

SUTHERLAND GROVE CONSERVATION AREA RESIDENTS' ASSOCIATION

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AELTC **Planning Applications: 21/P2900** **London Borough of Merton (LBM)**

2021/3609 **London Borough of Wandsworth (LBW)**

SGCARA **OBJECTION**

1) BACKGROUND

1.1) Local Context

The footprint of Sutherland Grove Conservation Area (SGCA) contains approx. 1000 households, & is adjacent to Southfields centre, including Southfields District Line Station. SGCA residents therefore have a pertinent interest in developments that would affect Southfields & also Wimbledon Park, our closest local resource for sport and outdoor leisure.

1.2) Application/Planning Context This Application is unusual in being submitted in identical format to both LBM & LBW, despite the fact that it is LBM who 'owns' the public park. The other landowners are The Wimbledon Club (who acquired their current site in 1890, 25 years before Trusteeship of the public park was acquired by LBM's predecessor, the Wimbledon Corporation) & AELTC, who bought the land leased to Wimbledon Park Golf Club (WPGC) in the controversial 1993 purchase. References to LBM policies may be taken to include parallel policies of LBW where applicable.

Elements of this multi-faceted Application appear incompatible with Statutory planning obligations at NPPF, London & Local Plans level. These, & other arguments against granting Consent, are described clearly in the Objections of other nearby Residents' Associations. The most comprehensive expositions of the incompatibility of many elements of the Application with planning obligations are offered in the Objections submitted by Parkside Res. Assn & Wimbledon Park Res. Assn. SGCARA concurs strongly with these, so will not repeat them in our own submission. They include incompatibilities with the following:

NPPF (2021) paras. 99, 147, 148, 149, 196, 199, 200, 201

The London Plan (2021) G3A1, G4B, G6, G7B, GG2

LBM Local Plan (2011) CS 13, DM D2, DM D4E, DM01A, & the Merton Character Study (2021)

LBW Local Plan (2016) PL4

& also challenges to AELTC's Economic Social & Community Benefits Report (ESCB) submitted with the Application.

The Application also appears to disregard Climate Change obligations, as described in **2)** below.

1.3) AELTC, the 'Qualifiers' & the Bank of England Sports Ground (BofESG)

A number of local residents, whether tennis aficionados, 'Fans for a Fortnight', or not at all, have been content, indeed proud, to have the prestigious Wimbledon Championships on their doorstep. At two weeks in duration, those who love the razzmatazz & carnival atmosphere have been satisfied, whilst it has been just about tolerable for those who have found accessing local shops & facilities, swamped by the huge influx of visitors, challenging & unpleasant. Likewise, some local shops & services thrive during those two weeks, whilst others are seriously disadvantaged.

The fact that the Qualifying rounds have been held in the preceding week or so at the well-regarded Bank of England (BofE) Sports Ground, has been crucial in maintaining this balance.

The AELTC expansion-proposals would shatter this balance & involve many years of disruption & environmental harm from many aspects of the proposals. The estimated daily rise in spectator-attendance alone from 42,000 to 50,000 for the Championships, with 10,000 per day for the 'new' Qualifiers, & out-of-area attendees for unspecified additional events at the Parkland Showcourt would pose serious challenges to the functioning of Southfields as a healthy neighbourhood locality. For what purpose?

The 2nd Consultation (May 2021) into the AELTC plans stated that the primary intent of the proposals was: *'to maintain the Championships as the premier tennis tournament in the world'*, variations of this phrase often repeated by AELTC since, including in the Application D&A Statement.

The Wimbledon Championships are *already* unique, being the world's only grass-court Grand Slam, with a formidable reputation for impeccable presentation & organisation of the event. The incentive for expansion is presumed to be the re-modelling/re-building of much of the Paris Roland Garros site, (similarly constrained within a residential area) with concern that this will knock Wimbledon from its 'top spot'. The AELTC proposals have some echoes of the controversial expansion of Roland Garros into part of the *Jardin des Serres d'Auteuil*, (the Court Simonne-Mathieu - 2019). With glasshouses on all four sides, & the playing surface 15 feet below ground, any harm from the intrusion of this court into the beautiful botanical gardens is at least reduced as the court is 'only' 26 feet high. The playing surface of the Parkland Showcourt proposed by AELTC presumably cannot likewise be sunk below ground as basement development is already proposed to the limit of what is possible without disrupting drainage on this site at the foot of steep London Clay hillsides or the root-function of the veteran oak trees surrounding the proposed location. Consequently the Showcourt would be over 100 feet tall, dominating & adversely impacting views from the public park & elsewhere, (detailed below). This epitomises the inherent unsuitability of many of the AELTC proposals for their Wimbledon Park Golf Club site.

The status quo of splitting the Qualifiers and Championships between the two sites has worked well, sharing the burden of substantial footfall & traffic. The National Tennis Centre is also adjacent to the BofESG, making its location ideal. This scenario could continue, but AELTC appears to have an ideological conviction that both elements of the tournament need to be on a single site, despite the many negatives, described further below.

1.4) AELTC & the Lease-Sale of BofESG

In Sept 2019 the BofE decided to sell its Sports Ground, (long leasehold – 125 years)

Gerald Eve – Agents for the Sports Ground sale - stated: *'On the instruction of the Bank of England, Gerald Eve are delighted to bring this renowned and historic site to the market for the first time in over 100 years. The site provides a unique investment opportunity in its existing use, or alternatively presents a variety of redevelopment options for a range of uses, subject to obtaining the necessary permissions.'*

This suggests that consolidation & expansion of the tennis facilities already enjoyed at the BofE Sports Ground would have been possible, without the need for the proposed extensive & destructive levelling & re-modelling of the landscape required on the Wimbledon Park Golf Club (WPGC) site. The narrow approach-roads are also in stark contrast with the *'excellent road links'* extolled in the Gerald Eve BofE Brochure).

At one point the BofE was said to be *'close to finalising the sale'*, AELTC very likely the *'preferred bidder'*. The sale was paused during the height of the COVID pandemic. On 29th June 2021 AELTC announced that it had signed a Lease agreement with the BofE (15 years with a break clause after 10) for the use of the Sports facilities (ie 'Plot A' of the 3 sections of the grounds delineated by Agents Gerald Eve). This suggests that AELTC are preparing for the possibility that their proposals to transform the intrinsically-unsuitable WPGC site may take over 10 years to complete....

The Application Planning Statement (PS) 1.2.2 states: *'It has been a long-held aspiration of the AELTC to improve the profile and prominence of the Qualifying Event & to increase the opportunities for spectators to attend the event. Added to this, whilst the AELTC has recently been able to extend their lease at the Bank of England site (up until 2035) there is a need to find a sustainable long-term location for the Qualifying Event.'*

AELTC has introduced a **'Mythbusters'** page of its Wimbledon.com website, in direct response to the plethora of Objections, & therefore revealing AELTC's guiding principles of the Application. On this **'mythbusters'** page AELTC writes:

'...The AELTC Wimbledon Park Project was designed to address two of The Championships' most significant weaknesses. First, that our Qualifying Competition is currently hosted in Roehampton (which is both an inferior venue away from our main site, and reliant on a short fixed-term lease)....'

Photographs in the Gerald Eve brochure, its description of *'this renowned and historic site'*, & the stated availability of a 125-year lease appear to show that the AELTC claims of both BofESG as an *'inferior venue'* & *'reliance on a short fixed-term lease'* are disingenuous. They appear to confirm that the reasoning behind the proposed move of the 'Qualifiers' from the BofESG to the WPGC site, with the substantial carbon-footprint this will entail, is ideological not necessary.

1.5) Unsuitability of the WPGC land for some of the AELTC proposals

1.5.1) Geological/Topographical Considerations

The BofESG as an established Sports Venue is by its nature flat. The WPGC is undulating (requiring much *'cut & fill'* for levelling,) & surrounded by steep hills. These along with the proximity of the lake means that the water-table is high at the levels of proposed construction. Predominance of London Clay (away from the sands of the lowest levels) makes the excavation stated as required for basement works envisaged for the show court (7m deep) & main maintenance hub (11m deep) challenging. All additional work required adds greatly to the carbon-footprint of this project.

1.5.2) Golf v Tennis? Environmental & Amenity Considerations

There is apparently-misleading comment about the site on the **'Mythbusters'** page :

'importantly, the removal of the golf infrastructure of fairways, bunkers, greens and tees (all part of the existing heavily-managed landscape) will restore the landscape's open and more naturalistic character. It will also reveal some of the historic views both into and across the site which have been lost under the golf course template'



AELTC's WPGC site, as it appears at present (photographed from nearby Osborne House, but also as visually-enjoyed by users of the public park & passers-by). It is Metropolitan Open Land (MOL) -the urban equivalent of Green Belt. This is the main area where AELTC are proposing 38 grass courts, an 8000-seater Show Court + infrastructure, all requiring substantial earthworks & the felling of 300 trees. Replacement trees will take years to mature to restore lost habitat.

The WPGC site, as the photos show, does not immediately present visually as *'heavily-managed landscape'*. Removal of the golf-infrastructure would be followed & replaced by tennis-court infrastructure, arguably more intrusive, the flat surface required for these courts achieved by 'cut & fill' of natural undulation. AELTC have confirmed that each of the 38 grass courts would be protected by electric fences in the seasons when *not* in use & surrounded by partitioning when *in* use, each with provision for appropriate covers when needed. This would also be a *'heavily-managed landscape'*. There will be considerable hard-surfacing for wide walkways/maintenance, giving a 'municipal' not natural impression. The grass may become worn & less attractive following the 10,000 visitors expected per day for the 'Qualifiers' & 50,000 per day for the Championships.

It is not straightforward to compare the relative environmental disadvantages of a golf course to tennis courts. Golf course-management involves some assumed use of chemicals, despite current efforts to reduce these. The proposed tennis courts require land-levelling, concrete lining, & layers of imported soil-types for each court. Steaming will apparently be undertaken to eliminate unwanted biological matter. Nature is relatively undisturbed by small numbers of quiet golfers, as opposed to the large tennis spectator-numbers indicated above. The WPGC site by its nature has been accessible for golf to be played throughout the year, including visitor-access & youth schemes. Grass tennis courts that would replace golf-infrastructure would only be in use for the approx. 3 weeks of the Championships & Qualifiers, with possible very occasional use for LTA events, & no community-use, (as confirmed by Justin Smith AELTC Head of Estate Development).

2) Environmental Concerns

2.1) Planning Obligations Since the Declaration of Climate Emergency by Merton Council (July 2019) & Wandsworth Council (Nov 2019), it is incumbent on both councils for the environmental impact of substantial projects such as that proposed by AELTC to be the paramount consideration in reaching a planning decision. The extreme weather events in the UK & throughout the world in 2021, many highlighted at COP26, have demonstrated the supreme urgency of responding to the Climate Crisis. This response should start in each & every locality, with each & every planning decision.

Such environmental obligations are clearly set out in the **Local Plans**, although these pre-date the Declarations, (see **LBW** PL4 – *'Open Space & the Natural Environment'* & the corresponding **LBM** CS13).

The **London Assembly** also declared a Climate Emergency (April 2019). The current London Plan (2017) pre-dates this, but clear environmental obligations are to be found within it, (eg **Green Infrastructure & the Natural Environment** - G4, G6, G7, **Social Infrastructure** – S5, **Heritage & Culture** - HC1,) to which local authorities must adhere.

The NPPF 2021 Para. 8 includes **c) environmental objective** *'to protect & enhance our natural, built & historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste & pollution, and mitigating & adapting to climate change, including moving to a low carbon economy.'*

Para 11 includes **a)** *'all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth & infrastructure; **improve the environment; mitigate climate change (including by making effective use of land in urban areas)** & adapt to its effects;*

Planning for the Climate Crisis A Joint Statement (from Adept, Campaign for National Parks, Centre for Sustainable Energy, Civic Voice, Coal Action Network, Community Planning Alliance, Cycling UK, Friends of the Earth, Greenpeace UK, Mammal Society, National Flood Forum, Open Spaces Society, Ramblers, Rights: Community: Action.,

Town & Country Planning Association, UKGBC) was issued 14.10.21 (ahead of the COP26 Summit) This Statement includes the following planning-obligation reminder:

'The Climate Change Act 2008 sets out an overall carbon reduction budget and requires the Secretary of State to ensure all regulatory frameworks deliver on this budget. The planning system, including any national policy, must clearly deliver on this legal requirement if the budget is to be effectively implemented. There can be no significant carbon leakage points in our regulatory approach. As a result, planning strategies and development management decisions must ensure but they deliver on the obligations of the 6th carbon budget.'

2.2) The environmental impact of some Application proposals appear at odds with AELTC's own website statements on Sustainability

'We believe that the All England Club & The Championships, along with other major sporting bodies & events, has a meaningful role to play in helping to protect the environment, today & for the future.

Changes to our climate are accelerating & we have a responsibility to play our part, mitigating our own impacts, ensuring we have a climate resilient estate for the future & using our influence to support this important cause.

This is not just because it is expected of us, but because it aligns with our values of Heritage, Integrity, Respect & Excellence, & will leave a lasting & positive legacy for the benefit of members, guests, players, partners & our local, national & international communities.

The Planning Departments of the LBM & LBW have the serious responsibility of deciding whether all aspects of the Application proposals are compliant with Climate Emergency obligations.

2. Air-quality Concerns

Separate from the environmental impact of the construction-materials & processes is the serious adverse effect on air-quality from elements of the Application proposals, eg from construction vehicles.

3.1 Existing Air-quality Concerns

According to <https://addresspollution.org/> Air-quality at the Southfields traffic lights/crossroads (Replingham/Augustus/Wimbledon Pk Rd) & also at Granville Rd/Wimbledon Pk Rd roundabout already fails World Health Organisation (WHO) Guidelines for safe levels of particulate matter, even before these 'safe levels' were revised significantly *downwards* (22.09.21) by 50% for PM2.5mg/m³ & 10mg/m³ & by 70% for Nitrous Oxides (NO₂) - 'PM2.5' being particulate matter with an aerodynamic diameter not exceeding 2.5 micrometres. Those Southfields locations exceed the revised safe limits, even before the proposed heavy construction-traffic is taken into account, & the same is likely to be true of other 'pinch point' locations.

Information on the Defra Local Air Quality Management (LAQM) website, states clearly that there is *'no safe threshold below which no adverse effects would be anticipated'* (for these particulates).

Of great concern is that dangerous particulate matter of 2.5mg/m³ is also formed by chemical reactions between gases such as sulphur dioxide & nitrogen oxides, causing secondary particles.

The serious harm caused by poor air-quality is only just beginning to be understood.

These effects are obviously worse near construction sites, in heavy traffic or near long queues of idling traffic at traffic lights, the latter already a daily occurrence at the main Southfields crossroads.

3.2 Air-quality Concerns from Construction-transport

The PA **Transport Assessment** (Section 8) designates Wimbledon Pk Rd as part of the primary route for construction-vehicles, (despite the additional disadvantage that Wimbledon Pk Rd has in effect just been narrowed north of the Southfields traffic-light/crossroads).

This primary (final) route is expected to come from the A3 in Wandsworth, following Buckhold Rd (A218), Granville Rd (problematic with the railway bridge), Wimbledon Pk Rd, on to Church Road.

A secondary route via the A219 & Wimbledon village has been identified, although expected to be used by a smaller proportion of construction traffic. *'Further access points from Home Park Road and Revelstoke Road may be employed for specific works.... but are broadly considered to be unsuitable for HGV access.'*

Figure 8.2 indicates the frequency of HGV activity.

The most intense appears to be Jan–March 2024 & Sep–Nov 2024 when 585 HGVs per month (27 per day, up to 3 per hour) are anticipated, followed by Oct 2022–April 2023 & Sep-Dec 2023 with about 400 HGVs per month / 19 per day, up to 2 per hour.

If LGV activity is added, these numbers appear to increase by at least one third.

This HGV/LGV activity would have a severe effect on air-quality, even before construction-processes are taken into consideration. The Environment Bill currently under consideration may bring stronger regulation of particulate-limits, making these construction-proposals unworkable.

The Application as currently proposed must be Refused on Environmental/Climate Emergency grounds alone.

3.3) Environmental impact of proposed construction - concrete

It is now widely accepted (eg Chatham House Report June 2018) that concrete is responsible for over 8% of the global CO2 emissions partly from the burning of fossil fuels in production but also from naturally occurring chemical reactions during process. There is current exploration of decarbonising all aspects of cement-production (eg Imperial College Report May 2021), but this will take many years to fulfil.

Substantial quantities of concrete would be required for the Application proposals – principally in the construction of the show court & maintenance hubs, including where basement works are proposed. Smaller quantities would be required for lining the 38 grass courts. The (numerous) hard-surface walkways are proposed to be porous, but concrete may play some part in their construction? Withdrawing the show court from the Application would reduce the quantity of concrete required considerably.

3.4) Threat to Bio-diversity from Application proposals

The Application appears to include no given time-frame for the felling of up to 300 trees on the site. If this felling is projected for completion within a short time-frame, there will be considerable habitat-loss. The proposals for replacement are impressive - eg the production currently underway of new oak saplings from acorns collected in 2020 – but these habitats will not mature for many years. In the course of their WPGC site tour, AELTC's Jennette Emery-Wallis & also Andy Wayrd (AELTC Landscape Design Manager) shared their genuine passion & intention for tree-replacement, care of the retained trees (including the 41 'veterans') & establishment of the conditions for acid-grassland in the 'new' Parkland. However, long-term survival of all of the retained trees is not guaranteed. A small number are to be transplanted, with acknowledged risks to survival. Mitigation to protect trees whose roots are close to/impacted by the construction work can also not guarantee success. The loss to bio-diversity of removal of topsoil from most of the site is uncertain, (as opposed to the disruption & heavy carbon-footprint of the actual removal-process), because of the intense management required before removal (golf course) & after (tennis courts). Current bio-diversity is good- revealed in AELTC's own environmental survey in the public Consultations earlier in 2021 which identified 7 bat-species & 55 bird-species (including a pair of breeding kestrels). This bio-diversity will be severely disrupted by the years of proposed landscape-remodelling & construction

The AELTC's website '**Sustainability**' page (see above) states the following ambitions:

*... 'Reducing **emissions** from our operations to 'net zero' by 2030, Being a **resource-efficient** organisation by 2030, Contributing to a 'net gain' in **biodiversity** by 2030...'*

The Application proposals appear to make this last biodiversity goal impossible since the site will be subject to severe disruption for most of that time.

The willingness to cover the cost of de-silting the lake in impressive, but this might be catastrophic for bio-diversity in the short to medium-term. De-silting is fraught with challenges, including likely contaminants in the silt which would make dredging hazardous for marine & other wild-life. The Preliminary Ecological Appraisal carried out for Merton Council by Salix Ecology (May 2018) estimated the volume of silt present to be in the region of 72 000m³ (approx. 50% of the lake-volume). The suggestion has been made by AELTC that draining of the entire lake & allowing the silt to dry out before transportation might be necessary.... Possibly a wonderful result for bio-diversity in the long-term, but a severe negative in the short to medium term, including for the bat species which hunts insects just above the lake-surface, found in Wimbledon Pk.

3.5) Sustainable transport goals confused

The Application Travel Plan includes:

7.4.1 Encouraging walking and cycling gives opportunities to build healthy exercise into daily life. It also reduces the reliance on taxis and private hire vehicles for local travel.

Yet the Application seeks to close Church Road to *all* users except those with tickets for the Championships & Qualifiers (up to a month), the ban including the very walkers & cyclists encouraged in the Travel Plan. (Those two groups were permitted access during the 2021 Closure).

4. Parkland Showcourt not compatible with other goals

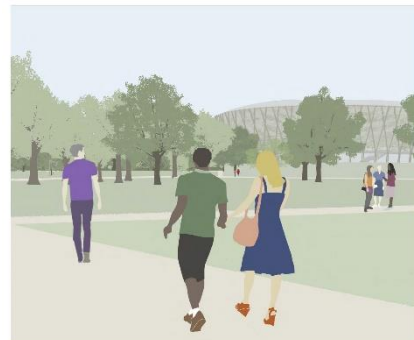
The Application **Design & Access Statement 01** states: *‘The sentiment of Tennis in an English Garden aims to demonstrate this capacity to set a stage for the world’s most elite competition amidst the beautiful surroundings of a summer’s day with strawberries and cream, leveraging the most innovative of practices alongside some of the oldest.’* The D&S Statement goal above may be achievable through grass tennis courts proposed on the WPGC site, but does not appear at all compatible with the proposed Show Court. CGIs of the proposed show court (Outline PP only sought at this stage) from AELTC’s 3rd Public Consultation are shown below. Only one of these is reproduced in the Application Design Guidelines, presumably because the others show how detrimental the show court would be to many views within the park as a whole, (& they attracted much negative response at the time of the 3rd Consultation).



5. View from central parkland



6. View from lake edge at the corner of the public park



7. View from northern parkland



8. Parkland Show Court



4. View from Church Road



9. Scenic view of lake

AELTC's Justin Smith confirmed in an email of 04.08.21 to the Chairs of local Res. Assns. that the only change from 3rd Consultation to Application affecting the show court was '*Greater explanation of the choice of location of the Parkland Show Court*', ie these pictures accurately represent the impact of the show court. The 6th picture is a 19th Century water-colour of the view across to St Mary's Church, not so different from the view in our own time, (*minus cattle of course...!*)

These CGIs are therefore directly pertinent to the Application. They demonstrate how over-bearing & dominant the show court would be (even assuming covered with greenery in time). Views, including of the proposed permissive parkland, would be severely compromised, & the '*first renovation of a Capability Brown landscape within Greater London*' & '*restoration of historic views*' not a reality. Crucially all the CGIs are from an imagined late spring/summer. The show court would *completely* blight views within the park, (including the public park) in late Autumn/Winter/early spring, when there is an absence of deciduous leaves & therefore bare trees. The showcourt is completely incompatible with the '*very special circumstances*' and '*public benefit*' required to permit building on MOL.

5. Continued reliance on use of the (public) Wimbledon Park

The Application proposes that 750 private & shared (*rented?*) bikes & e-bikes be parked on Wimbledon Park at the entrance on Wimbledon Pk Rd. The Applicant states: '*Use of the cycle parking facilities will be monitored frequently & the provision would be increased in the future if dictated by demand.*' ...presumably by using yet more of the public park?

The Application suggest that there be parking for 660 visitor cars. (In 2021 there was parking for up to 500 cars. Why more when the stated aim is to make the Qualifiers/Championships 'Public-Transport' events) A taxi rank is also proposed at the northern gate. Although it is to be welcomed that the Application proposes moving the 'Queue' from the public park to the south of the site, SGCARA Objects to the continued use of the public park for AELTC purposes.

6. Perceived Pressures from AELTC on the Planning Depts, esp.LBM, to Allow this Application

On a government level, we regularly read of one Dept vying with another for influence, & perceived pressure applied to depts over decisions that will have substantial financial implications for others. It is clear that LBM receives considerable financial input from the presence & activities of AELTC within its boundaries. It is also clear that AELTC is hinting at additional expenditure for LB Merton facilities *if PA 21/P2900 is Passed*, eg In the 3rd Public Consultation on its proposals, AELTC wrote: '*we are discussing potential enhancements to existing facilities within the public park, which would be managed by Merton Council*'. The concern is that this will be a strong pressure on the LBM Planning Dept (particularly) against Refusal of the Application, or reluctance to request amendments. SGCARA reminds the Planning Depts of both LBM & LBW of their responsibilities to consider the Application & reach a Decision on planning grounds alone, not in any context of financial or other perceived pressures.

These perceived pressures include:

6.1 Offer of financial/technical help for the de-silting of Wimbledon Park lake

In Planning Statement (PS) 1.1.6 the Applicant (AELTC) states:

'The proposal also includes de-silting (which AELTC are committed to contributing towards) and environmental works to Wimbledon Park Lake'

(The lake remains under ownership of LBM & is outside the AELTC-owned application-area). AELTC's interest in the lake is presumably in the attractive backdrop it would provide for the tennis facilities proposed for its WPGC land.

At the time of his design of Wimbledon Pk, (c 1765), Capability Brown advised that the lake should be regularly de-silted. As AELTC noted in their 1st Consultation on the proposals as revealed at that time '*this practice has been lost*'. The offer of a contribution for de-silting would assist LBM to comply with its statutory obligations under the Reservoir Act 1975, (which are not in any way related to the development).

6.2 Attempt to re-classify the WPGC site

SGCARA notes that in LBM's draft Local Plan there is a (contested) proposal to re-classify the WPGC land as a "brownfield" site. This extraordinary & unwarranted change of classification would of course make granting PP for AELTC's Application much more straightforward & appears to have been suggested with that in mind. The WPGC site must remain MOL land (ie 'Urban Green Belt') with the consequent protection: *'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.'* (NPPF Ch13, para147)

The current AELTC proposals do not offer those 'very special circumstances'.

6.3 AELTC allowed to make an Outline Application (part of site)

Wimbledon Park is a Grade 2* Listed Heritage Asset & worryingly on Historic England's 'Heritage at Risk' Register for over 5 years. It is a Heritage Asset for both **LBM & LBW**.

AELTC's Wimbledon Park Golf Club site & part of the public park & are in the Wimbledon North Conservation Area. PAs 2021/3069 & 21/P2900 include application for Outline Permission. This is contrary to the **LBM Local Plan Policy DMD4E**, which states: *"Outline applications will not be acceptable for developments that include Heritage Assets"*, yet AELTC has been allowed to make this hybrid Application, which should have been declared Invalid.

6.4 Presumption for closure of (parts of) Church Rd to become a permanent TMO

The Application includes the following: *'This proposed temporary closure of Church Road does not form part of the proposed development, & is the subject of an Experimental Traffic Order for the 2021 Championships. This will allow the measures be implemented for an initial 18-month period, with the opportunity for stakeholders to make representations before it is implemented as a permanent Traffic Management Order'*.

The **LBM's** website confirms that the Consultation on the 2021 ETO ends 31.12.21, ie is still ongoing. At the time of Applications 21/P2900 & 2021/3609, (August 2021), how can the Applicant can be so certain that a permanent TMO will result? What promises/assurances have already been requested?

6.5 Perceived willingness of LBM to release AELTC from the Restrictive Covenants of 1993.

The 1993 Covenants include: *'building shall not impair the appreciation of the general public of the extent & openness of the property'*. The proposed show court is clearly incompatible with the Covenant, as also indicated in Historic England's assessment: *'we have concerns about the overall scale & extent of the proposed new structures & associated infrastructure...large net increase in built form and intensification of activity would result in the permanent loss of existing areas of open parkland & associated visual impacts.'*

The following public statements were made at the time, & should be for *all* time, not just until it is convenient for the Covenants & understandings to be ignored, as is suggested in the current Chairman's 2021 response (below).

(Sept) 1993 John Currie, All England Chairman: *'We completely understand and support everyone's determination to keep the land open & we purchased the land on that basis.'*

Tony Colman, Merton Council Leader 1993: *'Respecting the wishes of local people, this Council is resolute that the land will be retained as open space. All England has bought the land knowing this is our policy & is aware that we would not allow development of the site.'*

Current AELTC Chairman, Ian Hewitt, responded to recent (2021) correspondence as follows:

'As to the assurances made in 1993, I am sure you can appreciate that the requirements of the club & the community have developed in the resulting 28 years & that the AELTC has needed to work to ensure that The Championships remain a preeminent tennis tournament & continue delivering significant & improved socioeconomic benefits to the local area. It has been our stated aim for many years that purchasing the golf course & especially the freehold

was done with the intention of moving our Qualifying event onsite, but our proposals also mean that Wimbledon Park will be as open as it is now in terms of verified views & will in fact, through the creation & opening up of parkland previously occupied solely by a private golf course, be substantially more openly accessible to the public in the future."

The characterisation above of WPGC as a 'private golf course' has been challenged earlier. The implication is that AELTC has planned for many years to ignore the 1993 Covenants. This sadly contributes to an increasing trust-deficit from the public towards AELTC, building on the distaste felt that individual WPGC members were essentially 'bribed' with increasingly-large sums of money (finally £85,000 per member) to vote for early-relinquishment of the WPGC Lease, compounded by a perception that the voting process was skewed by AELTC's apparent suggestion/persuasion that all members – old & new – should have equal rights for this vote.

The public sadly have no sound reason to trust the AELTC's current pledges, eg as regards the long-term future of 'Permissive' access to the newly-created Parkland, or the statements of '*no further plans to expand*' below:

Statement on the AELTC Wimbledon.com 'Mythbusters' page

*'By gaining Planning Permission for this project & securing the future of this nationally-significant event, we are addressing the present & future needs to deliver a world-class event & offer significant year-round access to the public. **We have no further plans to expand beyond those included within the scope of the current planning application**'.*

There is no end to this type of 'war of escalation'. What happens when one of the other Grand Slams builds yet another 'show court' style tennis stadium? Will AELTC respond with an Application to construct another show court? in the 'permissive' parkland, which will be its only land remaining? As we know to our cost from the 'promises' made in connection with airport/terminal expansion, these '*no further plans*' undertakings are worthless.

AELTC now appears prepared to lose credibility with, & support of, the local population in the apparent pursuit of a 'Bigger is Better' narrative that the proposals in this Planning Application represent. SGCARA is concerned that this Application will be considered 'too big to Refuse', partly because of the financial support AELTC have offered post-PP (most significantly in regard to the de-silting of the lake), as described above. Any '*Public Benefits*' are uncertain, eg permanent access to the permissive parkland & vague promises of ticket-availability. (*Why have AELTC never offered favourable ticket-availability to local residents before?*) The lake-walkway is a Covenant obligation not a benefit associated with this Application. AELTC is clearly disturbed by the level of Objection uploaded & demonstrated in the local community. It appears to be engaged in an unseemly, & ruthlessly-determined, 'charm offensive' to effect mind-change, (reminiscent of the determined efforts to 'persuade' WPGC members to vote for early lease-release). This includes the controversial '**Mythbusters**' website page, a 'Community Open Day' 28.11.21 (with no mention of the Application or proposals), & the recent delivery to local residents of the 1st AELTC "Community Newsletter" ever sent out in the approx. 100 years of occupancy of its current site SGCARA requests the following:

a) that at the least LBM & LBW negotiate the removal of the Parkland Showcourt from the Application. The space released would also allow for more sensitive, less crowded, siting of any grass courts granted PP on the WPGC site, thereby also reducing the number of trees needing to be felled.

b) that Conditions are applied to any PP granted as follows:

b.1) for the Public Benefit elements to be completed & available for public use before any additional tennis facilities resulting from PP can be used. The Public Benefits are principally the lake-walkway, the additional public (permissive) parkland & the de-silting of the lake.

b.2) for only electric taxis/vehicles to be permitted at any taxi-ranks/drop-off/pick-up points (for tennis events) granted Permission through this Application. This would protect the local populations from the now-acknowledged harm from diesel engines, & reduce the carbon-footprint of activities directly arising from the tennis events.

