

For the attention of Mr Stuart Adams and Mr Tim Bryson,  
Planning and Building Control  
London Borough of Merton  
Merton Civic Centre  
London Road  
Morden SM4 5DX

**10<sup>th</sup> June 2021**

**Dear Sirs**

**AE LTC Golf Course Development                      EIA Scoping Report April 2021**  
**Application 21/P1709**

The first draft of the applicant's 150 page EIA Scoping Report was produced on 16 March 2020, the second draft more than a year later, on 20 April 2021, submitted to the London Borough of Merton and registered on 22 May 2021. Comments are due by 14 June or 17 June. The Wimbledon Park Residents' Association submits these comments to assist the Council and to be considered in this important application.

The following comments adopt the paragraph numbering of the EIA Scoping Report.

**1 Project Background**

1.3. Here and in many other places the applicant asserts that:

"The improvements will maintain the Championships as the premier tennis tournament in the world on grass; deliver a positive impact for local, national and international communities; and allow the relocation of the Qualifying Tournament from its existing site at Roehampton to take place at the Site in the week preceding The Championships."

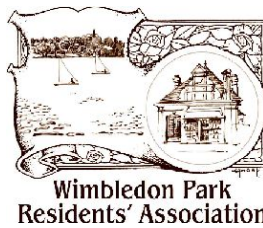
The applicant offers no evidence in support of the assertion that the Championships will be enhanced or even maintained by the proposal, and this goal is irrelevant in any assessment of the effect of the proposal on the environment. The applicant makes no reference to the restoration and protection of the Grade II\* Listed Park and no reference to any environmental concerns or improvements. The Council should require the applicant to provide challengeable evidence of its assertions and address environmental concerns directly.

**2 EIA Process and Methodology**

2.10. "Affected designated neighbourhood fora" include: WPRA, The Wimbledon Society, The Capability Brown Society, The Friends of Wimbledon Park, Belvedere Residents' Association, Osborne House WPR, Victoria Drive Conservation Area Residents' Association, Sutherland Grove Conservation Area Residents' Association, Southfields Triangle Residents' Association, Southfields Grid Residents' Association, Gardens RA, and Parkside Residents' Association. Would the Council kindly confirm that all have been consulted?

2.17. The applicant's ES is "required to consider its reasonable alternatives for the proposed development". The applicant should be required to address alternatives within the applicant's extensive existing grounds, for example a different location for the show court. The applicant makes much of its Masterplan (1.3 and 4.1), so should be expected to have taken alternatives into account. Nothing in this EIA addresses alternative options.

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### **3 Site Description and Context**

3.3. The Site Boundary includes Wimbledon Park Lake and Church Road between the Golf Club and the current AELTC facility. Who owns Church Road: the applicant, the Council or someone else? Will the Council ensure that all owners are notified?

3.5.2. "Church Road is also a key transport corridor during the Championships". It is in fact a key transport corridor all year round. Will the Council ensure that this issue is fully addressed?

3.7.1 and Fig 3.1. "The Site surrounds TWC on all sides". Why does this not address the access road to TWC and consider the views of TWC about the proposal to close Church Road? Has the Council consulted TWC as an affected party?

### **4 Proposed Development**

4.1 (and 1.3). What is the status of the Masterplan? If it is relevant and the applicant is to rely on it, the Council should require it to be included in the application and disclosed for scrutiny.

4.3 (and 6.3). It is unsatisfactory to leave all the detail of the buildings for a "reserved matters" application in which neighbours would have little input. How many buildings are proposed ("up to 7")? The Show Court will be 30.5 metres high, that is the size of a ten-storey building. Sufficient detail of the exterior, scale, and massing of all buildings must be required. Its size also has a strategic effect on the matters within or without the scoping report, see paragraph 6 below.

4.4. "A range of wider public benefits are also being considered, which may include ... permissive access through parts of the site for the general public". This suggests public access may not be conceded and is inconsistent with other comments from the applicant. Since the effect of the proposals on the surrounding neighbourhood (eg traffic and noise) will be the subject of this study, why is community and public access and use during the subsequent operational phase omitted? The Council should require it to be included.

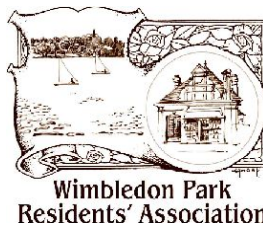
4.6. Phased construction over 8 years. The EIA and the application should address the implications for traffic and noise during that time, including a proposal for a sequence of development, for scrutiny by the Council and all those affected.

4.8 and 4.12. The "Championship phase" will be from May to August each year, at least 3, probably 4 months, and include major works. The Council should consider whether this restriction will still enable the proposal to fulfil the promises of public access and community benefit.

4.13.1. Will there be 3 or 4 new sets of court seating?

4.13.3. Church Road closed to the "majority of vehicular traffic". The Council should require an explanation of all bus, emergency and other public service vehicle route, and consult with all services accordingly.

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4.16 and 4.18. This suggests that wider community use will not be permitted before May and is likely to happen only after August each year, thus allowing use only in the autumn. See comment above on 4.4.

## **5 Planning Policy**

5.9. The sports ground rules do not trump the heritage land rules, and even if the sports ground rules are to be considered they read as cumulative. In detail, (a) is clearly inappropriate, the land is far from surplus to requirements; (b) there is, in fact, no plan to replace a lost golf course; and (c) the proposal is no substitute for an open golf course.

5.12. The proposal should not be allowed as an exception to the green belt rules: it is not for the provision of facilities for outdoor sports or recreation, it is for the provision of private sport-as-entertainment and an indoor facility of an enormous, closed court.

5.20. This is a Grade II\* listed Park (4.1.2 and 10.6) and as such "substantial harm or loss ... should be wholly exceptional". This must trump the sports ground rules.

5.30. The reference to LBM's designation of the AELTC (Church Road) ground as a "world class sporting venue..." is surely irrelevant, as this site is not part of the AELTC ground.

## **6 Topics Scoped Out**

Some topics scoped out, as listed in paragraph 2.24, demand comment:

**Daylight, Sunlight and Overshadowing.** The information provided in the Scoping Report for both the existing AELTC buildings to the west of Church Road and the proposed additional buildings and/or structures in the Application site is insufficient for the purpose of analysing the potential impact of the proposals in terms of Daylight, Sunlight and Overshadowing. Under 6.3 the information offered is limited to the overall height. Fig 6.1 offers only diagrammatic modelled shadows of the proposed and existing structures which are difficult to reconcile.

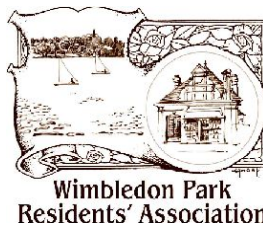
**Wind Microclimate.** The information provided under 6.7, "this structure will be of 30.5 m in height, will present an irregular shape...", is again too limited to ascertain its potential impact in terms of wind microclimate. Nor is there any information about any other structure proposed for the Parkland.

**Major Accidents and Natural Disasters.** We have concerns about the impact of the intensification and concentration of the use of the main modes of transport to the site, principally related to our local underground stations, public services and an increase in the use of local infrastructure.

**Waste and Recycling.** We are of the view that the relevant authorities should be given the maximum opportunity to scope the requirements that are envisaged during construction and operation of the extended AELTC facilities.

**Electronic Interference.** We do not see the benefit of postponing a scoping opinion of any topic that may arise with the introduction of a new 30.5m high structure in Parkland.

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### **Energy and Sustainability and Climate Change Mitigation and Adaptation.**

Both these topics are scoped out on the grounds that a District Renewable Energy Centre within the proposals will offset any uplift in energy consumption. These topics require a wider consideration and should be scoped in; also, the substantial impact of the DREC should be scoped in.

### **7 – 16 Topics Scoped In**

The WPRA generally reserves its representations/comments on these, as insufficient time has been allowed to scrutinise them at this stage. In the meantime, here are a few comments:

7.3 and 7.4. A separate Transport Assessment will be issued to highway officers at Merton and Wandsworth for consultation. Will this be available for public comment? Construction traffic, public transport and emergency services and the public's use of Church Road are all critical to residents.

7.11. Is 2021 the baseline year for traffic assessment, or is it to be 2019 (see 7.12), and in each case what adjustment will be made to account for the effect of COVID restrictions?

7.12. The existing baseline conditions listed here are inadequate. The wider area should be assessed. The closure of Church Road, including the disruption of bus services and dislocation of traffic, will have a significant effect.

7.17. Since the EIA is concerned with the environmental effects of the applicant's proposal, road closure is likely to produce a good result. How will this be weighed against the inconvenience to users?

7.22.5 and 7.26. While public transport users are relevant as likely to be affected, it seems that the public transport service itself will be considered separately. How will service users be protected?

### **9 Noise and Vibration**

9.15. What use of the courts and park will be assessed during the operational phase? Will this just be the tennis, qualifying and championships, or extended use at other times of the year?

### **Appendix B**

The only Conservation Area considered in the assessment is Wimbledon North. Surely the setting of others will be affected by the proposal including travel and transport disruption, so should be considered during the application process.

Yours faithfully

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