



9 February 2023

Merton Planning: planning.representations@merton.gov.uk

Wandsworth Planning: planning@wandsworth.gov.uk

Dear Sirs,

Wimbledon Park, AELTC Planning Application 21/P2900 (Merton) and 2021/3609 (Wandsworth)

This is a response to your request for comments on the latest round of documents very recently lodged on the planning websites. This letter maintains our objection to the application, adding the further ground that the papers lodged by the applicant fail to communicate what is the applicant's proposal.

The point has already been made (The Wimbledon Society comments dated 23 November 2022) that the huge number of contradictory and obfuscatory documents now makes it impossible for the planning authority and other decision-makers, leaving aside Councillors and the public, to understand what exactly is in the application. This message draws attention to just one such issue among very many.

Both planning authorities have drawn attention to the Travel Plan (amended) 13.12.22 as a document on which consultation and comments are sought. It was marked "*P02 Revised to incorporate TfL's comments NM 13/12/2022 CM*". It was signed by Natalie Maynard of Buro Happold, the leading firm of engineers engaged by the applicant, and her email address was inserted at the end. But it did not show where changes had been made. There was no summary of them, no revision marks, and, worse, the document contradicts other current application documents.

Despite the applicant's protestations of community engagement, experience of asking questions directly of the applicant is not good: for example, The Wimbledon Society letter of 20.07.22 to which there has been no substantive response. I therefore emailed Ms Maynard and asked if she could kindly explain where changes had been made. Without that, it was also impossible to assess whether the TfL comments, which were of great concern, had been addressed adequately.

I did receive a reply, from the applicant, who directed me to the planning authority who would "*pass on any relevant points for us to answer*", passing responsibility to the over-worked and hard-pressed planning authorities and perhaps even suggesting this was not a relevant point. The applicant has made a lot of its alleged good relations with the local community, so this seemed to be unhelpful. I repeated the direct question: the applicant surely must know what was changed? There has been no answer.

This question is clearly a "*relevant point*", and now it falls to the planning authorities to address it.

In context this is not a trivial matter. The local community has been very concerned about the proposed closure of Church Road. It has been a fundamental part of the applicant's scheme to integrate both sides of Church Road into one development. The applicant has entered into extensive discussions with TfL, and no doubt the Councils as well, but it is still unclear to the community how it will affect all users of Church Road.

The original application, 18 months ago, included a Transport Assessment of 134 pages, plus 4 supporting documents of 25, 24, 60 and 65 pages (total 308 pages). The Transport Assessment Addendum issued 23.05.22 ran to 81 pages. The original Travel Plan (47 pages) was amended in a 50 page document. The Merton Planning website lists TfL comments of 05.11.21, 30.11.21, 12.08.22, 22.09.22, 16.12.22, and applicant responses of 15.09.22 and 08.11.22. Despite all these discussions, there is just one clear indication of the applicant's position on the closure of Church Road: the original Design and Access Statement of 31.07.21 (all 611 pages), describing it as a "seamless event space". As far as we can tell, this has never been amended. In fact, it was reinforced in the applicant's Road Closure Security Parameters document issued on 23.05.22, among the first large batch (60+) of amended or new documents nearly a year after the original set. This stated:

"The addition of the Church Road closure and restrictions in Somerset Road, creates the most effective operational safe and secure footprint that enables all security and stewarding resources to operate safely ... It is recognised that the closure of Church Road and Somerset Road will continue to cause disruption to local residents".

It went on to conclude:

"The issue of a permanent TMO by the London of Merton by being totally committed [sic] to the overall plans and outcomes for the AELTC and The Championships, becomes a critical factor for the safety and security of the event attendees. The London Borough of Merton's commitment is welcomed and described in their Spatial Vision of their Vision and Strategic Objectives document
<https://www.merton.gov.uk/system/files?file=local20plan20202020-20vision20and20strategic20objectives.pdf>"

The planning websites now include Management of Church Road, a further document from Buro Happold on behalf of the applicant, dated 11.11.22, in which at para 1: *"it is important to recognise that the closure of Church Road is not being sought under the planning application and the delivery of the WPP Planning Application does not rely on the said closure."* This conflicts with previous statements from the applicant, and fails to address the key issues concerning the public about their use of the road.

Despite all this to-ing and fro-ing, we don't know which, if any, is a true statement of the applicant's position on Church Road, whether the Design and Access Statement should have been amended or withdrawn, or whether the Road Closure Security Parameters (itself a new document) remains or is now untrue. Nor do we know whether TfL are also satisfied. As there seem to be no changes to the key documents which explained the application's position, has this application been modified or not? Having asked the applicant the simple question "What has changed?", their failure to answer leaves the planning decision-makers and the public none the wiser, in fact simply more confused.

In accordance with NPPF 40 - 42, the issues with TfL should have been thrashed out pre-application, and the community's concerns that Church Road was to be closed should have been accommodated at the consultation stage. They were not, and clearly the debate continues between applicant and consultee, while the applicant appears to ignore local opinion.

This is just one of very many examples of an application that is confusing and contradictory, not in accordance with policy and good practice. For one of the largest projects ever contemplated in the Borough of Merton, directly challenging the considerable planning policies and designations intended to protect this site, this is unacceptable. It should be rejected or withdrawn. The applicant must start again.

For and on behalf of WPRA Planning Committee