

From:
To: [Future Merton](#)
Cc:
Subject: P08333 - Future Merton Local Plan - Representation on behalf of the AELTG
Date: 22 March 2024 13:06:58
Attachments: [image001.png](#)
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[240322 Merton Local Plan - January 2024 Main Modifications - AELTG Representation.pdf](#)

Dear Future Merton Local Plan,

Please find attached a representation on behalf of our client, the All England Lawn Tennis Ground Plc (AELTG) on the January 2024 Main Modifications to Merton's draft Local Plan.

Should you require clarification on any of the content, please do not hesitate to ask.

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London Borough of Merton
Merton Civic Centre
London Road
Morden, Surrey
SM4 5DX

22 March 2024

Dear Sir/Madam,

P08333 – Representation on behalf of the All England Lawn Tennis Ground Plc on the Main Modifications (2024) of the London Borough of Merton’s Local Plan

- 01.1.1** On behalf of our client, All England Lawn Tennis Ground Plc (AELTG), we provide this representation on the Main Modifications (2024) to Merton’s Local Plan. The new Local Plan has always had a direct impact on our client, with Site Allocation Wi3 covering their main grounds as well as their holding on the former Wimbledon Park Golf Club.
- 01.1.2** The overarching change in this modification is that Site Allocation Wi3 has been modified to cover the AELTC’s main site only, with the whole of Wimbledon Park (covering all landholders within the London Borough of Merton’s administrative boundary) now falling within a new planning policy (WIMBLEDON PARK – N8.1).
- 01.1.3** This representation focusses on the new **Policy N8.1 (Wimbledon Park)** and the modified **Site Allocation Wi3 (All England Lawn Tennis Club)**. We append the original and the modified wording to this statement for reference.

01.2 COMMENTARY AND REPRESENTATION ON POLICY N8.1 – WIMBLEDON PARK

- 01.2.1** We consider the area which the policy covers should be named ‘Wimbledon Park: Registered Park and Garden – Policy N8.1’. ‘Wimbledon Park’ can have different meanings depending on an individual’s perspective. The day-to-day experience of Wimbledon Park for the general public will most likely mean the land owned by the London Borough of Merton, rather than The Wimbledon Club’s or the former Wimbledon Park Golf Club where there is no general public

access. This proposed alteration will further clarify the area in which the policy covers, with the Registered Park and Garden's status being the only unifying designation of the three land holdings. Throughout the policy and supporting text, the precise use of 'Wimbledon Park' should be carefully reviewed wherein we suggest use of 'Registered Park and Garden' (RPG) could be a more appropriate term.

- 01.2.2 We divide the rest of our response to this new policy as per the Policy Text and the Supporting Text.

POLICY TEXT

OPENING SENTENCE

- 01.2.3 Further to our consideration over the name of the policy, we consider that the opening sentence of the policy should be amended to: 'To address the reasons why the Grade II* Wimbledon Park (**including the publicly owned Wimbledon Park, the former Wimbledon Park Golf Course and The Wimbledon Club**) is on Historic England's Heritage at Risk Register and to recognise and support its sporting, recreation, ecological and amenity functions.'
- 01.2.4 This would further clarify the extent of the designation given the three very different operations and holdings within the registered park and garden.

POLICY TEXT PART A, B, J

- 01.2.5 For reasons described under paragraph 01.2.1, replace 'the park's sport' with '**the RPG's**' under part a). Replace 'Wimbledon Park' with '**RPG**' under part b). Replace 'Respecting the site's historic setting' with Respecting the **RPG's** historic setting.'

POLICY TEXT PART C

- 01.2.6 Policy N8.1 can be seen as a response to the duties placed on Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, as per paragraph 196 of the National Planning Policy Framework (20th December 2023). The full 196 paragraph is:

'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. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place.'

- 01.2.7** Our client agrees with the principle of what the policy is seeking to achieve in addressing the issues facing the RPG. To address the issues facing the RPG, a wide range of interventions are identified in the policy text and supporting text.
- 01.2.8** Appropriate new development (in consideration of all other policy designations, including Metropolitan Open Land) can be an effective means of achieving the policy aim and is supported by Paragraph 196 part c) of the NPPF, (*'c) the desirability of new development making a positive contribution to local character and distinctiveness;'*).
- 01.2.9** Part c) of Policy N8.1 is therefore a welcome acknowledgement of this issue; however we argue it should be expanded to all parts of the RPG; not just the former golf course land given the supporting text notes that several existing buildings within the public parts of Wimbledon Park are harmful to the RPG and new development(s) would help to address these matters (as identified in paragraph 8.1.23 of the supporting text). The critical status of Wimbledon Park lake also requires investment to ensure its long-term future as identified under paragraph 8.1.26 and 8.1.27).
- 01.2.10** We suggest further clarity should be added in the wording of the clause by noting the golf course to be a former private members club and that 'additional' public access should be secured, noting that public access is already available in the publicly owned part of Wimbledon Park.
- 01.2.11** We therefore propose part c) of the policy is amended from *Securing investment in the former golf course to conserve and enhance the historic landscape, biodiversity, sport and recreation and secure public access* to state: '**Securing investment in the former private members golf course, Wimbledon Park Lake and where appropriate the whole Registered Park and Gardens** to conserve and enhance the historic landscape, biodiversity, sport and recreation and secure **additional** public access'

POLICY TEXT PART J

- 01.2.12** The clause largely reflects the previous Wi3 Site Allocation wording, however it contains reference to 'new views'. We detail our considerations on this wording under the Supporting Text section of this representation but suggest that in respects of this clause 'where possible' is inserted given establishing these views is likely to be the result of a development proposal and will be part of a range of considerations for the decision maker.

- 01.2.13 Our suggested wording is therefore: ‘Respecting the site’s historic setting, enhancing historic and, **where possible**, new views to and across the lake, and to St Mary’s Church, and supporting greater public access to these views.’

WIMBLEDON PARK HOUSE: ARCHAEOLOGICAL PRIORITY ZONE (APZ)

- 01.2.14 The entirety of Wimbledon Park is located with the APZ however there is no reference to this in the policy. The APZ was previously referenced in the former wording of Site Allocation Wi3 (now correctly removed). Our client has no particular position on whether this should be referred to in the policy but we raise as a consideration for the Council.

SUPPORTING TEXT

- 01.2.15 We propose modifications to Paragraph 8.1.3 to give greater clarity over the status of the land. We propose the following text:

‘Wimbledon Park, Registered Park and Garden, is in three ownerships: Merton Council, the All England Lawn Tennis Club and the Wimbledon Club. About a third of the RPG is owned by Merton Council is currently publicly accessible. The All England Lawn Tennis Club’s ownership concerns the former private Wimbledon Park Golf Club, who had been the leaseholders of the site since 1898 and this land is not publicly accessible. The AELTC’s main grounds lies to the west of the RPG across Church Road and the whole park has been used for many years to support the successful functioning of the Wimbledon Tennis Championships each summer. The Wimbledon Club is a private sports club and is not publicly accessible. Planning application 21/P2900 has been submitted to Merton and Wandsworth Councils relating to the former golf course within Wimbledon Park. In 2016, the Registered Park and Garden was added to Historic England’s “Heritage at Risk” register.’

- 01.2.16 With this amendment, paragraph 8.1.14 could be deleted.
- 01.2.17 Paragraph 8.1.7 of the text refers to Paragraph 98 of the NPPF 2023. This should now be altered to Paragraph **102**. The rest of the text remains unaltered.
- 01.2.18 We suggest additional clarity via alterations to the final sentence to Paragraph 8.1.9: This policy supports the provision of well-maintained and adequately sized paths, bridges, toilets, drainage and other ancillary services to support **increased public** access to and enjoyment of **the Registered Park and Garden** for people of all ages and abilities.
- 01.2.19 Paragraph 8.1.10 refers to ‘*replacing non-native with native species*.’ Our client agrees with this general sentiment, however with climate change it is becoming increasingly necessary to adapt landscapes, for instance by introducing more drought resistant species that may not necessarily have been a native species. We suggest a minor modification to this text, namely

'replacing **inappropriate** non-native with native species **and/or introducing appropriate and justified climate resilient species**.'

01.2.20 Paragraph 8.1.11 of the text refers to Paragraph 190 of the NPPF 2023. This should be altered to Paragraph **196**. The rest of the text remains unaltered.

01.2.21 Paragraph 8.1.22, referring to how historic view lines across the lake can be improved states under part b) '*Improving the appearance of buildings or removing them and to co-locating their services within other facilities while maintaining easy access to the lakeshore for watersports equipment and people.*'

01.2.22 Greater flexibility is suggested in how development proposals could respond to these matters. Our suggested wording is therefore: '**Either** improving the appearance of building(s), **redeveloping the building(s) or removing buildings and** co-locating their services within other facilities while maintaining easy access to the lakeshore for watersports equipment and people **(if relevant).**'

01.2.23 Paragraph 8.1.23 references the creation of new views. This also relates to part j) within the main policy text (commented earlier in this submission). The 2022 draft Local Plan only referenced historic views and therefore this new view reference is understood to be a change from previous submissions. Our client recognises this opportunity and considers it a positive addition in principle.

01.2.24 However, these new views are not defined in any existing public document (with relevant public scrutiny required of new guidance such as this), as opposed to historic views which feature in the conservation area guidance. Given the proposed landscape management plan will set a new direction for the whole park we suggest that these new views are identified within this landscape management plan. Reiteration of the historic views in the landscape management plan would create a clear single point of reference to assist the decision maker, interested party and public (supported by paragraph 16 d) of the NPPF). Subsequently, we suggest a part e) to the supporting text under this paragraph, namely:

01.2.25 **e) Identifying in the new landscape management plan the existing historic views, and where there are opportunities to establish new views. The plan will provide guidance for the enhancement of the historic views and criteria for supporting the new views.**

01.3 COMMENTARY AND REPRESENTATION ON SITE ALLOCATION WI3: ALL ENGLAND LAWN TENNIS CLUB

01.3.1 Site Deliverability: The policy states this time period to be between 5-10 years. Whilst this timeframe was relevant specifically for the AELTC's proposals on the former Wimbledon Park

Golf Course (now removed from the allocation) it is not applicable for the main site. The AELTC's proposals for this site will be an ongoing series of works and investments and therefore will likely run the full length of the Local Plan period.

- 01.3.2** Site Description, paragraph 2: The description states there are 18 outdoor and indoor tennis courts at the grounds. Paragraph 4 refers to 22 grass courts. Noting that the allocation covers the whole of the AELTC's main site (and the new courts at Somerset Road), the correct number is that the main site comprises a total of 18 Championship Grass Courts (including Centre Court and No. 1 Court) and 14 Grass Practice Courts located in Aorangi Park. A further six Grass Practice Courts are available during The Championships which are located temporarily on the three Croquet Lawns to the North end of the site. There are also currently six American clay courts and two acrylic courts located in the Southern Apex of the Grounds. The Somerset Road project, completed in 2022, opened a further six indoor acrylic courts and six outdoor American clay courts.
- 01.3.3** Site Description, paragraph 3: The 2015 date should be amended to **2016**.
- 01.3.4** Site Description, paragraph 5: We observe that the description of the surrounding area does not identify the tall buildings such as those on Somerset Road which add to the character of the area.
- 01.3.5** Site Description, paragraph 6: The updated text includes: *In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council*. As an appropriate update to the text, we suggest an additional sentence stating: **'The application was resolved for approval at planning committee in October 2023 but has received a mayoral call in from the GLA with a hearing anticipated in 2024'**.
- 01.3.6** Site Description, (former) paragraph 8: The paragraph has been deleted in the updated wording however this paragraph was not exclusively referring to Wimbledon Park. The AELTC need to invest as much in the main site as it does Wimbledon Park, to ensure the club remains at the pinnacle of sport. We suggest that the paragraph is reinstated, but instead states: **'The AELTC is continuing to invest in the upgrade and improvement of their facilities across their estate to support The Championships, in tandem with their proposals at the former Wimbledon Park Golf Club, to improve the buildings, facilities, landscaping, experience and sustainability of the site to retain its position as the premier tennis tournament.'** This text is important in identifying the reasons behind the AELTC seeking development via the site allocation at the site.
- 01.3.7** Site Allocation: The amended text in the main modifications document states: *'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.~~ We view a further piece of text should be deleted, namely: 'World class sporting venue of national and international significance with support for continued and long-term investment in **the site all-sites towards this end and to improve community access, particularly to Wimbledon Park Lake.**'

01.3.8 Design and accessibility guidance 1b). We suggest that the sentence includes reference to exploring opportunities to invest in, and secure further improvements, in the former Wimbledon Park Golf Course as Per Policy N8.1 so that the site allocation and policy have greater recognition of each other.

01.3.9 Design and accessibility guidance (3): The text states: '*Development proposals will need to investigate the potential impact of the proposed development on archaeological heritage.*' The revised Wi3 Site Allocation area no longer falls within the boundaries of the Wimbledon Park House APZ area, with no APZ falling within the revised Site Allocation. Clause 3 should therefore be deleted as it is a remnant of when Wimbledon Park was part of the allocation.

01.3.10 Infrastructure Requirements 3) states: '~~Transport for London are engaged in the master planning of the site and may have infrastructure requirements relating to the amended use of the former golf course site. A travel plan will also be required to incorporate all the AELTC's landholdings and the Championships, which should support how people access the site in a sustainable way.~~' This clause is considered out of date, reflecting when the former Wimbledon Park Golf Course was part of the site allocation (hence the deleted reference to the former golf course). Any proposal on the Wimbledon Park site will need to be accompanied by a Travel Plan (as indeed was the case with planning application 21/P2900). Such a development will also be conditioned to require a Travel Plan (again as was the case with the planning conditions contained in the draft Merton decision notice for planning application 21/P2900). Regarding the main site covered by this allocation, the operations of the site are already established and the alterations that have occurred to date have not materially altered the way in which transport to the site occurs. It is therefore inappropriate for a blanket approach to a require a travel plan and it should only be an exceptional proposal, (which would generate the need for an appropriate Travel Plan appropriate to the proposal and its context regardless) that this requirement should be sought. This is also already addressed under the Infrastructure Requirements 1) clause. The clause is therefore unnecessary and should therefore be deleted in full.

01.3.11 Infrastructure Requirements 5) concerns addressing deficiency in access to nature. The AELTC supports this aim but with the knowledge that not all development proposals given their scale may be appropriate for this matter. We therefore suggest the second sentence is modified to: 'The Council will expect proposals **where appropriate** to address this deficiency in accordance with the Green Infrastructure policies.'

01.3.12 Finally, as described, the yearly overlay is an essential requirement of the AELTC's to meet the operational needs of The Championships. Given the restriction on temporary buildings during The Championships via an Article 4, the policy should acknowledge the central need for such infrastructure as a critical part of the management of the site. We therefore suggest an additional 'Infrastructure Requirement' clause stating: **'Supporting development proposals for the temporary erection and installation of facilities to support the annual Wimbledon Championships.'**

01.4 SUMMARY

01.4.1 Our client's particular interests in the new Local Plan particularly pertain to Site Allocation Wi3 and the new planning policy N8.1 Wimbledon Park. Our client supports the broad principles that these policies are seeking to address. Securing investment into the park, through proposals akin to the WPP project, will in our view be essential to achieving the wide range of interventions identified to address the reasons the RPG is on the heritage at risk register and this approach is supported by the NPPF paragraph 196.

01.4.2 We trust that this submission is a helpful consideration to the Council in the preparation of the Local Plan and viewed as a positive enhancement to the proposed wording and supporting text. Should any matter not be clear, or you wish for further clarification, please do not hesitate to contact us.

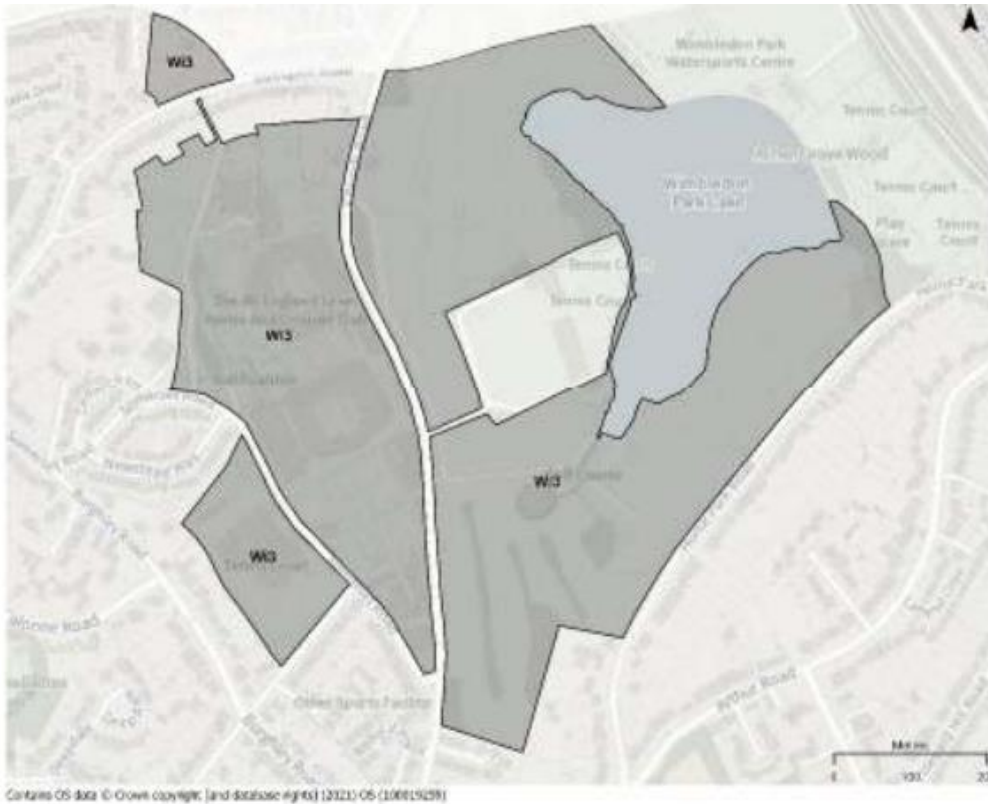
Yours faithfully,

Rolfe Judd Planning Limited

01.5 APPENDIX 1: 2022 LOCAL PLAN TEXT

2022 Local Plan Examination Text

Site Wi3: All England Lawn Tennis Club - Church Road, Wimbledon, SW19 5AE



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| Ward | Wimbledon Park |
| Site Description | <p>The All England Lawn Tennis and Croquet Club site, and specifically the Wimbledon Championships has long been internationally recognised as the premier tennis tournament in the world on grass. This long-established competitive tennis venue is the reason that “Wimbledon” is an internationally recognised and valued brand.</p> <p>The site is the All England Lawn Tennis Club (AELTC), an internationally recognised tennis venue with 18 outdoor and indoor tennis courts and supporting hospitality, offices, catering, press, players, security etc in a series of buildings and structures across the site.</p> <p>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 combined annual economic activity associated with The Championships and the activities of the AELTC was estimated in 2015 to be £180m for London and £280m for the UK (based on figures provided by AELTC).</p> <p>The main site is approximately 14 ha, with a smaller site of approximately 3ha 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.</p> |

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| | <p>Wimbledon Park, including Wimbledon Park Lake, lies at the other side of Church Road to the east of the site. The remaining surrounding area are made up of detached, semi-detached and terraced homes, many set in large plots in treelined streets.</p> <p>AELTC now owns the former golf course in Wimbledon Park and proposes that this becomes part of the hosting estate for the Wimbledon Championships, enabling the entire site to support the qualifying rounds and the Championships themselves by 2030.</p> <p>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.</p> <p>The AELTC have commenced the preparation of an 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.</p> |
| Site owner | All England Lawn Tennis and Croquet Club |
| Site area | 44 hectares |
| Existing use | <p>Part of the AELTC estate used mainly between May to September and intensively during the two weeks of the internationally recognised Wimbledon Championships. Outside The Championships period the site remains in use for member, club and charitable activities and includes the AELTC's Wimbledon Lawn Tennis Museum which attracts 100,000 visitors per year.</p> <p>Wimbledon Park Golf course is currently an 18-hole golf course with club house and maintenance facilities with no public access other than in line with golf club membership rules. This use will cease from January 2022.</p> |
| Site allocation | 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. |
| Site deliverability | 5-10 years |
| Design and accessibility guidance: | <p>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. Other opportunities benefits are:</p> <ul style="list-style-type: none"> • Make the most of the substantial economic benefits (directly and indirectly) of the site for the borough and for London. • In combination with the AELTC Raynes Park site, to support the capacity of the Wimbledon Junior Tennis Initiative, in providing better facilities for the free tennis coaching programme for primary school aged children in Merton and Wandsworth schools. • 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) working with other landowners Merton and Wandsworth Councils (public park landowner) and The Wimbledon Club (sports facilities landowner) all within |

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| | <p>Wimbledon Park.</p> <p>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.</p> <p>Development proposal will need to investigate the potential impact of the proposed development on archaeological heritage.</p> | |
| Infrastructure requirements. | <p>The AELTC site is used in a highly intensive manner, usually for less than two months per year, and relatively little outside the tennis grass court season given its size and scale. Any assessments relating to buildings or structures (e.g. transport assessments, carbon savings etc) should take account of any unusual usage patterns prevalent at the time and predicted for its future use.</p> <p>Development proposals for this site must refer to the have regard to Merton's Infrastructure Delivery Plan 2021 and ensure infrastructure requirements have been addressed by the proposal.</p> <p>Transport for London are engaged in the master planning of the site and may have infrastructure requirements relating to the amended use of the former golf course site. A travel plan will also be required to incorporate all the AELTC's landholdings and the Championships, which should support how people access the site in a sustainable way.</p> <p>The developer should contact Thames Water and SGN (Southern Gas Networks) to discuss requirements for any improvements to the water, wastewater and gas infrastructure network.</p> <p>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.</p> <p>This site is in an area identified as being deficient in access to public open space. The Council will require 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, in accordance with the Green Infrastructure policies.</p> | |
| The site location | | |
| Impacts Listed Buildings or undesignated heritage assets. | <p>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". Various listed buildings and structures are also visible from the site.</p> | |
| Impacts a Conservation Area. | <p>Yes. The north end of the existing tennis site sits within Bathgate Road conservation area. A part of the site is within an Archaeological Priority Area. Wimbledon North conservation area covers the west of the site (Wimbledon Park) and lies to the south of the site .</p> | |
| Impacts an Archaeological Priority Area. | <p>Yes</p> | |
| Impacts a Scheduled Ancient Monument. | <p>No</p> | |
| In a Flood Zone | <p>No, however the AELTC owned land at the golf course borders Wimbledon Park Lake, a key part of the man-made historic landscape features which is also a Category A reservoir (regulated by the</p> | |

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| | Environment Agency). Merton Council are undertaking improvements to Lake and the raised dam to ensure compliance with the Reservoirs Act. |
| In a town centre | No |
| Is it in an Opportunity Area | no |
| Impacts a designated open space | Yes, Open Land and designated open space |
| Impacts ecology designations | Yes, the golf course and surrounding land and lake are designated as Sites of Importance for Nature Conservation and green corridors. |
| Public Transport Accessibility Level (PTAL). | PTAL 2 poor access to public transport |

**01.6 APPENDIX 2: MERTON DRAFT LOCAL PLAN. PROPOSED
MODIFICATIONS JANUARY 2024.**

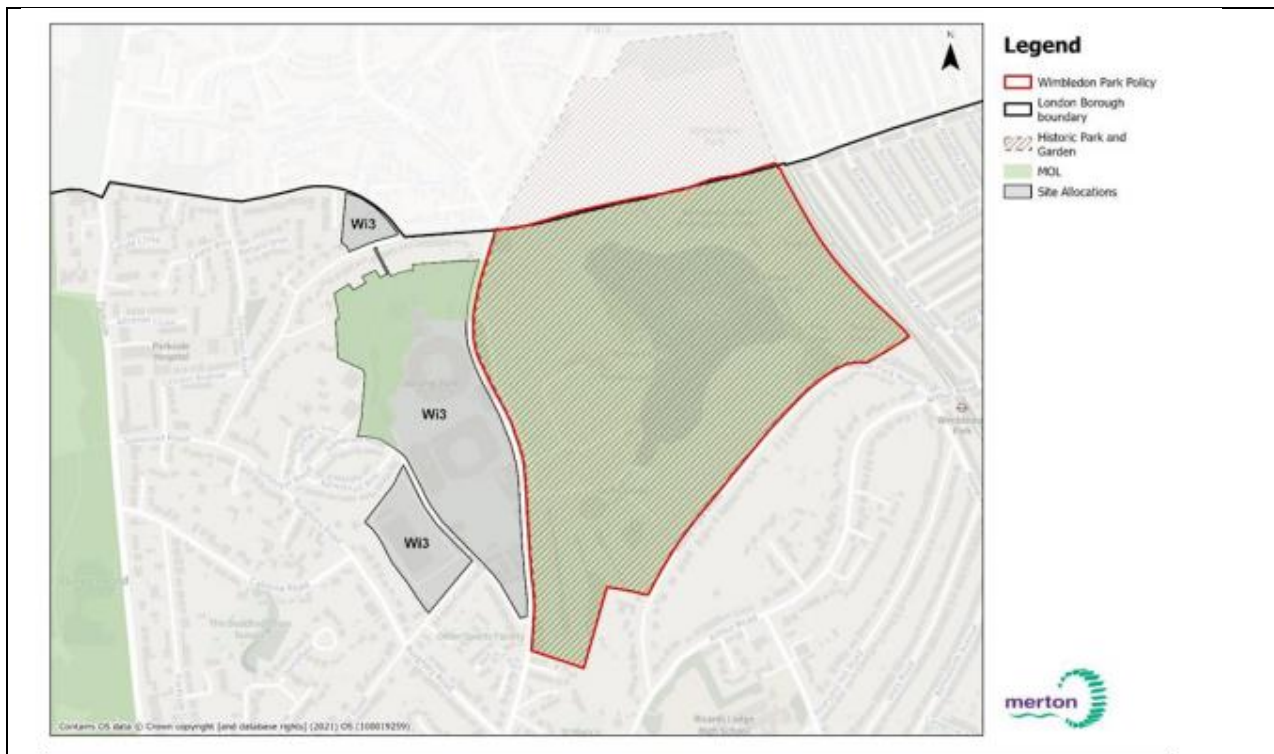
Main Modifications Text – January 2024 (Policy N8.1)

WIMBLEDON PARK – POLICY N8.1

To address the reasons why the Grade II* Wimbledon Park is on Historic England's Heritage at Risk Register and to recognise and support its sporting, recreation, ecological and amenity functions.

We will do this by:

- a. Supporting, the park's sport, recreation, play and amenity uses and enhancing access to them, ensuring their successful integration with historic and biodiversity designations.
- b. Preparing a landscape management plan to help all landowners co-ordinate the long-term management and maintenance of Wimbledon Park.
- c. Securing investment in the former golf course to conserve and enhance the historic landscape, biodiversity, sport and recreation and secure public access.
- d. Improving public access around the whole lake, alongside biodiversity, sporting, public safety, flood risk, while ensuring compliance for reservoir safety.
- e. Addressing the lake's poor condition and seeking restoration of its historic shape and form.
- f. Ensuring the lake continues to operate safely and in line with the national requirements for a large raised Reservoir, while managing flood risk.
- g. Identifying and protecting historic trees and other trees of significant amenity value and considering a programme for their renewal.
- h. Considering the removal of insensitive tree and other non-native planting, particularly on the former golf course and around the athletics track.
- i. Protecting and enhancing biodiversity, increasing the ecological interest of the park and its waterbodies.
- j. Respecting the site's historic setting, enhancing historic and new views to and across the lake, and to St Mary's Church, and supporting greater public access to these views.



SUPPORTING TEXT

8.1.1. Wimbledon Park is a Grade II* Historic Park and Garden, lying to the north of the borough and crossing the borough boundary between Merton and Wandsworth. The majority (c48ha) of the park lies within the London Borough of Merton; a smaller proportion (c12ha) lies within the London Borough of Wandsworth.

8.1.2. Wimbledon Park is the remnants of a larger Lancelot “Capability” Brown landscape, designed in the late 1700s originally for a nearby Manor House (since demolished). The Wimbledon Park Conservation Area Character Appraisal for Wimbledon Park contains details of the successive Manor Houses and the evolution of Wimbledon Park to what it is today.

8.1.3. Wimbledon Park is in three ownerships: Merton Council, the All England Lawn Tennis Club and the Wimbledon Club. About a third of Wimbledon Park, owned by Merton Council is currently publicly accessible. The All England Lawn Tennis Club’s main grounds lies to the west of Wimbledon Park across Church Road and the whole park has been used for many years to support the successful functioning of the Wimbledon Tennis Championships each summer. Planning application 21/P2900 has been submitted to Merton and Wandsworth Councils relating to the former golf course within Wimbledon Park.

8.1.4. The whole of Wimbledon Park is designated as Metropolitan Open Land, designated Open Space and Green Corridor. Wimbledon Park lies within Wimbledon North Conservation Area and a Tier 2 Archaeological Priority Area. Except for the public park, the site lies within a Site of Importance for Nature Conservation (SINC) Borough Grade 1. These designations are addressed by other policies in the Development Plan.

8.1.5. Wimbledon Park lake is the clearest surviving feature of Capability Brown’s original design. Other surviving landscape features over 200 years old include veteran trees and the presence of woodland at Horse Close and Ashen Grove. The lake is also a registered ‘large raised’ Reservoir under the Reservoir Act 1975, an active watersports destination and a Site of Importance for Nature Conservation, containing protected species and their habitats. The Lake connects via the Wimbledon Park Brook and surface water sewer network into the River Wandle downstream in Earlsfield.

8.1.6. In addition to the historic and natural environment designations, Wimbledon Park is an intensively used

sporting venue across all three land ownerships, hosting watersports, tennis, beach volleyball, cricket, hockey and golf until 2023. The public part of the park is also important for recreation, play and amenity. Wimbledon Park meets multiple priorities for green and blue infrastructure and associated amenity, education, health and wellbeing benefits as set out in Merton's Green Infrastructure Study 2020.

Sports, recreation and play

8.1.7. NPPF 2023 paragraph 98 states "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 and can deliver wider benefits for nature and support efforts to address climate change." The London Plan supports retaining and enhancing formal and informal sporting and recreational facilities to encourage physical activity and deliver a range of social, health and wellbeing benefits. The London Plan also recognises that the co-location of sporting facilities can increase participation.

8.1.8. Wimbledon Park supports a wide range of sports and recreational uses including angling, watersports, athletics, bowls, hockey, cricket, mini-golf, tennis and beach volleyball. It also provides open space for informal sports and recreation, particularly on the Great Field in the public park, walking around the park and parts of the lakeshore, the recently deculverted brook and in the children's playgrounds and splash play. In line with policy IN14.3 we will safeguard existing sport and recreation facilities, encourage further opportunities for sport, recreation and play, encourage co-location of services and improve community access.

8.1.9. The public park is intensively used and this policy seeks to maintain this and improve public access to private land ownership where possible. This policy supports the provision of well-maintained and adequately sized paths, bridges, toilets, drainage and other ancillary services to support access to and enjoyment of more of the park for people of all ages and abilities.

Enhancing biodiversity and access to nature

8.1.10. Wimbledon Park, including the lake, has multiple land use designations to support biodiversity and nature conservation. Protected species including different species of bat and birds, stag beetle, common frog and toad, European eel, veteran trees and other flora. There is also potential to improve biodiversity resilience by better habitat management, for example addressing the poor condition of the lake, removing recent planting located too close to veteran trees, replacing non-native with native species, and reducing pollutants in grassland management. In line with policy O15.3 biodiversity and access to nature we will protect and enhance biodiversity and improve accessibility to nature.

The historic environment

8.1.11. Paragraph 190 of the NPPF 2023 state "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. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation.
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

8.1.12. In 2016 the Wimbledon Park Registered Park and Garden was added to Historic England's Heritage At Risk Register due to the following issues:

- Uncertainty around the future [of the entire historic landscape].
- The impacts of divided ownership on landscape management.
- Obscured views.
- The deterioration of the Lake.

Addressing the future of the historic landscape and landscape management

8.1.13. Wimbledon Park is currently owned by three freeholders. The 9 hectare lake and c18 hectares of

Wimbledon Park is owned by Merton Council and used as a public park, including part that lies within the London Borough of Wandsworth.

8.1.14. The remainder is privately owned and is not publicly accessible. 29 hectares is the freehold of the All England Lawn Tennis Club. In 2016 when Wimbledon Park was added to Historic England's "Heritage at Risk" register, Wimbledon Park Golf Club was the leaseholder of this land which was used as a golf course for many decades until January 2023. The remaining c4 hectares is owned by the Wimbledon Club.

8.1.15. Wimbledon North Conservation Area Character Appraisal 2006 (sub-area 2) describes the remnants of the Capability Brown landscape at Wimbledon Park, and positive and detrimental features. For many decades landscape management has been divided across four organisations (the council, the Wimbledon Club, AELTC and their leaseholder, the Wimbledon Park Golf Club). The sites were being managed intensively and largely independently in accordance with their main purpose: either as a public park including sporting and recreational uses, a private sporting venue or a golf course.

8.1.16. Wimbledon north conservation area character appraisal 2006 identifies positive and negative landscape features within and just beyond Wimbledon Park. Addressing the negative features in Wimbledon Park's landscape, enhancing the positive features and, where possible, better co-ordinating landscape management across the whole site will help to address the reasons that Wimbledon Park is on the Heritage at Risk Register.

8.1.17. To this end we will secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward. This will provide a comprehensive plan for the conservation, enhancement and ongoing management of the entire registered park and garden that takes full account of the site's historic development and significance, acting as a common agreed baseline for all parties to work from.

Addressing obscured views

8.1.18. In the eighteenth century the original Capability Brown landscape was curated across a larger area in the "English Landscape" style, using the existing topography and man-made features including the creation of the lake with spurs to resemble river entrances, open parkland interspersed by carefully placed trees and woodland all giving rise to curated views, including of St Mary's Church spire. Veteran trees, particularly oak and some dating or pre-dating the 1800s, remain across the former golf course and within the council-owned public park. The woodland belts at Horse Close Wood and Ashen Grove were also part of the Brownian layout.

8.1.19. Younger, faster growing trees have been planted to create fairways as part of the former golf course operations; sometimes obscuring the views and parkland setting and sometimes in too close proximity to veteran trees. Faster growing conifers and polars planted to screen the athletics track also dominate the landscape negatively.

8.1.20. Due in part to the reservoir dam face, trees, and C20th buildings and structures built within the park, the parkland and lake are difficult to see from key publicly accessible points, including Home Park Road, the closest entrance to Wimbledon Park Station. The topography (rising at either end and including the lake's dam face) both helps and hinders views across the area. Buildings on or adjacent the lakeshore in the public park and the Wimbledon Club site obscure views across the lake.

8.1.21. The following measures should be considered for addressing obscured views, including those derived from Wimbledon North Conservation Area Character Appraisal 2006:

8.1.22. To improve the historic view lines across the lake:

- a) Removing insensitive tree planting, particularly around the athletics track and on the former golf course.
- b) Improving the appearance of buildings or removing them and to co-locating their services within other facilities while maintaining easy access to the lakeshore for watersports equipment and people.

8.1.23. To improve views across the whole park and lake, improving historic views and creating new views:

- a) Removing insensitive fairway tree and other planting on the former golf course and anywhere else it is found,
- b) Improving public access to currently private land and particularly around the whole lake.

- c) Ensuring that viewing points are accessible to people of all abilities by creating or maintaining paths, fences and planting so as not to create a barrier to access or views.
- d) Ensuring that buildings or development are co-located wherever possible and designed to minimise their impact on the landscape.

Addressing the deterioration of the lake

8.1.24. Wimbledon Park lake is the largest and most visible remaining feature of Capability Brown's man-made landscape. The spurs that feed into the lake have been partially filled in, reducing the lakes size, form and shape. The Lake is fed by overland flow paths and the surface water sewer network, principally by two large surface water sewers and outfalls both of which are currently adopted by Thames Water. The total catchment area which feeds the lake is approximately 230ha of which 40ha is direct catchment and 190ha is indirect catchment from urbanised areas, including highway runoff.

8.1.25. It is a registered as a Grade A large raised reservoir, regulated under the Reservoir Act 1975. The reservoir is retained by an earthfill embankment, some 320m long. The height of the embankment varies from approximately 1m to a maximum of about 4m. The Lake flows into the River Wandle downstream in Earfield via the Wimbledon Park Brook and the surface water sewer network.

8.1.26. The Lake is not used for drinking water supply purposes. The current poor quality of the Lake and its setting is one of the reasons that Wimbledon Park is on the "heritage at risk" register.

8.1.27. As well as being a large raised reservoir, the lake is intensively used for a variety of activities including angling, watersports and by wildfowl (including visitors feeding the birds) and has high localised amenity value. Over the years, the lake has suffered from pollution incidents, as a result of fly tipping waste into drains or via drainage misconnections from private properties which inadvertently connects household foul drains to the surface water sewer network which ultimately feeds into the lake. Several of these pollution incidents have resulted in fish kills, particularly in summer when oxygen levels in the lake are low and water depths are shallow.

8.1.28. The lake is generally shallow in depth, sited in an urban area and in terms of water quality it is nutrient rich. During summer, when the water heats up and oxygen levels are low and nutrient levels are high, the suffers from algal blooms, some of which can be hazardous to wildlife, pets and the public. Since its formation, the Lake has over time silted up quite considerably. This siltation is in part due to detritus ingress through the outfalls into the Lake, vegetation (leaf fall) and wildfowl habitat, combined with a relatively stagnant water passage through the lake being artificially dammed over hundreds of years.

8.1.29. A Section 10 Reservoir Act inspection report was carried out in 2014 which included statutory requirements that needed to be actioned to ensure compliance with the Act for Reservoir Safety. The council carried out a bathymetric survey of the silt levels in 2015. The council completed the Wimbledon Park Lake Reservoir Safety scheme in 2022, which has addressed reservoir safety requirements and made some improvements to the landscape and lake edge. As part of the wider opportunities of this project, the Council were able to deculvert an open section of the Wimbledon Park Brook in the public park to help create additional flood storage and improve the landscape and biodiversity. However the lake needs de-silting to ensure its amenity and historic value, to ensure water quality is not compromised, as the climate changes and hotter summers become more frequent. De-silting will be likely to help to reduce the number and length of algal blooms, improve it ecological capacity, increase oxygenation and continue to use the Lake it safely and fully for watersports, angling, heritage, biodiversity and amenity.

8.1.30. Given the size of this historic asset and its London location, the lake shoreline currently has very limited public access. We will work with all landowners to improve public access around the whole lake, taking into account biodiversity habitats, sporting, safety and reservoir management considerations.

Main Modifications Text – January 2024 (Site Allocation Wi3)

MM Appendix 6 - page 283 (MM115) changes to Site Allocation Wi3

MM Appendix 6 - page 283 (MM115) changes to Site Allocation Wi3

Site Wi3: All England Lawn Tennis Club - Church Road, Wimbledon, SW19 5AE



Ward: Wimbledon Park

Site description:

1. The All England Lawn Tennis and Croquet Club site, and specifically the Wimbledon Championships has long been internationally recognised as the premier tennis tournament in the world on grass. This long-established competitive tennis venue is the reason that “Wimbledon” is an internationally recognised and valued brand.
2. The site is the All England Lawn Tennis Club (AELTC), an internationally recognised tennis venue with 18 outdoor and indoor tennis courts and supporting hospitality, offices, catering, press, players, security etc in a series of buildings and structures across the site.
3. 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 combined annual economic activity associated with The Championships and the activities of the AELTC was estimated in 2015 to be £180m for London and £280m for the UK (based on figures provided by AELTC).
4. The main site is approximately 14 ha, with a smaller site of approximately 3ha 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.
5. Wimbledon Park, including Wimbledon Park Lake, lies at the other side of Church Road to the east of the site. The remaining surrounding area are made up of detached, semi-detached and terraced homes, many set in large plots in tree-lined streets.
6. AELTC now owns the former golf course in Wimbledon Park and proposes that this becomes part of the hosting estate for the Wimbledon Championships, enabling the entire site to support the qualifying rounds and the Championships themselves by 2030. **In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council.**

~~7. 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.~~

~~8. The AELTC have commenced the preparation of an updated masterplan new masterplan to investigate and identify the future development opportunities for the AELTC estate and The Championships incorporating the golf course.~~

Site owner: All England Lawn Tennis and Croquet Club
Site area: 17.83 hectares

Existing uses:

1. Part of the AELTC estate used mainly between May to September and intensively during the two weeks of the internationally recognised Wimbledon Championships.

2. Outside The Championships period the site remains in use for member, club and charitable activities and includes the AELTC's Wimbledon Lawn Tennis Museum which attracts 100,000 visitors per year.

~~3. Wimbledon Park Golf course is currently an 18 hole golf course with club house and maintenance facilities. This use will cease from January 2022.~~

Site allocation: 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.~~

Site deliverability: 5-10 years

Design and accessibility guidance:

1. 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.~~

Other ~~opportunities~~ benefits are:

a. Make the most of the substantial economic benefits (directly and indirectly) of the site for the borough and for London.

b. In combination with the AELTC Raynes Park site, to support the capacity of the Wimbledon Junior Tennis Initiative, in providing better facilities for the free tennis coaching programme for primary school aged children in Merton and Wandsworth schools.

~~c. Secure investment in the former golf course to invest in and reimagine the historic landscape and secure pedestrian 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 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.~~

2. Development proposals 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, **from Bathgate Road conservation area and those views identified in the Wimbledon north conservation area appraisal.**

3. Development proposals will need to investigate the potential impact of the proposed development on archaeological heritage.

Infrastructure Requirements:

1. The AELTC site is used in a highly intensive manner, usually for less than two months per year, and relatively little outside the tennis grass court season given its size, scale and bespoke use. Any assessments relating to buildings or structures (e.g. transport assessments, carbon savings etc) should take account of any unusual usage patterns prevalent at the time and predicted for its future use.

2. Development proposals for this site must **refer to the** ~~have regard to Merton's Infrastructure Delivery Plan~~ **and ensure infrastructure requirements have been addressed by the proposal** and Green Infrastructure Study 2020.

3. ~~Transport for London are engaged in the master planning of the site and may have infrastructure requirements relating to the amended use of the former golf course site. A travel plan will also be required to incorporate all the AELTC's landholdings and the Championships, which should support how people access the site in a sustainable way.~~

4. The developer should contact Thames Water and SGN (~~Southern Gas Networks~~) to discuss requirements for any improvements to the water, wastewater and gas infrastructure network.

5. This site is in an area ~~identified as being deficient~~ **of deficiency** in access to nature. The Council will ~~require~~ **expect** proposals to ~~alleviate~~ **address** this deficiency in accordance with the Green Infrastructure policies.

6. ~~This site is in an area identified as being deficient in access to public open space. The Council will require 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, in accordance with the Green Infrastructure policies.~~

7. To assess any potential environmental impacts to Wimbledon Common (Special Area of Conservation), any substantial development proposal must be supported by measures set out in planning policies for on-site and off-site environmental monitoring proportionate to the scale of development proposed. Such proposals will be required to submit a full Construction Logistics Plan - outlining all phases of construction' and proposals must support the installation of air quality monitoring devices along the A219 (Parkside) during the construction of the site.

The site location

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| 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". Various listed buildings and structures <u>including Grade II* listed St Mary's Church and Wimbledon Park, a Grade II* listed Historic Park on the "heritage at risk register"</u> are also visible from the site. |
| Impacts a Conservation Area. | Yes. The north end of the site sits within Bathgate Road conservation area. The whole of the site is within an archaeological priority zone. Wimbledon <u>North</u> conservation area lies to the west <u>and the south</u> of the site |
| Impacts an Archaeological Priority Area. | Yes <u>No</u> |
| Impacts a Scheduled Ancient Monument. | No. |
| In a Flood Zone. | No, however the AELTC owned land at the golf course borders Wimbledon Park Lake, a |

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| | key part of the man-made historic landscape features which is also a Category A reservoir (regulated by the Environment Agency). Merton Council are undertaking LBM29 Schedule of Main Modifications to Merton's Draft Local Plan – January 2024 Page 165 of 165 improvements to Lake and the raised dam to ensure compliance with the Reservoirs Act |
| Is in a Town Centre. | No |
| Is in an Opportunity Area | No |
| Impacts a designated open space. | Yes, part of the site to the north and north-west is designated as Metropolitan Open Land (MOL) and designated open space. |
| Impacts ecology designations. | No Yes, the golf course and surrounding land and lake are designated as Sites of Importance for Nature Conservation and green corridors. |
| Public Transport Accessibility Level (PTAL). | PTAL 2 poor access to public transport |