

AS/P7238
20 December 2018

Ms Tara Butler
Future Merton Team
London Borough of Merton
London Road
Morden
SM4 5DX

Dear Tara,

**Merton Draft Local Plan 2020 Consultation
Representations made on behalf of the All England Lawn Tennis Club**

We write on behalf of the All England Lawn Tennis Club (the AELTC) to make representations to the London Borough of Merton's Draft Local Plan (2020) consultation January 2019. This letter follows representations made on behalf of the AELTC as part of the previous consultation on the Draft Local Plan in January 2018.

The AELTC welcomes the opportunity to work collaboratively with LB Merton to formulate a new Local Plan for the Borough. In particular, the AELTC is keen to promote a positive planning policy framework which recognises the importance of The Championships as the premier tennis tournament in the world and on grass – and supports the continued improvement of the AELTC's facilities within Merton.

The AELTC and The Championships

Wimbledon is the oldest tennis tournament in the world and is widely regarded as the finest stage in world tennis. The Championships have been held at the Church Road site since 1922 and have been a key factor in placing Wimbledon on the global map. In particular:

- The global TV audience for The Championship event is estimated to be 1.2 billion people;
- The Championships are watched in 200 broadcast territories around the world;
- Up to 10,000 staff are employed during The Championship period itself;
- 300 local school children are world-renowned Ball Boy and Ball Girls at The Championships each year;
- Around 500,000 people visit Wimbledon during The Championships fortnight;
- Another 100,000 tourists visit the areas throughout the year coming to see the multi-award winning Wimbledon Lawn Tennis Museum.

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In order to maintain Wimbledon's leadership position, the AELTC has committed to a long-term development programme to improve its facilities throughout the Borough. Standing still is not an option. In 2011 The Club commissioned Grimshaw to develop a Master Plan to guide the further long term development of The Club and its facilities. The Wimbledon Master Plan was developed during 2012-2013 with the aim of ensuring Wimbledon remains the finest stage in world tennis.

The first phase of The Master Plan has been the remodelling and construction of a retractable roof at No. 1 Court to enable uninterrupted play irrespective of weather, thereby guaranteeing tennis for around 27,000 spectators on the two main show courts – No. 1 Court and Centre Court. Planning permission was granted in June 2015 (ref: 14/P3481) and construction is expected to be completed before The Championships 2019.

The second phase will involve the replacement of the existing covered courts on Somerset Road with a new world class indoor courts facility, a basement car park and 6 new external clay courts. The new facility will play a key role in the future operation of The Championships, as well as providing new Club facilities for Members. Planning permission for the project was granted on 29th May 2018 (ref: 16/P4651) and early works started on site in August 2018 with the main works contract due to commence in August 2019.

The above development projects are only the first step in the implementation of the Wimbledon Master Plan, which will continue to see the upgrade and improvement of facilities at the site over the next 10 to 15yrs (and beyond).

The All England Club Community Sports Ground - Grand Drive, Raynes Park

In early 2015 the AELTC established the All England Club Community Sports Ground on their existing sports site at 216 Grand Drive, Raynes Park. Key to this was the provision of additional tennis facilities including six synthetic surface tennis courts (three of which are covered by an air dome) as well as changing and WC facilities (Planning Permission ref: 14/P3466 - January 2015).

The sports ground has been operating successfully since the summer of 2016 and the facilities have provided a home for the All England Club's Community Tennis Programme and the Wimbledon Junior Tennis Initiative (WJTI). The Community Sports Ground also provides a training base for the Wimbledon Ballboys and Ballgirls, who are drawn from many local schools.

Given the success of the new facilities, the AELTC intends to expand and enhance the services they can offer on the site, a move which would benefit both The Championships and the local community. Planning permission was granted on 9th October 2018 (Council Ref: 18/P1024) for the provision of additional world class grass courts (and ancillary facilities) as well as covered hard surface courts, which would be used for practice by professional players in the run up to and during The Championships, as a venue for amateur tennis competitions and for use by the local community. Works are intended to start on site in Spring 2019.

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Representations on Draft Local Plan 2020

Overall we consider the policies in the Draft Local Plan (2020) to support the Council's objectives to expand on and improve sports and recreation facilities in the borough, and we support the inclusion of the two AELTC sites (Church Road and Raynes Park) as new site allocations. The principal comments below relate to the site allocations and the need to recognise the importance of The Championships in the borough.

Chapter - Our Places

Policy N3.6 – Wimbledon Town Centre

As outlined above, The Championships have been a key factor in placing Wimbledon on the global map and this is acknowledged in section 3.6.1 of the supporting text for Policy N3.6 which states:

'Wimbledon is south west London's best known town centre, with a reputation for quality recognised internationally due to the 150 year old Wimbledon Tennis Championships'.

We are supportive of the above statement, but suggest that the importance of The Championships be recognised in the policy wording, specifically in Policy N3.6 part b, as follows:

*N3.6(b) Enhancing the experience for people coming to Wimbledon commensurate to its international reputation **in association with the Wimbledon Tennis Championships** by requiring exemplary design and landscaping, streetscene and public realm investment, taking opportunities to green Wimbledon.*

The AELTC consider there to be an under provision of hotels within the Wimbledon Town Centre which is a particular problem during the 2 week Championships period (when on average approximately 500,000 people visit the site) but also throughout the year when guests and Members from across the globe attend events on the main Church Road site. We therefore support the encouragement of high quality hotels within the town centre as identified in Policy N3.6 (part e) and section 3.6.19 of the supporting text.

Site Wi3

Our client welcomes the inclusion of the main AELTC Church Road site (including Somerset Road site) as a new site allocation in the Draft Local Plan. Importantly, the allocation recognises the site as a world class sporting venue of national and international significance and supports the continued upgrade and improvement of the AELTC's facilities within the borough.

We would like to highlight that the 'Site Name' of the allocation is incorrectly identified as the 'All England Club Community Sports Ground' and we request this be updated to 'The All England Lawn Tennis Club' (as per the title page of the site allocation).

We also suggest the following amendments to the Site Description section of the site allocation text to ensure accuracy:

*The site is the All England Lawn Tennis and Croquet Club (AELTC), a substantial, internationally recognised tennis venue with 18 **grass show courts as well as other** outdoor and indoor tennis courts **with** supporting hospitality, offices, catering, press, players, security*

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etc in a series of buildings and structures across the site.

The site is occupied all year around but is used intensively and in its entirety during the two weeks of the Wimbledon Championships when it employs more than 10,000 people on-site, is visited by more than 500,000 spectators and broadcast to more than a billion people in +200 countries.

The main site is 14.1 ha, with a smaller site of 2.8 ha across Somerset Road housing covered courts to the west and 22 grass courts in a site to the north; all of which are part of the AELTC site.

Wimbledon Park and Golf Course lies at the other side of Church Road to the east of the site. The remaining surrounding area are is made up of detached, semidetached and terraced homes, many set in large plots in tree-lined streets.

Site RP5

Our client also welcomes the inclusion of the All England Club Community Sports Ground site as a new site allocation in the Draft Local Plan. The allocation recognises the importance of the site as part of the operation of The Championships and the WJTI and in providing community tennis and sports facilities for the borough.

We recommend the following minor amendments to the text to reflect the existing use of the site:

- **Site Allocation Title** – we ask that the title of the site allocation be updated to reflect the name of the site as ‘The All England Lawn Tennis Club Community Sports Ground’.
- **Strategic Planning Factors** – The south-west corner majority of the site is within Flood Zone 1 with part of the site designated as Flood Zone 2. The site has historically suffered from surface water drainage issues; the recent redevelopment planning permission for redevelopment of Phase 2 of the site proposes has also undertaken significant work to improve the drainage.
- **Opportunities** – Opportunities to optimise the use of an underutilised site for uses compatible with its current designation as playing fields open space (including sports and recreation facilities).

Chapter - Environment

Policy O8.2 – Open Space and Green Infrastructure and O8.5 – Leisure, Sport and Recreation

Both the main AELTC site in Church Road and the All England Club Community Sports Ground in Raynes Park are designated as Open Space under the current Local Plan, and the northern part of the main Church Road site is also designated as Metropolitan Open Land (MOL). Our previous representations submitted to the Council in January 2018 requested that these allocations be removed and the importance of the Championships be recognised.

Whilst a Policies Map is not included with the Draft Local Plan, the accompanying map to Policy O8.2 suggests that the MOL designation has been removed from the main Church Road site which is welcomed. The current MOL designation is inconsistent with the current use and nature of the site as a world class sporting venue incorporating extensive tennis and spectator facilities. We understand that the Council’s Open Space Strategy is currently being finalised and that this

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document will recommend whether the Open Space designations be retained or removed under the Draft Local Plan.

It is acknowledged in Site Allocation RP5 that sports and recreation uses are compatible with Open Space and this is further supported by the National Planning Policy Framework (2018). We therefore recommend that Policy O8.2 be amended to go further in supporting proposals for new and improved sports facilities within designated Open Space in accordance with Policy CS13 of the current Core Strategy.

It is acknowledged that Policy O8.5 supports the refurbishment and replacement of sport, cultural and recreational and play facilities in open spaces, but does not specifically support new and improved facilities within designated open space which could make it difficult for any new facilities to be provided if either of the AELTC sites were to remain designated as open space.

Policy CC8.11

Policy CC8.11 of the Draft Local Plan requires *'all proposed developments within the borough to demonstrate that they have made the fullest contribution to minimising energy use and carbon dioxide emissions from construction and operation, in accordance with the Mayor of London's Energy Hierarchy'*. Table 1 of the Policy clearly identifies the emissions reduction target for various thresholds of development and does not require non-domestic developments of less than 500sqm to meet a particular reduction target. Our client supports this approach as it can be difficult to achieve carbon reduction targets for smaller schemes.

However, further clarification should be provided as to the thresholds for which Sustainability and Energy Statements are not required given the policy wording states that *'all proposed developments'* will need to demonstrate that they have made the fullest contribution to minimising energy use and carbon dioxide emissions.

Chapter - Economic Development

Tc7.11 – Culture, arts and tourism development

As outlined above, the AELTC consider there to be an under provision of hotels within the Wimbledon Town Centre and we support the encouragement of high quality hotels within the town centre as identified in Policy N3.6 (part e) and section 3.6.19 of the supporting text. We recommend the support for high quality hotels be further reinforced in Policy Tc7.11

Wimbledon Park Golf Course

The Council will be aware that the AELTC is in the process of finalising the acquisition of the Wimbledon Park Golf Course. No detailed proposals have been formulated for the golf course as yet. However, the AELTC has a long-term ambition to move it's qualifying competition from the Bank of England Ground in Roehampton to the main AELTC grounds. This is a key objective for the Club in order to maintain the position of The Championships as the pinnacle of the sport.

The AELTC is committed to working closely with the Council and other key stakeholders during the formulation of future proposals for the use of the golf course site. At this stage, it is envisaged that any works to deliver additional tennis facilities on the golf course would begin in 2022.

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Summary

Overall we support the general direction the Council have taken in the Draft Local Plan and support the inclusion of new site allocations for the main AELTC Church Road site and the All England Club Community Sports Ground in Raynes Park.

We would welcome the opportunity to meet with the Future Merton team to review the matters raised above and collectively work towards the formulation of a positive planning policy framework, which recognises the role of The Championships and supports the continued enhancement/improvement of the AELTC's facilities within the Borough.

We trust that the above provides a useful outline of the AELTC's position. Nevertheless, please do not hesitate to contact Jon Roshier or the writer should you wish to discuss any points raised in greater detail.

Yours faithfully

Analeise Smith

For and on behalf of
Rolfe Judd Planning Limited

cc Justin Smith AELTC