



GLA planning department

8 June 2024

**GLA Consultation on Revisions submitted by All England Lawn Tennis Ground plc to Planning Application LB Merton Ref 21/P2900 LB Wandsworth 2021/3609 Wimbledon Park Golf Club, Home Park Road SW19 7HR
(GLA Stage III Mayoral Call in Ref: 2024/0045/S3 and 2024/0047/S3)**

Consultation Response and Commentary

Social Community and Economic Benefits Addendum Report and Community Benefits Addendum Report submitted by AELTC, both dated April 2024

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for Save Wimbledon Park

1. Introduction

This Response and Commentary is submitted in coordination with representations from Save Wimbledon Park in its paper dated 8th June 2024 and additional expert submissions of the same date from Richard Rees RIBA (addressing Green Belt Policy, Very Special Circumstances and “Need”) from Mark Service (providing a Heritage Assessment) and from Environmentalist Dr David Dawson (addressing BioDiversity Net Gain and other Environmental issues).

We submitted detailed representations upon the above applications during their review by Merton Council (“LBM”) and Wandsworth Council (“LBW”) including a commentary upon the GLA Stage 1 Referral Planning Report GLA/2021/0914/S1/01 dated 1 November 2021. In view of the GLA call in of the applications and subsequent direction on 22 January 2024 we assume all submissions received by LBM and LBW will have been forwarded to the GLA and so we do not propose repeating here the points previously made. We have reviewed the details of the Revisions now submitted to the GLA by the applicant and which are the subject of this Consultation.

In this Commentary we will deal principally with the matters raised in the Addendum Reports noted above, ie the Social Community and Economic Benefits Addendum Report April 2024 (“SEB”) and Community Benefits Addendum Report April 2024 (“CB”) which were submitted in support of the Revisions together with Rolfe Judd’s Cover Letter dated 29th April 2024 (“RCL”).

2. Application Context and Revisions Summary

Application details - The application site comprises the former Wimbledon Park Golf Course (“WPGC”) and Lake which is part of the Grade II* listed Wimbledon Park originally designed by Capability Brown. The proposal envisages a major expansion of the AELTC’s facilities onto the WPGC which, inter alia, will enable the relocation of the AELTC’s Qualifying Tournament, held over 4 days in the week preceding the Championships, currently at the AELTC’s Community Sports Ground at Roehampton. Key elements of the proposed development, the “Wimbledon Park Project” (“WPP”) comprise an 8,000 seat Stadium with a roof, 38 grass courts, 10 further buildings including a maintenance hub of 30,000 sq ft and 9.4kms of connecting roads and pathways, an area in the southern section to be set aside for public access and a new Boardwalk built on the Lake.

The Revisions – These propose that in the northernmost section of the site, a further area comprising 1.7ha, is to be made available for public access. In addition, a minor boundary adjustment to railings around the nature reserve (where public access is restricted) in the southern parkland will release a further 0.31ha for public access. The effect of the proposed additions is claimed to create 11.1ha (previously 9.4ha) of publicly accessible open space. Apart from some other relatively minor amendments noted below, in all other material respects and after a planning process which has lasted almost 3 years, the application is unchanged from the proposals approved in principle by LBM in October 2023 and rejected by LBW in November 2023.

Planning Policy Requirements – these are that, as the developer has admitted, the WPP proposals are inappropriate development on Metropolitan Open Land (= Green Belt): other considerations must **clearly outweigh** the potential harm to the Green Belt and any other harm from the proposal. Further, this development has also been admitted to cause harm to the Grade II* listed registered Park and Garden. Merton’s Conservation Officer advised that the category of harm is substantial. If so, the harm must be necessary to achieve **substantial public benefits** that outweigh it. Even if less than substantial, the harm must still be **weighed against public benefits**. Even at this fourth attempt in the application process and after considerable objections and opposition and a resounding decision to refuse from LBW, **the benefits offered, and other considerations still fail to achieve any of these objectives or pass any of these tests.**

Following the GLA call in, we are disappointed to note that the AELTC has not taken the opportunity to reconsider its proposals in a more constructive fashion given the evident planning policy constraints and the extensive objections which have been lodged over the 3 years during which this application has been under consideration. **It remains our view, notwithstanding the revisions, that the application should be refused.**

Our principal concerns are set out below.

2.1 Primary purpose and visual limitations of the new access area

Notwithstanding some modest additional soft landscaping proposals (which we note now include the loss of a further 4 mature trees without additional replacement provision beyond what is already proposed) the proposed visual presentation of the 1.7ha northern area has not been changed materially to accommodate the public access and “leisure and recreation opportunities” now envisaged. The reality is that **the primary purpose of this area is to support extensive and visually intrusive tournament infrastructure, to be installed and de-rigged annually.** These are the temporary northern entrance facilities comprising a large bank of turnstiles (24 security lanes), pathways, a large pedestrian queueing area and security infrastructure (including a pavilion) required for spectator admissions. The area is currently rough, uneven grassland with little visual interest. The preparation for these annual

installations will require extensive excavation, infilling and levelling followed by overlay of a large area of permanent heavy-duty hardstanding and pathways all capable of supporting heavyweight equipment and the vehicles transporting it. **There is therefore little scope to introduce the shrubs, vegetation and other planting similar to what is proposed for the Southern parkland area to enhance its “green” setting.**

2.2 A belated and insufficient gesture

It has been open to the AELTC from the outset to offer more public access to the WPGC than was included in the original application. **To make this revision so late in the process demonstrates very clearly that there is a recognition that the proposals as originally presented fail to satisfy the stringent planning policy tests required to justify inappropriate development on Metropolitan Open Land.** Perhaps this northern area has now been selected as it houses no tennis courts or permanent infrastructure and serves no practical purpose for them, outside of the 3 to 4 months’ Championships period. But notwithstanding the justifications now offered the shortcomings are obvious. Suggestions in the RCL (at p6) that outside of the tournament period this area might be available for park runs are optimistic given that park runs require a 5km route. Pop up attractions such as Farmers markets (there are already 2 well established markets in the locality operating weekly) and exhibitions are also suggested uses but these are hardly everyday features and would require a hands-on management input (not on offer) which could not be effectively secured as a planning obligation. Scope for installing facilities for active sporting uses (which are not available in the new southern parkland due to the topography and landscaping) is limited given the annual requirements for temporary tournament infrastructure installations noted above. With its vast hard standing surface, the area will present as a “dead end” given that fencing will be required to separate it from the AELTC’s private grass courts beyond and to reflect the separate ownerships of the AELTC’s private estate and the public Wimbledon Park.

2.3 Location challenges.

For the purposes of public access outside of the Championships period, the new Northern parkland will remain as a distinct and separate area from the Southern parkland. Whilst pedestrians could walk from one to the other through the public park (presumably following an extended route around the perimeter athletics stadium) the two AELTC owned parcels are some considerable distance from each other, with different topography and landscaping; they are not a unified whole. Whilst the CB suggests (at p3) that there will be “new public connections and pathways” these are not specified as design commitments. They are merely an option in the list of potential “enhancements” set out on p8/9 and as such are not guaranteed. If the AELTC wish to claim that they are offering “a more unified green space experience” then the pathways must be designated as commitments and financed independently of the proposed “enhancements” fund.

2.4 Questionable claims as to mitigating open space deficiencies.

The RCL, noting at p9 that evidence provided in a 2021 Report for LBW’s then proposed new Local Plan indicated that *“the Southfields Ward experiences a deficiency in natural/semi natural open spaces, and also amenity green spaces. The West Hill Ward is identified as experiencing deficiencies in parks and gardens, as well as natural and semi natural open space”* suggests that this new provision addresses those deficiencies. LBW’s Local Plan was subsequently adopted on 19th July 2023. As the new area for access is not designated in the Plan as “natural or semi natural open space” (nor is the adjoining part of the public Wimbledon Park within LBW’s borough boundary so designated) we do not see how the offer of public access to it can address these deficiencies in Southfields or West Hill wards. We also fail to see how the provision of a mere 1.7ha of open space in this location, which adjoins the existing public Wimbledon Park and is outside the LBM boundary, can realistically make any impact upon apparent access deficiencies for residents in LBM’s Hillside Ward, as is claimed at p10 of the RCL given the considerable distance separation between the area and the LBM Hillside Ward boundary. Wimbledon Common is considerably closer to the Hillside boundary in any event.

2.5. Further discrepancies and misleading claims about arrangements for public access

Other concerns from the descriptions of the arrangements for public access to this Northern area and the additional 0.31ha in the Southern parkland are:

2.5.1 access to the Northern area is not “a year-round substantial public benefit” (see para 6.6 SEB). Apart from the tournament period itself, the AELTC’s timetable for set up and post Championships’ de rig of temporary infrastructure is currently mid-May - end July, (and if Qualifying is relocated to SW19, the set up may need to commence earlier than that.) Planning conditions already require that set up and de rig works have to be scheduled sequentially by arrangement with LBM to mitigate impacts upon the local road network as large installations are transported on narrow local roads. The northern area will be closed to the public throughout that period, a time of year when access to outdoor space is usually most valued. **Furthermore, all access is in any event permissive given that the land remains in the applicant’s ownership** – see para 2.6 below

2.5.2 As for the Southern parkland area, access will also be significantly restricted during the Championships period (including set up and de rig) given that there will be a similar temporary entrance facility with turnstiles and security infrastructure to admit spectators arriving from Wimbledon as well as a Car Park for VIPs and hospitality guests. The Boardwalk on the Lake will also be closed. A pathway is promised to be kept open to link Church Road and Home Park Road during the Championships. However, the draft Heads of Terms for a S106 Agreement listed in the LBM Planning Officer’s report included provision for 1 week’s “full closure” of the Southern parkland before the start of Qualifying, 2 weeks “full closure” post Championships as well as other closures “in the interests of health and safety and maintenance”. **This is not “year-round” parkland use.**

2.5.3 the provision of the additional 0.31ha of open space in the Southern parkland will be at the expense of the nature reserve which had been designated to protect important habitats and allow ecology to flourish. There is a maintenance hub and staff parking area which if relocated into the AELTC’s private areas on the WPGC, (and preferably reduced in size) would free up considerably more space for public use in the southern parkland.

2.5.4 plans for the southern parkland area and **measurements quoted throughout the documentation continue to claim that the southern parkland has an area of 9.4ha of publicly accessible space. This is incorrect.** This 9.4ha measured area incorporates parcels which are inaccessible to the public such as the 30,000sq ft maintenance hub adjoining the Home Park Road boundary (helpfully shown as “AELTC grounds” on the map at p9 of the RCL) the nature reserve and the staff car park. **A more accurate measurement of accessible space is closer to 7.8ha.**

2.6 Public access is “permissive” not permanent.

Notwithstanding the claims in the RCL, SEB and CB the public access being offered is not guaranteed as permanent. Accordingly claims for the creation of a new “public park for London” (as seen in an extensive and somewhat misleading advertising campaign currently featuring across London’s transport network) are somewhat wide of the mark. In public parks, access is enjoyed as of right. The WPGC remains in the private ownership of the AELTC. **All access is by permission of the AELTC. The terms of that access cannot be assumed to be “permanent” or available “in perpetuity” as they are only promised on a contractual basis to LBM under a S106 Planning agreement; S106A of the Town & Country Planning Act 1990 allows a developer, after 5 years, to apply for a modification or discharge of the obligation.** The community is sceptical in any event that the AELTC will honour this S106 commitment long term, not least because it describes its Masterplan for the WPGC as “an evolving vision”. There is every reason to assume that in years to come the AELTC will still claim to need further expansion to be “at the pinnacle of global tennis”. It therefore seems inevitable, given their present approach of constantly upgrading,

improving and replacing facilities as their commercial priorities change, that the permissive parkland, as the only unbuilt upon open space in their estate, would be vulnerable to further incursion if the WPP application is approved as a precedent for commercial development would have been irrevocably set. The only way in which this risk could be avoided would be for the parkland to be transferred to a community trust with the AELTC as its ongoing manager. That is not on offer.

3.Strategic Update and Need

The SEB also includes an update on “key policy and strategic context” since the July 2021 submission, and restatements of the assessment of the “need” for the development and the importance of the Championships. We do not propose addressing these issues in this paper as relevant policy issues are addressed in more detail in the SWP paper noted above and the paper from Richard Rees offers a very full analysis and criticism of the need for the proposed development and assessment of the Harm to the MOL and listed Wimbledon Park. We would however add some further observations on the claims in the SEB, CB and RCL which purport to justify relocation of the Qualifying Tournament to SW19, presented as a key element of the WPP proposals.

3.1 “The Championships is the only Grand Slam tournament where the Qualifying event is not held onsite and the AELTC does not have long term security of tenure at Roehampton” are not justifications for the WPP proposals.

3.1.1 Wimbledon is also the only Grand Slam tournament still played on grass. The vulnerability of that surface presents infrastructure challenges which other Grand Slams do not have to address. Therefore, it does not follow that a “copycat” approach of a unified tournament (Qualifying + Championships) on a single site is either necessary or indeed desirable for its event staging. If anything, the AELTC should be encouraged to celebrate its history and special character and emphasise what sets it apart from the other tournaments by adopting a bold and distinctive approach. The present lack of security of tenure at Roehampton does not mean that the Qualifying event itself is at risk or that SW19 is the only alternative place where it could be held. No information has been disclosed about the possibility of securing a longer-term commitment at Roehampton in any event.

3.1.2 Also there are a number of well-established grass court tennis centres around the country (a number of which already host successful and popular smaller tournaments) where the 4-day Qualifying event could take place. As happens with the hosting of the Open in golf, **a rotation of these venues to host Qualifying would promote grass court tennis nationally and allow the undoubted value of the Wimbledon Brand and its associated economic benefits to be exported more widely across the country.** Why should London and in particular SW19 have the monopoly on the Qualifying event as well as the Championships? The AELTC, despite its “All England” name, has made no attempt to consider any alternative venue for it.

3.2 “Relocation of the Qualifying event will enhance the player and spectator experience” are further questionable justifications

3.2.1 The Qualifying event is important for the players because of its association with the Championships, not its physical location. Qualifying provides a means of securing entry to the Championships and accessing the generous prize money and the opportunities to improve world ranking points which are available. Whilst good facilities are important, the Qualifying event will still be a priority for aspiring champions regardless of its location.

3.2.2 As for the spectator experience, those attending Qualifying in SW19 will have no access to any of the luxury hospitality and retail facilities available on the main site during the Championships and none of the Qualifying matches will be held in the new Stadium with the benefit of the roof if there is rain.

Seating will be provided in temporary stands as happens at Roehampton. **So, Qualifying in SW19 will remain as at present in Roehampton, an outdoor weather dependant event.**

3.3 Lack of a convincing business case

The Championships, comprising all or most of the best-established players in the world, will always be the main attraction for ticket purchasers and SW19 already offers a unique and world class experience, always heavily oversubscribed, without the Qualifying event on site. No business case, based upon specific threats and risks, has been put forward as to why that status could be at risk, even long term, without the WPP proposals being in place.

4. Projected Economic Benefits

In summary, the projected economic benefits for the WPP proposals as now claimed in the SEB (and reiterated in the RCL and CB) are all unchanged from the original planning submission in July 2021. This is despite the lengthy planning delays (most of which have arisen from the AELTC's interventions attempting to satisfy outstanding policy and planning requirements) during a period of significant economic uncertainty, nationally and globally. This has put the project some 3 years behind schedule with inevitable consequential construction and other costs' inflation which has still been ignored. Nor is any adjustment offered to reflect the SEB's acknowledgement that after completion of the WPP, the projected Championships' attendance for 2033 will have increased by 135,000 (relative to the 2022 attendance) and not 150,000 as previously stated. With this in mind **it is also evident that the Revisions now under consultation clearly have no impact upon the projected economic benefits, despite all the claims being made for what they could deliver.**

As a reminder the main elements of the economic benefits claimed for the WPP in the SEB are:

- “the total economic impact of the Championships, with the new WPP proposals are projected to be £326.10 million (2028 prices) for London”;
- employment - creating 256 temporary staff at the Championships and 40 full time staff per year as well as jobs in construction of the WPP development with knock on effects from “local spending”. Local procurement will be encouraged through an Employment and Skills Plan
- increasing the annual funding for the LTA through its share of Championships' surplus
- increase funding available to the Wimbledon Foundation

Taken in turn, our comments on these claims are:

4.1 Questions on the assessment of the impacts and methodology for projections

4.1.1 The projections are not presented in the context of any data for the existing London wide economy as a whole which is surely an important reference point in evaluating impact. Having regard to the projected growth rates for the London wide economy for 2025, as referenced in the GLA Economics Forecast Report December 2023, the SEB's £326.10m projected economic impacts of the Championships, with the completed WPP proposals added in as noted above amounted to **less than 0.1% of the London wide “central scenario” figure**. It is also somewhat unhelpful that the SEB's projections seek to highlight the economic activity already generated by the Championships when this will no doubt continue whether or not the WPP proposals are approved. A separate figure for the uplift which the completed WPP proposals would generate would have been useful but is not included in the SEB, although in the July 2021 planning submission using similar projections for 2028 prices it was claimed that that the WPP proposals would “generate an additional...£38.32m” in London. **On this analysis, London's global competitiveness will not be measurably improved if the WPP proposals are approved or indeed measurably harmed if the development does not proceed as proposed in the application.**

4.1.2 Basing the projections for the Championships (incorporating the WPP proposals) upon 2028 prices is of little relevance today given the delays already encountered in the project and the uncertainties as to likely completion timetables. Given the requirements for completion of other WPP infrastructure works ahead of the completion of the new grass courts, there is little prospect of the Qualifying event relocating to SW19 by 2028. Moreover, the Stadium, whose seating is key to increasing spectator numbers, is now not scheduled for completion until 2033. Signing off the projections without any meaningful supporting evidence with an assertion in the SEB that “It is also expected that these figures will be greater in 2033” is hardly a robust analysis justifying approval of the WPP proposals.

4.1.3 The original projections from July 2021 used survey data of spending etc. habits based upon a sample of just 5000 attendees at the 2016 Championships. We have previously queried the suitability of using such a small sample, whether it continues to reflect post pandemic spending profiles and the extent to which projections of this nature are simply a redistribution of visitors’ daily spending which would still have been incurred had they not visited SW19.

4.1.4 The projections still assume that the relocated Qualifying event will attract 40,000 “new” spectators all paying full price for their tickets from Year 1. Yet the planning documents suggest 40,000 is a maximum capacity figure, not necessarily an attendance forecast. **The spending profile (and economic impact) of spectators at Qualifying is wrongly assumed to be the same as for Championships’ attendees, 56% of whom travel from outside London and a further 8% from abroad; Qualifying is a much more low-key event, with cheaper tickets attracting spectators from a much smaller catchment area.** The economic impact of the existing Qualifying event (where attendances have been rising due to improved infrastructure provision) and the loss to the Roehampton area from the relocation to SW19 (including employment, not just during the event but also for the installation and de rig of temporary infrastructure etc) does not appear to be taken into account in the projected uplift at SW19. As noted previously, these projections misunderstand the nature and profile of the Qualifying event and offer unrealistic assessments for its potential future operation in SW19.

4.1.5 The omission of any allowance for the expenditure required to deliver the WPP proposals adversely affects the credibility of the projections. Excluding construction costs from a business case for development is not good commercial practice, particularly in an era of rapidly rising costs. This also undermines the claims (discussed further at paras 4.4 and 4.5 below) for increased surpluses which will benefit the LTA and Wimbledon Foundation. In any event, the planning negotiations have forced the AELTC to commit to additional expenditure on enhancements to Wimbledon Park, the full cost of desilting the Lake and, perhaps, some other expenses which were not included in the original application nor, we assume, accounted for in the projections. The fact that increased revenue for the AELTC through increased ticket sales is also excluded is not, in our view, a sufficient mitigating factor and in any event the figures are not quantified for comparison.

4.1.6 The projected increase in future Championships’ attendance figures (and on which spending projections are based) is now quoted as 135,000 instead of the 150,000 suggested in the July 2021 submission but the lower attendance is not reflected in the economic projections. The projections also appear to assume that the new Stadium will sell all of its 8,000 seats every day for the whole tournament which seems optimistic given that The Championships is a knock out tournament with fewer matches played as the event progresses. Separately, and by way of further objection on this point, Richard Rees has noted a potential safety concern with the WPP’s projected target of 50,000 visitors per day (if it were to prove correct) given that the maximum capacity of the main site (excluding the WPGC/parkland) is currently 42,000 and is frequently congested along narrow walkways, and with bottlenecks especially when the show courts empty. On the WPGC, only 5 out of 38 parkland courts plus the Stadium will be used for Championships matches. So, when play ends on parkland courts, the

spectators there will inevitably migrate to the main site, adding to the crowds and congestion. **Far from enhancing the visitor experience, the additional numbers may well undermine it.**

4.1.7 Also, in estimating potential impacts for LBM and LBW in these projections it would appear that no allowances have been made to reflect the losses which will occur locally in Roehampton as a result of the relocation to SW19 of the Qualifying Tournament. By contrast it appears that at least some of the projected economic activity from the relocated event is merely displacement to SW19 but is being assessed as net gain.

4.1.8 The SEB also notes (at para 5.4) that the Championships “support London’s status as a global sporting and cultural hub” not only in attracting visitors but also a far-reaching global audience. It states that in 2022, globally, total linear TV audiences were over 320 million. Whilst broadcast rights are undoubtedly a key revenue stream for the AELTC itself, ongoing TV coverage of tournament matches will continue regardless of the WPP. Since the WPP will not add any extra matches to be broadcast, but will merely distribute the existing number across a wider number of courts, it does not follow that WPP will mean that TV coverage will expand significantly. Moreover, there is no demonstrated link between TV coverage and any direct economic benefit to the locality or to London as a whole, so it is unclear what the purpose of this assertion is meant to be.

4.2 Employment impacts

4.2.1 As with the economic benefits, and notwithstanding the Revisions now proposed, the projected jobs figures are unchanged from the 2021 application documents. It is helpful that ongoing ambiguous claims by the AELTC in its publicity materials and Newsletters have been clarified ie that **256 jobs are now acknowledged as temporary, not permanent, Championships roles, most of which will run for just 2 weeks at most.** However, these additional employment numbers are at best marginal when set in the context of Merton’s overall economically active population which for the y/e 31 December 2023 amounted in total to some 111,000 people aged 16 and over:

(see ONS data: <https://www.ons.gov.uk/visualisations/labourmarketlocal/E09000024/>). As such the jobs proposed to be created amount to no more than 0.27% of that population even aggregating Championship and Full Time Equivalent roles together and treating these as fully equivalent.

4.2.2 Claims are also made (RCL at p14) in this context that the AELTC will “develop an Employment and Skills Plan to actively seek local procurement and promote local employment/apprenticeships.” This is a laudable initiative but is surely one which a responsible business of the AELTC’s size ought to be adopting in any event as part of an ongoing community engagement programme. **It is a pity that it is only being promoted as contingent upon the approval of the WPP proposals but if so, it should be secured as part of the S106 agreement.**

4.2.3 The SEB makes overly optimistic assumptions as to likely “local spend” by “new” employees. To validate these assumptions comparative data might for example have been provided based on current AELTC employees’ spending profiles but no such data is offered. The assumptions should also be set in the context of some 12,865 active businesses in Merton (acknowledging that these are not all in leisure, retail and tourism) see ONS data on Merton: <https://explore-local-statistics.beta.ons.gov.uk/areas/E09000024-merton/indicators#economy>

4.2.4 Construction Industry Employment opportunities are not relevant.

We do not accept the premise that creating employment within the Construction Industry should be considered as an economic or planning justification in itself; otherwise, every large-scale project to develop Metropolitan Open Land would merit permission even if it amounted to inappropriate development

4.3 Increased LTA funding

Both the SEB and CB refer to the WPP's "potential" to increase funding for the LTA. **The private arrangements between the AELTC and LTA for sharing the Championships' surplus are based upon an historic commercial deal which the planning process cannot influence;** the calculation of the surplus available for sharing and the commercial imperatives which inform it are not disclosed and with no cost/benefit analysis for the WPP proposals there is no evidence as to how the completed WPP proposals might impact upon future surplus figures. The likely continuation of the arrangements is in any event independent of the WPP. LTA will make its own decisions as to distribution of the surplus it receives and has a mission to support tennis "in Britain"; so, there can be no guarantee that its share of surplus will come to LBM, LBW or even London. (Note that the LTA has recently already made a substantial investment in upgrading the outdoor all-weather tennis courts in Wimbledon Park. Will further LTA funding for grass roots tennis be available in LBM and LBW in the foreseeable future?)

4.4 Increased funding for the Wimbledon Foundation

Some ten years ago the AELTC chose to set up the Foundation to support good causes with which it wishes to be associated. That is to be commended and the AELTC can be deservedly proud of the philanthropic contributions noted at paras 8.4 and 8.5 of the SEB already made by the Foundation both locally and at a wider level since it was established. However, these distributions have been made with existing facilities and historic revenues. At para 8.21 **the SEB concludes that increased profits generated by the WPP will result in further funding for the Foundation. This cannot be guaranteed nor is it a factor relevant to the determination of the planning application.** Whilst it is assumed that the AELTC will wish to continue its voluntary funding of the Foundation, and that there is no suggestion that ongoing funding is somehow contingent upon the approval of the WPP proposals, the Foundation is not a party to the application and its ongoing success and financial viability is a matter for its Trustees and the AELTC, not the planning process. **Its reputation and work cannot be used as leverage to justify planning approval of the WPP as the SEB appears to imply.**

5. Social and Community Benefits

In addition to the public access arrangements discussed in Section 2 above, further social and community benefits are noted in the SEB, CB and RCL as follows:

5.1 Encouraging local engagement and visits to The Championships

5.1.1 Local residents will be offered access to the Stadium (500 tickets per day when in use). A welcome offer although it is clear from the July 2021 planning submissions that the Stadium will not host any Qualifying matches, presumably to preserve surface quality for the Championships. It also appears that these community tickets will have to be paid for at cost, which reduces the accessibility benefit for the less well off. In this context the Planning Statement of July 2021 had suggested at para 1.3.3 that unreserved seating would be available in the Stadium for Grounds Pass holders. Why has that offer been dropped? It means that the Stadium, like the other Show Courts, will simply be used to raise yet more revenue for the AELTC through ticket sales.

5.1.2 Local school children and/or community youth groups will be offered up to 1,000 tickets free of charge to the Qualifying event. This too is a welcome offer although the presence of children on free tickets, spending, at best, their pocket money, underscores the point at 4.1.4 above that assumptions, and the economic impact projections upon which they are based, that the high-profile spending associated with Championships' attendance will apply equally across the Qualifying event in SW19, are wide of the mark.

5.2 “Encourage year-round community use of the new grass tennis courts, with at least seven of the new grass courts made available for use by the local community between mid-July to mid-September” (SEB p3) – An Oxymoron.

5.2.1 Not only is it contradictory, but this is also a misleading statement. **Use of the courts cannot be “year-round” as the grass court tennis season only runs between mid-May and mid-September and the Tournament must be completed first.** Courts will be closed to preserve quality until the start of Qualifying (usually a 4-day event) in the last week of June and play ceases after the end of the season in mid-September when the courts are renovated (in some cases dug up and relaid) and then mothballed until the following year. The promise of Community use of “at least” 7 courts from “mid-July” also appears highly optimistic since the Championships event does not finish until mid-July, the Southern parkland (which adjoins the area where the 7 courts are located) is then closed for 2 weeks (see para 2.5.2 above) and de rig activity will also be taking place on the site. In reality the courts’ availability is likely to be 6-7 weeks at most.

5.2.2 This community use offer also includes relocation of the AELTC’s long established Wimbledon Junior Tennis Initiative (WJTI). This is a popular initiative but relocating it to WPGC will put extra pressure on community use of the 7 available courts. The finals week of the grass roots “Play your Way to Wimbledon” event will also relocate from the AELTC’s existing facilities. However, as these are both existing initiatives merely being displaced, they cannot be claimed as additional community benefits generated by the WPP.

5.2.3 The offer of play on just 7 courts, a mere 18% of the new provision, over just 7 weeks at most in a year, is negligible and underscores the minimal contribution which the AELTC’s WPP expansion will make in practice to promoting sporting activity ie tennis playing (as opposed to paying for tickets to watch professional matches) by local people. The July 2021 Planning Statement acknowledged that post Championships, the courts would be in a condition suitable for amateur play, belying suggestions that the grass surface will have been compromised by 3 weeks intensive elite level match play. We suggest that the provision (or lack of it) in the WPP offer should be contrasted with the previous sporting use before the AELTC’s purchase of the Golf Club and its lease. In that era, there were opportunities to play golf across the course year-round not only for Golf Club members but also local residents paying a modest green fee as well as a junior golf academy. **The WPP proposals, if approved, far from generating an increase in opportunity for local people to play sport on the WPGC, represent a significantly reduced sporting opportunity.**

5.3 “Deliver at least 400m2 of on-site community space, including bookable community spaces within the Golf Clubhouse” (SEB p3) – Unhelpful lack of clarity

We note that the reference to 400m2 is not included in the CB which merely refers in general terms to providing “additional interior spaces” within the Stadium (subject to as yet unspecified design choices) and converting the Clubhouse to “space for wider community use” (including the welcome provision of publicly accessible toilets available to users of the new Southern Parkland and the existing public Wimbledon Park.) The ambiguity is unhelpful not least because **400m2 is a very modest amount of space – equivalent to roughly half the area of one of the new grass courts** - and the Clubhouse or the Stadium, individually, are likely to have significantly more internal capacity for community use than this. Whilst we welcome the commitment to community use in the Clubhouse in particular, if a cap of 400m2 is applied across both buildings it means that it is more than likely that the AELTC will be able to avoid delivering promised community space in the Stadium which has been a key part of their “offer” from the outset. The lack of any criteria for availability, capacity or costs is also unhelpful.

5.4 Improve connectivity across the site, through provision of new boardwalks and new angling pontoons (SEB p3); this is merely reflecting an existing obligation.

There is an existing obligation from the AELTC's freehold purchase of the WPGC in 1993 to deliver and dedicate a public walkway around the Lake once golf ceased to be played; this is not contingent upon approval of the WPP proposals. The Lake borders have deteriorated in places since 1993 but the 1993 walkway route, if installed today, would be obstructed in places where the AELTC have decided to site several new courts across it. The boardwalk, located mostly within the LBM owned Lake itself, is therefore being promoted by the AELTC as a pragmatic alternative which enables them to retain and use land which would otherwise have to be released to LBM. Given that public access to the Lake perimeter is already promised from the 1993 obligation, the boardwalk offer cannot now be considered as new community benefit contingent upon the approval of the WPP proposals. It would also appear that, as with the new parkland areas, public access to the boardwalk is to be permissive and AELTC controlled (so there will be closures during the Championships) despite the fact that the 1993 walkway was to be dedicated as public land. The proposal has also been criticised for causing ecological damage to the Lake and obstructing historic views.

5.5. Support active travel to and from Wimbledon Park, with financial contributions to fund TfL projects and travel plan monitoring (SEB p3); this should not be contingent upon the WPP

Plans to reduce on site car parking and promote sustainable alternatives had previously been announced; in any event the initiatives in the proposals should be integral to a sustainable event management plan and not contingent upon the WPP. However, given the congestion already experienced at Southfields Station there is an obvious risk of further potentially dangerous pedestrian congestion due to the increased capacity which the WPP will generate. This too has been highlighted in the paper by Richard Rees.

5.6 Enhance local ecology, including desilting of the Wimbledon Park Lake (SEB p3); these proposals have been criticised

Expert environmental advice criticises this proposal; the dredging methodology currently proposed is likely to destroy protected habitats. These issues are examined in more detail in separate submissions from Dr David Dawson

5.7 Enhance Wimbledon Park in heritage, recreational and amenity terms, through AELTC financial contributions (SEB p3). (This proposal is also addressed in the CB p8 in a section headed "Wimbledon Park Heritage, Landscaping Enhancements and Facilities Improvement Fund") - Unacceptable lack of clarity as to enforcement and deliverability

5.7.1 In its extensive publicity material for this Consultation the AELTC are promising residents that they will deliver certain facilities in the public Wimbledon Park (specifically a children's playground, a new boathouse for the Sailing Club and public toilets near to the Wimbledon Park Road entrance) if the WPP proposals, as revised, are approved. **That is not what is being put forward in the CB.** The proposal at p8 of the CB echoes what was offered in the previous Community Benefits Statement of May 2022 namely:

- a vague "cooperation arrangement" with uncertain outcomes apparently dependent upon the cooperation of co-owners of the Park (LBM and The Wimbledon Club). This envisages a joint owners' working group to identify agreed improvements to the whole of the Grade II* Listed Park and Garden
- with the AELTC making an unspecified "significant financial contribution" to a fund to pay for these works (are other co-owners expected to contribute and/or will they have any veto?)
- and also, for "improved recreational facilities" to be paid for by the AELTC, chosen (by whom?) from an un-costed list for which there had been no prior public consultation or liaison with interest groups such as Residents' Associations or the Friends of Wimbledon Park.

This was and remains an unsatisfactory approach. An "agreement to agree" requiring cooperation from neighbouring owners who are not party to a planning application cannot be an enforceable planning obligation. **In any event, proposed contributions need to be specified, evaluated and assessed against relevant planning criteria.**

5.7.2 The Officers' Reports to the Planning Committees of LBM and LBW addressed the difficulties outlined above by setting out Heads of Terms for a S106 Planning Agreement which included a schedule of agreed and costed "enhancements" for the public Wimbledon Park, to be paid for by the AELTC. **If a similar approach is envisaged by the GLA, we suggest that the community should be given an opportunity to assist in identifying priorities for these facilities.** Distinctions should also be drawn between works which are a) only necessary for the effective delivery of the WPP proposals (such as connecting pathways and entrance improvements) and which should therefore be financed separately by the AELTC as part of the WPP project costs, b) agreed improvements to the historic park to be delivered via a S106 Agreement and financed from the proposed new fund and c) (also to be secured via a S106 Agreement) existing community engagement benefits which the AELTC as a responsible business is already providing and is promising to maintain if the WPP proposals are approved. **Currently no figures are included for proposed enhancements nor is there any agreed list of commitments, merely a summary of options.** Without this information it is impossible for the community to make any informed evaluation of the full scope of the AELTC's "offer".

5.8 "Tours of the WPP site"; these are operating already

Claims are also made in the CB and SEB that the WPP will generate additional visitors to the area after the Championships, largely because the WPGC site will be added to the existing programmes of Site tours. **In the absence of any projected numbers this claim cannot be evaluated.** The AELTC already provide site tours of the WPGC and Nature Weekends, at no charge, to bring in more visitors. **None of these activities require the implementation of the WPP and especially the installation of the intrusive Stadium, buildings and other infrastructure which its proposals require.**

6. Social and Community Importance of the AELTC

6.1 Section 8 of the SEB includes a summary of the "significant role" played by the AELTC in supporting a wide range of Community initiatives both locally in LBM and LBW and across London and the UK. These include, in some detail, the work of the Wimbledon Foundation (which we have already discussed above) as well as the Wimbledon Junior Tennis Initiative for tennis coaching, a "work at Wimbledon" programme with opportunities for roles at the Championships and, curiously, the longstanding Ball Boys and Girls training programme for the Championships. A recently launched local community scheme with retail discounts in the AELTC shop and café as well as a community ticketing programme are also noted. The conclusion is a claim that "the WPP will increase the revenue generated by the Championships to create additional funding to be channelled back into the LTA and the initiatives mentioned above".

These are of course important and laudable initiatives but, in all cases, they are well established and have been successfully funded from the AELTC's existing revenues. Their continuation or future viability cannot be regarded as contingent upon the successful outcome of the WPP application and indeed it is somewhat surprising, even questionable, that this connection is even implied. (No more Ball Boys and Girls??) **The WPP proposals must be assessed on their planning merits.**

7. Conclusion

In our previous representations we argued that the WPP application should be refused as the extensive and intrusive development proposals are inappropriate development upon protected Metropolitan Open Land. **Despite its stated ambition to remain at the pinnacle of global tennis the AELTC has failed to demonstrate that this can only be achieved by the approval of the WPP proposals, or that the WPP proposals are sufficient to make the requisite robust case that there are Very Special Circumstances justifying approval, or that the potential harm is outweighed by these proposed "benefits".** The revisions now offered in this latest Consultation are extremely modest in the context of

the overall scheme – if anything, given the extensive procedural formalities which accompany a consultation of this nature, they are being viewed locally as little more than a “damp squib” – and make no difference to that conclusion.

It is a pity that the AELTC has not taken the opportunity of a GLA referral to reflect, after 3 years of local debate about its proposals, upon the criticisms and concerns raised by residents in over 2000 planning representations to LBM and LBW, a petition with objections now standing at over 18,500 signatures as well as the many objections now lodged with the GLA. Instead, the AELTC’s response has been to reach beyond the local community and to try and influence the planning outcome by launching an unprecedented high profile and extensive London wide media campaign. This heavy-handed approach demonstrates little if any appreciation of the interests and concerns of the community which its application materials suggest it wishes to support.

We urge the Deputy Mayor to recognise that it is a planning application which much be judged against clear policy criteria. On that basis, the WPP proposals must be refused.

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