

EC/P07994
29 January 2021

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The Oval
London
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Dear Sir / Madam

**London Borough of Merton New Local Plan
Representations on behalf of The All England Lawn and Tennis Club (AELTC)**

We write on behalf of our client, the AELTC, to make representations on the New Local Plan.

The AELTC's Church Road site hosts The Championships, Wimbledon, which is the oldest tennis tournament in the world and is internationally regarded as the finest stage in world tennis. The Championships and AELTC grounds are of national and international significance. The AELTC's strategic aspirations are to maintain Wimbledon's position at the pinnacle of the sport, and leverage that position to act as a guardian of tennis, and a force for good for its communities, particularly locally.

The main All England Lawn Tennis Club (AELTC) site comprises 18 grass show courts (including No.1 Court and Centre Court), 8 external clay courts within the Southern Apex, 16 grass practice courts on the north eastern section of the site. The site also accommodates significant infrastructure to support The Championships including catering facilities, player facilities, hospitality, offices, media and broadcasting facilities, press, security, etc., in a series of buildings and structures across the site.

The AELTC acquired the Wimbledon Park Golf Club (immediately to the east of the main grounds) in the 1990s and in December 2018 it bought the remaining years of the lease from the golf club. This significantly increases the AELTC's landholdings and will provide the opportunity to host the qualifying event at the expanded site. The AELTC has begun a process of master planning to establish ideas for the use of the land in the future.

The New Local Plan is of particular interest and relevance to the AELTC as they are involved in a number of live projects to ensure the AELTC's facilities are genuinely regarded as the finest in global tennis and thus contribute to Wimbledon's pinnacle position, including the new master plan development. The upgrade and improvement of facilities is important in order to maintain Wimbledon's status as the premier tennis tournament in the world and a key contributor to the local

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and London economy

The AELTC is understandably keen to ensure that existing and emerging planning policy does not set out any potentially inappropriate barriers to new development coming forward and instead that it encourages sustainable development within the Borough as a whole and at the AELTC site.

This letter sets out a summary of AELTC's comments on the New Local Plan in turn below.

Comments on New Local Plan

Site Allocation

Site Allocation Wi3

Firstly, we welcome and support that the main AELTC site on Church Road, including Wimbledon Park Golf Course, has been allocated within the New Local Plan as Site Allocation 'Wi3'. Upon review of the site allocation we have a number of comments which are covered in turn below.

We would like to note that the site name referred to within the site allocation is incorrect and should be updated to, 'All England Lawn Tennis Club and The Championships'. It should be ensured that reference to the club within the Local Plan is either 'The All England Lawn Tennis Club' or 'AELTC'.

Within the 'Site description' section it is requested that the economic contribution of The Championships is recognised. The following wording can be inserted to address this point:

"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 the AELTC)."

The 'Strategic planning factors' section of the site allocation notes the following:

"This includes hosting the qualifying rounds for the tennis championships at both the Raynes Park site and by providing tennis related development on the golf course and providing wider community benefits including greater public access."

It is requested that this sentence is amended to the following to ensure the aspirations for the use of the site are clear.

*This includes **the opportunity to** host the qualifying rounds for the tennis championships at ~~both the Raynes Park golf course site and by providing~~ **through** tennis related development **to extend the grounds** ~~on the golf course~~ and providing wider community benefits including greater year-round public access.*

Further, it is considered that within the 'strategic planning factors' section that following the commentary on the AELTC Master Plan in 2013, it should be recognised that the AELTC are currently preparing an updated Master Plan to identify future development opportunities of the main and extended AELTC estate. It is suggested that following text is included relating to the new Master Plan.

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“Following the acquisition of the golf course, the AELTC has commenced the preparation of an updated Estate Master Plan to identify the future development opportunities for the extended AELTC estate and The Championships.

The AELTC’s priorities in developing a new Estate Master Plan are to strengthen The Championships for the years to come, including the staging of an enhanced qualifying event at the grounds, and to use the AELTC’s influence and resources to deliver a greater positive impact for its communities. Critical to this will be the AELTC’s commitment to act as a good steward of the expanded land holding, reflecting its history and its place in the local community.”

Within the ‘Issues’ section of the site allocation, it should be recognised that there is currently no public access to the golf course and around the majority of Wimbledon Park Lake.

Further, within the ‘Issues’ section the following is noted;

“Any assessments relating to buildings or structures (e.g. transport assessments, carbon savings etc) should take account of this unusual usage pattern.”

The AELTC welcome that the seasonal use of many of buildings on the AELTC Estate is recognised within the site allocation. It is requested that the wording on this element is updated to the following to ensure this is clear when assessing proposals against planning policy requirements.

*“Any assessments relating to buildings or structures (e.g. transport assessments, carbon savings etc) should take account of this unusual usage pattern. **Consideration of the seasonal use should particularly be taken into account when assessing proposals against sustainability policies CC8.11 and CC8.12 with the need for bespoke energy modelling”***

The ‘Opportunities’ section of the site allocation recognises the potential of the AELTC site; however it does not specifically reference the golf course. It is important that the potential for tennis related development of the golf course is recognised within this section of the site allocation. New development of the golf course provides the potential for the historic and community benefits noted. The inclusion of the golf course in the main AELTC estate and the new Master Plan allows these benefits to be provided, it is therefore requested that this is made clear.

Site Allocation RP5

Site Allocation RP5 refers to the All England Lawn Tennis Club Community Sports Ground at Raynes Park. Within the ‘Site description’ for the site allocation there appears to be no acknowledgement of the approved application (Ref: 18/P1024) to redevelop the site to increase and improve tennis related facilities. This approved application will provide a further 16 x external grass tennis courts and 3 x acrylic tennis courts within permanent air domes. Landscaping and parking improvements are also incorporated, including a clubhouse. Construction is currently underway on site for these new facilities as part of this planning permission, with the new tennis courts near completion. In light of this, it is important that these new facilities are recognised within the site description at the beginning of the site allocation.

Within the ‘Site allocation’ section the following is stated:

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“The site is can be found in designated open space with sport and recreation use that are compatible with open space designation.”

It is assumed that this sentence is intended to note the sites open space designation and that the current sport and recreational use on site is compatible within this designation. It is requested that this is made clear in the wording.

It is requested that the second paragraph of the site allocation section is amended to the following to recognise the need for these facilities to also support The Championships.

“This site provides an opportunity for significant, sustained and long-term investment in sporting facilities in Merton to support The Championships and to provide access to the local community to aid in tackling health inequalities, which is one of the stated goals of the AELTC’s charity, the Wimbledon Foundation. Development of the site provides opportunities to optimise the use of an underutilised site for uses compatible with its current designation as playing fields.”

Within the ‘Design and accessibility guidance’ section of the site allocation it is noted that the 2018 planning permission provided 16 external grass courts. It is requested that this description is updated to include the 3 x acrylic tennis courts within permanent air domes that were approved as part of the planning permission.

Climate Change

In general, the AELTC are supportive of a number of the proposed changes relating to climate change as they are in line with the requirements of the intent to publish London Plan. The AELTC recognise Merton’s ambitions for climate change through their recently adopted Climate Strategy Action Plan. As you may know, the AELTC is a signatory to the UN Sport for Climate Action Framework.

Whilst the AELTC are supportive of Merton’s ambitious goals relating to climate change and zero carbon, further consideration is required of the planning policies proposed. We have commented on these in turn below.

In relation to Policy CC8.11 Minimising Greenhouse Gas Emissions, there is a requirement for a 50% reduction in CO2 for non-residential development over 500sq. It should be recognised that the current GLA 2020 Energy Assessment Guidance requires a 35% on-site reduction beyond Part L 2013, with 15% achieved through energy efficiency measures. Further, there is no mention of energy efficiency standards that are expected, in addition to the 50% reduction. We would request clarification on this point.

Whilst we understand Merton’s ambitions to achieve zero carbon by 2030, the requirement of a minimum of 50% goes above London Plan Policy targets. Such minimum requirements are likely to have a significant impact on development proposals coming forward. It is therefore requested that these targets are amended to be in line with the London Plan.

It is noted that Clause 1.1.14 of policy CC8.11 requires the carbon shortfall to be assessed at £300 per tonne. This represents a significant increase by £205 per tonne compared to the current London Plan. Whilst it is understood that this increase above London Plan policy is to incentivise on-site savings, such a requirement will have significant financial implications on the delivery of schemes. It

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does not appear that this has been assessed from a viability point of view. Viability testing is important to ensure that policy requirements set out do not threaten the ability to deliver high quality schemes in a viable manner.

Within Policy CC8.12 Minimising Energy Use, a table is provided referring to fabric efficiency targets. Clarification is sought on if these targets are based on predicted operational energy use (regulated + unregulated) from TM54 (or similar), or just regulated (from BRUKL).

Clause 1.1.4 of Policy CC8.14 Minimising Waste & Promoting a Circular Economy, refers to embodied carbon targets that new developments should achieve by 2025. It is not clear what the evidence base is that informs these targets. Such targets do not appear to have been robustly tested for economic and financial viability to understand deliverability.

In summary, the key concerns the AELTC have with the emerging climate change policies are relating to the targeted carbon reductions and space heating requirements. Further evidence base and viability testing is required to fully understand the implications of the policy aspirations. Our understanding is that the requirements have been developed based upon the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide. While we applaud the ambition and intent of the LETI publication, and the ambition of Merton's emerging policies to align with this, the document was produced as guidance for designers, rather than an evidence based document.

Currently it is not clear if the proposed policy requirements have been robustly tested and evidenced to allow appropriate justification of the proposed policies in accordance with paragraphs 31 and 35 of the NPPF.

Green and Blue Infrastructure

Within the New Local Plan information an updated Open Space and MOL map is included and a summary table of the proposed amendments. The policy map changes table and summary advises that Open Space and MOL amendments are proposed to the All England Lawn Tennis Club (Ref TEP-03). However, upon review of the updated proposals map it appears that these proposed amendments have not been taken into account. We trust this is an error and this will be picked up upon review of map provided within the consultation material.

A review of the summary of the proposal map amendments demonstrates that it is only proposed that the MOL designation is removed from the built up areas and buildings of the site and the designation is retained on the practice courts to the north. In terms of open space, it is stated that the designation should be retained to the lawns, gardens and general open space to the northwest of the site. Whilst the AELTC understand Merton's desire to protect these areas, retaining these areas under an MOL or Open Space designation is not appropriate or in line with planning policy. The site is not accessible to the public to allow for the benefit of these designations, furthermore it is part of the main AELTC site for The Championships.

Policy O8.5 Sport and Recreation states the following regarding the AELTC.

“e. Recognise the All England Lawn Tennis Club as being an internationally significant sporting venue.”

It is requested that this wording is updated to include *‘and continue to support activity and*

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enhancement' as it is important that enhancement of facilities is supported to ensure the continued success of The Championships.

Transport

The AELTC are generally supportive of the transport and highway policies within the emerging Local Plan and the ambition to encourage sustainable transport modes, particularly walking and cycling.

As part of the consultation material, a walking and cycling route map is provided for the Wimbledon area. The proposed route on the plan seeks to direct a combined walking and cycling route through the main AELTC site in two different locations off Somerset Road and Church Road. The AELTC site is private land and part of an operational site all year around; it is therefore not accessible to the public to provide a walking or cycling route. Access onto the site is carefully controlled.

The proposed route map may potentially be an error and it would appear that the route is intended to carry on along Church Road and then joining onto Bathgate Road to where it links to the remainder of the route identified on the map.

The proposed walking and cycling route is therefore strongly resisted and it is requested that the map is updated taking this into account.

Economy

Within the draft policy document on economy it appears that Policy TC7.9 on Culture, arts and tourism development is missing. The AELTC would like the opportunity to view and comment on this policy once the policy wording has been provided.

Conclusion

The AELTC welcome the opportunity to comment on the New Local Plan and support the allocation of the main AELTC Estate on Church Road, including the golf course and the Raynes Park site. Specific comments are provided in relation to these site allocations to ensure the intentions of these sites and proposed future use is made clear.

Whilst the AELTC are generally supportive of the New Local Plan and the proposed policies there are elements of the draft guidance that require further clarity and explanation to allow them to be effective and viable. The AELTC would welcome further discussion on these points if helpful.

The AELTC trust that their comments will be fully considered as part of the consultation and we would be happy to discuss the matter further on their behalf if necessary.

Yours sincerely

Emily Cochrane

For and on behalf of
Rolfe Judd Planning Limited