

# Inspectors' Matters, Issues and Questions – 3 August 2022

## Matter 5: Site Allocation Wi3 (All England Lawn Tennis Club)

Issue (i): Is Site Allocation Wi3 justified, effective consistent with national policy, and in general conformity with the London Plan?

NB: This session will take forward the discussions held at Stage 1 focusing particularly on the material to be produced by the Council following the Inspectors' initial directions at that stage.

**Q1. Is the Council's updated heritage evidence base relating to the Wi3 Allocation proportionate, and does it justify the approach taken including in terms of any suggested MMs?**

Council response:

- 5.1 Yes, the council's updated heritage evidence base on historic matters relating to the Wi3 allocation is proportionate and it justifies the approach taken in terms of any suggested MMs.
- 5.2 The council's Statement of Common Ground with Historic England prior to the Stage 1 hearings ([Document D13k dated June 2022](#)) stated as an action point for the council.
- The Council to produce a supplementary evidence document for the Local Plan that summarises the historic and current information from a heritage perspective and clearly defines the parameters for the allocation, taking on board the opportunities and constraints present on site. It is important that the supplementary document is not seen to predetermine the planning applications. Both parties agree that the relevant information likely exists, but it is not easily identifiable or readily accessible as part of the new local plan's evidence base.*
- 5.3 Appendix 3 to this statement contains the council's updated evidence on historic matters.
- 5.4 To make it easier for all participants in the Examination to follow what modifications the council is now proposing to Site Wi3, Appendix 2 to this statement contains a copy of Site Allocation Wi3 with comments to identify the

source of the council's proposed modifications.

- 5.5 The council has discussed this evidence with Historic England and submitted earlier versions prior to the Stage 2 deadline of 19th September 2022, however the council has not given Historic England colleagues enough time to consider the final version of the historic environment information prior to 19<sup>th</sup> September 2022. The council will work with Historic England on statements of common ground to be submitted at least five days prior to the hearing date for Site Wi3.

**Q2. Would any suggested MMs provide a positive strategy for the conservation and enjoyment of the Registered Park, and provide an effective basis for measures to address the reasons for its inclusion on Historic England's Heritage at Risk register (per paragraph 190 of the Framework)?**

Council response:

- 5.6 Yes, suggested MMs would provide a positive strategy for the conservation and enjoyment of the registered park and provide an effective basis for measures to address the reasons for its inclusion on Historic England's Heritage at Risk register as per NPPF paragraph 190.
- 5.7 NPPF paragraph 190 states "*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."*

- 5.8 These main modifications are illustrated in Appendices 1 and 2 to this statement.

**Q3. Is an updated Statement of Common Ground with Historic England available which covers the above points?**

Council response:

5.9 The council and Historic England have liaised on this site allocation and other matters in the Local Plan.

5.10 We are continuing to work together to produce an updated Statement of Common Ground on this allocation which will be produced at least five days before the relevant hearing session.

**Q4. Would suggested MMs ensure that the allocation is grounded in an understanding and evaluation of the defining characteristics of the Wi3 site and its surroundings (per paragraph 127 of the Framework)?**

Council response:

5.11 NPPF paragraph 127 states “Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.

5.12 Appendix 1 and 2 to this statement sets out the Main Modifications proposed to Site Allocation Wi3 (the table in appendix 1) and also for clarity and ease of reading this statement sets out Site Allocation Wi3 with reference to each of the modifications.

5.13 In particular, the main modifications proposed under the “Design and accessibility guidance” and “Infrastructure” sections ensure that the allocation is grounded in

an understanding and evaluation of the defining characteristics of Site Wi3 and its surroundings. For example:

5.13.1 Modifications are proposed to ensure that the site allocation is evidenced, justified and in conformity with national policy by including measures relating to its surroundings.

5.13.2 Modifications are also proposed to clarify that the site will be used intensively for a short period of time each year and for most of the year (+10 months) will be used in a much more limited fashion.

**Q5. Would any suggested MMs ensure that the approach to Metropolitan Open Land (MOL) is justified, and do they provide an effective basis for development management across the Wi3 site in these regards?**

Council response:

5.14 Yes, with the proposed MMs, as set out below, the approach to MOL for Site Allocation Wi3 is justified and sets out a clear and effective basis for development management and decision-making.

5.15 Following on from the Stage 1 hearing discussions and actions, further modifications are proposed to the Wi3 site allocation and Strategic Policy O15.1 relating to MOL. These are included in Appendix 1 and Appendix 2 of this statement.

5.16 The first is the replacement of the site allocation map on page 282. The map has been amended to show both the site allocation boundary as well as the MOL boundary. This modification clearly and visually illustrates the interaction between MOL and the entire site, which was previously only described in words. This modification is considered necessary for effectiveness and to improve clarity for decision-making.

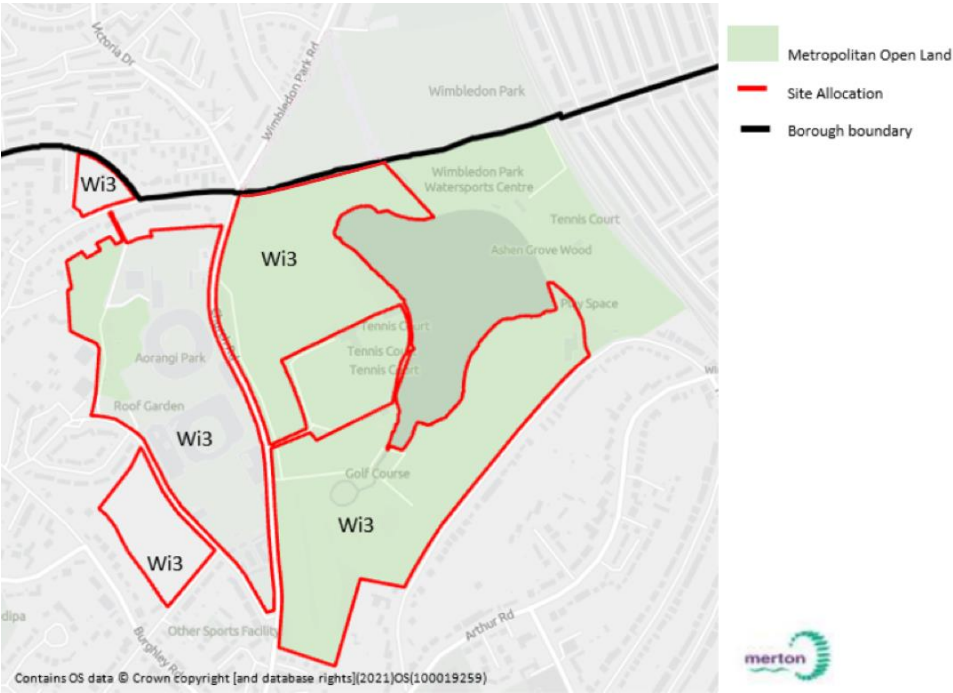
5.17 The second modification is the insertion of additional text in the “impacts a designated open space” section of the site allocation, to make it clear that part of the site is to be removed from MOL through this Local Plan. This is to ensure the plan is consistent with national policy.

- 5.18 The third modification is the addition of two new paragraphs in the supporting text of Strategic Policy O15.1. This text is necessary to ensure the Plan is consistent with national policy, specifically paragraph 140 of the NPPF.
- 5.19 The final modification is the addition of a new appendix, after page 602. The appendix includes additional details on MOL, including a list and description of all MOL sites, a visual representation of proposed boundary changes and exceptional circumstances, for relevant sites. This appendix is necessary to improve clarity on the changes to MOL brought forward through the Plan, to ensure the Plan is consistent with national policy.
- 5.20 Following the discussion at the Stage 1 hearings, the council considers that these proposed modifications are necessary to ensure that the Plan is justified, in relation to the approach on MOL, and that site allocation Wi3 clearly sets out an effective basis for development management.

Proposed modifications:

**Site Allocation Wi3**

*(replace site allocation map with the following:)*



**Site Allocation Wi3**

<b>The site location</b>	
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Impacts a designated open space	Yes, <u>Metropolitan Open Land (MOL)</u> and designated open space. <u>A small area of MOL will be removed from this site, due to exceptional circumstances in accordance with NPPF 140. Refer to the Appendices, Strategic Policy O15.1 and the Policies Map for further information on MOL.</u>
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## Strategic Policy O15.1 - Supporting Text

*(new paragraphs below 15.1.2)*

There are 9 areas of Metropolitan Open Land (MOL) designated in Merton, which are of great importance to the green character of the borough. Through the green infrastructure reviews undertaken for this Plan, the MOL boundaries have been reviewed and the council does not consider that major changes are needed to accommodate growth. The MOL sites illustrated on the Policies Maps and listed in the Appendices will continue to be protected from inappropriate development in accordance with London Plan Policy G3 and NPPF paragraph 147. Further information is set out in Policy O15.2 Green Infrastructure and Open Space.

Some minor boundary amendments have been made to MOL sites on the Policies Map through this Local Plan. These include corrections to mapping irregularities, and inconsistencies, changes to reflect the built form on site that has come forward through approved planning applications, which no longer protects the spatial or visual openness of the MOL, and some exceptional circumstances. These boundary changes to the Policies Map help to create strong, defensible and permanent boundaries and ensures consistency with the NPPF and London Plan. With reference to NPPF 140, further information on these boundary changes is provided in the Appendices.

## New Appendix

### Metropolitan Open Land (MOL) - boundary amendments and exceptional circumstances

(Below is an extract of the relevant part for Wi3)

#### MOL-02 – Wimbledon Park

#### Site Description (including relevant physical boundary features):

Wimbledon Park MOL is located within the Wimbledon Neighbourhood. It includes the publicly accessible Wimbledon Park (within the LB Merton boundary), the Wimbledon

Park Golf Course and Club, The Wimbledon Club sports club, Wimbledon Park Lake and part of the All England Lawn Tennis Club (AELTC).

The physical boundaries include:

- North – It should be noted that as Wimbledon Park is located in the boroughs of both LB Merton and LB Wandsworth, the northern boundary of this MOL site in Merton is the borough boundary, which is not a physical boundary.
- East – fenced landscaping along the District Underground Line.
- South – Home Park Road and the fenced rear boundaries of residential properties.
- West – Church Road.
- The smaller area of Wimbledon Park MOL on the site of the AELTC site is bound by the rear fenced boundaries of residential properties to the north and west, operational buildings to the south, and the boundary of Aorangi Terrace (also known as Murray Mound) to the east.

**Description of MOL boundary change (including any exceptional circumstances):**

To remove a small area on the AELTC site which contains buildings and other specific features that are not considered to contribute to the openness of the Wimbledon Park MOL.

The Wimbledon Championships event is of national and international significance, in sporting, economic and cultural terms. The Wimbledon Park MOL comprises the entirety of Wimbledon Park, to the east of Church Road, in addition to a small area to the north of the AELTC site. This area includes some practice courts and buildings, but is not connected either visually or physically, to the park, with clear boundaries set by Church Road. The site owners have provided evidence which sets out a long-term vision for The Wimbledon Championships at this location, which includes the relocation of the Qualifying Event and enhancement of the current site to create a more user-friendly experience and to maintain its position as one of the best sporting events in the World.

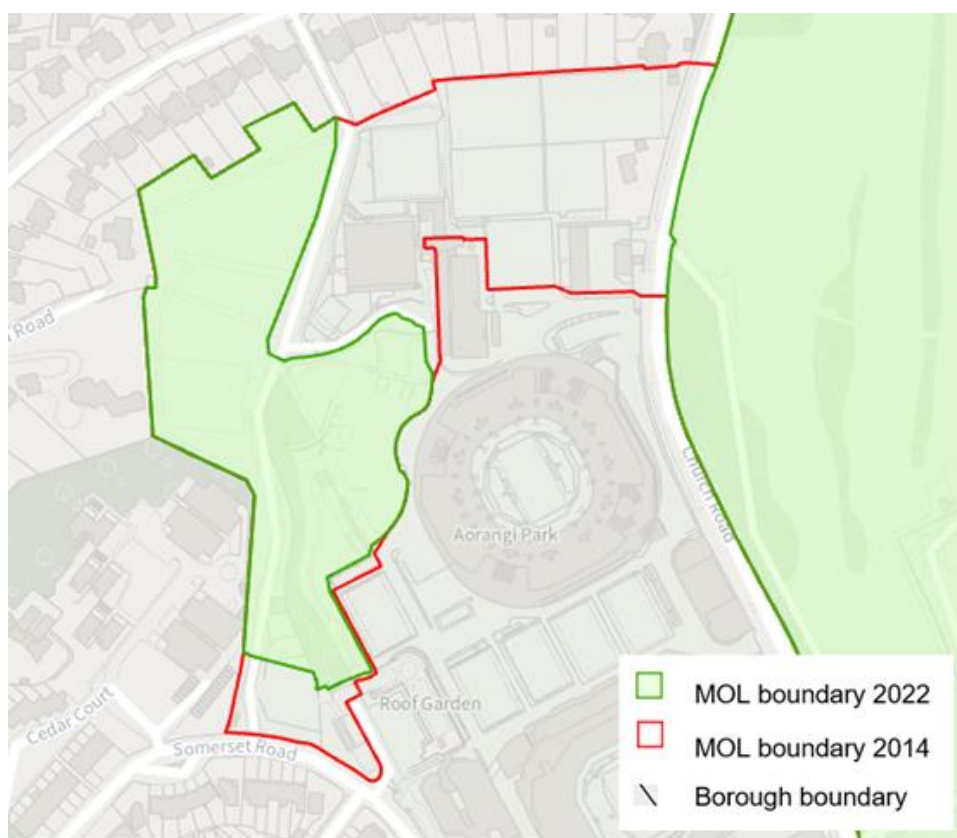
This part of MOL does not meet the strategic designation criteria and it is considered there would be no harm to the wider MOL function of Wimbledon Park, as the land is clearly separated from Wimbledon Park, visually and physically.

The remaining areas of the site, namely Wimbledon Park and the area known as Aorangi Terrace (Murray Mound) still meet MOL criteria 1, 2 and 4 and maintain openness as detailed in the NPPF.

The physical boundaries are clear and defensible and capable of enduring beyond the Plan period, as the Wimbledon Championships is a long lasting international sporting event. The council considers that exceptional circumstances exist for this part of the MOL to be removed.

This boundary change results in a reduction of 2.5ha (from 52.5ha to 50ha), which is a 4.76% change.

**Map illustrating boundary change:**



**Q6. Taking together the presence of restrictive covenants relating to part of the Wi3 site with recent case law<sup>1</sup> referred to in previous hearing statements is the allocation effective insofar as its deliverability (or developability) over the plan period is concerned (per paragraph 35(d) of the Framework)?**

**Council response:**

5.21 Yes, the allocation is effective insofar as its deliverability or developability over the 15-year plan period is concerned.

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<sup>1</sup> *London Historic Parks and Gardens Trust v Minister of State for Housing* [2022] EWHC 829 (Admin)



5.22 A covenant exists on part of the site allocation, dating from 1993 when the council sold what was then Wimbledon Park Golf Course to the All England Lawn Tennis Club. The text of the covenant is included below.

THE THIRD SCHEDULE

1 Not to use the Property otherwise than for leisure or recreational purposes or as an open space Provided Always that this restriction shall not prevent the use of the Property for car parking generally in the manner adopted in connection with the Championships held in 1993 and uses ancillary thereto for and in connection with the Transferee's annual tennis Championships held at the Transferee's adjacent land;

2 No building shall be erected on the Property other than a building or buildings the use of which is ancillary to the recreational or open space use referred to in paragraph 1 above and which building or buildings will not impair the appreciation of the general public of the extent or openness of the Property Provided Always that this restriction shall not prevent the Transferee or its successors in title from consenting to the erection of a building which is not permitted under this paragraph 2 where consent is required to be given to the erection of such a building pursuant to the provisions of the Lease or any extension or renewal thereof;

3.1 This covenant will not take effect in relation to any part of the area shown coloured green on Plan B annexed hereto ("the Dedication Land") until the Lease or any continuation or renewal thereof ceases to subsist.

3.2 Subject to paragraph 3.1 above as soon as practicable after golf ceases permanently to be a use on any part of the Dedication Land (a "Relevant Part") the Transferee or its successors in title will dedicate that Relevant Part as a public walkway Provided Always that the Transferor shall have the right to defer the said dedication of the Relevant Part on giving the Transferee 28 days notice in writing to a date which may be nominated by the Transferor ("the Deferred Date") subject to giving the Transferee 28 days prior written notice of the Deferred Date.

C [ THE FOURTH SCHEDULE

1 To be responsible for the level of water in the Lake and for the maintenance of the Lake walls (to the extent that The Wimbledon Park Golf Club Limited is not obliged to maintain the Lake walls pursuant to the Lease) and the Transferor shall have all such rights of entry on to the Property as may be necessary to fulfill these obligations;

2 Not to give any acknowledgement to the owners or occupiers of the Cricket Club that any building now or hereafter constructed or permitted to be constructed by the owners of the Cricket Club does not encroach on the Property notwithstanding the acknowledgement by the Transferor to the Transferee that the relevant part of the boundary of the Property is that identified on site by the line of the angle-iron stakes on 1 December 1993;

3 If at any time the whole or any part of the area shown coloured green on Plan B is dedicated as a public walkway at the Transferor's cost to fence the boundary of the said walkway to the minimum specification shown on the plan annexed hereto marked Plan C within one year after the date of the said dedication.

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5.23 In assessing the deliverability / developability of Site allocation Wi3 over the Local Plan's lifetime of 2021/22 - 2036/37, the council has considered a potential scenario where an element of the site's development in accordance with the Site Allocation would give rise to some conflict with the covenant. This is to ensure that the council's approach is robust and is not based on overly optimistic assumptions about the potential impact of the covenant on Site Allocation Wi3's deliverability over the next 15 years.

5.24 In the event that such a conflict would arise, it will be a matter for the landowner, AELTC, to secure a release from the covenant. Two principal routes are available to achieve this.

- 5.25 First, the landowner / developer could ask the council to release or modify the covenant as the council is the party with the benefit of the covenant in its capacity as landowner of the adjoining Wimbledon Park. In general, a party with the benefit of a covenant has power to agree to discharge or modify that covenant. The council as landowner has, in principle, such a power in respect of the covenants affecting part of the land within Site Allocation Wi3. It will be a matter for the council in its capacity as landowner to decide whether to exercise that power, should it be asked to do so and the council would of course observe any legal requirements which arise in respect of the specific covenant under consideration. Before agreeing to modify or discharge the covenants the council, as landowner, may engage with and/or consult with others with an interest in the covenant, including local community groups.
- 5.26 Secondly, and alternatively, the landowner, AELTC, may seek to vary or to discharge a restrictive covenant by making an application to the Upper Tribunal (Lands Chamber) pursuant to s.84 of the Law of Property Act 1925.
- 5.27 As there are two principal routes that could be followed in the event that some aspect of development on Site Allocation Wi3 gives rise to a conflict with the restrictive covenant, this provides sufficient assurance that the site allocation is reasonably deliverable and developable over the plan period.
- 5.28 In relation to the decision of the Thornton J. in [London Historic Gardens Trust v Minister of State for Housing \[2022\] EWHC 829 \(Admin\)](#) the existence of a local Act of Parliament which prevented a national Holocaust memorial and learning centre being built without its amendment or repeal was held to be a material planning consideration in determining the Holocaust Memorial and learning centre's planning application on Victoria Tower Gardens.
- 5.29 It is clear from the judgment that it this related to the particular circumstances of the proposed development. In that case, developing a national Holocaust memorial within Victoria Tower Gardens was attempted to be justified in preference to alternative locations in part because of the need to deliver the memorial during the lifetime of the remaining survivors of the Holocaust.

5.30 The Judge held that the restriction in the relevant Act of Parliament was directly relevant to the decision-maker's assessment of the merits of the proposed location in Victoria Tower Gardens compared to alternative locations (see for example para.149 of the judgment of Thornton J.). Similar issues do not arise in respect of policy Wi3 as in the *London Historic Gardens Trust* case. The Judge made clear at para.109 of her judgment in particular that the effect of non-planning restrictions on deliverability of development is not usually a planning consideration. It is not therefore considered that the decision in the *London Historic Gardens Trust* case has any particular bearing on the soundness of Site Allocation Wi3.

5.31 In conclusion, the council has considered the presence of the covenant on part of Site allocation Wi3 and has concluded that the Site Allocation is reasonably deliverable and developable over the lifetime of this local plan.

## Appendix 1 - main modifications relating to site Wi3 (see also responses to Questions 2 and 4 of this Matter)

283 and 284	Site allocation Wi3 design and accessibility guidance	<p><i>Move the following existing paragraph from “site description” on page 283 to “design and accessibility guidance” on page 284:</i></p> <p><u>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.</u></p>	To make the plan effective and in recognition of the Statement of Common Ground between LB Merton and LB Wandsworth, January 2022	May 2022 – response to the Inspectors’ questions
283	Site Allocation Wi3 site description	<p><del>The AELTC have commenced the preparation of an updated masterplan</del> <u>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.</u></p>	To improve clarity	September 2022 - in response to action arising from Stage 1 Hearings of Merton’s Local Plan.
283	Site Allocation Wi3	Secure investment in the former golf course to invest in and <u>conserve and enhance</u> <del>reimagine</del> the historic landscape	To make the plan effective and in recognition of the Statement of Common Ground between LB Merton and Historic England June 2022	September 2022 - in response to action arising from Stage 1 Hearings of Merton’s Local Plan.
283	Site Allocation Wi3 design and accessibility guidance	<p><u>The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club).</u></p> <p><u>The Wimbledon Park Registered Park and Garden was added to Historic England’s Heritage At Risk Register due to the following issues:</u></p> <ul style="list-style-type: none"> <li><u>Uncertainty around the future [of the entire historic landscape];</u></li> <li><u>The impacts of divided ownership on landscape management;</u></li> </ul>	To make the plan effective, in conformity with national policy and in recognition of the Statement of Common Ground	September 2022 - in response to action arising from Stage 1 Hearings of Merton’s Local Plan.

		<ul style="list-style-type: none"> <li>• <u>Obscured views; and</u></li> <li>• <u>The deterioration of the Lake</u></li> </ul> <p><u>It 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.</u></p> <p><u>Development proposals must secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward, to 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.</u></p>	between LB Merton and Historic England June 2022	
284	Site Allocation Wi3 design and accessibility guidance	<p><u>Wimbledon Park lake is the clearest surviving feature from the Capability Brown landscape and its poor quality is one of the reasons that Wimbledon Park is on the "heritage at risk" register. Development proposals will need to:</u></p> <ul style="list-style-type: none"> <li>• <u>improve public access around the whole lake, alongside ecological, sporting and reservoir management considerations.</u></li> <li>• <u>address the poor condition of the lake.</u></li> <li>• <u>aim to re-create the Capability Brown lake layout</u></li> </ul> <p><u>Development proposals must:</u></p> <ul style="list-style-type: none"> <li>• <u>identify and protect historic trees and other trees of significant amenity value and consider a programme for their renewal and replanting as appropriate.</u></li> <li>• <u>Consider the removal of insensitive tree and other planting on the former golf course.</u></li> </ul>	To make the plan effective and in conformity with national policy.	September 2022 – in response to evidence compiled on Site Wi3
284	Site allocation Wi3 design and accessibility guidance	<p><i>Design and Accessibility guidance:</i> 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>...</p>	Consistency with national policy and with Grade II* reference already included in Wi3	May 2022 – response to the Inspectors' questions



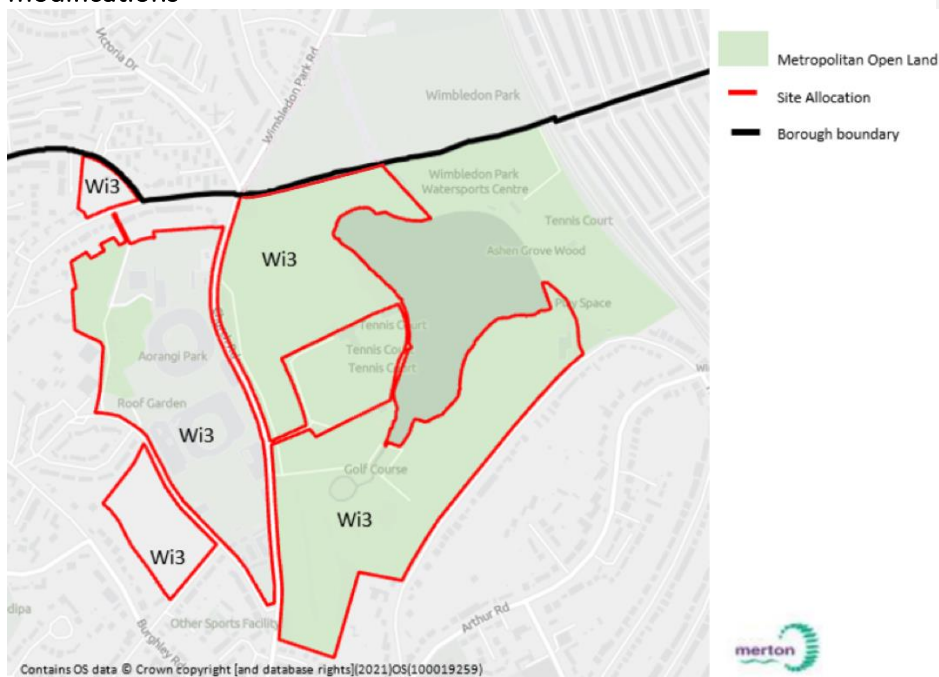
		<i>Impacts listed buildings or undesignated heritage assets</i> Yes, the AELTC golf course, together with Wimbledon Park (owned by Merton Council) and the Wimbledon Club (privately owned) are the remains of a 18th century Capability Brown designed landscape which is now a Grade II* listed Historic Park and is on the “heritage at risk register”	site description on page 283	
284	Site allocation Wi3, new paragraph under Infrastructure requirements	<u>1. In accordance with NPPF 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wimbledon Park MOL. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.</u>	For clarity and consistency with national policy.	May 2022 – response to the Inspectors’ MIQ.
284	Site allocation Wi3, Infrastructure requirements	The developer should contact Thames Water and SGN ( <del>Southern Gas Networks</del> ) to discuss requirements for any improvements to the water, wastewater and gas infrastructure network.	See above - initial MM3.2a at Page 96	September 2022 – in response to Stage 2 MIQs.
284	Site Allocation Wi3 infrastructure requirements	<u>Wimbledon Park Lake is a registered reservoir and must be managed in accordance with the Reservoir Act 1975.</u>  <u>To assess any potential environmental impacts to Wimbledon Common (Special Area of Conservation), development proposal must be supported by measures set out in planning policies for on-site and off-site environmental monitoring. Development proposals will be required to submit a full Construction Logistics Plan - outlining all phases of construction’. Development proposals must support the installation of air quality monitoring devices along the A219 (Parkside) during the construction of the site.</u>	To ensure the plan is consistent with national policy, justified and effective	September 2022 – in response to evidence compiled on Site Wi3 including the Habitats Regulations Assessment – Stage 1 hearings
285	Site allocation Wi3, Impacts a designated open space	Yes, <u>Metropolitan Open Land (MOL)</u> and designated open space. <u>A small area of MOL will be removed from this site, due to exceptional circumstances in accordance with NPPF 140. Refer to the Appendices, Strategic Policy O15.1 and the Policies Map for further information on MOL.</u>	To ensure the plan is consistent with national policy.	September 2022 - in response to Stage 2 MIQs and action from Stage 1 hearings.





**Appendix 2 – copy of Site allocation Wi3 containing proposed main modifications and their source**

Extract of Site Wi3: All England Lawn Tennis Club - Church Road, Wimbledon, SW19 5AE including source of proposed main modifications



**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.
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. In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council.~~

**Commented [TB1]:** Moved to "design and accessibility guidance section in line with Document 0D13b LB Merton and LB Wandsworth Statement of Common Ground dated June 2022

**Commented [TB2]:** Main modification proposed for factual accuracy and in response to issues raised at the Stage 1 hearings, June 2022

**Site owner:** All England Lawn Tennis and Croquet Club

**Site area:** ~~17.83~~ 44 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 with no public access other than in line with golf club membership rules. 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 including the qualifying event. 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.

**Commented [TB3]:** Modification proposed for clarity

- c. Secure investment in the former golf course to invest in and conserve and enhance ~~reimagine~~ 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.

The golf course is part of a Capability Brown designed Grade II\* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club).

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; and
- The deterioration of the Lake

It 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 proposals must secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward, to 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.

- 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 and those identified in the Wimbledon north conservation area appraisal.
- Development proposal will need to investigate the potential impact of the proposed development on archaeological heritage.
- Wimbledon Park lake is the clearest surviving feature from the Capability Brown landscape and its poor quality is one of the reasons that Wimbledon Park is on the "heritage at risk" register. Development proposals will need to:
  - improve public access around the whole lake, alongside ecological, sporting and reservoir management considerations.
  - address the poor condition of the lake.
  - Seek restoration of the historic shape of the lake
- Development proposals must:
  - identify and protect historic trees and other trees of significant amenity value and consider a programme for their renewal and replanting as appropriate.
  - Consider the removal of insensitive tree and other planting on the former golf course.
  - increase the ecological interest of the site.

#### **Infrastructure Requirements:**

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

**Commented [TB4]:** Modification proposed for conformity with national policy and in line with [Submitted Document 0D13k](#) LB Merton and Historic England Statement of Common Ground on site Wi3 dated June 2022

**Commented [TB5]:** Modification proposed to move this from the "site description" section in line with [Document 0D13b](#) LB Merton and LB Wandsworth Statement of Common Ground dated June 2022

**Commented [TB6]:** Modification proposed for conformity with national policy and in line with [Submitted Document 0D13k](#) LB Merton and Historic England Statement of Common Ground on site Wi3 dated June 2022

**Commented [TB7]:** Modification proposed to move this from the "site description" section in line with [Document 0D13b](#) LB Merton and LB Wandsworth Statement of Common Ground dated June 2022

**Commented [TB8]:** Modification proposed for conformity with national policy and in line with [Submitted Document 0D13k](#) LB Merton and Historic England Statement of Common Ground on site Wi3 dated June 2022

**Commented [TB9]:** Modification proposed for conformity with national policy and in line with [Submitted Document 0D13k](#) LB Merton and Historic England Statement of Common Ground on site Wi3 dated June 2022

**Commented [TB10]:** Modification proposed derived from evidence in this topic paper, for conformity with national policy and to ensure the plan is justified. Proposed text derived in part from recommendations set out in [Submitted Document 12D9](#) Wimbledon North Conservation Area Character Appraisal (part 2)

**Commented [TB11]:** Modification proposed derived from evidence in this topic paper, for conformity with national policy and to ensure the plan is justified. Proposed text derived in part from recommendations set out in [Submitted Document 12D9](#) Wimbledon North Conservation Area Character Appraisal (part 2)

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.

**Commented [TB12]:** Modification proposed to ensure plan is effective

1. 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.
2. 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.
3. 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.
4. 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.
5. 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.

In accordance with NPPF paragraph 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wimbledon Park MOL. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.

**Commented [TB13]:** Modification recommended for conformity with national policy and justified

Wimbledon Park Lake is a registered reservoir and must be managed in accordance with the Reservoir Act 1975.

**Commented [TB14]:** Modification recommended to ensure plan is clear and justified

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

**Commented [TB15]:** Modification recommended in consideration of the Habitats Regulations Assessment

The site location	
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 18 <sup>th</sup> 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.
Impacts a Conservation Area.	Yes. The north end of the <u>existing tennis</u> site sits within Bathgate Road conservation area. <del>The whole</del> <u>A</u> part of the site is within an <del>a</del> <u>Archaeological p</u> Priority <del>zone</del> <u>Area</u> . Wimbledon <u>N</u> orth conservation area

	<del>covers</del> <del>lies to</del> the west of the site <u>(Wimbledon Park)</u> <del>and lies to the south of the site.</del>
Impacts an Archaeological Priority Area.	Yes
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 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 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, <u>Metropolitan</u> Open Land <u>(MOL)</u> and designated open space. <u>A small area of MOL will be removed from this site, due to exceptional circumstances in accordance with NPPF 140. Refer to the Appendices, Strategic Policy Q15.1 and the Policies Map for further information on MOL.</u>
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

Appendix 3 – Council's updated evidence

**Topic paper – historic environment Site allocation Wi3 All England Lawn Tennis Club, Wimbledon Park**

# Topic paper – historic environment Site allocation Wi3 All England Lawn Tennis Club, Wimbledon Park

September 2022

## 1. Executive summary

1.1. In June 2022 Historic England and Merton Council agreed a [statement of common ground relating to Site Wi3](#) which provided an action for the council as set out below.

1.2. *“The Council to produce a supplementary evidence document for the Local Plan that:*

- *summarises the historic and current information from a heritage perspective and*
- *clearly defines the parameters for the allocation,*
- *taking on board the opportunities and constraints present on site.*

*It is important that the supplementary document is not seen to predetermine the planning applications.*

*Both parties agree that the relevant information likely exists, but it is not easily identifiable or readily accessible as part of the new local plan’s evidence base.”*

1.3. In addition to the policy framework set out in Section 2, the main background historic evidence for the allocation of Site Wi3 includes the following documents:

- [Wimbledon North Conservation Area Character Appraisal](#) – particularly [Sub Area 2 Wimbledon Park](#) (included as an appendix to this Topic Paper and submitted to the Examination as **12D9** in December 2021 to the Local Plan examination.) and also other sub areas adjoining the park. Published by the London Borough of Merton
  - [Wimbledon Park masterplan 2018](#) submitted to the Examination as **LBM10** relating largely to the council's landholdings in Wimbledon Park - published by the London Borough of Merton in December 2018 (included as an appendix to this Topic Paper)
  - [Historic England's statutory listing for the Grade II\\* Registered Park and Garden](#), and the reasons for it being on the "[Heritage at Risk](#)" register,
  - [Archaeological Priority Areas Appraisal in Merton](#) – published by Historic England in 2016 and submitted to the Examination as **12D7**
  - Listed Buildings (statutory) – Historic England website and Merton's Local Plan
  - Locally Listed Buildings – London Borough of Merton (various dates and locations) and Merton's new local plan
- 1.4. Other information that is pertinent to the historic analysis of the area but which post-dated the site allocation is the information submitted with planning application 21/P2900 including applicant's information and other people and organisation's representations on the planning application. While these have been read by the council as, collectively, they present an up to date and comprehensive record of information relating to the historic environment in the area, the site allocation does not use this information as its source.
- 1.5. As listed above, there is a wealth of historic information available for Wimbledon Park. This topic paper draws together the key findings from the extensive historic information contained across all documents that have informed the historic aspects of the Site Allocation; it does not intend to repeat it.
- 1.6. Section 2 summarises the policy background relevant to the allocation.
- 1.7. Section 3 Table 1 below draws together a summary of historic information, including opportunities and constraints, for the main historical factors relevant to Site Allocation Wi3. Where relevant it also recommends modifications to Site Allocation Wi3 that are designed to realise these opportunities and constraints. Links to information sources are provided.
- 1.8. Appendix 1 contains the maps of Statutory and Locally Listed Buildings in Merton and Wandsworth in proximity to Wimbledon Park



## 2. Policies and parameters for the allocation

2.1. The key parameter for the allocation from an historic perspective are to:

- Comply with NPPF, particularly chapter 16 on heritage and necessary legislation
- create the opportunity and investment necessary to address the reasons that Wimbledon Park is on the “Heritage at Risk” register.

2.2. The NPPF states at paragraph 190

*190 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.*

2.3. NPPF paragraphs 194 to 208 provide the national policy on determining planning applications affecting heritage assets.

2.4. The London Plan 2021 states in its policy on HC1 Heritage, Conservation and Growth states at parts B and C

*B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:*

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making*

*2) utilising the heritage significance of a site or area in the planning and design process*

*3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*

*4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

*C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

- 2.5. [Merton's Heritage Strategy 2021-2025](#) has four objectives, each delivered by specific actions. The site allocation can contribute to all objectives to a greater or lesser extent, particularly objective 2 but also objective 1 (developing the borough's visitor potential and the investment this can bring; promoting Merton's heritage to our residents, visitors and tourists) and objective 4 (continuing to increase the level of external funding to support our heritage from a range of sources) and objective 3 (strengthening partnership work across the heritage network and beyond)

Objective 1: Raise Merton's profile by increasing public access to the borough's unique and diverse cultural heritage

To be delivered by:

- Expanding the borough's digital heritage offer to increase the range of historic documents, activities and resources available online.
- Getting underrepresented groups more involved in heritage projects and championing their own heritage.
- Developing the borough's visitor potential and the investment that this can bring.
- Contributing to the quality of life for residents and the community.
- Promoting Merton's heritage to our residents, visitors and tourists.

Objective 2: Safeguard the borough's varied heritage sites and resources, protecting and conserving them for the benefit of future generations

To be delivered by:

- Enhancing the borough's public realm.

- Influencing design of new developments so that they enhance our shared heritage.
- Initiating heritage-led regeneration to maintain geographical and historical character.
- Supporting external funding bids that will enhance our built environment heritage assets.
- Developing our collections, museums, sites and landscapes and improving accessibility.

Objective 3: Ensure that Merton's heritage provision is inclusive by working collaboratively to widen public engagement and participation

To be delivered by:

- A more diverse and stronger network of volunteer led organisations and groups.
- An increase in the number of people volunteering for the benefit of Merton's heritage.
- Strengthening partnership work across the heritage network and beyond.
- Developing use of Merton's heritage as an educational resource.
- Developing school services, resources and placement opportunities for children and young people
- Enabling everyone, alone or collectively, to benefit from Merton's cultural heritage, contribute towards its enrichment, and participate in decisions about its future.

Objective 4: To recognise the important contribution of social enterprise and secure ongoing funding and investment in Merton's heritage through partnership work, external funding and sponsorship.

To be delivered by:

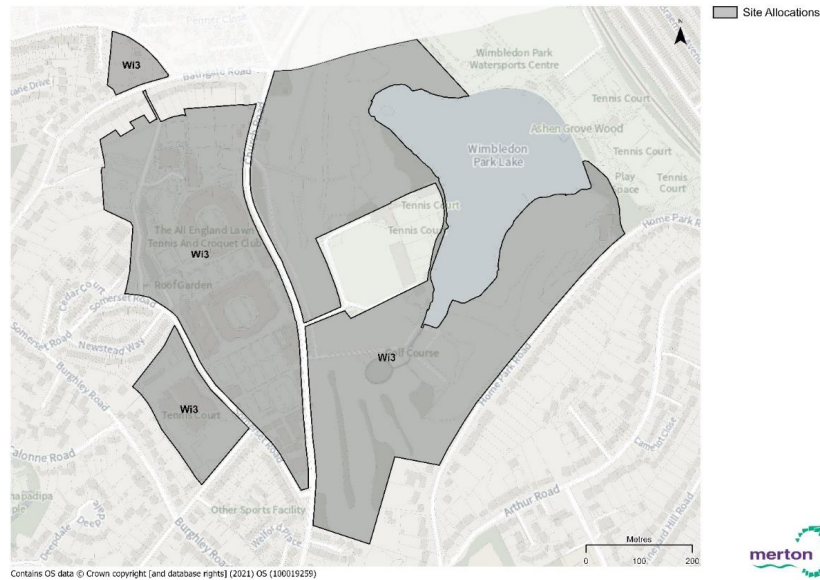
- Continuing to increase the level of external funding to support our heritage from a range of sources.
- Pursuing sponsorship opportunities and input into ongoing heritage projects from the business community.
- Encouraging the expansion of the tourist economy.
- Working in partnership with local, regional and national organisations and agencies in understanding and caring for Merton's heritage.

### 3. Summary of historic information including opportunities and constraints

3.1. There are several land use designations relevant to the site allocation Wi3 from an historic environment perspective. These have been submitted to Merton's Local Plan in the Policies Map and are illustrated below and in Appendix 1:

- a) Grade II\* listed Registered Park and Garden, on Historic England's "Heritage at Risk" register.
- b) Archaeological Priority Area Tier 2
- c) Part of Wimbledon North Conservation area (and within sight of other conservation areas including Bathgate Road conservation area and Victoria Drive Conservation Area in Wandsworth)
- d) Tree protection orders, particularly where these relate to veteran trees and the remnants of Ashen Grove Wood and Horse Close Wood.

Image 1: Merton Local Plan – site allocation Wi3



#### Overall Grade II\* listing and the Heritage at Risk register

3.2. The Wimbledon Park Registered Park and Garden was registered as such in 1987. In 2016 it 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; and
- The deterioration of the Lake

3.3. This chapter contains maps and diagrams extracted from the evidence base relating to the historic environment around Wimbledon Park and site allocation Wi3. These include:

- a) [Submitted Document 12D7](#) Historic England Archaeological Priority Areas for Merton (2016) – Tier 2: Wimbledon Park House
- b) [Submitted Document 12D9](#) Wimbledon North Conservation Area Character Appraisal (part 2)
- c) Historic England – [listing](#) and [Heritage at Risk Register](#)

- d) [Document 0D13k](#) Statement of Common Ground between Historic England and Merton Council dated June 2022
- e) [LBM10 Merton's Wimbledon Park Masterplan 2018.](#)

3.4. Table 1 summarises and draws together the opportunities and constraints around the historic environment, based on the evidence, and proposes modifications to set out the site parameters, in line with the NPPF.

Image 2: Merton – Conservation area designations and listed buildings (see also appendices for more details)

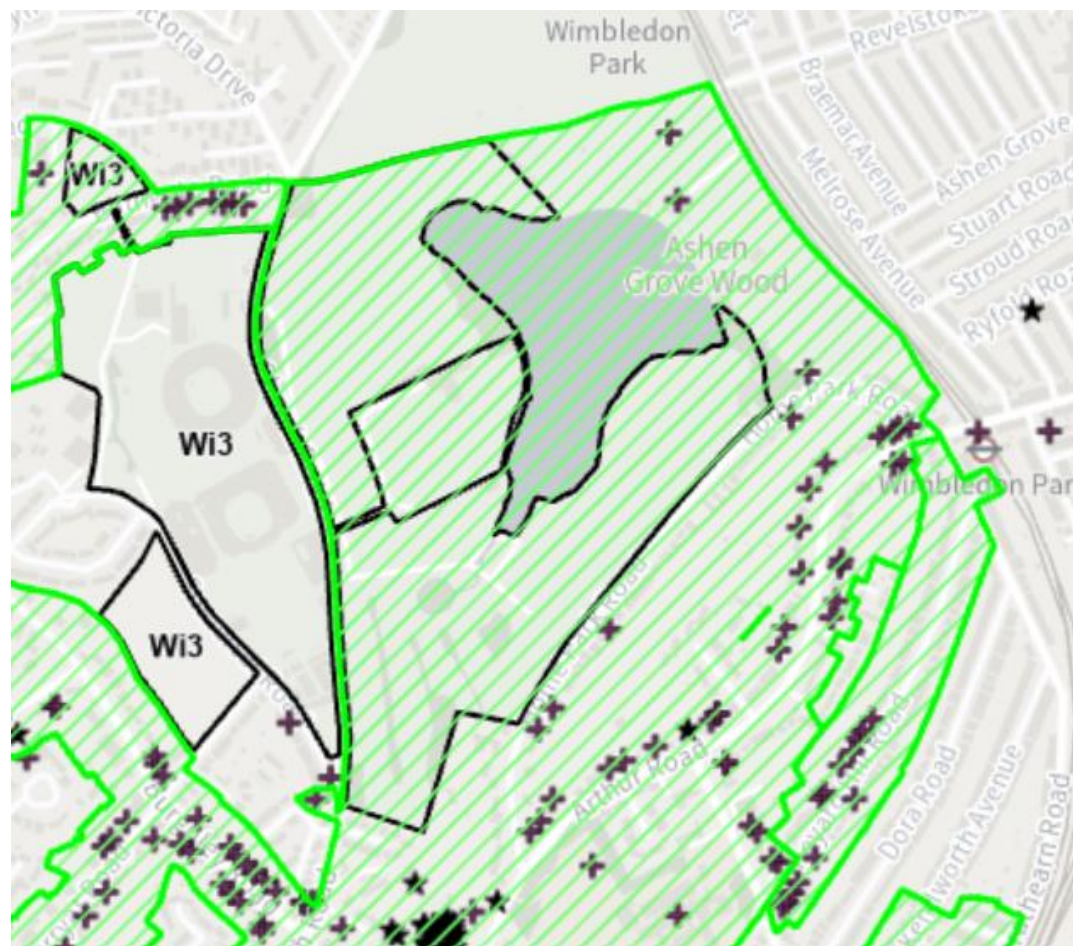




Image 3: Merton – Site Allocation Wi3 and Archaeological Priority Area Tier 2

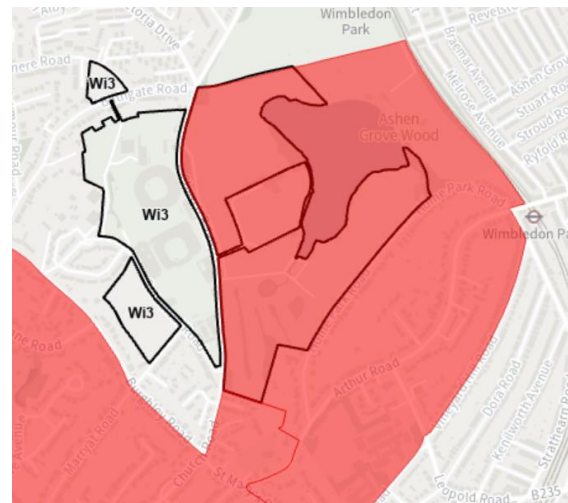


Image 4 – Merton: Historic Park and Garden site designation (please note that the parkland to the north lies in LB Wandsworth and is also part of this designation).

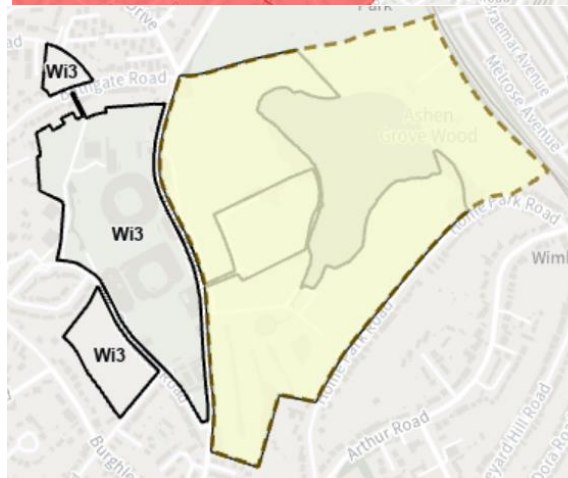


Image 5 extract from [Submitted Document 12D7](#) Historic England Archaeological Priority Areas for Merton (2016) – Tier 2: Wimbledon Park House

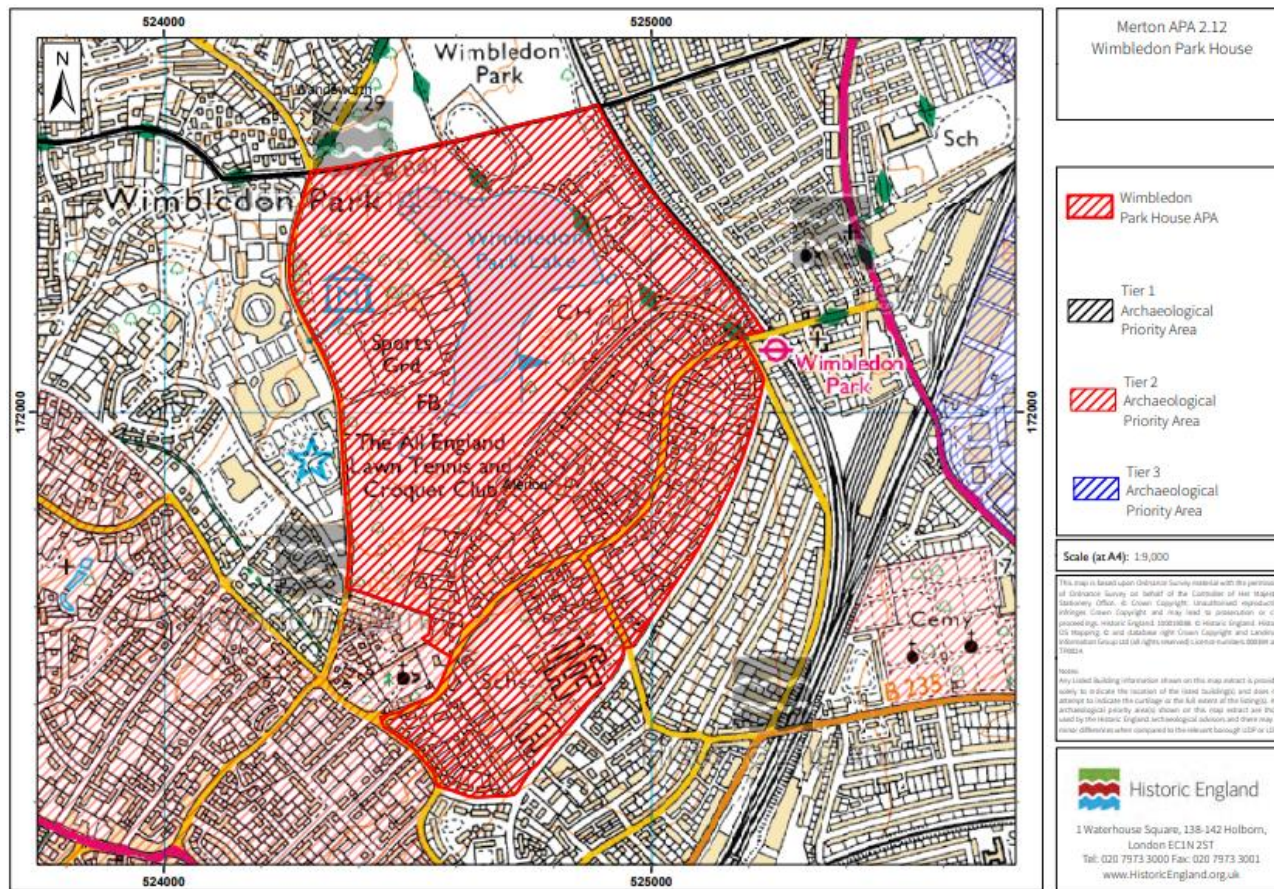
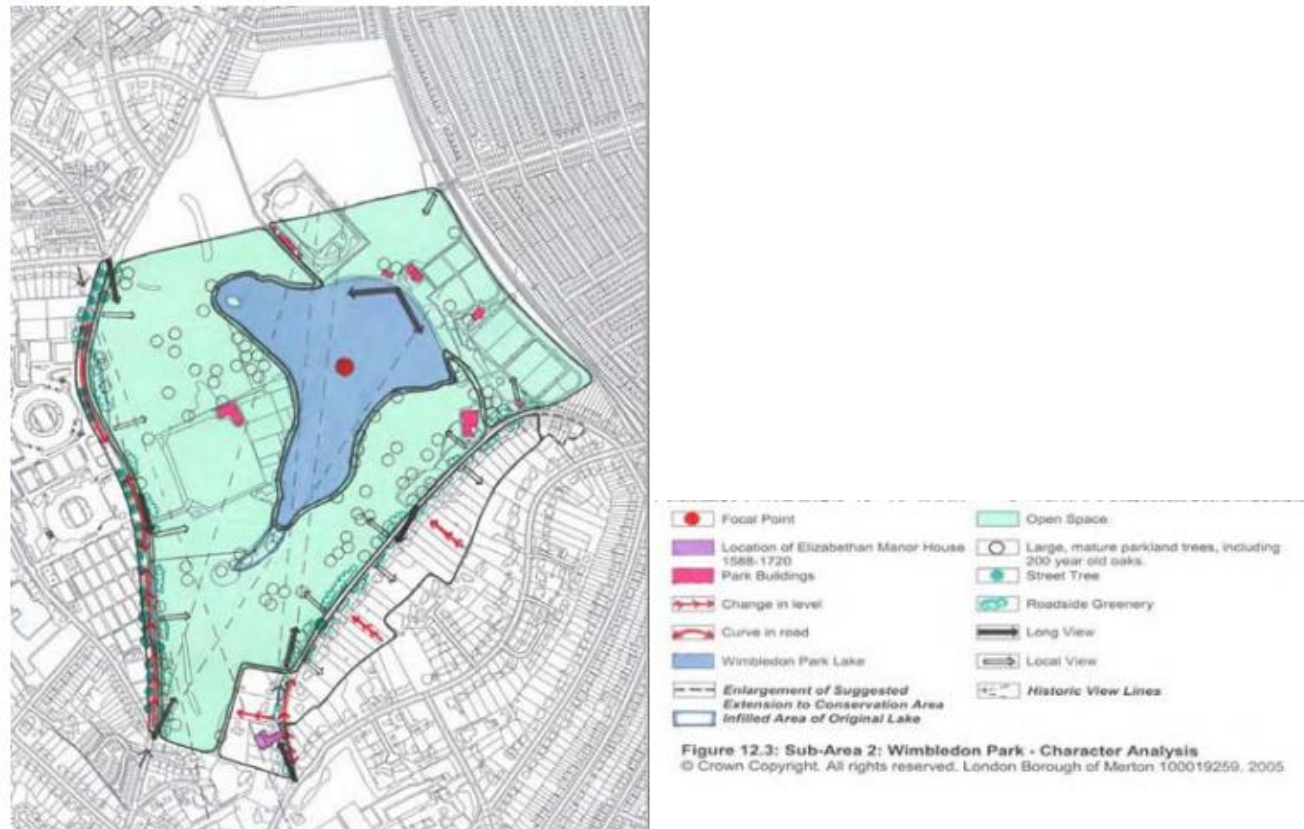


Image 6: Character analysis from [Submitted Document 12D9](#) Wimbledon North Conservation Area Character Appraisal (part 2)



**Table 1 – summary of historic information including opportunities and constraints**

Main sources of information (for Local Plan Examination)	Constraints on site – and whether the allocation can address them	Opportunities arising from the allocation	Proposed modifications
<p><u>Wimbledon Park Lake</u></p> <p>Wimbledon Park Lake is widely recognised to be the clearest surviving feature of Capability Brown’s landscape from c1765 onwards. Entirely man made; originally laid out as part of parkland for Marlborough House and Wimbledon Park House which both lay to the south of site. Lake has been reduced in extent and depth since construction. The condition of the lake is one of the reasons that Wimbledon Park is on the “Heritage at Risk” register. The lake is heavily used for watersports activities in the summer months and for angling all year round. The lake also has an ecological role.</p>			
<p><a href="#">Submitted Document 12D9</a> Wimbledon North Conservation Area Character Appraisal (part 2)</p> <p><a href="#">Submitted Document 12D7</a> Historic England Archaeological Priority Areas for Merton (2016)</p> <p>Historic England – <a href="#">listing</a> and <a href="#">Heritage at Risk Register</a></p> <p><a href="#">Submitted Document LBM10</a> Merton Council’s</p>	<p>The lake is a registered reservoir and must be managed in accordance with the Reservoir Act 1975 (this is also an opportunity)</p> <p>The condition of the lake is poor, with significant silt deposits.</p> <p>The lake is fed by gullies from the public highway, which can have an impact on water quality.</p> <p>Hot summers (changing climate) are causing the lake to dry out, particularly around the tips, and the remaining water quality to worsen.</p>	<p>Address the condition of the lake, which is one of the reasons the Park is on the “heritage at risk” register – <a href="#">proposed modification a</a></p> <p>Improve public access to the lake, and therefore different viewpoints across the lake. The shoreline to the north is currently the only publicly accessible part of the lakeshore. Public access to shore must be balanced with ecological and reservoir factors <a href="#">proposed modification b</a></p> <p>The allocation could help to return the lake closer to the original Capability Brown layout – <a href="#">proposed modification c</a></p>	<p>A. Main modification recommended to refer to condition of the lake and need to improve it (Heritage at Risk Register)</p> <p>B. Main modification recommended to refer to improving public access to lake shore, balanced with ecological and reservoir considerations.</p> <p>C. Proposed allocation amended to refer to potential to re-create Capability Brown lake layout</p> <p><i><a href="#">Wimbledon Park lake is the clearest surviving feature from the</a></i></p>



Main sources of information (for Local Plan Examination)	Constraints on site – and whether the allocation can address them	Opportunities arising from the allocation	Proposed modifications
<p>Wimbledon Park Masterplan 2018</p> <p><a href="#">Submitted Documents 15D2 to 15D7</a> Merton's Strategic Flood Risk Assessment</p>	<p>Parts of the lake have been infilled compared to its original Capability Brown design.</p> <p>The lakeshore, and views across the lake from the shoreline, are currently only publicly accessible from a small part of the council's land to the north.</p> <p>The lake is widely used for watersports and angling (this is also an opportunity).</p> <p>The views of the lake from the site entrance at Home Park Road and the facilities in that part of the park are almost entirely obscured by the dam face, trees and buildings</p>		<p><u>Capability Brown landscape and its poor quality is one of the reasons that Wimbledon Park is on the "heritage at risk" register.</u></p> <p><u>Development proposals will need to:</u></p> <ol style="list-style-type: none"> <li><u>improve public access around the whole lake, alongside ecological, sporting and reservoir management considerations.</u></li> <li><u>address the poor condition of the lake.</u></li> <li><u>Seek restoration of the historic shape of the lake</u></li> </ol>

Main sources of information (for Local Plan Examination)	Constraints on site – and whether the allocation can address them	Opportunities arising from the allocation	Proposed modifications
<p><u>Views</u></p> <p>Wimbledon Park was originally designed as a parkland setting including the lake, relating to Marlborough and then Wimbledon Park house which lay to the south of the site (junction of Arthur and Home Park Road, also now Ricards Lodge school playing fields). Prior to both an Elizabethan manor also stood in the same area. Original views are since obscured by C19th and C20th development and vegetation. Due in part to 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. St Mary's Church spire is visible from many parts of the site but not vice versa at ground level. The topography (rising at either end and including the lake's dam face) both helps and hinders views across the area. Currently views from the lake shoreline across the lake are only publicly accessible from a limited area of the public park. Buildings on or adjacent the lakeshore in the public park and the Wimbledon Club site, including temporary domes in winter, obscure views across the lake.</p>			
<p><a href="#">Submitted Document 12D9</a> Wimbledon North Conservation Area Character Appraisal (part 2)</p> <p><a href="#">Submitted Document LBM10</a> Merton Council's Wimbledon Park Masterplan 2018</p> <p>Historic England – <a href="#">listing</a> and <a href="#">Heritage at Risk Register</a></p> <p>Site visits</p>	<p>Views constrained by topography and the dam face, lack of public access all around the site, trees and vegetation, C19th and C20th buildings built on the lake shoreline and around the site.</p> <p>The majority (two thirds) of Wimbledon Park is not accessible – allocation to improve accessibility to other parts of the Park.</p>	<p>Improve public access to and views from other parts of the site.</p> <p>As the allocation relates to the largest of the now three landowners for Wimbledon Park, there is now the opportunity to create a historic environment landscape management plan. This would apply to the whole of Wimbledon Park; all landowners should use to inform long term development and management of the Park on their own landholdings, to improve views over time.</p> <p>From Submitted Document 12D9 Wimbledon North Conservation Area Part 2: Seek the enhancement, restoration and preservation of historic views to and</p>	<p>Site allocation states (with proposed main modification added) <i>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 <u>and those identified in the Wimbledon north conservation area appraisal.</u></i></p>

Main sources of information (for Local Plan Examination)	Constraints on site – and whether the allocation can address them	Opportunities arising from the allocation	Proposed modifications
		across the lake, and of the landscape setting around the lake	
<p><u>Listed buildings.</u> There are statutory and locally listed buildings within 500m of the site allocation Wi3 that is within Merton, there are also some in Wandsworth (see Section 2 and appendices for maps of both). The locally listed buildings that lie within Wimbledon Park, although within the council-owned land not within the Site Allocation, are the White Pavilion (at the entrance to Home Park Road) and the Bowls Club pavilion close to the lake. There appears to be an error on the locally listed building records which states that Wimbledon Park is locally listed (it is statutorily listed). There are a cluster of locally and statutorily listed buildings and structures at St Mary's Church, to the south of the site, visibly obscured from the allocation. [Registered Park and Garden listing in separate column]</p>			
<p>Historic England listed buildings records (<a href="#">HE website</a> and appendices to Merton's Local Plan)</p> <p>Wandsworth Locally Listed Buildings (Wandsworth Policies Map)</p> <p>Merton Locally listed buildings (Merton new Local Plan Policies Map and <a href="#">website</a>)</p> <p><a href="#">Submitted Document 12D9</a></p> <p>Wimbledon North Conservation Area Character Appraisal (part 2)</p>	Listed buildings and structures lie outside the site allocation and few are visible		

Main sources of information (for Local Plan Examination)	Constraints on site – and whether the allocation can address them	Opportunities arising from the allocation	Proposed modifications
<p><u>Archaeology</u> Wimbledon Park House Tier 2 Archaeological Protection Area (APA) covers Wimbledon Park and incorporates the residential area that lies west of Arthur Road, to the south east of the Park. From the late 16<sup>th</sup> century to the mid 20<sup>th</sup> century at least three successive manor houses stood in the area to the south of Wimbledon Park, close to where the western end of Home Park Road meets Arthur Road. [NB, while the APA 2016 refers to three manor houses: Wimbledon North Conservation Area Character Appraisal refers to four: Elizabethan, Belvedere, Marlborough and Spencer. None of these survive]. The APA represents land covered by the grounds. It is classified as Tier 2 because it covers the site of a heritage asset of archaeological and historic interest and a Grade II* Registered Park and Garden with archaeological interest. In 2004 a brick-lined service tunnel was found which is thought to have linked the Marlborough House manor to a building serving the manor and other archaeological remnants of the longstanding and successive country house operations have been found in the area.</p>			
<p><u>Submitted Document 12D7</u> Historic England Archaeological Priority Areas for Merton (2016)</p> <p><u>Submitted Document 12D9</u> Wimbledon North Conservation Area Character Appraisal (part 2)</p>	See opportunities	<p>The area has been occupied by successive manor houses and grounds since the 1500s, with the grounds largely overlaid on each other. The Wimbledon Park part of the site allocation was part of the grounds of these successive demesnes. Wimbledon Park part of the site allocation has been landscaped and managed as golf fairways for c100 years. Development proposals represent a significant opportunity to investigate the archaeological heritage (including soils and ecological heritage) of the former golf course, including any remnants of successive demesne layouts to build a more comprehensive picture of the history of the area.</p>	<p>Site allocation states . <i>“Development proposal will need to investigate the potential impact of the proposed development on archaeological heritage.”</i></p>

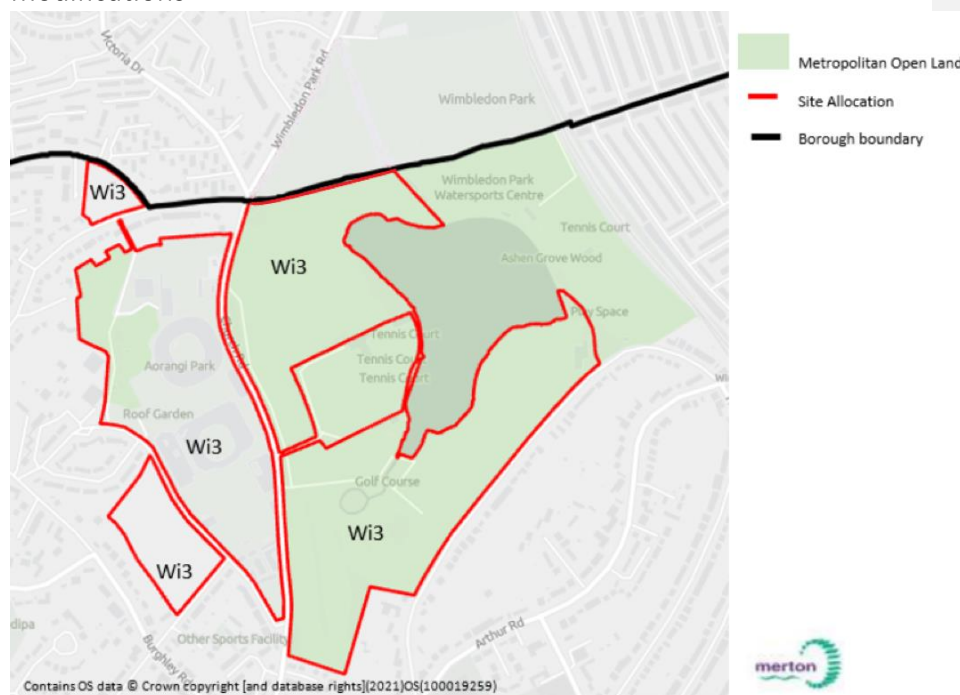


Main sources of information (for Local Plan Examination)	Constraints on site – and whether the allocation can address them	Opportunities arising from the allocation	Proposed modifications
<p><b>Trees and landscape</b> In the eighteenth century the original Capability Brown landscape was curated across 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 parkland in Site Wi3 and within the council-owned public park (not part of the allocation). The woodlands at Horse Close Wood and Ashen Grove were also part of the Brownian layout. 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. There are also trees planted outside the site allocation, particularly the conifers screening the athletics track, that dominate the landscape negatively.</p>			
<p><a href="#">Submitted Document 12D9</a> Wimbledon North Conservation Area Character Appraisal (part 2)</p> <p><a href="#">Submitted Document LBM10</a> Merton Council’s Wimbledon Park Masterplan 2018</p>	<p>The constraints below are identified from <a href="#">Submitted Document 12D9</a> Wimbledon North Conservation Area Character Appraisal (part 2)</p> <p>Poor management of Ashen Grove wood for ecological reasons.</p> <p>Insensitive tree and other planting on golf course.</p> <p>Lack of public access to Ashen Grove Wood and private [former golf] club lands.</p> <p>Pressure to diminish the historic wooded backdrop to the Park through redevelopment, and to remove historic street trees.</p>	<p>The opportunities below are identified directly from <a href="#">Submitted Document 12D9</a> Wimbledon North Conservation Area Character Appraisal (part 2) unless otherwise stated</p> <p>Seek the identification and protection of historic trees and other trees of significant amenity value throughout the Sub Area and consider a programme for their renewal and replanting as appropriate.</p> <p>Seek better management of Ashen Grove Wood and other management opportunities to increase the ecological interest of the park.</p> <p>In addition to the opportunities specifically stated in the Wimbledon North conservation area character appraisal but to address identified constraints:</p>	<p>D. Main Modification recommended to add reference to the identification and protection of historic trees and trees of significant amenity value.</p> <p>E. Main modification recommended to add reference to increasing the ecological interest of the park.</p> <p>F. Main modification recommended to add reference to removing insensitive trees and other planting on the former golf course lands</p>

Main sources of information (for Local Plan Examination)	Constraints on site – and whether the allocation can address them	Opportunities arising from the allocation	Proposed modifications
		<p>Consider the removal of insensitive tree and other planting on the former golf course.</p> <p>Ensure greater public access to formerly private golf course club lands.</p>	<p><u>Development proposals must:</u></p> <p>a. <u>identify and protect historic trees and other trees of significant amenity value and consider a programme for their renewal and replanting as appropriate.</u></p> <p>b. <u>Consider the removal of insensitive tree and other planting on the former golf course.</u></p> <p>c. <u>increase the ecological interest of the site.</u></p>
<p>Registration as historic park and garden and Heritage at Risk register On 1<sup>st</sup> October 1987 the whole of Wimbledon Park was registered by Historic England as Grade II*. In 2016 the park was added to the Heritage at Risk register. The Heritage at Risk listing for Wimbledon Park is summarised in paragraph 3.2 of this topic paper and includes uncertainty around the future [of the entire historic landscape] and the impacts of divided ownership on landscape management, as well as other matters which are considered above. At the time Wimbledon Park was entered on the Heritage at Risk register in 2016, the golf course was leased and managed separately. Since then AELTC have bought back their freehold and there are now three landowners – all freeholders – across the site: Merton Council, the Wimbledon Club and the All England Lawn Tennis Club.</p>			
<p><a href="#">Submitted Document 12D9</a></p> <p>Wimbledon North Conservation Area Character Appraisal (part 2)</p> <p><a href="#">Submitted Document LBM10</a> Merton Council's Wimbledon Park Masterplan 2018</p>	<p>Constraints on land ownership and uses – although the number of landowners have reduced and they are all freeholders, there are different uses within the Park according to land ownership, including sporting (watersports on the lake and a wide variety of land based sports: cricket, tennis, athletics, beach volleyball),</p>	<p>The allocation presents an opportunity to invest in the largest landholding, approximately two thirds of the site, more if the lake is incorporated.</p> <p>The allocation also presents an opportunity to produce a landscape conservation management plan to improve co-ordination between different landowners across the whole site, rooted</p>	<p>Main modification recommended to include statement first added to <a href="#">Document OD13k</a> Statement of Common Ground between Historic England and Merton Council dated June 2022</p> <p><u>Secure the production of a landscape management and maintenance plan as part of any</u></p>

Main sources of information (for Local Plan Examination)	Constraints on site – and whether the allocation can address them	Opportunities arising from the allocation	Proposed modifications
<p>Historic England – <a href="#">listing</a> and <a href="#">Heritage at Risk Register</a></p> <p><a href="#">Document OD13k</a></p> <p>Statement of Common Ground between Historic England and Merton Council dated June 2022</p>	<p>recreation, ecology and the lake as a designated reservoir.</p> <p>Buildings, boundary treatments, planting regimes, fencing, paths and movement have all been identified as having a negative effect on the historic environment in the Wimbledon north conservation area character appraisal for Wimbledon Park</p>	<p>in the historic environment. Although the Site Allocation only covers Site Wi3 (the AELTC landholdings), should the other landowners be making changes to their properties – either management or maintenance or development – then the single landscape management and maintenance plan could help co-ordinate each party's investment with view to addressing the reasons that the Park is on the Heritage at Risk register</p>	<p><i><u>development proposals that may come forward, to 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.</u></i></p>

Extract of Site Wi3: All England Lawn Tennis Club - Church Road, Wimbledon, SW19 5AE including source of proposed main modifications



**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.	
7. <del>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.</del>	<b>Commented [TB1]:</b> Moved to "design and accessibility guidance section in line with <a href="#">Document 0D13b</a> LB Merton and LB Wandsworth Statement of Common Ground dated June 2022
8. <del>The AELTC have commenced the preparation of an updated masterplan new masterplan to investigate opportunities for the AELTC estate and The Championships incorporating the golf course: In August 2021/P2900 to Merton Council.</del>	<b>Commented [TB2]:</b> Main modification proposed for factual accuracy and in response to issues raised at the Stage 1 hearings, June 2022
<b>Site owner:</b> All England Lawn Tennis and Croquet Club	
<b>Site area:</b> <del>17.83</del> <u>44</u> hectares	
<b>Existing uses:</b>	
<ol style="list-style-type: none"> <li>Part of the AELTC estate used mainly between May to September and intensively during the two weeks of the internationally recognised Wimbledon Championships.</li> <li>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.</li> <li>Wimbledon Park Golf course is currently an 18-hole golf course with club house and maintenance facilities <u>with no public access other than in line with golf club membership rules.</u> This use will cease from January 2022.</li> </ol>	
<b>Site allocation:</b> 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.	
<b>Site deliverability:</b> 5-10 years	
<b>Design and accessibility guidance:</b>	
<ol style="list-style-type: none"> <li>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 <u>including the qualifying events</u> <ol style="list-style-type: none"> <li>Make the most of the substantial economic benefits (directly and indirectly) of the site for the borough and for London.</li> <li>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.</li> <li>Secure investment in the former golf course to invest in and <u>conserve and enhance</u> <del>reimagi</del> pedestrian <u>and cycle</u> access to areas of formerly private land such as more of the lakeside; includes the opportunity to address the reasons why Wimbledon Park is on Historic England <u>landowner of the</u> former golf course <del>landowner</del> working with other landowners Merton and and The Wimbledon Club (sports facilities landowner) all within Wimbledon Park.</li> </ol> </li> </ol>	<b>Commented [TB3]:</b> Modification proposed for clarity  <b>Commented [TB4]:</b> Modification proposed for conformity with national policy and in line with <a href="#">Submitted Document 0D13k</a> LB Merton and Historic England Statement of Common Ground on site Wi3 dated June 2022
<u>The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with</u>	<b>Commented [TB5]:</b> Modification proposed to move this from the "site description" section in line with <a href="#">Document 0D13b</a> LB Merton and LB Wandsworth Statement of Common Ground dated June 2022
<u>The Wimbledon Park Registered Park and Garden was added to Historic England's Heritage At Risk Register</u>	
<ol style="list-style-type: none"> <li><u>Uncertainty around the future [of the entire historic landscape];</u></li> <li><u>The impacts of divided ownership on landscape management.</u></li> <li><u>Obscured views; and</u></li> <li><u>The deterioration of the Lake</u></li> </ol>	<b>Commented [TB6]:</b> Modification proposed for conformity with national policy and in line with <a href="#">Submitted Document 0D13k</a> LB Merton and Historic England Statement of Common Ground on site Wi3 dated June 2022
<u>It 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.</u>	
<u>Development proposals must secure the production of a landscape management and maintenance plan</u>	<b>Commented [TB7]:</b> Modification proposed to move this from the "site description" section in line with <a href="#">Document 0D13b</a> LB Merton and LB Wandsworth Statement of Common Ground dated June 2022

<p><u>come forward, to 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 b</u></p>	
<p>2. Development proposal must respect the site's historic setting including the views to St Mary's Church a Grade II* listed Wimbledon Park <u>and those identified in the Wimbledon north conservation area appraisal</u></p>	<p><b>Commented [TB8]:</b> Modification proposed for conformity with national policy and in line with <a href="#">Submitted Document OD13k</a> LB Merton and Historic England Statement of Common Ground on site W13 dated June 2022</p>
<p>3. Development proposal will need to investigate the potential impact of the proposed development on a</p>	<p><b>Commented [TB9]:</b> Modification proposed for conformity with national policy and in line with <a href="#">Submitted Document OD13k</a> LB Merton and Historic England Statement of Common Ground on site W13 dated June 2022</p>
<p>4. <u>Wimbledon Park lake is the clearest surviving feature from the Capability Brown landscape and its poor</u>  <u>Park is on the "heritage at risk" register. Development proposals will need to:</u>  a. <u>improve public access around the whole lake, alongside ecological, sporting and reservoir management considerations.</u>  b. <u>address the poor condition of the lake.</u>  c. <u>Seek restoration of the historic shape of the lake</u></p>	<p><b>Commented [TB10]:</b> Modification proposed derived from evidence in this topic paper, for conformity with national policy and to ensure the plan is justified. Proposed text derived in part from recommendations set out in <a href="#">Submitted Document 12D9</a> Wimbledon North Conservation Area Character Appraisal (part 2)</p>
<p>5. <u>Development proposals must:</u>  a. <u>identify and protect historic trees and other trees of significant amenity value and consider a progr</u>  <u>appropriate.</u>  b. <u>Consider the removal of insensitive tree and other planting on the former golf course.</u>  c. <u>increase the ecological interest of the site.</u></p>	<p><b>Commented [TB11]:</b> Modification proposed derived from evidence in this topic paper, for conformity with national policy and to ensure the plan is justified. Proposed text derived in part from recommendations set out in <a href="#">Submitted Document 12D9</a> Wimbledon North Conservation Area Character Appraisal (part 2)</p>
<p><b>Infrastructure Requirements:</b>  <u>The AELTC site is used in a highly intensive manner, usually for less than two months per year, and relat</u>  <u>given its size, scale and bespoke use. Any assessments relating to buildings or structures (e.g. transport</u>  <u>account of any unusual usage patterns prevalent at the time and predicted for its future use.</u></p>	<p><b>Commented [TB12]:</b> Modification proposed to ensure plan is effective</p>
<p>1. Development proposals for this site must <u>refer to the have regard to</u> Merton's Infrastructure Delivery P  <u>been addressed by the proposal and Green Infrastructure Study 2020.</u></p> <p>2. 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>3. The developer should contact Thames Water and SGN (<del>Southern Gas Networks</del>) to discuss requirements for any improvements to the water, wastewater and gas infrastructure network.</p> <p>4. 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>5. 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>	
<p><u>In accordance with NPPF paragraph 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wimbledon Park MOL. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this</u></p>	<p><b>Commented [TB13]:</b> Modification recommended for conformity with national policy and justified</p>
<p><u>Wimbledon Park Lake is a registered reservoir and must be managed in accordance with the Reservoir A</u></p>	<p><b>Commented [TB14]:</b> Modification recommended to ensure plan is clear and justified</p>
<p><u>To assess any potential environmental impacts to Wimbledon Common (Special Area of Conservation), development proposal must be supported by measures set out in planning policies for on-site and off-site environmental monitoring. Development proposals will be required to submit a full Construction Logistics Plan - outlining all phases of construction'. Development proposals must support the installation of air quality monitoring devices along the A219 (Parkside) during the construction of the site.</u></p>	<p><b>Commented [TB15]:</b> Modification recommended in consideration of the Habitats Regulations Assessment</p>

The site location	
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 18 <sup>th</sup> 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.
Impacts a Conservation Area.	Yes. The north end of the <u>existing tennis</u> site sits within Bathgate Road conservation area. <del>The whole</del> <u>A part</u> of the site is within an <del>a</del> <u>Archaeological p</u> <del>Priority zone</del> <u>Area</u> . Wimbledon <u>North</u> conservation area <u>covers</u> <del>lies to</del> the west of the site <u>(Wimbledon Park) and lies to the south of the site.</u>
Impacts an Archaeological Priority Area.	Yes
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 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 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, <u>Metropolitan</u> Open Land <u>(MOL)</u> and designated open space. <u>A small area of MOL will be removed from this site, due to exceptional circumstances in accordance with NPPF 140. Refer to the Appendices, Strategic Policy O15.1 and the Policies Map for further information on MOL.</u>
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



## 4. Appendix 1 – further details of historic assets

Image 7 Wandsworth – map of locally and statutory listed buildings near Wimbledon Park

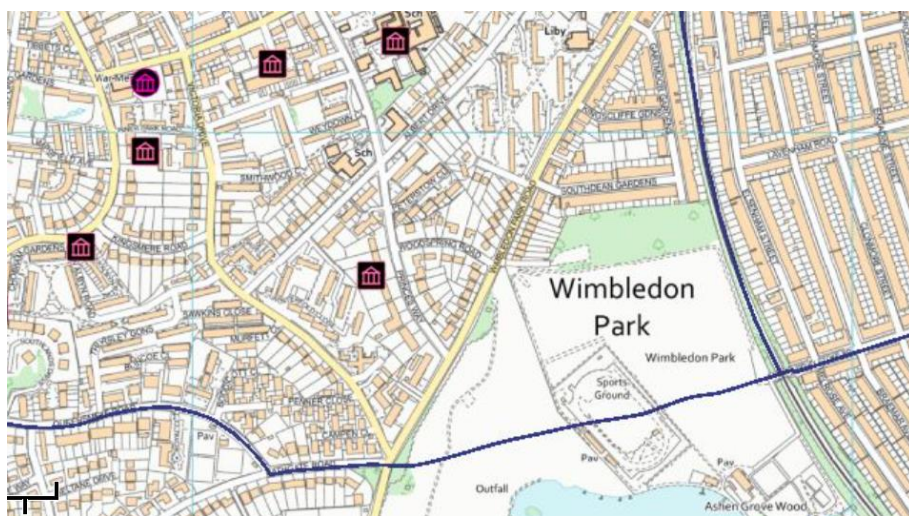


Image 8 Merton – Wimbledon Park north – statutory (illustrated by a star symbol) and locally listed (+) buildings



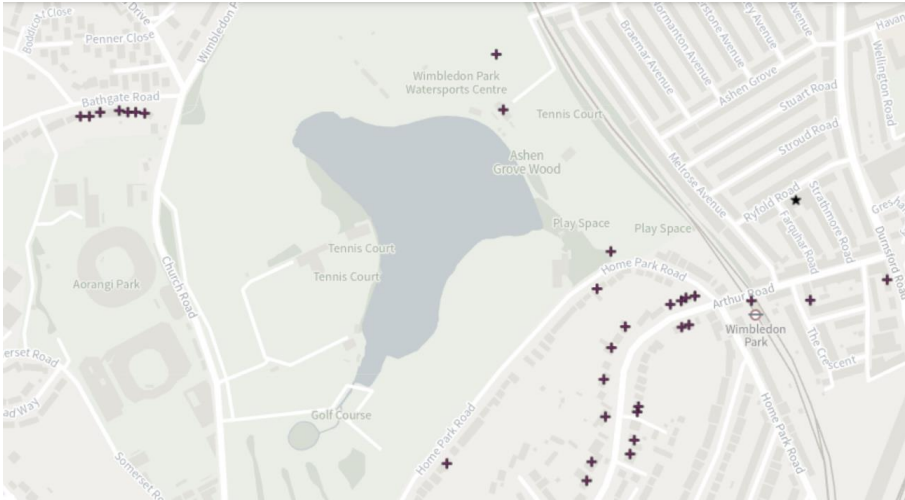


Image 9 Merton – Wimbledon Park south – statutory and locally listed (+) buildings

