

## **LB Merton Local Plan Inquiry, Hearing Statement, Dr D.G. Dawson**

**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?**

**May 2022**

I made submissions in September 2021 that the Wimbledon Park Golf Course should be removed from the proposed site allocation Wi3, for the following reasons:

1. The grade II\* historic park (list #1000852) which includes the golf course is at risk partly because divided ownership results in discordant landscape management. The whole historic park should be planned as one to help overcome its problems.
2. Wi3 would make incoherent a previously coherent policy for the golf course across two boroughs and with two adjacent land owners, so compounding the risk to the historic park.
3. Wi3 Would prejudice planning decisions in favour of intensive development to attract visitors on the golf course incompatible with Metropolitan Open Land policy and the conservation of heritage, landscape and biodiversity.

Since those submissions were made, LB Merton have proposed a very large number of Main Modifications to the draft Plan, which introduce further considerations. Here I respond this new material and review Wi3 as applied to the golf course in relation to national policy and the London Plan. I conclude that the Wi3, as applied to the golf course is not justified, not in general conformity with the London Plan, not consistent with national policy and so not effective.

### **A. The application of Wi3 to the golf course would promote intensive built development at the expense of its natural character.**

A Main Modification proposed by the golf course owner (AELTC) and endorsed by LB Merton makes reference to a Masterplan in preparation for the golf course. In the description of Wi3: *"The AELTC have commenced the preparation of a new masterplan to investigate and identify the future development opportunities for the AELTC estate and The Championships incorporating the golf course. In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council."*

Although the planning application is clearly not a Masterplan it is put forward by LB Merton as indicative of future development opportunities on the golf course under Wi3. The planning application involves the construction of a huge show court, 38 new grass courts, each within a concrete foundation, many maintenance buildings, reception areas for visitors, and kilometres of access paths, which would replace the existing natural features of the golf course, including very many mature trees. Wi3 clearly promotes intensive built development on the golf course at the expense of its natural character.

**B. Application of Wi3 to the golf course threatens it with development contrary to national and London policy.**

NPPF 11b (footnote 7) on sustainable development, refers to the presence of Green Belt, irreplaceable habitats and designated heritage assets as providing a strong reason for restricting the overall scale, type or distribution of development. This applies to the golf course.

The golf course lies within Metropolitan Open Land, which the London Plan Policy G3 states is *“afforded the same status and level of protection as Green Belt:*

*1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt”*

NPPF 145 states that planning authorities *“should plan positively to enhance [Green Belt with] beneficial use to... retain and enhance landscapes, visual amenity and biodiversity...”*

Planning for intensive built development is clearly not planning positively to enhance the irreplaceable habitats and designated heritage assets of MOL and so is inconsistent with national policy and not in general conformity with the London Plan.

**C. Applying Wi3 to the golf course would introduce uncertainty into the consideration of development proposals.**

NPPF16 states that *“Plans should.*

*d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”*

Imposing Wi3 onto the golf course applies a policy in favour of development to a place otherwise protected as a *“Capability Brown designed Grade II\* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area.”*

Removing the golf course from Wi3 would remove this policy conflict so allowing greater certainty in the consideration of development proposals.

**D. To obviate the risk to the Grade II\* park, it should be planned as one.**

NPPF 35 states that *“Plans are ‘sound’ if they are:*

*b) Justified – ... taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) Effective – ... based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred”*

and NPPF15 states that *“...plans should provide a positive vision for the future of each area; a framework for addressing ... economic, social and environmental priorities; and a platform for local people to shape their surroundings”*

The Gardens Trust report: *Vulnerability Brown, Capability Brown landscapes at risk* outlines the problems faced by Brown's listed parks. It sees divided ownership as a

major risk factor. Here the boundary with LB Wandsworth introduces a further division.

Applying Wi3 to the LB Merton part of the golf course (just one of the three ownerships in the listed park) compounds the problems of divided ownership. The plan does not have, or propose, a Masterplan for the whole Grade II\* park. This is a serious omission.

**E. The golf course does not lie within an area deficient in access to nature.**

Wi3 states that *This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies.*

The analysis given in Figure 5 of the *Green Infrastructure, Biodiversity and Open Space Study* is wrong because the adopted procedures for the identification of such deficiencies were not followed. The whole listed Grade II\* Wimbledon Park is indicated as "SINC excluded from analysis" on Figure 5. In fact, there is access to nature of the requisite Grade close to each of the three entrances to the public Wimbledon Park. Correct application of the procedures removes all deficiencies nearby, leaving a tiny residual area in the southern part of the existing AELTC site, west of Church Road.

Areas of Deficiency in Access to Nature are designed to prioritise areas for action to increase access and it would be inappropriate for other places that are set in genuinely deficient areas to be deprived of attention in favour of the golf course.

I have prepared a proposed agreement with LB Merton in the form of a Main Modification which would serve to remove the golf course from Wi3 and initiate the preparation of a Masterplan for the whole Grade II\* listed heritage park.

I trust that this further statement will assist the planning of one of LB Merton's greatest assets.