

Development Control  
Attention: Stuart Adams  
Merton Council: Civic Centre  
London Road  
MORDEN SM4 5DX



22 September 2021

Dear Mr Adams

## **21/P2900 - THE AELTC GOLF CLUB LANDS**

This application is for the development of the land to the east of Church Road, with a new 8000 seat Stadium, plus some 38 tennis courts, together with a number of maintenance and other buildings. The site is defined as Metropolitan Open Land (MOL) and is a major part of the Grade 2 star designated ("at risk") Heritage Asset that is Wimbledon Park.

The Park is also a Conservation Area, with a Lake and many trees remaining from the original 1766 design by the celebrated landscape architect, Capability Brown.

The whole of the Park has been protected and designated as open land in all the Borough and London-wide Plans since the creation of the London Boroughs in 1965.

The freehold of the Golf Club lands was acquired from the Council by the All England in 1993, with clear public (and legal covenant) promises that the land would not be built on.

Despite this undertaking, a large new Stadium is now proposed, some 95 metres long, and 30 metres (100 feet) high. With some smaller buildings, the equivalent of 2 blocks of flats and 10 bungalows.

**The Society view is that this application is fundamentally flawed and should not be approved.**

Substantial new permanent buildings (not just the Stadium) but Maintenance Depots, Player buildings and Turnstile structures etc are proposed. This is quite contrary to planning policies in the National Planning Policy Framework (NPPF) which says that "**development that harms (MOL) should not be approved, except in very special circumstances**" (147).

The 'exceptional circumstances' quoted in the NPPF at 148/9 do not apply. No evidence is produced that explains why clear and long-standing Planning Policy should be ignored.

Instead the 'special pleading' is no different to what could be claimed by any developer on any MOL.

It is also contrary to the clear Planning Policies in the London Plan, where "**MOL should be protected from inappropriate development in accordance with National Policy**" (G3A1).

Also in the Local Plan the clear Policy is that "**The Council will continue to protect MOL from inappropriate development**" (DMO1A).

Partial public access to part of the Park, some culverting removal, the proposed walkway around the Lake, cosmetic upgrading of Church Road, potential unspecified public use of the vacated Clubhouse - these come nowhere near making restitution for the loss of protected open land and Heritage.

No new MOL land is provided to compensate for the loss. In the case of the nearby Wimbledon Common, this is the requirement under the 1871 Act for any loss of land.

The dredging of the Lake is merely a cash gift to the Council, whose responsibility this is, and could raise questions about the perceived independence of the Council in deciding the application.

Additionally, should such a new Stadium be approved, who is to say that other stadiums will not be built in the future? Will assurances given now be any more valid than those of 1993?

As a Defined and Listed grade 2 star Heritage Asset, and being on the “at Risk” Register, the NPPF says that “**substantial harm to Grade 2 star registered Parks should be wholly exceptional**” (para 200): and “**great weight should be given to the asset’s conservation, the more important the asset, the greater the weight**” (199).

The introduction of a large permanent Stadium plus many smaller buildings is clearly quite contrary to National Policy, and a destructive intrusion on this protected open space.

The original Park of some 480 hectares in 1766 has been reduced by development to today’s 60 hectares. This urbanising proposal will effectively reduce the size of the Park to less than 30 hectares. Twin 10 storey flats, with ten bungalows would have a similar footprint.

The natural open-ness of the Historic Parkland is also severely impacted by the proposed buildings. Additionally, the large paved areas (one of the turnstile structures is 100 metres in length), and the somewhat regimented court layout, compromise what should be flowing green space in the Brownian tradition.

Being in a Conservation Area, Outline or hybrid applications are not appropriate, and contrary to the Local Plan Policy DM D4E, which says that “**Outline applications will not be acceptable for developments that include Heritage Assets**”.

For any building the size of a Stadium, only a full application should be accepted. Were an Outline permission to be granted, this would allow substantial changes to be made to the eventual design.

Given that the application involves the operation of a national sporting event, and that the Council may potentially stand to gain financially, (eg the Lake dredging, the release from the covenant) the Society view is that, to protect the Local Planning Authority’s independence, the planning decision should be taken at national, not local level.

The incorporation of Church Road into the site application boundary is not accepted. Church Road is and should remain a fully Public Highway, independent of the AELTC, and remain open for normal public pedestrian and cycle use throughout the year. Any traffic restrictions or diversions should be dealt with by normal traffic orders annually. The plans show normal public pedestrian/cycle movements between Southfields and Wimbledon being totally blocked off, with no alternative routes, and this should not be accepted.

Some 660 parked cars, a large bike park, public transport turning, and the Queue are all ‘externalised’ by being located in the adjoining Council-owned public Park, severely limiting its use by the general public.

This is not acceptable and space for these facilities must be found within the AELTC’s own lands.

The impact on the local roads, all of small scale and some hilly, of construction traffic is significantly underestimated.

The suggested HGV routes through the Village are also not fully shown, and there is no indication of what routes HGV lorries from the south, say from Sutton or Croydon, would be advised to take.

The projected numbers are of real concern, and the impact of such heavy and large construction vehicles on the Village and local roads over several years is likely to be quite unacceptable.

The opportunity to create new east-west public pedestrian/cycle links through what has been a barrier to east-west movement has been missed.

In the time available it has not been possible for the Society to consider the wider traffic and transport implications of the proposals.

**Conclusion** In view of the importance of this sporting project, and its clear breaching of national and local planning policies on open space protection and on Heritage, this is an application that should be decided by the Secretary of State and not the LPA.

The Society feels that a blunt Refusal would not be enough. It needs to be accompanied by some positive suggestions, an indication of a more acceptable way forward, respecting the traditions and aspirations of the sport, but also reflecting the importance of the Heritage and the open Park.

- There should be no permanent buildings on the Golf Club lands whatsoever:
- Instead, **temporary** tented facilities and stands, as for major 'world' events like Chelsea, Henley, the (golf) Open, Wentworth etc could work.  
It is not for the Society to advise on how the All England sees its role in world tennis, but the tradition of the 'English garden', the adaptable white tented Village, could be seen as a contrast to the almost mechanised and inflexible building-oriented no-grass complexes of the "other three".
- If any MOL were to be built on, it **must** be replaced by an equivalent area of new green MOL:
- All maintenance facilities should be on the western site, crossing Church Road as required:
- New public footpath/cyclepath links need to be provided across the site, from Revelstoke Road through to Bathgate Road (during Park opening times) and Home Park Road to Somerset Road: and the route between Southfields and Wimbledon permanently maintained:
- More temporary facilities for the Queue, car and cycle parking etc should be provided on site, not in the adjoining Park:
- Courts should be fewer in number, and be less regimented, to "flow" with a more natural layout:
- The plan for construction traffic needs to understand and reflect the small scale nature of the local roads and environment:

This is an important and nationally significant sports project that has the potential for showing how a short duration event can be accommodated within a sensitive environment, itself having national importance for heritage and nature.

In the Society's view, the present approach does not yet measure up to that ideal.

Yours sincerely,

Chris Goodair,  
Chairman, Wimbledon Society Planning and Environment Committee