

EC/P07994  
6 September 2021

Ms Emily Cochrane  
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Old Church Court  
Claylands Road  
The Oval  
London  
SW8 1NZ

Dear Sir / Madam

**London Borough of Merton New Local Plan  
Representations on behalf of The All England Lawn and Tennis Club (AELTC)**

We write on behalf of our client, the AELTC, to make representations on the New Local Plan.

The AELTC's Church Road site hosts The Championships, Wimbledon, which is the oldest tennis tournament in the world and is internationally regarded as the finest stage in world tennis. The Championships and AELTC grounds are of national and international significance. The AELTC's strategic aspirations are to maintain Wimbledon's position at the pinnacle of the sport, and leverage that position to act as a guardian of tennis, and a force for good for its communities, particularly locally.

The main All England Lawn Tennis Club (AELTC) site comprises 18 grass show courts (including No.1 Court and Centre Court), 8 external clay courts within the Southern Apex, 16 grass practice courts on the north eastern section of the site. The site also accommodates significant infrastructure to support The Championships including catering facilities, player facilities, hospitality, offices, media and broadcasting facilities, press, security, etc., in a series of buildings and structures across the site.

The AELTC acquired the Wimbledon Park Golf Club (immediately to the east of the main grounds) in the 1990s and in December 2018 it bought the remaining years of the lease from the golf club. This significantly increases the AELTC's landholdings and will provide the opportunity to host the qualifying event at the expanded site. The AELTC has recently submitted a planning application for the use of this land in the future.

The New Local Plan is of particular interest and relevance to the AELTC as they are involved in a number of live projects to ensure the AELTC's facilities are genuinely regarded as the finest in global tennis and thus contribute to Wimbledon's pinnacle position, including the planning application that has been submitted for the Wimbledon Park Project. The upgrade and improvement of facilities is important in order to maintain Wimbledon's status as the premier tennis tournament in the world and a key contributor to the local and London economy

The AELTC is understandably keen to ensure that existing and emerging planning policy does not set out any potentially inappropriate barriers to new development coming forward and instead that it encourages sustainable development within the Borough as a whole and at the AELTC site.

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The AELTC submitted detailed comments to the Stage 2a consultation on the New Local Plan 1<sup>st</sup> February 2021, of which AELTC welcome that some of these comments were incorporated in the new Draft Local Plan. This letter sets out a summary of AELTC's comments on the Stage 3 consultation of the New Local Plan in turn below.

## **Comments on New Local Plan**

### Site Allocation

#### *Site Allocation Wi3*

As noted in previous comments on the New Local Plan, we welcome and support that the main AELTC site on Church Road, including Wimbledon Park Golf Course, has been allocated within the New Local Plan as Site Allocation 'Wi3'. Upon review of the site allocation we have a number of comments which are covered in turn below.

Within the 'Site Description' section it is suggested that following the last paragraph regarding the preparation of the updated masterplan, that the following text is included relating to the new Master Plan.

*"The AELTC's priorities in developing a new Estate Master Plan are to strengthen The Championships for the years to come, including the staging of an enhanced qualifying event at the grounds, and to use the AELTC's influence and resources to deliver a greater positive impact for its communities. Critical to this will be the AELTC's commitment to act as a good steward of the expanded land holding, reflecting its history and its place in the local community."*

Within the 'Existing Use' section of the site allocation, it should be recognised that there is currently no public access to the golf course and around the majority of Wimbledon Park Lake.

Within the 'Design and accessibility guidance' section, it is suggested that the first paragraph is amended to the following to recognise the Qualifying Event as part of the proposals for the golf course.

*"Development of the site provide an opportunity to master planning the golf course land to create environmental, social and economic benefits to the wider area, to host more sporting activities, upgrade and improve AELTC's facilities to continue the prominence of The Championships and the opportunity to host more of the pre Championship activities within Merton, including the Qualifying event."*

Further, within this section it is stated that the AELTC is the 'former golf course landowner'. This needs to be updated with the word 'former' removed as the AELTC are the landowners of the golf course.

We note that within the 'Issues' section of the previous version of the Local Plan (Stage 2a Consultation) the following was stated;

*"The AELTC site is used in a highly intensive manner for less than a month per year, and relatively little given its size and scale outside the tennis grass court season. Any assessments relating to*

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*buildings or structures (e.g. transport assessments, carbon savings etc) should take account of this unusual usage pattern”*

The AELTC request that this statement is re-inserted into the Site Allocation as it is important that the seasonal use of many of the AELTC Estate buildings is recognised within the site allocation. Further, this reflects current discussions to date with Merton Officers on the Energy Assessments for recent applications on the main AELTC Estate, such as the Millennium and Media Buildings.

#### *Site Allocation RP5*

Within the ‘Site allocation’ section the following is stated:

*“The site is can be found in designated open space with sport and recreation use that are compatible with open space designation.”*

It is assumed that this sentence is intended to note the sites open space designation and that the current sport and recreational use on site is compatible within this designation. It is requested that this is made clear in the wording.

Within the updated Draft Local Plan a new section has been added, ‘Infrastructure Requirements’, in which there is some commentary on open space provision. We would suggest amending this paragraph to the below to reflect planning policy (amendments noted in red).

*“This site is in an area identified as being deficient in access to public open space. The Council will require **major development** proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, **where this is suitable and viable**, in accordance with the Green Infrastructure policies.”*

#### Climate Change

In general, the AELTC are supportive of a number of the proposed changes relating to climate change as they are in line with the requirements of the intent to publish London Plan. The AELTC recognise Merton’s ambitions for climate change through their recently adopted Climate Strategy Action Plan. As you may know, the AELTC is a signatory to the UN Sport for Climate Action Framework.

Whilst the AELTC are supportive of Merton’s ambitious goals relating to climate change and zero carbon, further consideration is required of the planning policies proposed. We have commented on these in turn below.

In relation to Policy CC2.2 Minimising Greenhouse Gas Emissions, there is a requirement for a 50% reduction in CO2 for non-residential development over 500sq. It should be recognised that the current GLA 2020 Energy Assessment Guidance requires a 35% on-site reduction beyond Part L 2013, with 15% achieved through energy efficiency measures. Further, there is no mention of energy efficiency standards that are expected, in addition to the 50% reduction. We would request clarification on this point.

Whilst we understand Merton’s ambitions to achieve zero carbon by 2030, the requirement of a minimum of 50% goes above London Plan Policy targets. Such minimum requirements are likely to

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have a significant impact on development proposals coming forward. It is therefore requested that these targets are amended to be in line with the London Plan.

It is noted that Clause 2.2.17 of policy CC2.2 requires the carbon shortfall to be assessed at £300 per tonne. This represents a significant increase by £205 per tonne compared to the current London Plan. Whilst it is understood that this increase above London Plan policy is to incentivise on-site savings, such a requirement will have significant financial implications on the delivery of schemes. It does not appear that this has been assessed from a viability point of view. Viability testing is important to ensure that policy requirements set out do not threaten the ability to deliver high quality schemes in a viable manner.

Within Policy CC2.3 Minimising Energy Use, a table is provided referring to fabric efficiency targets. Clarification is sought on if these targets are based on predicted operational energy use (regulated + unregulated) from TM54 (or similar), or just regulated (from BRUKL).

Clause 1.1.4 of Policy CC2.5 Minimising Waste & Promoting a Circular Economy, refers to embodied carbon targets that new developments should achieve by 2025. It is not clear what the evidence base is that informs these targets. Such targets do not appear to have been robustly tested for economic and financial viability to understand deliverability.

In summary, the key concerns the AELTC have with the emerging climate change policies are relating to the targeted carbon reductions and space heating requirements. Further evidence base and viability testing is required to fully understand the implications of the policy aspirations. Our understanding is that the requirements have been developed based upon the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide. While we applaud the ambition and intent of the LETI publication, and the ambition of Merton's emerging policies to align with this, the document was produced as guidance for designers, rather than an evidence based document.

Currently it is not clear if the proposed policy requirements have been robustly tested and evidenced to allow appropriate justification of the proposed policies in accordance with paragraphs 31 and 35 of the NPPF.

#### Green and Blue Infrastructure

Within the New Local Plan information an updated Open Space and MOL map is included and a summary table of the proposed amendments. The policy map changes table and summary advises that Open Space and MOL amendments are proposed to the All England Lawn Tennis Club (Ref TEP-03). We welcome that these changes have now been incorporated into the updated proposals map following the Stage 2a consultation.

A review of the summary of the proposal map amendments demonstrates that it is only proposed that the MOL designation is removed from the built-up areas and buildings of the site and the designation is retained on the practice courts to the north. In terms of open space, it is stated that the designation should be retained to the lawns, gardens and general open space to the northwest of the site. Whilst the AELTC understand Merton's desire to protect these areas, retaining these areas under an MOL or Open Space designation is not appropriate or in line with planning policy. The site is not accessible to the public to allow for the benefit of these designations, furthermore it is part of the main AELTC site for The Championships.

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Policy IN14.3 Sport and Recreation states the following regarding the AELTC.

*“e. Recognise the All England Lawn Tennis Club as being an internationally significant sporting venue.”*

It is requested that this wording is updated to include *‘and continue to support activity and enhancement’* as it is important that enhancement of facilities is supported to ensure the continued success of The Championships.

### **Conclusion**

The AELTC welcome the opportunity to comment on the New Local Plan and support the allocation of the main AELTC Estate on Church Road, including the golf course and the Raynes Park site. Specific comments are provided in relation to these site allocations to ensure the intentions of these sites and proposed future use is made clear.

Whilst the AELTC are generally supportive of the New Local Plan and the proposed policies, there are elements of the draft guidance that require further clarity and explanation to allow them to be effective and viable. The AELTC would welcome further discussion and clarification on these points.

The AELTC trust that their comments will be fully considered as part of the consultation and we would welcome further discussion on the comments raised.

Yours sincerely

*Emily Cochrane*

For and on behalf of  
Rolfe Judd Planning Limited