase by an additional £54.38 million within the UK economy, of which it is estimated that £38.32 million would occur within London. The increase in revenue would allow for additional funds to be channelled into social and community initiatives, such as the Wimbledon Foundation, the Wimbledon Junior Tennis Initiative, and the Lawn Tennis Association to support grassroots tennis.
 - The Championships experience: The Championships are internationally renowned, and the proposal would constitute a significant investment in their future. The proposals would enhance the spectator experience by enabling better access to more tennis events between both the championship and qualifying tournaments and improving spectators' comfort levels through more circulation space, access to courts, and supporting facilities. Bringing the qualifying rounds to the AELTC would raise their profile and build a sense of atmosphere for the players.
 - Social and community benefits: The proposals would deliver London's first new public park (9.4 ha) since the Queen Elizabeth Olympic Park, which would provide a network of new paths and linkages through the previously restricted site. The design of the new park would be in keeping with the historic landscape. The park would be maintained by the AELTC and open for public access year-round outside of the championship and qualifying event periods. The park's hours of operation would match those of the existing Wimbledon Park. This new open space would benefit the local community by promoting active lifestyles, health, and wellbeing through new amenity space. Additionally, some of the physical space delivered as part of the proposals would be flexible space available for use by the wider community for a range of events and activities.
 - Employment and training: There are currently 446 staff employed by the AELTC year-round, with an additional 18 seasonal staff employed from April to October. The proposals would require an additional 40 jobs year-round and 12 additional seasonal staff.
 - Heritage: The wider park, of which the site is part, has been identified as 'at risk' by Historic England. The proposed development would repair and restore the heritage interest in the site that dates to the original Capability Brown designed landscape, including de-silting and remodelling the lake to better reflect its historic alignment, de-culverting two brooks, revealing the historic views, and developing a Conservation Management Plan for the wider Registered Park and Garden area.

- Ecology and biodiversity: The proposals would retain and protect all veteran trees on site and include the planting of 1,500 new trees, which would more than double the number of trees on-site. The works would deliver a biodiversity net gain of 10.01 percent on site habitats and 13.05 percent in linear units. The proposal also includes a detailed management strategy for the ongoing stewardship of the land and its environmental assets.

Assessment of the VSC case

Social and community benefits

20. London Plan Policy G4 recognises that open spaces, particularly those planned, designed and managed as green infrastructure, provide a wide range of social, health and environmental benefits and are a vital component of London's infrastructure. Moreover, the creation of new open space, particularly green space, is essential in helping to meet the Mayor's target of making more than 50 per cent of London green by 2050. To this end, part B2 of this policy instructs that development proposals should promote the creation of new areas of publicly accessible open space.
21. Furthermore, Paragraph 8.4.4 of London Plan Policy G4 states that proposals to enhance open spaces through such means as improved public access, inclusive design, recreation facilities, habitat creation, landscaping improvement or Sustainable Drainage Systems (SuDS) to provide a wider range of benefits for Londoners will be encouraged.
22. GLA officers accept that the delivery of a new park as described in applicant's submission documents would accord with the strategic policy aspirations of Policy G4, particularly in respect of delivering new green space, paths, and sports facilities which would promote active lifestyles. It is also acknowledged that the delivery of tennis infrastructure for community use would accord with local policy aspirations for the site to support the Wimbledon Junior Tennis Initiative in the emerging Merton Local Plan. Officers also acknowledge that the site is in an area identified as being deficient in access to nature and public open space. The proposal could meaningfully address these deficiencies.
23. Additionally, the Championships are recognised as a prestigious international event; one which supports London in its role as a world city. Safeguarding the future of this tournament through an on-site investment in its vital infrastructure would therefore constitute a benefit as it would support London in its world city role.
24. For these reasons, GLA Officers consider that this proposal has the potential to deliver a significant benefit to community members; however, for this to form part of any VSC case the details of community use arrangements must be secured via Section 106 agreement. GLA officers seek further discussions with the applicant and the Councils regarding the detail of the proposed community use (particularly in respect of access hours/periods and charging rates/affordability of the sports facilities). A full understanding of the key terms of the community use agreement is required to properly weigh this potential benefit against the proposed harm to openness.

Heritage benefits

25. The site forms part of a Grade II* Listed Historic Registered Park & Garden of 18th Century significance and that the entirety of the historic park inclusive of the site is identified as being 'at risk' by Historic England. London Plan Policy HC1 states that development should conserve the significance of heritage assets by being sympathetic to their significance and appreciation within their surroundings. Part E of this policy states that where heritage assets have been identified as being at risk boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and that boroughs should set out strategies for the repair and reuse of the assets.
26. In its emerging Local Plan, Merton states that development proposals for this site should respect the site's historic setting including views to St Mary's Church and the surround area from the Grade II Listed Wimbledon Park as well as any impact on archaeological heritage. Likewise, in its Local Plan Wandsworth states that development proposals for Wimbledon Park should aim to conserve and enhance the character and appearance of the historic park and garden. For this reason, GLA officers consider that the proposed heritage benefits could form part of a VSC case subject to further consideration and confirmation from the local authorities that the proposals accord with their strategies for the repair and reuse of the assets. Further consideration of the proposal's heritage impacts will be required when details of the proposed buildings are assessed at reserved matters stage.

Ecology and biodiversity benefits

27. London Plan Policy G6 states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gains, which should be informed by the best available ecological information and addressed from the start of the development process. Part E of this policy states that proposals which reduce deficiencies in access to nature should be viewed positively.
28. GLA officers consider that the proposed ecology and biodiversity benefits could form part of a very special circumstances case; however, to do so benefits which demonstrably exceed London Plan policy requirements should be appropriately secured. Further comments on the proposed ecological and biodiversity elements of this proposal are provided in the Sustainable Development section of this report.

Impact on Metropolitan Open Land

29. The NPPF clearly states that essential characteristics of Green Belts (and therefore MOL) are their openness and their permanence, therefore an assessment of the impact of proposed development on the visual and functional openness of the MOL is warranted; however, as matters of appearance, means of access, landscaping, and scale for the proposed new buildings and structures are not considered in detail as part of this application, a full assessment of the impact on visual openness cannot be undertaken yet.
30. That notwithstanding, the outline component of this proposal indicates that the show court would accommodate 8,000 spectators and feature a mobile roof.

Although the court would be ‘nestled’ into the landscape and situated within a ring of mature trees, the magnitude of its scale and capacity would certainly impact the visual and functional openness of the MOL. A thorough assessment of the existing and proposed openness of the MOL using appropriate figures and diagrams should be undertaken when reserved matters are considered.

VSC assessment conclusion

31. GLA officers are satisfied that the provision of a new park would realise strategic and local policy aspirations for additional open and green space to address deficiencies of both in the local area; however, given that the scale and appearance of the proposed show court are reserved matters an assessment of the harms cannot be fully undertaken at this stage. Consequently, it cannot yet be determined whether the harms to the MOL would be outweighed by the proposed benefits. Additional information should therefore be considered, and the identified benefits should be secured before the very special circumstances case can be accepted.

Sport and recreational use

32. London Plan Policy S5 seeks to ensure that there is a sufficient supply of good quality sports and recreation facilities in London. This policy instructs that existing sports and recreational land/facilities should be retained unless an assessment shows that the land/facilities are surplus to requirements (at the local and sub-regional level) or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. Where new facilities are proposed on existing open space, this policy instructs proposals to be considered against any relevant policies protecting that open space, in this case London Plan Policy G3 Metropolitan Open Land, as well as against the borough’s needs and opportunities for sports facilities and the potential impact of the development. The policy further sets an expectation that development proposals maximise the multiple use of facilities. The supporting text for this policy recognises that specialist sporting venues and stadiums have a role to play in providing facilities that enable wider access to sport as well as possessing an inherent cultural value.
33. The proposal would result in the loss of the Wimbledon Park Golf Club, an existing golf facility. LB Merton and LB Wandsworth have undertaken exercises to identify the demand and supply of sports pitches within their respective boroughs. These both include assessments of the supply of and demand for tennis facilities. Sport England have also assessed the supply and demand for tennis facilities in the local area.
34. Merton undertook their assessment in 2019. The result of this assessment in Merton is that there are currently 205 courts across 30 sites, of which 60% are available to the community. Of the local authority owned courts, only 22% are considered good quality. Based on current and projected demographics in the area this amounts to an undersupply of club courts and a utilisation of community courts which exceeds recommended levels. Consequently, Merton’s

strategy document identifies a potential requirement for between 31 and 47 additional floodlight outdoor courts within the borough by 2035.

35. It is noted that Wandsworth's sport court assessment dates to 2013, and as such may not accurately reflect current conditions in the borough. That notwithstanding, the result of the Wandsworth assessment is that there are 174 courts across 23 sites that are available for community use. Clubs in the borough are generally operating at capacity. Both assessments identify opportunities to increase local participation in the sport of tennis.
36. Neither authority has assessed the supply of and demand for golf facilities. The applicant has undertaken their own analysis of golf facilities in the area and has identified 19 courses operating within a ten-mile radius of the site, nine of which are within five miles. 17 of these courses are open to members of the public (albeit some only at certain times) with greens fees ranging from £12-125. For these reasons, GLA officers would consider that the benefits of the proposed tennis infrastructure outweigh the loss of the golf facility in line with London Plan Policy S5, subject to confirmation from the local authorities and Sport England that the proposal is in line with local needs and opportunities for sports facilities.

Land use principle conclusion

37. 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 as set out above, and the proposed benefits must be secured.

Urban design

38. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Development layout

39. The positioning of the proposed show court is logical relative to the site's natural setting, surroundings, and existing facilities. The applicant should explore the potential to locate the northern players' hub along the boundary to the southeast to create a cluster of buildings along with the grandstand and maintenance buildings for the Wimbledon Park athletics track on the opposite side of the site boundary as this would help reduce the impact of the development on the openness of this part of the site.

40. The principle of embedding the grounds maintenance hub into the natural features of the site given the area's topographic change is supported.
41. Additional information is requested regarding the proposed amendments to Church Road, specifically relating to how the connections would work across this road.

Scale, massing, and architecture

42. The visual impact of the maintenance hubs on the public highways and neighbouring properties should be minimised as much as possible to reduce the impact on the openness of the parkland.
43. The aspiration to express the parkland show court as an extension of the landscape and embody the English garden character of the AELTC in the materiality of the building through a palette of natural material and colours is welcomed and should be secured at reserve matters stage. Nevertheless, the parkland show court is anticipated to have a notable impact on the openness of the MOL in terms of its visual impact, built footprint, height, and volume. As also outlined above, the applicant is advised to provide as much detail as possible to facilitate an assessment on the impact to MOL openness in line with London Plan Policy G3, and to enable a conclusion to be reached on whether the harm is outweighed by the very special circumstances. Additionally, an assessment of the development's impact on heritage assets should be undertaken at reserve matters stage in line with London Plan Policy HC1.

Public realm

44. London Plan Policy D8 encourages the provision of new public realm and seeks to ensure that such areas are well-designed and well-connected. Part C of this policy specifically seeks to ensure that development proposals maximise the contribution of public realm towards active travel and part H of this policy seeks to ensure that appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter. Part O of this policy instructs that free drinking water should be provided at appropriate public realm locations.
45. The provision of new paths and pedestrian routes through the park would encourage active travel and is therefore supported in line with part C of this policy. Further information is requested on how the proposed routes would tie into the existing lake circuit and boardwalk arrangement.
46. The conservation approach towards ancient and veteran trees is welcomed. Images within the design and access statement show fences around veteran trees. The applicant should confirm that any proposed tree fences would not impede paths or other public access routes.
47. In line with part H of Policy D8, further information is requested regarding access arrangements to the park including the boundary treatments with

Wimbledon Park, park access arrangements during the qualifying and championship events, and any potential gated access across the site. The applicant should also ensure that appropriate management and maintenance arrangements are in place for the public realm, which maximise public access in accordance with the Public London Charter. Public access to the park should be secured appropriately.

48. Given the size and nature of the new park, the applicant should ensure that public drinking water is available at appropriate locations across the site in line with part O of Policy D8. This should be secured by condition.

Agent of change

49. London Plan Policy D13 states that development proposals should manage noise and other potential nuisances through good design and separation. To this end, the applicant should ensure there are measures in place to mitigate any nuisance acoustic impact from operation of the new infrastructure, the show court in particular, on the SINC and nearby residential uses.

Inclusive access

50. While landscaping, access arrangements, and buildings are all reserved matters not covered by this planning application, the applicant's stated commitment to embedding the principles of accessibility and inclusivity as underlying principles of the overall design is welcomed. The stated ambition to provide of step-free access to all parts of the site and use landscaping to ameliorate level changes across the site is supported and should be secured.

Transport

Healthy Streets and Vision Zero

51. Public realm improvements along Church Road and the public access to the southern parkland offer some benefits for pedestrians, however there are limited improvements for cycle access incorporated into the design. The plans for Church Road include alterations to the position of the existing bus stops and removal of laybys which should be subject to further discussion with TfL. The north bound bus stop (BP3585) is not shown in the plans and should be retained as existing, whilst the proposed position of the south bound bus stop (BP3584) is on a sweeping left-hand bend creating a road safety concern which should be addressed. The removal of the coach stop (BP6256) and associated layby is accepted, however assurance that coaches will not instead use the bus layby should be confirmed to avoid obstruction.
52. A temporary road closure on Church Road, and diversion of the 493 bus route, was agreed for the 2021 Championships. Although it is the intention that this will be implemented for future events, agreement will be required with TfL prior to each closure. It is noted that pedestrians and cyclists not attending the event

will also be diverted, and further consideration of the suitability of the proposed routes is required.

53. An Active Travel Zone (ATZ) assessment has been completed which reviews seven key routes connecting the site with the nearest public transport services. Some minor improvements are suggested, which are supported, however it is acknowledged that there are already several public realm improvements in the area that will contribute to the pedestrian environment including the proposals for Church Road and the LB Wandsworth scheme adjacent to Southfields station. The most recent collision data has also been reviewed. Whilst no road safety improvements are recommended as part of this assessment, the TA identifies several reported collisions involving a pedestrian or cyclist on the key ATZ routes that have taken place during previous Championships. Where no permanent road safety improvements are made, the provision of temporary measures should be considered for future events and included in the Travel Plan.

Trip generation and mode split

54. For the year-round scenario the development is not anticipated to generate a significant impact on the local transport network when offset against the existing use. Although there would be public access to the southern parkland, no car parking is proposed, and it is expected that trips will largely be limited to walking or cycling. The trip generation for the Championships and Qualifying Event is based on survey data from previous events. Further detail is required to understand how this data is collected for queue spectators, non-queue spectators and staff/contractors. Some clarity is also required to understand the methodology used to calculate the net peak hour trips and some inconsistencies in the data presented in the TA. The proposed total mode share for non-car travel is estimated to be 74 percent of person trips, however staff travel by private car is still proposed to comprise 31 percent of trips; therefore, measures to reduce this further in line with the strategic mode shift targets set out in London Plan Policy T1 should be considered, such as reducing the on-site staff car parking.

Highway impacts

55. Spectator capacity for future events is proposed to increase by up to 8,000 people, however the vehicle traffic impact to the site is anticipated to reduce by the opening year of 2030 due to the removal of a significant amount of on-site car parking. Whilst this is supported, it is expected that many of these trips will instead use the Park & Ride (P&R) service or park elsewhere off-site. As such there is likely to be an increased impact on other parts of the highway network, such as near the entrance to the P&R. The applicant has undertaken an extensive highway modelling assessment using VISSIM, however the scope has not been agreed with TfL. Further discussions are required to confirm whether a full audit is necessary, or whether further assessment should be undertaken to consider the impacts near to the Morden Park P&R.

Public transport impact

56. Some assessment of the station utilization and line loading for nearby London Underground services has been completed, however details to confirm the methodology applied should be provided which should be in accordance with the London Underground Station Planning standard formula. Given the temporary uplift in demand for bus services, and the provision of the shuttle service, no capacity enhancements would be required.

Car parking

57. For the year-round scenario the applicant is proposed to retain the 64 existing car parking spaces on site for AELTC employees associated with the Central Grounds Maintenance Hub. It is understood that these employees are expected to increase up to 60 persons to support the proposed development, and therefore this seems a high parking to staff ratio which would undermine travel by sustainable modes. This parking is proposed to include 4 spaces allocated to disabled persons car parking and will have 20 percent equipped with vehicle charging infrastructure.
58. A significant reduction in on-site car parking by 1,512 spaces is proposed for the Championships. This is supported and the phased approach to reducing the temporary car parking is included in the Car Park Management Plan which should be secured by condition. Despite this, the car parking summary included in the TA suggests that 600 of the temporary spaces that are currently used for spectator car parking will be shifted to staff use, despite no increase in staff proposed for the development. Therefore, further justification of the amount of car parking for staff should be provided. The amount of car parking to be provided for staff during the Qualifying Event should also be confirmed.

Cycle parking and cycle hire

59. A total of 60 short stay cycle parking spaces and 34 long stay cycle parking spaces are proposed to be provided for year-round use at the site. The short stay parking is proposed to be spread across different areas of the site including at each access, which is welcomed. It is noted that these will be in accordance with the London Cycling Design Standards (LCDS), including the provision of changing and locker facilities. For the Championships it is proposed to provide up to 1,500 temporary cycle parking spaces, comprising two areas of around 750 spaces at each of the northern and southern access points. The amount of cycle parking to be provided for the Qualifying Event should also be confirmed.
60. The Cycle Hire scheme will be expanded into south west London by 2030, including the area around Wimbledon. In pre-application discussions, a contribution of £220,000 RPI indexed was requested to be secured from this development towards the initial cost to install a 50-point docking station and operate the service. Not only would this support year-round access to the site and parkland by active modes, the provision of a cycle hire docking station within the vicinity of the site would support more last mile journeys to be made

by cycle during the Championships. The TA suggest that 14 percent of last mile trips would be made by taxi and could shift to more sustainable modes.

Deliveries, servicing, and construction

61. A Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) have been prepared to support the application. The increase in delivery and servicing trips for the Championships and Qualifying Event is not expected to have a significant impact and is proposed to be managed outside of peak times as existing. The detailed DSP and CLP should be secured by condition.

Sustainable development

Energy strategy

62. The outline energy strategy generally complies with London Plan policies however, the applicant will be required to submit additional information at the reserved matters stage. They are also requested to provide clarifications in relation to the outline proposals, which have been requested below.
63. The applicant is required to submit the GLA's Carbon Emission Reporting spreadsheet in excel format to support all reserved matters applications. The link to the spreadsheet can be found [here](#).

Be Lean

64. Based on the information provided there are no elements of the outline proposal that will have regulated energy consumption as defined under Part L 2013 of the Building Regulations. This should be confirmed by the applicant as the statement indicates that maintenance hubs will be included in the detailed element of the hybrid application. The applicant should be conditioned to provide detailed energy modelling of all new buildings to demonstrate compliance with London Plan policies.
65. It is noted that the proposed buildings will be intermittently in use that therefore would have periods of no or low use throughout the year. The applicant is encouraged to undertake the TM54 modelling approach, as required by the Be Seen guidance, and to submit this alongside any compliance modelling conducted to support the reserved matters application. This would give planners the ability to assess the differential in energy consumption and carbon emissions arising due to the intermittent usage. The applicant should be conditioned to supply compliance modelling and Be Seen outputs for all new buildings proposed as part of subsequent reserved matters applications to the borough and in consultation with the GLA.

Overheating

66. The applicant is encouraged to maximise the use of natural ventilation considering the setting of the new buildings. Where active cooling is required

due to the proposed uses of the buildings it should be ensured that the design achieves an actual cooling demand below that of the notional cooling demand of the compliance modelling. The Be Seen submissions should demonstrate the expected cooling demand in relation to the compliance modelling.

Be Clean

67. The applicant has outlined that the strategy for the site is to utilise a distribution network and possibly link to the existing AELTC site. They have outlined that this strategy would be futureproofed for DHN connection and will be used to facilitate a move away from gas for the entire AELTC estate. This is welcomed. The applicant is encouraged to consider if the intermittent nature of site use will impact the effectiveness of a centralised heating system in terms of operational and embodied carbon emissions. Again, the Be Seen energy consumption and WLC assessments should account for the proposed usage profile and intensity and be used to inform efficient design. Should efficient designs deviate from policy requirements this should be fully detailed with robust evidence so that the planning authorities can make an informed decision on the appropriateness of the strategy. The applicant should be conditioned to present the heating strategy to the local authority and in consultation with the GLA. The proposed heating solution should be presented in terms of its regulatory compliance, expected Be Seen performance and WLC impacts.

Be Green

68. The outline energy statement submitted indicates that roof mounted photovoltaic (PV) will not be feasible. The applicant is encouraged to continue to investigate how roof mounted PV can be included in the design proposals. BIPV is proposed and the most suitable renewable energy generating technology. Consideration of the use of the electricity generated by the arrays, once these are detailed, should be provided. It is expected that during periods of no/low usage that generated electricity is utilised which would, as a minimum involve export to the local grid.
69. It is proposed that heat pumps will be utilised, although the final types of heat sources that are to be used are still to be determined. Again, the applicant is encouraged to consider the expected usage and select a heat source that achieves the best performance during periods of use and will achieve the lowest Whole Lifecycle Carbon.

Be Seen

70. The applicant should review the 'Be seen' energy monitoring guidance to ensure that they are fully aware of the relevant requirements to comply with the 'be seen' policy. The guidance is available [here](#). A commitment should be provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages as applicable.

Whole Lifecycle Carbon (WLC)

71. The applicant has submitted a WLC assessment which will be reviewed separately, and comments will be provided to the applicant and Councils under separate cover. The WLC assessment should be presented separately in excel using the GLA's WLC assessment template and should follow the GLA WLC guidance. The template and guidance are available [here](#). Applicants will also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions.

Circular Economy

72. A circular economy statement has been provided in line with London Plan Policy SI 7 and is currently being reviewed by officers. Detailed comments will be provided under separate cover.

Environmental issues

Air quality

73. Full air quality comments have been sent to the local authorities and applicant under separate cover. Two conditions are recommended to ensure that the proposal complies with London Plan policies. Further assessment may be required at reserved matters stage.

Green infrastructure and biodiversity

74. Information on proposed landscaping, ecology, and biodiversity has been submitted and is being reviewed by GLA officers. Detailed comments will be issued under separate cover.

Local planning authority's position

75. Merton and Wandsworth Council planning officers are currently assessing the application and it is expected to be considered at respective planning committee meetings in due course.

Legal considerations

76. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of

determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

77. There are no financial considerations at this stage.

Conclusion

78. London Plan policies on land use, urban design, heritage, transport, sustainable development, and environmental issues are relevant to this application. Whilst the proposal is broadly supported in principle, the application does not currently comply with these policies, as summarised below:

- **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 demonstrated. Further information is required on the level of harm and the benefits, and the proposed benefits must be secured.
- **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.
- **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.
- **Sustainable development:** The outline energy strategy generally complies with London Plan policies; however, the applicant will be required to submit additional information at the reserved matters stage. They are also requested to provide clarifications in relation to the outline proposals.
- **Environment:** The proposal complies with London Plan air quality policies. Detailed comments on green infrastructure and biodiversity will be issued under separate cover.

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

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and engaging all communities in shaping their city.