

**From:**  
**To:** [Future Merton](#)  
**Cc:**  
**Subject:** Consultation on Main Modifications to Merton's Draft Local Plan  
**Date:** 20 March 2024 17:24:32  
**Attachments:** [Local Plan PRA SubmissionMar24pdf.pdf](#)

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Dear Future Merton team,

I attach for forwarding to the Inspectors comments on behalf of the Parkside Residents' Association for the Consultation on Main Modifications to Merton's Draft Local Plan.

Please acknowledge safe receipt.

Yours sincerely

Chairman

**PARKSIDE RESIDENTS' ASSOCIATION**  
**c/o 20 Burghley Rd**  
**Wimbledon**  
**London SW19 5BH**

20 March 2024

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cc.

Dear Sirs

**Consultation on Main Modifications to Merton's Draft Local Plan**

**Comments for consideration by the Inspectors.**

The membership area of the Parkside Residents' Association includes roads which adjoin the landholding of the All England Lawn Tennis Club (AELTC) bordered by Church and Somerset Roads Wimbledon.

We have contributed to previous consultations on earlier drafts of the Local Plan and at the Hearing which took place in October 2022. In view of its proximity to our membership area, our particular focus has been with Site Allocation Wi3, the All England Lawn Tennis Club, Church Road, Wimbledon, SW19 5AE and modifications made to that Allocation during the Draft Plan's Examination stages. This submission responds to the consultation launched by Merton on 2<sup>nd</sup> February 2024 on the latest main modifications in the draft Plan and with particular reference to the further changes relating to Site Allocation Wi3.

The texts to which we will refer are as set out in Merton's **LBM29 MM Appendix 6 (MM115)**, **LBM30 (AM167)** and, as appropriate, as set out in the reissued draft of the Plan **LBM31** dated January 2024 which incorporates the proposed changes to Wi3 on **p 300** and **pp 307-310**.

Our comments are as follows:

**1. Site Allocation Wi3 area – Correction of Map Error (LBM 30 AM167)**

We are pleased to note that in this draft of the Plan, and accepting the arguments that we and other Residents' Associations and the Wimbledon Society had made in earlier submissions, Site Allocation Wi3 no longer includes the land to the east of Church Road, comprising the former golf course in Wimbledon Park which is also owned by the AELTC. Instead Wi3 is now limited to 3 parcels of land to the west of Church Road which together house the AELTC's headquarters (including members' facilities) and core facilities and infrastructure required to host and deliver the annual Championships. We **support** this change which is confirmed on the Maps shown in **LBM29 MM114** and **LBM31 at p300** and the text of the site description in **LBM31 p307**. Unfortunately there is an **error in LBM30 AM167 which suggests the former Wimbledon Park golf course on the west side of Church Road is still part of Wi3**. Since this is at odds with MM114, LBM31 p300 and the Site allocation text at P307 we assume this error can safely be ignored.

**2. Site Allocations introduction LBM31 Ch.09 p300**

**2.1** The Introduction to the Draft Plan notes at **para 1.1.4 p4** that *"The Local Plan must be read as a whole document"* which suggests, rightly in our view, that **a consistent approach should be adopted**. **Para 1.1.18. p4** also explains the purpose of Site Allocations in the Plan as *"Site allocations sets [sic] out land use requirements for sites that will contribute to the borough's growth."* Elsewhere in the draft, in chapters referencing different areas of the Borough, (specifically **Colliers Wood at p82, Mitcham at**

**p116, Morden at p197 and Raynes Park at p232**) the following paragraphs are used to describe in more detail what the Site Allocations' purpose should be:

*“Site allocations are planning policies which apply to key potential development sites of strategic importance. Site allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs, public open space, public access routes, transport infrastructure and social infrastructure, such as health or education facilities.*

*Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. Any development proposal for a site allocation will be determined against planning policies (including the London Plan).”*

Whilst each Site identified in the Site Allocations lists has its own summary of existing and potential uses and policy parameters, the framework set out in these paragraphs acknowledges that these Sites are included because of their strategic significance, and the expectation that any redevelopment has a part to play in the delivery of the Borough's wider strategic objectives. The fact that this focus and context is adopted for Site Allocations throughout the Plan (save, inexplicably, for Wimbledon Site Allocations, upon which we comment below) underscores in our view the principle that it is intended that a consistent approach, should be adopted.

**2.2** Unfortunately, **LBM31** shows at **p300** that the above paragraphs have been deleted as the purpose for the 13 Site Allocations (including Wi3) for Wimbledon listed in Chapter 09. Instead, alternative wording for Wimbledon's Site Allocations' framework is substituted:

*“Identifying sites for a specific land use or type of development helps give certainty to what is likely to happen in that neighbourhood and helps provide homes, business space, town centre type uses, infrastructure, community facilities, sports, parks and open spaces and other types of development to help meet the borough's and London's needs. These sites are contained in the development plan as site allocations.”*

**No explanation is offered as to why this substitution has been made.** The alternative wording is little more than a narrative list of different types of development as opposed to an indication of the relevant parameters and the approach which is to be adopted for identified Sites in a strategic development context. It also fails to acknowledge these Sites as *“key potential development sites of strategic importance”* or that redevelopment proposals should ensure that the Site *“integrates well into its surroundings and contributes towards meeting strategic needs..”*. No evidence is offered as to why the Wimbledon Site Allocations, which have been included with this acknowledgement in earlier drafts of the Plan, apparently no longer justify this characterisation or assessment criteria. Why should a different framework be adopted for the strategic development significance of Sites in Wimbledon (including South Wimbledon) compared with those in Colliers Wood, Mitcham, Morden, and Raynes Park? It is a particularly incongruous approach given that elsewhere in the Plan, Wimbledon is identified as the Borough's *“only Major Town Centre, and the heart of its successful economy”* and where clarity of strategic development priorities for key potential development sites is surely of great importance.

**2.3** This amendment is not noted in the summary in LBM 29 nor in the Additional Modifications in LBM30. Has it been mistakenly included in LBM31? In any event it is our view that subject only to our comment in para 2.4 below, and for the sake of consistency throughout the Plan, **the amendment should be deleted and the original wording, as adopted elsewhere in the Plan for Site Allocations in other parts of the borough, should be reinstated on page 300 of LBM31.**

**2.4.1** As a drafting point, we have noted and concur with the view of the **Wimbledon Society at p4 of their submission dated 19<sup>th</sup> March** that Site Allocations should **NOT be characterised as “planning policies”** (our underlining) as stated in the opening sentence of the descriptive paragraphs noted at point 2.1 above. Site Allocations are bespoke *“land use requirements”* for specific sites with strategic significance and not planning “policies” as such which are intended to apply across the whole Borough and apply in wider contexts. **Accordingly the reinstated paragraphs on P300 should begin:**

***“Site Allocations apply to key potential development sites of strategic importance and are needed to ensure that when a strategic site comes forward for redevelopment.....etc etc”***

**2.4.2** It follows from our comments above, and for consistency in the Plan that the same introductory wording should be adopted for these paragraphs where they appear in the Chapters for **Colliers Wood at p82, Mitcham at p116, Morden at p197 and Raynes Park at p232**

**3. Should Wi3 be retained at all as a Site Allocation?**

As noted above, the land now comprised in Wi3 to the west of Church Road houses the AELTC's headquarters along with core facilities and infrastructure required to host and deliver the annual Championships. It has been used for this purpose, and nothing else, for over a century. It is intensively developed already with much of the current infrastructure either recently completed or subject to cyclical upgrades. It is not a vacant site and certainly not "brownfield" like many other Site Allocations elsewhere in the Borough where viable alternative uses meeting different strategic objectives can usefully be identified. Unlike those other Sites, the scope for any redevelopment, we suggest, lies principally in upgrading or replacing existing facilities to continue the existing uses – as happened when a roof was added to Centre Court, or when No 1 Court was rebuilt with a roof, or when the members' Indoor Courts' building was replaced, and more recently the Media Centre was rebuilt. We query if this potential is consistent with the strategic objectives contemplated for other Sites designated with Site Allocations because their scope or capacity for additional or alternative uses is recognised? As such, and whilst we recognise that no Modification to this effect is proposed, we would respectfully ask whether, on reflection, there is any justification for the retention of Wi3 in the Plan as a Site Allocation at all?

If notwithstanding our comments above, it is the Inspectors' view that the Site Allocation Wi3 with the area as presented in this consultation should be retained in the Plan, then we have the following comments upon the proposed changes to the text as noted in LBM29 and LBM31 where a number of conflicting amendments and apparent drafting errors appear:

#### **4. Comments on Wi3 map and text changes: LBM29 MM Appendix 6 (MM115) and LBM31 pp307-310**

##### **4.1 Map error LBM29 MM115**

The area of Metropolitan Open Land within Wi3 is incorrectly shown here as being reduced from the current designation. As confirmed by Merton's Tara Butler in her email of 20 February to C Coombe and others who had queried the point, the MOL boundaries within Wi3 "are to remain as they are in the 2014 adopted plan." **The 2014 boundaries are correctly used in LBM31 p307 so we assume this should prevail.**

##### **4.2 Ward error LBM29 MM115**

Wi3 is within Village, not Wimbledon Park Ward. **This is corrected in LBM31 p307 so we assume this should prevail**

##### **4.3 Site description - paras 2 and 4 errors LBM29 MM115 and LBM31 p307**

(NB Although the errors listed below are not noted in LBM 29 or LBM 31 the mistakes are factual inaccuracies and contradictions which have not previously been picked up and so we respectfully suggest that this Consultation is the opportunity to address and correct them)

###### **4.3.1 To clarify, the Site which is Wi3 now comprises 3 separate parcels, namely**

- (i) (the largest of the 3 parcels) the AELTC's headquarters, known as their "main site", on the western side of Church Road, incorporating the Championships' outdoor courts, stadia and infrastructure, the AELTC's offices and administrative facilities, members' and debenture holders hospitality facilities as well as the Lawn Tennis Museum
- (ii) a smaller site to the north of the main site, adjoining Bathgate Road, housing the AELTC's croquet lawns and croquet players' clubhouse, and
- (iii) to the south of the main site, a site adjoining Somerset Road and Marryat Road incorporating an Indoor Courts complex and 6 all-weather outdoor courts for AELTC members' use.

**4.3.2 Para 2 says there are "18 outdoor and indoor courts" yet para 4 refers to "covered courts to the west and 22 grass courts in a site to the north". Neither is correct.** The only indoor courts in Wi3, as noted above, are the 6 in the Members Indoor Courts complex off Somerset Road. On the "main site" within Wi3 there are 4 show courts or stadia (Centre and No 1 Courts plus Courts 2 and 3) as well as 28 further outdoor grass courts. There are also all weather hard courts laid on the main site but the number currently available is not clear as tournament hospitality facilities have been installed in the hard courts areas. Additionally, 6 temporary courts are installed annually for the Championships on the croquet lawns in the northernmost parcel within Wi3 adjoining Bathgate Road. If detailed descriptions of the number of courts are required to be included, perhaps the AELTC can be asked to clarify the description and number of courts to be specified to ensure the Plan is accurate?

#### **4.4 Site description para 6 relevance?**

The text here refers to the former golf course which is not part of the Site Allocation. The AELTC's planning application 21/P2900 is also mentioned but does not relate to the land within Wi3. The proposals in that application were approved by LB Merton subject to a S106 Agreement and GLA referral. The application was refused by LB Wandsworth and has now been called in for determination by the Mayor of London and could be called in by the Secretary of State. Its outcome is therefore uncertain so it should not be included in the Plan. We also query the inclusion of a narrative reference to the AELTC's "proposal" for the former golf course within Wimbledon Park which at this stage is a commercial aspiration, yet to be validated by any planning permission and which is in any event the subject of separate draft policy provisions in N8.1. **On that basis we suggest para 6 is deleted.**

#### **4.5 Site Location– Impacts ecology designations – green corridor omission LBM29 MM115 and LBM31 p310**

The area of MOL to the north of the main site includes a Green Corridor so **the statement in response to this question should be "yes" and reference to the Green Corridor reinstated.**

#### **Concluding Comment on Consultation Submission from Wimbledon Park Residents' Association ("WPRA") dated 15<sup>th</sup> March 2024 ("WPRA150324")**

We have seen this submission which addresses the inclusion of the **new Policy N8.1 relating to the future management of Wimbledon Park**. We discussed the content with WPRA and with the Wimbledon Society ("WimSoc") who have fully supported WPRA150324 in their own submission to this Consultation dated 19<sup>th</sup> March. **We concur with WPRA's analysis of Policy N8.1 and support the conclusions and recommendations of WPRA150324.** Whilst we agree that it is appropriate that a plan for the future management of Wimbledon Park should be established to address its "Heritage At Risk" status we concur with both WPRA and WimSoc that the proposals in policy N8.1 are disproportionate and ineffective. We refer in particular to the clear summary of the challenges in delivering the proposed approach adopted in N8.1 which are listed in Section 5 pp15-17 of WPRA150324 and we support the simple alternative suggestion in WPRA150324 Section 1. We note that WPRA also propose amendments to N8.1 should their alternative proposals be rejected. We agree with those amendments.

Yours faithfully

Chairman