

## Inspectors' Matters, Issues and Questions – April 2022

**Matter 14: Is the Wi3 (All England Lawn Tennis Club) allocation justified, and is it in general conformity with the London Plan, consistent with national policy and effective?**

Issue (i) Is the Wi3 (All England Lawn Tennis Club) allocation justified, and is it in general conformity with the London Plan, consistent with national policy and effective? Questions:

**Q1. Is the site allocation justified by the evidence base?**

Council response:

- 14.1 Yes, the allocation of Site Wi3 (All England Lawn Tennis Club) is justified, in general conformity with the London Plan, consistent with national policy and effective.
- 14.2 The Wimbledon Championships has been hosted at the All England Lawn Tennis Club site on Church Road for many decades and also hosted the Olympics in 2012 for tennis. It is one of the largest sporting venues in the borough, one of the largest employers in the borough, hosts by far the largest number of visitors to the borough (more than 500,000 people each year) and is the reason that “Wimbledon” and “SW19” are internationally and nationally known, helping to boost local businesses and other attractions.
- 14.3 Previous improvements to the existing buildings undertaken since 2013 (e.g., substantially refurbishing and adding a retractable roof to Court 1, redesigning the Museum Building and buildings at Somerset Road) were led by a series of planning applications and the AELTC site was not included as a site allocation in the council's development plan at the time, despite its significance to the borough.
- 14.4 AELTC have made representations to all stages of Merton's Local Plan stated that investment and expansion to host the pre-Championships qualifying grass court event on-site is necessary to maintain the Wimbledon Championships as the premier grass-court tennis tournament in the world. This has direct and indirect sporting and economic benefits to the borough, to London and to the UK.
- 14.5 Allocating the site as Wi3 in the Local Plan is justified to provide clarity on future expansion and development and to help identify, secure and co-ordinate planning matters across the site, particularly considering its historic, open space, biodiversity and other sensitive designations that cover the area. In 2021 AELTC submitted a hybrid planning application (part outline, part full) to LB Merton ([20/P2900](#)) and LB Wandsworth ([2021/3609](#)) relating to land to the east of Church Road.

- 14.6 The allocation of Site Wi3 is in general conformity with the London Plan. It was not identified as an issue of non-conformity at the GLA's Regulation 19 representation (contained within [0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-Sept 2021](#) and [0D7 completed copies of all Reg 19 representations to Merton's Local Plan](#) ), nor in [0D13a Statement of Common Ground between the GLA and Merton Council March 2022](#). In May 2022, the Mayor of London also provided his opinion that Merton's Local Plan is in general conformity with the London Plan, including on the matter raised in this question.
- 14.7 The site allocation is effective: it is deliverable over the plan period and based on effective joint working on cross boundary issues as evidenced by [Document 0D13b Statement of Common Ground between Wandsworth and Merton dated 25<sup>th</sup> January 2022](#). LB Wandsworth are the Local Planning Authority (LPA) for part of the AELTC-owned land to the north and the adjoining LPA to the site.
- 14.8 As set out in the responses to the questions below, the council has also considered important factors such as the historic and natural environment and representations received during Local Plan consultations on these matters as key evidence for this allocation.

**Q2. What is the status of the planning application pertaining to the site (reference:21/P2900) and when is a decision likely to be taken on it?**

Council response:

- 14.9 In August 2021 AELTC submitted a hybrid planning application (part outline, part full) to LB Merton ([20/P2900](#)) and LB Wandsworth ([2021/3609](#)) relating to land to the east of Church Road. The application description for Merton is for *"Cross boundary (Merton / Wandsworth) hybrid planning application (comprising part full permission and part outline planning permission) for expansion of the All England Lawn Tennis Club Grounds onto Wimbledon Park golf course with the introduction of new tennis courts, tennis related infrastructure and new buildings. Full planning permission for the provision of 38 grass tennis courts and associated infrastructure, comprising of the re-profiling of the landscape and the removal, retention and replanting of trees; provision of 7 satellite maintenance buildings; the provision of a boardwalk around the perimeter and across Wimbledon Park Lake; lake alterations (including lake edge, de-silting and de-culverting) 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 planning permission (with appearance, means of access, landscaping and scale reserved - layout only considered in detail) for the erection of new buildings and structures, including an 8,000-seat parkland show court incorporating a qualifying player hub, guest facilities and associated event operational facilities; a central grounds and maintenance hub and 2 players hubs. An Environmental Statement has been submitted with the*

*application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.*

- 14.10 Public consultation has taken place on the planning application. The application has also been referred to the GLA for Stage 1 in line with the Mayor of London Order 2008 and will be referred for Stage 2 once the Local Planning Authorities have determined the application.
- 14.11 The application is scheduled to be determined by each borough from June 2022 onwards.

**Q3. Is the site allocation, particularly in relation to its designation as MOL, justified and consistent with the Framework and the London Plan?**

Council response:

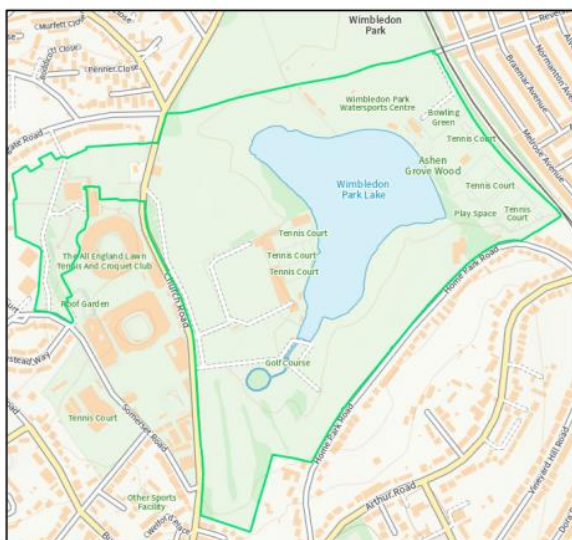
- 14.12 Yes, site allocation Wi3 is justified and consistent with the Framework and the London Plan, particularly in relation to its designation as MOL.
- 14.13 The site allocation does not propose to change the MOL boundaries on the eastern side of the site (i.e. AELTC land within Wimbledon Park). The proposed changes to the MOL boundary on the western side of the site (shown in [Document 0D2 Policy Map](#) and [Document 18D3 Summary of MOL changes](#)) are to reflect the current built form of this site, reflecting the physical features that are readily recognisable and likely to be permanent (NPPF 143(f) Document 0D20). The allocation for *World class sporting venue of national and international significance with support for continued and long-term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake* accords with NPPF paragraph 99(c) and London Plan 2021 policy G3 Metropolitan Open Land and the policy O15.2 in Merton's emerging local plan.
- 14.14 The proposed changes have also taken into consideration the site's well known use for internationally significant sport and the MOL criteria set out in London Plan policy G3 (Document 0D32 London Plan 2021). Additionally, the Mayor of London has provided his opinion that Merton's Local Plan is in general conformity with the London Plan.
- 14.15 The site allocation is justified as it has been based on proportionate evidence, including up to date information provided by the land owner and the All England Club's future Masterplan. The site allocation is considered to be an appropriate strategy for this site.

**Q4. Are any alterations proposed to the MOL boundary in respect of the Wi3 site, and if so are these justified by exceptional circumstances, and clearly articulated in the Plan?**

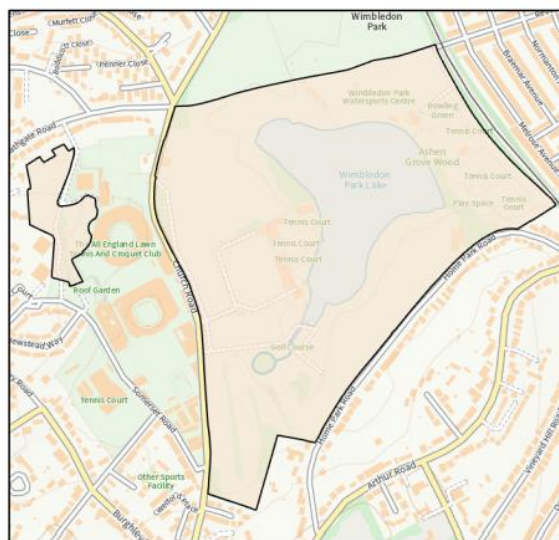
Council response:

- 14.16 Yes, a minor alteration is proposed to remove MOL from part of Wi3 to the west of Church Road (i.e. the existing AELTC site currently used for the Wimbledon tennis championships). Policy G3 of London Plan 2021 ([Document 0D32](#)) states that alterations to the boundary of MOL should be undertaken through the Local Plan process and changed in exceptional circumstances when this is fully evidenced and justified.
- 14.17 The alteration of this MOL boundary is fully evidenced and justified by Documents 15D1 Green Infrastructure Study and 18D3 Summary of MOL changes. This review included multiple site assessments, consideration of the MOL criteria and an understanding of the current bespoke use of the land as an international recognised sporting venue.
- 14.18 For clarity, there are no proposed alterations to the MOL boundary on the site allocation land on the east of Church Road (i.e. the former golf course and area known to form part of Wimbledon Park).
- 14.19 All MOL boundaries are clearly articulated on the Policy maps ([page 6 of document 0D2](#)). The altered MOL boundary for this site is also set out in Document 18D3 (extract shown below, for information).

2014 Policies Map



2021 Policies Map



Key:

2014 MOL (Merton Sites and Policies Map) - MOL outlined in green

2021 proposed MOL – MOL outlined in black

**Q5. If no MOL boundary changes are proposed, it is likely that very special circumstances would have to be demonstrated to justify any built development proposals on the Wi3 site at the application stage. With this in mind, do Site Allocation Wi3 and Policy N9.1 set out an effective approach to the site? Would the Plan be clear and unambiguous in these terms so that it is evident how a decision maker should react to development proposals?**

Council response:

- 14.20 As stated in response to Matter 14, Question 4, there is a proposed minor alteration to the MOL boundary to part of the site to the west of Church Road. The remainder of the site allocation to the east of Church Road that is currently adopted as MOL in the 2014 Development Plan is clearly identified on the Policy Maps (Document 0D2) as MOL.
- 14.21 The site allocation Wi3 and Policy N9.1 are effective: they are deliverable over the plan period and based on effective joint working on cross boundary issues as evidenced by Document 0D13b Statement of Common Ground between Wandsworth and Merton dated 25th January 2022 LB Wandsworth is the Local Planning Authority (LPA) for part of the AELTC-owned land to the north and the adjoining LPA to the site.
- 14.22 The allocation of Site Wi3 is in general conformity with the London Plan. It was not identified as an issue of non-conformity at the GLA's Regulation 19 representation (contained within [0D6 Schedule of Regulation 19 representations to Merton's Local Plan July-Sept 2021](#) and [0D7 completed copies of all Reg 19 representations to Merton's Local Plan](#) ), nor in [0D13a Statement of Common Ground between the GLA and Merton Council March 2022](#). The Mayor of London also provided his opinion that Merton's Local Plan is in general conformity with the London Plan.
- 14.23 As stated in the response to Matter 14, Question 2, the site owner submitted planning application (21/P2900) in August 2021, which, should it be approved, provide further evidence that the site allocation is deliverable over the plan period.
- 14.24 In accordance with Para 16(f) of the NPPF ([Document 0D20](#)), Local Plans should avoid unnecessary duplication of policies, including those within the NPPF and London Plan. Policy G3(A)(1) of the [London Plan 2021 \(Document 0D32\)](#), paragraphs 147-151 of the NPPF (Document 0D20) and Policy O15.2(a) of the Local Plan set out that inappropriate development, which is harmful to the Green Belt, should only be approved in very special circumstances. Decision makers will apply all policies within the Development Plan (which includes the Local Plan, London Plan and NPPF) in their assessment of a proposed development.



- 14.25 For information, upon review of the wording in Site Allocation Wi3, officers propose the following additional modification to page 285 (AM9.14a) of the Plan to improve clarity and to accurately reflect the MOL Policy Map. This is for clarity and accuracy, to align with the Policies Maps and “Site Description” text of Site Allocation Wi3.

Proposed additional modification:

Site Allocation Wi3, page 285

The site location	
Impacts a designated open space.	Yes, <u>Metropolitan</u> Open Land <u>(MOL)</u> and designated open space.

**Q6. Is site allocation Wi3 consistent with the Framework and London Plan insofar as the promotion of healthy and safe communities and open space and recreation are concerned?**

Council response:

- 14.26 Yes, the site allocation Wi3 is consistent with the NPPF and London Plan relating to the promotion of healthy and safe communities and open space and recreation.
- 14.27 The site allocation includes information under Infrastructure Requirements which requires proposed development to alleviate deficiency in access to nature and public open space, either through design and public realm improvements, or by providing new publicly accessible open space on site in accordance with the Green Infrastructure policies.
- 14.28 This is consistent with paragraphs 92(c) and 98 of the NPPF 2021 (Document 0D20), which identify that policies should enable and support healthy lifestyles through the provision of safe and accessible green infrastructure and layouts that encourage walking and cycling and that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.
- 14.29 The Site Allocation is also consistent with Policies G3(A)(2) and G4 of the London Plan 2021 (Document 0D32) which set out that boroughs should work with partners to enhance the quality and range of uses of MOL, and Development Plans should promote the creation of new areas of publicly-accessible open space. Additionally, the Mayor of London has provided his opinion that Merton’s Local Plan is in general conformity with the London Plan, including matters relating to site allocations.

**Q7. Is the Wi3 allocation based on a positive strategy for the conservation and enjoyment of the historic environment, taking into account the desirability of sustaining and enhancing the significance of heritage assets, and putting them into viable uses consistent with their conservation<sup>145</sup>? Is it based on proportionate evidence regarding the significance of those assets, including in relation to the reasons for the inclusion of Wimbledon Park on Historic England's Heritage at Risk register?**

Council response:

- 14.30 Yes, site allocation Wi3 is in accordance with paragraph 190 of the NPPF ([Document 0D20](#)) in that it is based on a positive strategy for the conservation and enjoyment of the historic environment, taking into account the desirability of sustaining and enhancing the significance of heritage assets, and putting them into viable uses consistent with their conservation.
- 14.31 Site allocation Wi3 says *“Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian and cycle access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England's “heritage at risk” register by AELTC (the landowner of the former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park.”*
- 14.32 Historic England's representation to Regulation 19 of Merton's Local Plan (contained in [Documents 0D6](#) Schedule of Regulation 19 representations July Sept 2021 and [0D7](#) Completed copies of all Regulation 19 representations July September 2021) refers to Historic England's representation to Stage 2a (dated February 2021) which contains more information on Historic England's opinion on Site Allocation Wi3.
- 14.33 Historic England notes that Wimbledon Park is within the top 30% of all Registered Parks and Gardens and reflects a level of exceptional historic interest that needs to be recognised and inform management decisions. Historic England also state *“The allocation of this site [Wi3] could bring major opportunities for enhancement to help tackle the HAR [Heritage at Risk] status of the RPAG [Register of Parks and Gardens].*
- 14.34 As stated in Site Allocation Wi3, Wimbledon Park is a Grade II\* listed but is on the Heritage at Risk register. It was added to the register in 2015 due to the long-term effects of divided ownership resulting in different landscape management, the lack of a coherent site-wide strategy for conservation and on-going management, impacts on views, and the lake's condition.

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<sup>145</sup> Per paragraph 190 of the Framework

- 14.35 The site allocation provides an opportunity to address the reasons for Wimbledon Park being on the Heritage at Risk register and this is stated in the Site Allocation's Design and Accessibility guidance

*"Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian and cycle access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England's "heritage at risk" register by AELTC (the landowner of the former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park.*

*Development proposal must respect the site's historic setting including the views to St Mary's Church and the surrounding area and the views from the Grade II listed Wimbledon Park.*

*Development proposal will need to investigate the potential impact of the proposed development on archaeological heritage."*

- 14.36 The site allocation Wi3 represents a positive strategy to help address why Wimbledon Park is on the Heritage at Risk register and is based on proportionate evidence.
- 14.37 Upon review of the site allocation, a modification is proposed to page 284. This is required for consistency with national policy and to ensure all references in the site allocation accurately describe the Grade II\* heritage listing.

Proposed modification:

Site Allocation Wi3, page 284:

*Design and Accessibility guidance:* Development proposal must respect the site's historic setting including the views to St Mary's Church and the surrounding area and the views from the Grade II\* listed Wimbledon Park.

...

*Impacts listed buildings or undesignated heritage assets* Yes, the AELTC golf course, together with Wimbledon Park (owned by Merton Council) and the Wimbledon Club (privately owned) are the remains of a 18th century

Capability Brown designed landscape which is now a Grade II\* listed Historic Park and is on the "heritage at risk register"



**Q8. Are the objectives of the site allocation informed by and consistent with opportunities identified in relevant conservation area appraisals?**

Council response:

- 14.38 Yes, the objectives of the site allocation are informed by and are consistent with opportunities identified in relevant conservation area appraisals, where these have not been superseded by more up to date information.
- 14.39 The Wimbledon North conservation area (part of submitted Document 12D9 Conservation area character appraisals ) covers the site and much of the surrounding area. A character assessment for [Sub Area 2: Wimbledon Park](#), was published in 2006. It references the Park's inclusion on Historic England's (then English Heritage) Register as a Grade II\* Historic Park and Garden but does not refer to its reasons for inclusion on the Heritage at Risk register as this came later in 2015. Other parts of the Wimbledon North conservation area character appraisals were published in 2007, including the introduction which sets the scene for the sub-areas, describing Wimbledon Park in paragraph 10.2 as *A remnant of Capability Brown landscape listed as Grade II\* on the Register of Historic Parks and Gardens, and used for a variety of recreational pursuits. The Sub Area includes most of the adjacent houses and their gardens within Home Park Road, formerly parkland, and the site of the first Wimbledon Manor House.*
- 14.40 The Wimbledon North conservation area clarifies the importance of Wimbledon Park to the conservation area designation, stating in paragraph 9.3 under the heading **Appearance of the Conservation Area** "*Wimbledon Park greatly contributes to its [ the Conservation Area's ] spacious quality, as well as historic interest, in that it is both a remnant of ancient parkland that once covered large parts of the Conservation Area and beyond, and an example of Capability Brown's landscape, including the lake and many fine trees.*"
- 14.41 The Wimbledon North Conservation Area Character Appraisal also makes clear that, following the demolition of significant buildings associated with the Capability Brown design, Wimbledon Park lake is one of the few remaining parts of the Capability Brown landscape, stating on page 40 *While these gardens have gone, the Park northwards from the house was landscaped from 1765 onwards by Capability Brown for Earl Spencer, and Brown's 12ha lake remains as the main feature of the present Park.*
- 14.42 The NPPF 2021 ([Document 0D20](#)) chapter 16 sets out national planning policy on the historic environment. It states in paragraph 190 that "*plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.*" The council's response to question 7 above sets out how Site Allocation Wi3 presents an opportunity for investment to address the issues that mean Grade II\* listed Wimbledon Park is on the "Heritage at risk" register.

14.43 NPPF paragraph 206 also states *Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.* The allocation of Site Wi3 provides that opportunity to enhance and better reveal the significance of the Grade II\* heritage asset. It is proposed to be allocated for *“World class sporting venue of national and international significance with support for continued and long-term investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake”*, which will improve the access to the largest remaining feature of the original Capability Brown landscape. Under the allocation’s “Design and accessibility” heading the allocation Wi3 states that the allocation provides an opportunity to *Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian and cycle access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England’s “heritage at risk” register by AELTC (the landowner of the former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park.*

14.44 Subject to agreement on proposed Main Modification MM9.4 (to move this paragraph from the site description to the Design and Accessibility section – refer to Matter 14, Question 9), the Design and Accessibility Section also states:

*The golf course is part of a Capability Brown designed Grade II\* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations.*

*Development proposal must respect the site’s historic setting including the views to St Mary’s Church and the surrounding area and the views from the Grade II\* listed Wimbledon Park.*

*Development proposal will need to investigate the potential impact of the proposed development on archaeological heritage.*

14.45 The site allocation provides a positive strategy towards addressing the reasons why Wimbledon Park is on the Heritage at Risk register, of enhancing access to and enjoyment of the heritage assets, as required by the NPPF.

**Q9. Part of the wider Wimbledon Park site is within the London Borough of Wandsworth, consequently, would the allocation be effective in its aim to seek**

**opportunities “to address the reasons why Wimbledon Park is on Historic England’s ‘heritage at risk’ register”? What, if any, specific policies or allocations relating to the Wandsworth element of the wider site are included in that Borough’s adopted or emerging development plans?**

Council response:

- 14.46 Yes, the site allocation Wi3 would be effective in its aim to seek opportunities to address the reasons why Wimbledon Park is on Historic England’s “heritage at risk” register.
- 14.47 Wimbledon Park is a Grade II\* listed Historic Park and Garden. It was added to the Heritage at Risk register in 2015, broadly due to four main reasons, the effects of divided ownership resulting in different landscape management regimes; the lack of a coherent site-wide strategy for conservation and on-going management; impact on views and the lake’s condition.
- 14.48 The allocation of Site Wi3 creates the conditions to address these effectively. The site allocation Wi3 involves the majority of park that is in private ownership. In 2018 Merton Council adopted a [Wimbledon Park masterplan](#) for the lands in its ownership, citing the desire to better co-ordinate landscaping and management with other landowners, to improve public access to the lake edge and to improve the condition of the lake.
- 14.49 Site allocation Wi3 is effective in seeking to address the reasons why Wimbledon Park is on the heritage at risk register and provide the basis for ongoing work between the majority landowners. The design and access section of Site Allocation Wi3 states:
- Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian and cycle access to areas of formerly private land such as more of the lakeside and the land at the former golf course. This includes the opportunity to address the reasons why Wimbledon Park is on Historic England’s “heritage at risk” register by AELTC (the landowner of the former golf course landowner) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park.*
- 14.50 Wimbledon Park lake is owned and managed by Merton Council; the AELTC and the Wimbledon Club own land at the lake edge. It is part of the designated Grade II\* Historic Park and Garden and it is also a designated reservoir under the Reservoir Act 1975.
- 14.51 The boundary between Wandsworth and Merton Councils runs through the north of Wimbledon Park, partly through AELTC-owned land and partly through the public park. Wandsworth Council is the Local Planning Authority for all the land in their borough boundary (regardless of ownership) and is also the landowner (freeholder) of the for the northern part of the public park in their borough. Merton Council manages the whole public park on behalf of both landowners LB Merton and LB Wandsworth.

- 14.52 In 2015 when the park was added to the Heritage at Risk Register, the landscape management of Wimbledon Park was across a variety of different leaseholders and freeholders. The majority of the park were managed as an active, private golf course by Wimbledon Park Golf Club (leaseholder) with the AELTC as the freeholder. The public park was managed wholly as a public park by Merton Council with both Merton Council and Wandsworth Council as freehold landowners. The Wimbledon Club owned and managed their lands.
- 14.53 Now (2022) three freeholders – AELTC, The Wimbledon Club and LB Merton - are responsible for landscape management of all of Wimbledon Park (aside from LB Wandsworth as LB Merton manages Wimbledon Park public park on behalf of both boroughs).
- 14.54 As stated in the Site Allocation Wi3, the investment in the AELTC owned and managed part of Wimbledon Park will be expected to address the reasons why the park is on the heritage at risk register. This would be carried out and secured via the planning application, secured by condition or planning obligation and in consultation with Historic England and other bodies.
- 14.55 Wandsworth Council is the local planning authority for a moderate parcel of Wimbledon Park within its borough boundary to the north of the park. Part of this land in LB Wandsworth is owned by the AELTC and part of the public park by Wandsworth Council itself; although this is managed on behalf of both boroughs by Merton Council.
- 14.56 The Statement of Common Ground between Wandsworth and Merton ([Document 0D13b](#), dated January 2022) specifically mentions Merton's proposed Site Allocation Wi3 under the heading "Natural Environment and Green Infrastructure". It states:

*"Between Merton and Wandsworth, the proposed expansion of the All England Lawn Tennis Club into the adjacent Wimbledon Park (mostly located in Merton and a site allocation Wi3 in Merton's Local Plan, partly located in Wandsworth) presents shared issues for the two boroughs in respect of the holding of the annual Championships, heritage, travel and open space issues. This is being dealt with through the planning application process and a cross-boundary planning application has been submitted to both boroughs in their roles as Local Planning Authorities as the development straddles the borough boundary (reference 21/P2900 in Merton; reference 2021/3609 in Wandsworth).*

*Wandsworth Council considers that Merton's proposed site allocation Wi3 will need to ensure that it complies with the NPPF, in that it is recognised that the allocation is on land designated as Metropolitan Open Land (MOL) within which development may only occur by exception and subject to the demonstration of 'very special circumstances' to clearly outweigh any harm to MOL and any other harm. Whilst outdoor sport may be appropriate development (NPPF 2021, para 149 ) this is only providing the facilities do not impact on openness and the purposes of land being designated as MOL. To address this, Merton*

*will propose amendments to the text within Site Allocation Wi3 of the Stage 3 Reg. 19 Plan (July 2021) as part of the examination process. Paragraph 7 of the Site Description (stating, 'The golf course is part of a Capability Brown designed Grade II\* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations') will be moved to the Design and Accessibility Guidance section."*

- 14.57 To ensure that the Site Allocation is effective and recognises the successful joint working between Wandsworth and Merton, the following Main Modification is proposed to pages 283 and 284.

Proposed Modification:

- 14.58 *Move the following existing paragraph from "site description" on page 283 to "design and accessibility guidance" on page 284:*

The golf course is part of a Capability Brown designed Grade II\* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations.

**Q10. Is the allocation of Site Wi3 consistent with the findings of the 'Merton Green Infrastructure, Biodiversity and Open Space Study 2020'<sup>146</sup> (the Green Infrastructure Study), and would the allocation contribute to the conservation of the natural environment?**

Council response:

- 14.59 The work undertaken as part of the Green Infrastructure Study (Document 15D1) included a review of the environmental policy map designations for this site, including Metropolitan Open Land, open space, site of importance for nature conservation (SINC) and green corridor. Follow up reviews of all the sites were also undertaken by the council, to ensure that any proposed boundary changes were based on site evidence that was as up to date as possible. The final recommendations taken forward in the Policy Maps (Document 0D2) are based on both these reviews. In the case of the proposed changes to Policy Map designations, the allocation is partly consistent with the findings of the Green Infrastructure Study, as there were also further changes recommended by officers.
- 14.60 Site allocation Wi3 is for "World class sporting venue of national and international significance with support for continued and long-term investment

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<sup>146</sup> Document 15D1



in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake.” This is consistent with the findings of the Green Infrastructure Study for this site, which identified that part of the site currently includes open air facilities for sport and recreation purposes that serve the people of London and are directly associated with the internationally recognised Wimbledon Championships.

- 14.61 In terms of the second part of this question, yes, site allocation Wi3 contributes to the conservation of the natural environment. There are no proposed changes to the site’s current designation as part of the Wimbledon Park SINC, which requires any proposed development to be assessed in accordance with Policy O15.3 Biodiversity and Access to Nature. This policy protects SINC’s against inappropriate development that would adversely affect the nature conservation value of the site and secure measures that enhance their nature conservation value. It also protects populations of protected species, priority habitats and priority species and expects all development on sites in areas of deficiency in access to nature to incorporate biodiversity elements and habitat features to improve nature conservation.
- 14.62 Site allocation Wi3 also specifies that as part of the infrastructure requirements, proposed development would need to alleviate the site’s current deficiency in access to nature. Additionally, because this site is designated as a SINC and green corridor, any development proposal for this site would be assessed in accordance with Policies O15.3 Biodiversity and Access to Nature and O15.4 Protection of Trees of the Local Plan, which both contribute to the conservation of the natural environment.

**Q11. Differing boundaries for the Wi3 site are shown in the Plan in the overview map on page 276 and within the allocation itself, which does not assist the clarity or effectiveness of the Policy. What is the correct boundary, is it justified, and what MMs would be required to ensure that the Plan would be effective in these terms?**

Council response:

- 14.63 The boundaries shown on the Site Allocation Wi3 page itself (page 282 of the Local Plan Document 0D1) and in all Policies Maps (Document 0D2) which include site allocations are correct.
- 14.64 On page 276 of the Plan there is an illustration of all site allocations in the Wimbledon neighbourhood and in this illustration part of the proposed boundary for Site Wi3 is missing, due to a mapping error. An additional modification (AM9.6a) has been proposed to insert the correct map. Officers were made aware of this error through the Regulation 19 consultation and the additional modification is illustrated on page 290 of 0D4. This modification is for accuracy and to reflect the correct Site Allocation boundary shown on page 282 (Local Plan Document 0D1) and in the Policies Map (Document 0D2).

- 14.65 The correct site boundary as shown in Site Allocation Wi3 and the [Policies Map \(Document 0D2\)](#) is justified as it identifies all of the land within the ownership of the AELTC in this location which is used to support The Championships, as stated in the representations provided by AELTC.