

OC/P08333
27th October 2022

FAO: Charlotte Glancy
Examination Office,
C/O Banks Solutions,
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East Preston,
West Sussex
BN16 1DD
bankssolutionsuk@gmail.com

Dear Ms Glancy,

**Wandsworth Local Plan – Examination in Public
Main Matter 1 – Legal Requirements and Overarching Issues
Representation by the All England Lawn Tennis Club**

Representations and Responses to Date - Summary

On behalf of the All England Lawn Tennis Club (AELTC) we have submitted representations on the Regulation 18 (dated 1st March 2021) and Regulation 19 (dated 28th February 2022) Wandsworth Draft Local Plan. We append these for ease of reference to this letter. The AELTC has a landholding within Wimbledon Park which is largely in Merton but straddles the borough boundaries of Merton and Wandsworth. The AELTC is proposing development within both boroughs.

In summary of our latest representation, we broadly supported the draft Local Plan but were concerned that there were inconsistencies between the London Borough of Merton's (LBM) draft Local Plan and the London Borough of Wandsworth's (LBW) treatment of Wimbledon Park Golf Course.

LBW commented in response to our Regulation 18 representation that '*Site allocations in LBW are not intended for the promotion of sporting venues. Consequently, it would be inappropriate to designate the site as such*'. This position is contrary to that of the LBM, and we raised that this position was inconsistent with Paragraphs 17 and 20 of the National Planning Policy Framework (NPPF). We noted that even if a site allocation is not viewed appropriate, given the cross-boundary nature of the site, it is important that both Local Plans are consistent in their treatment of the park and viewed that this lack of acknowledgement challenged the duty to cooperate under paragraph 24 of the NPPF.

Under document WBC-007 (*Schedule of Representations on the Publication (Regulation 19) Local Plan and the Council's Responses – Organised in Comment Order*) we observe commentary from LBW that it is acknowledged that the proposed site allocation Wi3 in the adjoining authority of the LBM '*presents shared issues for the two boroughs in respect of the holding of the annual Championships, heritage, travel and open space issues*' but that '*Wandsworth and Merton Councils have through the Duty to Cooperate process set out that this site will be considered through the planning application process and a cross-boundary planning application has been submitted to both*

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boroughs in their roles as Local Planning Authorities as the development straddles the borough boundary (reference 21/P2900 in Merton; reference 2021/3609 in Wandsworth)'.

This position is reiterated in Document WBC-005 (Statement of Common Ground – Neighbouring Authorities) paragraph 5.67 as evidence of co-operation with LBM. The Council commentary also states, '*The Local Plan policies will be used as part of this consideration including LP54.*'

Main Matter 1 – Legal Requirements and Overarching Issues

The Hearing Programme has raised a number of Main Matters which the Inspectors wish to examine. The matters of concern to the AELTC are considered to particularly straddle 3 areas:

- Main Matter 1 – Legal Requirements and Overarching Issues (particularly over the Duty to Co-Operate).
- Main Matter 20 – Green and Blue Infrastructure
- Main Matter 21 – Implementation and Delivery

In the interest of expressing and detailing our concerns to the Inspectorate as succinctly as possible, we would suggest our attendance at **Main Matter 1** to explain these issues more fully – but we happy to attend either of the Main Matters as is considered necessary by officers.

Our concerns with the responses from LMW to date on our representations are considered unsatisfactory for the following reasons:

1. LBW appears to be relying on a pending planning application to address the matters facing Wimbledon Park rather than formulating an appropriate policy. As Inspectors will be aware, Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Paragraph 12 of the NPPF requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Without a clear planning policy, a decision maker would not be clear how to respond to a planning proposal and it is inappropriate to rely on a planning application both procedurally but also if the aforementioned applications were refused, withdrawn, or an alternative proposal prepared. There is also nothing in the policy which would inform a decision maker on the need to refer to this application, liaise with LBM, or refer to LBM's Wi3 allocation.

2. LP54 places great weight on development proposals being in accordance with the needs of the Playing Pitch Strategy. This document however was published in May 2013 (Document SD-074 – Playing Pitch Strategy) and is deficient when it comes to tennis. The commentary on page 8 states that the Lawn Tennis Association (LTA) '*is in the process of reviewing its Strategy*' and only has aims targeted to 2016. The objectives for tennis on page 36 are described as largely only about addressing quality issues with current facilities.

The submission of the AELTC's planning application, which includes an offer for publicly available courts is evidence of increased provision for tennis courts rather than one simply of improvement. Given that the Playing Pitch Strategy is already rather out of date (raising questions against paragraph 15 of the NPPF), and that a local plan should be expected to last at least 15 years (paragraph 22 of the NPPF), it is questioned if the Playing Pitch Strategy should hold such prominence in the policy. There is no reference in the policy (or supporting text) that the Council will commit to undertake regular reviews of the strategy to

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ensure it is both up to date and effective to assist a decision maker in their determination of any application.

3. As has been well documented, Wimbledon Park features on Historic England's Heritage at Risk register due to:
 - a. uncertainty around the future (of the entire historic landscape),
 - b. the impacts of divided ownership on landscape management,
 - c. obscured views, and
 - d. deterioration of the lake.

LBM's draft Local Plan has recently concluded its Examination in Public. Through this process, along with the pending planning application that has highlighted the opportunities that can be secured to address the issues facing Wimbledon Park, LBM's Site Allocation Wi3 has developed so that the development proposals secure, for instance, the production of a landscape management and maintenance plan, address matters harmful to the Capability Brown landscape, infrastructure requirements related to the tournament and support enhancements of Green Infrastructure. These are targeted measures specific to the issues facing the Park which a positively prepared plan should look to address.

It is considered that LP54 is too vague to address the issues specifically facing the park. It also remains that the proposal put forward by the AELTC on the golf course is the only credible means of capturing contributions which can address the issues that the park faces both within and external to the ownership boundaries of the AELTC. Similar to reason 1. there should at least be some reference to Merton's Wi3 allocation if a site allocation is not pursued.

We trust this representation has identified the issues the AELTC has with the draft Local Plan and we look forward to expressing these in greater detail to the Inspector at the Public Examination. Should you require any further clarification in advance, or following, the Public Examination, please do not hesitate to contact the undersigned.

Yours faithfully,



Oliver Coleman
BA(Hons), MSc, MRTPI
Rolfe Judd Planning Limited

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Appendix 1: Previous Representations to the Local Plan

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EC/P7034
1 March 2021

Policy and Design Team
London Borough of Wandsworth
The Town Hall
Wandsworth High Street
London
SW18 2P

Dear Sir/Madam

**Wandsworth Draft Local Plan Consultation
Representations made on behalf of All England Lawn Tennis Club (AELTC)**

We write on behalf of the All England Lawn Tennis Club (AELTC) to make representations to the London Borough of Wandsworth's Draft Local Plan which is currently out for consultation (March 2021). These representations are written with specific reference to the Wimbledon Park Golf Club, which partially falls within the administrative boundary of the London Borough of Wandsworth.

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 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, 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 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.

Ms Emily Cochrane
1 March 2021

The Site – Wimbledon Park Golf Club

Wimbledon Park Golf Club is located immediately to the east of the main AELTC site along Church Road. The northern element of the site is within the administrative boundary of the London Borough of Wandsworth (LBW), with the remaining within the London Borough of Merton (LBM). The current existing use of the site is for a Golf Course.

The part of the site located within the LBW is within a Conservation Area (Wimbledon North Conservation Area), Metropolitan Open Land (MOL) and a Historic Park and Gardens. The site as a whole is part of a Capability Brown designated Grade II* Registered Park and Garden.

Within paragraph 14.32 of the draft Local Plan, Wimbledon Park is recognised as being included in the Register of Historic Parks and Gardens under the National Heritage Act 1983.

Following further review of the draft Local Plan, other than paragraph 14.32, there is no specific reference to the Wimbledon Park site or the Golf Course as part of this. Whilst it is understood that it may not be necessary to include Wimbledon Park as a site allocation within the draft Local Plan, given the cross boundary nature of the site with the London Borough of Merton, it is important that both Local Plans are consistent in their treatment of the site. This is particularly important given the AELTC have begun the process of a masterplan for the whole site.

The London Borough of Merton consulted on their Draft Local Plan in February 2021. Within the Draft Local Plan the Wimbledon Park Golf Club, in combination with the main AELTC site, has been allocated under site allocation 'Wi3'. The proposed allocation currently allocates the site for the following:

“World class sporting venue of national and international significance with support for continued and long terms investment in all sites towards this end and to improve community access, particularly to Wimbledon Park Lake”

The allocation further recognises the potential of Wimbledon Park Golf Course to support The Championships and host the qualifying rounds for The Championships themselves. The following opportunities are noted within the site designation:

“Opportunity 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.”

The London Borough of Merton draft Local Plan recognises the potential of the site for sport related development; however any development of the site would need to respond to the sensitive designations subject to the whole site.

In light of the above, it is requested that the draft Local Plan for Wandsworth recognises the future aspirations for Wimbledon Park Golf Club site and there is a consistency in approach to the site between the London Borough of Wandsworth and Merton.

Conclusion

The AELTC welcome the opportunity to comment on the draft New Local Plan. Whilst the AELTC are generally supportive of the draft Local Plan and the proposed policies, we request that there is a

Ms Emily Cochrane
1 March 2021

consistency in approach to the Wimbledon Park Golf Club site due to the cross Borough nature of the site. It is important that the future aspirations of the site are recognised.

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.

Yours faithfully



For and on behalf of
Rolfe Judd Planning Limited

EC/P07994
28 February 2022

Policy and Design Team
London Borough of Wandsworth
The Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sir / Madam

**Wandsworth Draft Local Plan
Representations made on behalf of All England Lawn Tennis Club (AELTC)**

We write on behalf of All England Lawn Tennis Club (AELTC) to make representations to the London Borough of Wandsworth's Draft Local Plan which is currently out for Regulation 19 consultation (February 2022). These representations are written with specific reference to the Wimbledon Park Golf Club, which partially falls within the administrative boundary of the London Borough of Wandsworth.

The AELTC submitted representations on the Draft Local Plan in March 2021 as part of the Regulation 18 consultation. This response should be read in combination with the previous representations submitted in March 2021. Following the Regulation 18 consultation, as part of the regulation 19 consultation the Council have provided the following response to the representations submitted.

"Wimbledon Park Golf Club is located immediately to the east of the main All England Lawn Tennis Club (AELTC) site along Church Road. The northern element of the site is within the administrative boundary of the London Borough of Wandsworth (LBW), with the remaining within the London Borough of Merton (LBM). The current existing use of the site is for a golf course.

The LBM has allocated the Wimbledon Park Golf Club, in combination with the main AELTC site, to support it as a sporting venue of national and international significance. Site allocations in LBW are not intended for the promotion of sporting venues. Consequently, it would be inappropriate to designate the site as such. However, proposals for the area within LBW will be assessed against the development plan. Wimbledon Park Golf Club, Church Road does not require site allocation."

We are concerned with the comment that "Site allocations in LBW are not intended for the promotion of sporting venues. Consequently, it would be inappropriate to designate the site as such". In accordance with the para 17 of the NPPF the Development Plan must include strategic policies to address the local planning authorities priorities for the development and use of land in its area. This includes leisure facilities (NPPF para 20), for which the proposals as part of the AELTC would fall under. We therefore do not understand why leisure facilities are unable to be allocated.

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Ms Emily Cochrane
24 Feb 2022

Despite this, it is understood that it may not be necessary to include Wimbledon Park as a site allocation within the draft Local Plan. However, given the cross boundary nature of the site with the London Borough of Merton, it is important that both Local Plans are consistent in their treatment of the site.

In accordance with paragraph 24 of the NPPF Local planning authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries. As drafted, the Local Plan fails to recognise the AELTC site and its allocation within the London Borough of Merton's adopted and draft Local Plan.

Further, emerging policies should refer to the London Plan. Policy S5 of the London Plan outlines the Mayor's approach to sports and recreation, including the provision of new facilities and the enhancement, replacement, and/or loss of existing facilities. Development proposals are expected to increase or enhance the provision of facilities.

In light of the above, it is again requested that the draft Local Plan for Wandsworth recognises the future aspirations for Wimbledon Park Golf Club site and there is a consistency in approach to the site between the London Borough of Wandsworth and Merton. The Local Plan remaining silent on this point fails to demonstrate effective cooperation on a site that crosses administrative boundaries. Further, The Championships are of national and international importance and provide as significant contribution to the economy, including locally. It is therefore important that the future aspirations of the AELTC on the Wimbledon Park Golf Club site are recognised within the new Local Plan.

Conclusion

The AELTC welcome the opportunity to comment on the draft New Local Plan. Whilst the AELTC are generally supportive of the draft Local Plan and the proposed policies, we again request that there is a consistency in approach to the Wimbledon Park Golf Club site due to the cross Borough nature of the site. It is important that the future aspirations of the site are recognised, particularly due to the national and international importance of The Championships.

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.

Yours faithfully

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For and on behalf of
Rolfe Judd Planning Limited