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Planning

Examination of the Merton Local Plan

Hearing Statement submitted on behalf of the All England Lawn Tennis Club (May 2022)

Matter 14 – Site Allocation Wi3 (All England Lawn Tennis Club)

1.0 Introduction

- 1.1.1 The following Hearing Statement has been prepared by Rolfe Judd Planning on behalf of the All England Lawn Tennis Club (the “AELTC”) in reference to Inspectors’ 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?”*).
- 1.1.2 This Statement builds on the previous representations submitted on behalf of the AELTC to the earlier rounds of public consultation on the emerging Merton Local Plan. For the sake of clarity our responses are set against the Inspector’s questions raised in relation to Matter 14. We understand that LB Merton will be providing a response to all of the questions raised. Our response is intended to provide additional clarity/information to particular questions within Matter 14, namely Questions 1, 3, 6 and 7.
- 1.1.3 We draw it to the Inspectors’ attention that a Planning Application has been submitted by the AELTC for part of the proposed site allocation Wi3 (for the site known as Wimbledon Park Golf Course). The proposals are known by the AELTC as the ‘Wimbledon Park Project’ (WPP). The planning application has been submitted to both LB Merton and LB Wandsworth (as a cross boundary scheme) and proposes the following:

“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 no satellite maintenance buildings; the provision of a boardwalk around the perimeter of and across Wimbledon Park Lake, lake alterations (including lake edge, de-silting & 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 maintenance hub and 2no. players hubs.

An Environmental Statement has been submitted with the application under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017"

- 1.1.4 The Planning Application is expected to be progressed towards determination during July 2022.

2.0 Matter 14 – Response to Inspectors' Questions

2.1 Overview

- 2.1.1 As stated in Section 1 of this statement we understand that LB Merton will be providing a response to all of the questions raised. Our response is intended to provide additional clarity/information to particular questions within Matter 14, namely Questions 1, 3, 6 and 7.

2.2 Question 1 - Is the site allocation justified by the evidence base?

- 2.2.1 The site allocation is about recognising the local, national and international significance of the AELTC and that in order to maintain and build upon this status and contribution, long term investment needs to be supported and encouraged and a site allocation is the appropriate planning designation to facilitate this unique operation.
- 2.2.2 The significant of the AELTC is recognised as The Championships are a key cultural and sporting fixture in the British summer and world sporting calendar. Known for its traditions stretching back well over 100 years, The Championship, Wimbledon is the oldest tennis tournament in the world and regarded as the most prestigious of the four Grand Slams (the others being the US Open, Australian Open and French Open). The event attracts top competitors and high-profile spectators with a global audience of 1.2 billion and is one of the "crown jewels" of British Sporting events.
- 2.2.3 It is vital that the AELTC continues to invest in the future development of The Championships if it is to maintain its position amongst the other Grand Slams, but also its status amongst other national and international sporting events.
- 2.2.4 Alongside the pressure to maintain an audience from other sports events, the AELTC face pressures within tennis itself. An increasing number of grass court events are held in Europe and especially with new markets opening in parts of the world such as China and India.
- 2.2.5 In 2011 The AELTC 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 published in 2012 and set out the

vision for the future of the grounds and is a framework against which new development will be assessed and refined. Amongst the key objectives for the Master Plan were the need to maintain The Championships as the premier tennis tournament in the world and on grass; to strengthen and enhance Wimbledon as a world class sporting venue of national and international significance; conserve Wimbledon's unique and special heritage; and continue to make a positive contribution to the local neighbourhood and community.

- 2.2.6 The Master Plan projects included the remodelling and insertion of a retractable roof above No.1 Court (completed in 2019), the provision of a new indoor tennis centre on Somerset Road (completed 2022), extensions to both the Museum Building (completed 2020) and the Millennium Building (works to commence in 2023). These development works have been fundamental in supporting and improving the operation and status of The Championships.
- 2.2.7 The AELTC have been the freeholder of the Wimbledon Park Golf Club since the 1990's. In December 2018 the AELTC purchased The Wimbledon Golf Club (a private company) from its Members, meaning that AELTC now owns the freehold and leasehold interests in the wider Wi3 Site, with golf due to cease at the Site in January 2023 (note: golf has ceased on the northern 9 holes as of January 2022). This has increased the AELTC's landholdings directly adjacent to the existing AELTC Grounds and provides the opportunity both to host the Wimbledon Qualifying Event and further improve The Championships experience.
- 2.2.8 The AELTC has identified key areas where currently The Championships and AELTC estate has fallen behind other tennis Grand Slam Tournaments. This includes:
1. The location, capacity, lack of tenure security (and the potential economic and social impact of this), and inadequacy of facilities at the Bank of England site in Roehampton for hosting the Qualifying Event,
 2. The need for additional tennis courts, including a larger, third Show Court,
 3. Inadequacy of practice courts for the main draw tournament.
- 2.2.9 In addition, there is also a pressing need to secure and conserve for the future, the heritage significance of the Grade II* Registered Park and Garden (RPG), and to remove it from the 'at risk' register whilst enhancing community access to, and engagement with, the site.
- 2.2.10 These 4 areas are expanded on in greater detail below.

1) The location and event capacity, lack of tenure security (and the potential economic and social impact of this), and inadequacy of facilities at the Bank of England site in Roehampton for hosting the Qualifying Event.

Location away from the main AELTC Site and Event Capacity

- 2.2.11 Currently, the Qualifying Event is hosted at the Bank of England Sports Centre in Roehampton, approximately 3 miles away from the main site. The Championships is the only Grand Slam tournament where the Qualifying Event is not onsite. The other Grand Slam tournaments can allow their qualifying to be well attended, atmospheric events in their own right, creating interest and excitement in the lead up to the main tournament.

- 2.2.12 The Qualifying Event for The Championships, Wimbledon, also currently has capacity for only 1,500 persons per day. Taking place over a seven-day period, this gives an approximate capacity of around 10,500 persons. By comparison, more than 115,000 people attended the qualifying event for the US Open in 2019, with the event hugely popular amongst fans wanting to see the emerging talent within the sport.
- 2.2.13 The Wimbledon Park Project would grant greater spectator access – 10,000 a day during qualifying and increase the daily capacity of The Championships from 42,000 spectators per day to 50,000 so more people can enjoy high quality tennis by players who may well be the stars of the future.

Lack of Security of Tenure and Securing Economic and Social Benefits

- 2.2.14 Whilst the AELTC has recently been able to extend their lease at the Roehampton site (up until 2035) there is a need to find a sustainable long-term location for the Qualifying Event, especially as the owners of the Bank of England site have made it clear that they intend to develop the site for commercial return.
- 2.2.15 Finding an appropriate, long term venue for the Qualifying Event is imperative to the future of The Championships, as without a Qualifying Event there cannot be a tournament. The availability of other sites in London to provide the space and quantity of grass courts cannot be identified and therefore the need cannot be provided elsewhere. The WPP proposals are therefore not just about securing additional social and economic benefits from the Qualifying Event, but maintaining, and building on, the considerable benefits of The Championships as existing.
- 2.2.16 To exemplify the importance of the AELTC, UK-wide economic activity generated by The Championships as an event in 2019 was estimated at c.£327million, of which c.£235million occurred in London.
- 2.2.17 The WPP proposals are estimated to generate an additional £54.38million to the UK economy, with £38.32million of that in London – a 14% increase at both scales. This is a significant economic boost, much of which occurs locally to the benefit of the local community.
- 2.2.18 The AELTC is also one of the largest employers in this part of London (with c.6,400 people employed in a diverse range of roles during The Championships). The proposals will add c.256 additional jobs required for the Qualifying Event and The Championships.

Courts, Infrastructure and Player Experience

- 2.2.19 The quality of the facilities at Roehampton do not meet the standards that a Qualifying Grand Slam Tournament should be providing. For example, the existing tennis courts are smaller than The Championships size courts and there is not enough time left on the Bank of England lease to allow for new courts to be built and for the club to make use of them. The courts are also not of a sufficiently high quality, and they are utilised for other sports throughout the year.
- 2.2.20 There is also a lack of changing facilities onsite to meet tournament requirements. Cumulatively, and when combined with much reduced event capacity, these factors have a negative impact on the overall player experience, especially when compared to other Grand Slams.

2.2.21 The site infrastructure (toilets, parking, etc) is also not suitable to cope with an increased number of spectators at the venue, which the club would like to achieve to increase public accessibility to sport. Investment to achieve this would also require permission on MOL and there is not enough time left on the lease to make this a viable option.

2) The need for additional tennis courts and a larger, third Show Court

2.2.22 There are currently 41 courts within the main AELTC site, including practice courts and playing courts, and the WPP would increase the number of courts to 80 in total, including practice courts and match play, for both the Qualifying Event and The Championships.

2.2.23 39 additional courts are needed for three main factors:

- a) The requirement for a larger, third, Show Court (1 new court proposed),
- b) The requirement for additional practice courts for the main draw event (8 courts proposed),
- c) The requirement for enough courts to facilitate the Qualifying Event (30 courts proposed; 10 practice courts for the qualifying and 20 Qualifying courts).

2.2.24 The Championships generates a significant demand for tickets each year; however, the size of the grounds and the capacity of the show courts severely restricts the number of spectators who can access world class tennis. With 8,000 additional tickets expected to be available from the new Show Court alone, this is a unique opportunity to expand access to the sport, a key aim of the Mayor of London's 'Sport for all of us' strategy.

2.2.25 The provision of additional facilities, particularly on the Wimbledon Park, also means that providing a facility within the parkland will allow opportunities for year-round use in ways the existing facilities cannot, for example:

- hosting local and regional tournaments,
- supporting Wimbledon Junior Tennis Initiative ("WJTI") events,
- and the potential to provide bookable spaces for the local community.

3) The requirement for additional practice tennis courts for the main draw tournament

2.2.26 As well as accommodating the Qualifying Event at the Wimbledon site, the AELTC Wimbledon Park Project seeks to address the lack of practice courts for the main draw tournament players.

2.2.27 At the other Grand Slams (which is the AELTC's international benchmark) the number of practice courts available to players is much greater than at The Championships.

2.2.28 The other Grand Slams can offer a whole court for each main draw player to practice on and AELTC wish to achieve the same level. However, to achieve this they need to build sufficient grass tennis courts. Due to wear of the natural surface, these courts can then not automatically be used for the events themselves as the courts

change in characteristics with wear and it is important to maintain a similar level of wear and therefore surface performance for the players across all the courts.

- 2.2.29 The Championships, Wimbledon is an internationally important tournament and therefore it is imperative that it provides adequate facilities for the competitors. Currently, players need to share courts or travel away from the venue to find an alternative, and often not comparable, practice surface. The new tennis courts proposed in the Wimbledon Park includes an allocation of eight [8] courts for main draw practice, which would ensure that sufficient courts are available for main draw players.

4) Works to and conservation of the Grade II* Registered Park and Garden

- 2.2.30 The entire Registered Park & Garden (which includes Wimbledon Park) is identified by Historic England as being 'at risk'. This is due to the divided ownership which has resulted in differential landscape management. Historic England note that the Wimbledon Park Project development has the potential facilitate a more coordinated approach and deliver investment across the entire Registered Park & Garden.
- 2.2.31 The benefits of a site allocation and the positive impacts that this can bring to the Registered Park & Garden is further elaborated in our response to Question 7 in this statement.

Summary

- 2.2.32 A clear and identifiable need to identify a suitable new site for the Qualifying Event for the AELTC has therefore been demonstrated and the location of the WPP development, adjacent to the existing main site, is both appropriate and cannot be accommodated in any other location given the constraints within London. The AELTC is a major economic and social contributor, locally, nationally and internationally and a long-term plan supporting its continued investment is essential to maintain and build upon these benefits. A site allocation is a wholly appropriate planning designation for this unique operation and is fully justified.

2.3 Question 3: Is the site allocation, particularly in relation to its designation as MOL, justified and consistent with the Framework and the London Plan?

- 2.3.1 The Metropolitan Open Land (MOL) designation relates to part of the Wi3 Site Allocation (primarily Wimbledon Park Golf Course and a small area on the northern part of the AELTC Church Road site). The London Plan (Policy G3) states that MOL should be afforded the same status and level of protection as Green Belt and protected from 'inappropriate development' in accordance with the Framework (NPPF). The London Plan also urges boroughs to work with partners to enhance the quality and range of uses of MOL - paragraph 8.3.4 states that:

"Proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage."

- 2.3.2 The NPPF paragraph 149 states that the construction of new buildings should be viewed as inappropriate in MOL. However, the paragraph goes on to note that there are exceptions to this general presumption. These exceptions include:

"(b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments as long as the facilities preserve the openness of the [MOL] and do not conflict with the purposes of including land within it".

- 2.3.3 NPPF paragraph 150 also identifies other forms of development that are not inappropriate in MOL, provided *"they preserve its openness and do not conflict with the purposes of including land within it"*. Criteria (e) attached to the paragraph specifically references *"material changes in the use of land (such as changes of use for outdoor sport or recreation..."* as being an appropriate form of development.

- 2.3.4 The Wimbledon Park Golf Course is an 18 hole private golf course, which includes a small number of buildings (including the Club House, a maintenance compound and several outbuildings around the course) and boundary fencing. There is currently restricted public access to the land. Furthermore, whilst the majority of the land is natural in appearance, it includes many typical man-made features including greens, bunkers, tees and pathways. The course is also intensively managed with trees and vegetation arranged around the fairways and greens. It is also relevant to note that during The Championships period (including a period of 14 working days prior and 5 working days post the tournament to allow for set-up and de-rig) the golf course is utilised intensively by the AELTC and their partner organisations for event car parking, hospitality (including the installation of hospitality marquees), for hosting the route for the queue, security and other operational functions.

- 2.3.5 In this respect the Site Allocation Wi3 is entirely consistent with both the Framework and London Plan in that it directly supports continued investment towards an important sporting use of the use and most importantly encourages improvement to community access, particularly around Wimbledon Park Lake (which is not currently possible). This has been an important consideration in the formulation of the WPP development proposals for the

site which include a new 9.4ha public park and a series of paths and boardwalks providing public access around Wimbledon Park Lake for the first time.

- 2.3.6 Whilst it is recognised that new substantial buildings (even those intended for sporting use – such as a new Show Court) could constitute ‘inappropriate development’ for the purposes of paragraph 149, it is apparent that the proposed wider sporting use of the site (for tennis) would be consistent with the criteria including in London Plan Policy G3 for including land within MOL. It is also noted that there is no intention to remove the MOL designation from the Wimbledon Park Golf Course.

2.4 Question 6: 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?

2.4.1 Further to the comments from the LB Merton on this matter, we wish to highlight the following contribution that the AELTC makes to the promotion of healthy and safe communities.

2.4.2 Every year the financial surplus of The Championships is passed to the Lawn Tennis Association (LTA) which supports tennis from the grassroots through to the professional game. The annual surplus from The Championships in 2019 was recorded at £45.7million which was distributed across the whole of the UK. This programme helps Londoners become and stay active to the benefit of mental and physical health. The WPP proposals have the potential to increase this funding further, supporting the growth of tennis at all levels and throughout the country.

2.4.3 The AELTC proposes that, as part of the WPP planning application 21/P2900, from the end of The Championships until the end of the grass court season (typically Mid-July to Mid-September), up to 7 courts will be available to the local community for:

- Wimbledon Junior Tennis Initiative (WJTI) participants and existing AELTC junior community tennis programme,
- A community tennis experience inviting local residents to come and play on the courts for free.

2.4.4 Whilst once part of Earl Spencer's Wimbledon Park, for over a hundred years the existing golf course has not been open to the wider public. It is open to a resident of Merton with a proof of address and able to pay a fee but otherwise it is a private membership, fee-charging club on private land within part of what remains of the original Wimbledon Park.

2.4.5 This is a familiar situation in Merton, with only 21% of its open space publicly accessible. The London Plan acknowledges that Metropolitan Open Land (MOL) has an important role to play as part of London's multifunctional green infrastructure and states that the London Mayor is keen to see improvements to the accessibility of MOL. The WPP proposals will help to deliver this aim with the new park accessible to the public, providing high quality, open space for leisure and recreation.

2.4.6 The WPP proposals will deliver free-of-charge public access to the new 9.4ha public park year-round. This will be the first new park in London since the Queen Elizabeth Olympic Park opened a decade ago and therefore the use of the land is wholly consistent with the Framework and London Plan.

2.5 Question 7: 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 consideration? 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?

2.5.1 Part of the Wi3 Site Allocation (Wimbledon Park Golf Course) is within an Historic Registered Park & Garden (Grade II*) of 18th Century significance. The Registered Park & Garden (which also includes Wimbledon Park and the Wimbledon Club) was designed by Capability Brown. Whilst the golf course has had a significant influence on the character of the land, the Wimbledon Park Golf Course site still retains a number of veteran trees and historic features (including the Wimbledon Park Lake).

2.5.2 The entire Registered Park & Garden (which includes Wimbledon Park) is identified by Historic England as being 'at risk'. This is due to the divided ownership which has resulted in differential landscape management. Historic England note (within the register listing) that the AELTC proposals have the potential facilitate a more coordinated approach and deliver considerable investment across the entire Registered Park & Garden.

2.5.3 The development provides the opportunity to repair/restore the heritage interest in the WPP site, to achieve better connections with the neighbouring land parcels and to allow greater public access. This will include:

- Removing the golf course template and adopting Brownian principles to remodel the landscape,
- Remodelling the Lake to better reflect its historic alignment,
- De-culverting the two brooks feeding into the Lake,
- Protecting veteran trees and significantly increasing tree planting (through the veteran tree propagation programme and introduction of new appropriate non-native and native species – climate resilient),
- Opening up and revealing historic views,
- Providing public access to a new Park and around Wimbledon Park Lake (for the first time),
- Celebrating the history of the site through education and interpretation boards and trails,
- Developing a Conservation Management Plan for the wider Registered Park and Garden area,
- Working with neighbouring landowners to improve the heritage value of the site through shared vision and management regimes (including the de-silting of the Lake),
- Promoting improved ecology and biodiversity – creating new habitats for a diverse range of local and European protected species,

- Introducing long-term management protocols which will significantly improve the stewardship of the landscape into the future.

- 2.5.4 The above works have been informed by extensive research and investigations by the AELTC into the rich history of the site. Collectively the above measures have the potential to better reveal and improve the heritage value of the Wi3 Site and significantly improve access, allowing the public to access the historic interest of the land. This is a considerable heritage benefit which will not only help off-set any identified harm caused by the development, but which will contribute to the wider planning benefits to be delivered by any development.
- 2.5.5 Moreover, a positive redevelopment of the site is considered to be the only viable mechanism to secure the substantial heritage benefits outlined above. It also provides the best (and potentially only) option to work towards removing the wider Registered Park & Garden from the at risk register. Indeed, these significant heritage and landscape benefits can only be realised through significant investment from the AELTC to improve the landscape and facilitating public access to the site. This is recognised by both Historic England and The Gardens Trust in their representations to the current Planning Application.
- 2.5.6 Overall development within the Wi3 Site Allocation will not only sustain but enhance the significance of heritage assets, putting it to viable uses consistent with its conservation. Furthermore, it will deliver wider social, cultural, economic and environmental benefits by opening up public access to additional land within the Registered Park & Garden and revealing/celebrating its history (for the first time). It will also make a positive contribution to local character and distinctiveness and embed the history of the site within the local area (also for the first time). Most importantly, it offers an opportunity to reverse the longer term decline in the heritage value of the site and work towards removing the wider registered park & garden from the at risk register.

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