



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)

Green Belt Policy, Very Special Circumstances and “Need”

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for Save Wimbledon Park, c/o 60 Vineyard Hill Road, London SW19 7JH

1. Summary

This application should be rejected on the following grounds:

1.1 The AELTC claims that it needs to develop 39 courts in Metropolitan Open Land (i.e. Green Belt) including an 8,000-seat stadium and other buildings to maintain its position as the premiere Grand Slam tennis event.

1.2 Far from justifying any need, this expert appraisal concludes that the proposal is inappropriate and gross over-development. It will make public safety in and outside the grounds much worse. It will destroy the quintessential AELTC offer and turn “Tennis in an English Garden” into “Tennis in an Industrial Complex”.

1.3 This application fails to pass the test required for development in the Green Belt and shows an unfortunate disregard for the importance of this precious site.

1.4 It also fails to satisfy the requirement to maintain the qualitative openness of the land instead creating a manufactured and artificial landscape.

2. Introduction

2.1 Save Wimbledon Park

The Save Wimbledon Park campaign is supported by a large number of national and local organisations,¹ who have been responding and objecting to this application as it has developed since

¹ CPRE London, Friends of the Earth Merton, Save Britain’s Heritage, The Wimbledon Society, The Wandsworth Society, Friends of Wimbledon Park, Merton and Wandsworth Tree Wardens; and Residents’ Associations for all the surrounding areas, namely Belvedere Estate, Osborne House, Parkside, Raynes Park and West Barnes, Southfields Gardens, Southfields Grid, Southfields Triangle, Sutherland Grove Conservation Area, Victoria Drive Conservation Area, West Wimbledon, Wimbledon East Hillside, Wimbledon House and Wimbledon Park, and the Wimbledon Union of Residents’ Associations.

2021. All papers have been produced by volunteers, many of whom have considerable, relevant professional experience, which is highlighted in some sections.

This assessment of the application of Green Belt Policy, Very Special Circumstances and “Need” 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 Mark Service (providing a Heritage Assessment), from Parkside Residents and their chair Sue Cooke (addressing Social, Community and Economic Benefits), and from Environmentalist Dr David Dawson (addressing Biodiversity Net Gain and other Environmental issues).

2.2 Expert authors

This paper was produced by Richard Rees RIBA and Ken McFarlane RIBA.

Richard Rees was design team leader at BDP for the 1992-1997 AELTC Long Term plan, the New Number 1 Court, and Henman Hill. He was consultant tennis architect for the Sydney and Athens Olympic Tennis Centres and worked on the tennis venues at the Beijing and Rio Olympics as well as the Kuwait International Tennis Centre. He also designed the Guangzhou Tennis Centre.

Ken McFarlane is chair of the Wimbledon House Residents’ Association, which supports Save Wimbledon Park, has lived in SW19 for 27 years and is a practicing architect, experienced in leisure and hospitality developments.

3. Metropolitan Open Land: NPPF 142-156. Inappropriate Development & Very Special Circumstances

“The essential characteristics of Green Belts [here MOL] are their openness and their permanence” (NPPF 142). This proposal preserves neither. Buildings and works of all kinds are inappropriate in MOL, and once built, the openness of the land is lost for ever. The developer concedes that it proposes inappropriate development and agrees that it must establish “very special circumstances” (NPPF 152). This requires the developer to justify the “need” for this development.

4. What is the Need?

The AELTC is the only grand slam owned not by its national tennis body but by a private members’ club. Already at the ‘pinnacle’ of its sport, it must satisfy a very demanding test, with evidence, to prove that in order to remain at the ‘pinnacle’, it is necessary for it to seek to increase its tournament area by 200% for a mere 20% increase in footfall, and for the same size of championships.

The developer’s latest set of application documents still fail to explain the ‘need’: the developer has merely continued to advance a general ‘pinnacle of sport’ argument, an assertion it has promoted since 1993 or even earlier, and which it has maintained without trebling its size.

Uniquely played on grass, this is the most successful global grand slam tournament, which has just published its best results ever,² with TV viewing figures exceeding all other grand slams. Please see the following table.³

² <https://www.thetimes.co.uk/article/b54ada63-3326-4c41-8b40-b7d593a79b29?shareToken=cdeb236f208a60218f1c97145667e1af>

³ <https://www.statista.com/statistics/1396457/tennis-grand-slam-fans-worldwide-by-tournament/>

Number of fans who follow or watch the tennis Grand Slam tournaments worldwide in 2022, by tournament

(in millions)



5. Maintaining the Wimbledon number one Grand Slam status

The AELTC claims it needs an extra 39 grass courts on Wimbledon Park to maintain its position as the premiere Grand Slam Tennis Event. This is a gross over-estimation in terms of need. No Grand Slam tournament needs this many courts because Grand Slam tournaments are limited in size by their large-scale draw structure, which will not change.

It is not the scale and number of courts that define why Wimbledon is now, and always will be, the Premiere Grand Slam tournament. It has a unique history and character that cannot be matched by the other three Grand Slam venues. Wimbledon has been going since the late 19th Century and the other Grand Slams only became ratified in the mid 1920's.

The four Grand Slam tournaments are the pinnacle events of the sport; each has its own characteristics, traditions, and historical importance. They are held over the season in Melbourne (Melbourne Park), Paris (Roland Garros), London (Wimbledon) and New York (Flushing Meadow). Wimbledon is the only grass tournament, Roland Garros is held on clay and the other two are played on an acrylic based hard-court surface.

Wimbledon's history alone, discounting size, means that it will always retain its premiere Grand Slam status. The developments on the site since the construction of the new Number One Court in the 1990's have guaranteed a modern and fit for purpose venue that plays on its 'Tennis in an English Garden' style.

6. Comparison with other Grand Slam Venues

The average number of courts needed for a Grand Slam tournament is around 20 and all the four Grand Slams have at least this number already. More than this is a luxury. The AELTC proposal to allow for

subsidiary tournaments such as for veterans, juniors and wheelchair players on new Wimbledon Park courts is not necessary as these tournaments happen already on the existing 20 Grand Slam courts during the second week of play as the main draw shrinks.

The AELTC wants to expand the site capacity from 42,000 to 50,000 visitors. To do this it would need approximately 20% more space than that currently provided. The proposal, however, is more than 200% greater than the area of its current site. The provision of an 8,000-seat stadium with a moveable roof in Wimbledon Park is part of this ambition.

Wimbledon already has a 4,000-seat stadium number 2 court. It does not matter that the number 2 court is smaller than the other Grand Slams because Wimbledon matches two of the other Grand Slams in the total number of premium seats in the top three stadium courts: 31,345 for Wimbledon, 30,281 for Roland Garros and 33,455 for Melbourne. The figure for Flushing Meadows – 45,957 - can be discounted as from the upper tiers of the oversized 23,771 seat Centre Court spectators cannot see the ball. Melbourne Park has a larger site area than Wimbledon and the other two Grand Slams because the site was once a giant railway siding and historically expansion was always easy. Expansion has now stopped at all the other three Grand Slam sites.

It could be argued that Melbourne is the premiere Grand Slam tournament on the basis of its site area and total spectator numbers. But size is not everything and although physical spectator numbers are important to fill the courts, they are not the critical element in the total success of a tournament. Millions watch tennis on TV and income is largely from this source. Wimbledon is top of the table in terms of this statistic (see figures from 2022 at paragraph 4 above).

7. Expansion of numbers and safety

Whilst recognizing the desire of the AELTC to expand the useable area of the Grand Slam tournament site to allow better spectator comfort, the plans as proposed do not address a fundamental issue of safety on the existing tournament site.

The existing site was designed in the mid 90's to expand the daily site population from 28,000 to 35,000 spectators based on a density of 1.1 m² per person at full capacity. This worked well for a number of years, but the capacity has since been increased to 42,000 spectators without any basic change to the layout of the site.

There are several significant pinch points near the Centre and Number 1 Courts and Henman Hill is a honeypot for spectators. The proposals expand the spectator area into Wimbledon Park and include Church Road, but a large proportion of the 8,000 extra proposed spectators will inevitably be attracted to the existing site and its already stressed circulation hot spots which will potentially lead to dangerous congestion unless the existing site is redesigned to allow for more spectator movement.

The tournament does not need more space off site alone, it needs re-adjustment of the existing space first to allow for future expansion otherwise the proposed capacity expansion is potentially dangerous.

8. The transport infrastructure in Wimbledon and Southfields

A constraint that has not been considered properly in asking for another 8,000 spectators on the site is the already dangerous congestion that occurs at the tube stations, particularly Southfields. TFL has discussed with the AELTC the opening of the turnstiles in the mornings to get people out of Southfields station on arrival. This does not allow for a much more dangerous scenario where the main stadium matches all finish at the same time. That is an event which the AELTC is unable to control as it would depend how games finish not start, or the weather may suddenly stop play.

In this situation the surge of spectators with 8,000 more on the site could be catastrophic. Trains on the District Line normally arrive full at Southfields as they start in Wimbledon and canny spectators will have worked this out. This means that in an evening surge there would be virtually no clearance from Southfields for some time.

Congestion at Southfields has always been an issue. This is yet another reason why expansion of site numbers is dangerous and ill-advised. Also, who wants to go and have a nice day at the tennis and then have it all spoilt by taking hours to get home in unpleasant and potentially dangerous circumstances.

9. The need for the qualifying tournament to be on site

Around 18 courts are needed for a qualifying tournament, and these have been provided successfully at nearby Roehampton for decades. 18 are needed for a four-day event but if run over a week that qualifying tournament would require a proportionately smaller number of courts. The players who attend these tournaments are not 'The Elite' as claimed by the AELTC Chair: they are the ones not good enough to qualify automatically. Players have not yet boycotted Wimbledon because the qualifying event is not located on site, so new qualifying courts in Wimbledon Park are not justified based on attraction.

Roehampton is a great site for qualifying as it does not get entangled in the extensive and complex set-up process for the main tournament and has plenty of space for qualifying practice courts. The site is also flat and treeless and only a short distance from the AELTC. One could ask the question even why Roehampton? Why can the Qualifying not occur in a well-equipped grass court venue elsewhere in the country to spread the interest and benefits outside London?

Moving the qualifying to the MOL would have a major disadvantage of prolonging the period of tournament disruption in the area of the AELTC by a further few weeks whereas it does not cause that disruption at Roehampton.

10. Number and size of New Courts

The AELTC has managed for decades to utilise the existing 21 Championship Courts and Aorangi Pavilion practice courts for the Tournament yet is asking for around the same number of courts again. It already has the same number of courts as those used by each of the other three Grand Slam venues. So where is the need to expand?

The qualifying courts, the proposed additional practice courts (no reason is given for why the existing number is inadequate) and new courts for the secondary tournaments currently running on the existing site result in this outrageous proposal for 39 courts in the MOL.

The proposed extra 39 Wimbledon Park courts comprise:

9 new practice courts

5 new Championship Courts including an 8,000-seat stadium with a closing roof

18 new courts for the qualifying tournament

7 new 'undesignated' courts

All these courts are proposed to be designed and set out at the same size as a stadium court plan, meaning they each take up a 16.4% greater area than if they were designed as a standard tournament court, which the existing Wimbledon mostly consists of.

There is no overlap of function of these proposed court types. No doubt it will be argued that the courts are grass and therefore over-use will destroy the surface. This argument is undermined by the fact that the main tournament courts are used intensively for two weeks. The current qualifying tournament only uses the courts for four days, allowing for overlap with either a practice or junior tournament function for at least a week before they degrade.

On this basis the maximum number of courts really needed can be defined as 18 for the qualifying tournament, if it is allowed on site, which then become practice courts for the main tournament, and a possible five main tournament courts to allow for some decanting of courts from the main site to ease congestion. However, the harm to the MOL caused by even 23 new courts is massive and questions the whole need to move from the efficient and convenient Roehampton site.

The junior tournament is played already on the main site in the second week of the main tournament when courts come free so why decant it into Wimbledon Park and destroy the MOL for an element that is not critical to the success of a Grand Slam? Also, the junior and veterans' tournaments that have run for decades give vitality to the courts on the existing site in the second week, which would otherwise appear rather empty. There is the danger of downgrading the experience for the second week spectator who does not have tickets to the stadium courts but wishes to experience the core of Wimbledon.

There are further or secondary impacts of the proposal for 39 courts. Kilometres of access paths will have to be built and several maintenance and staff buildings provided, all unsuitable in the MOL and listed Park.

11. A roofed 8,000-seat stadium

The need for a stadium to create a larger number 2 court than the existing 4,000-seat one on the main site is not proven. Although the USA and Australian opens have larger number 2 courts, their sites have not been constrained by a sensitive context like Wimbledon's. Roland Garros is in the historic Bois de Boulogne and their recently constructed new number 2 Court was restricted to 5,000 by a government decision due to the sensitivity of the site. Roland Garros still has fewer spectators than Wimbledon and manages quite nicely to justify its Grand Slam status.

The AELTC has proposed that the extra seats in the new stadium should be allocated to local people. This assumes local people would be interested in what is essentially the third-place venue that loses its attraction rapidly in the second week of the tournament, as all the major singles matches are then played on Centre Court or Number 1 Court. These tickets are no compensation for the fact that this enormous building will then sit around in the Wimbledon Park and MOL for the other 50 weeks of the year in perpetuity.

12. Harm to the MOL

Given that the very special circumstances are not proven from the counter arguments above, the harm that the proposed buildings and courts would cause the MOL is unacceptable. It appears that the AELTC have briefed their designers to pursue maximum development in Wimbledon Park ignoring its planning status completely.

It is worth noting that if the new stadium was allowed there would be a precedent for MOL and Green Belt all over the country to accept a structure comparable in size to the Royal Albert Hall. There is absolutely no precedent for this and thousands of cases of even small amounts of built development in MOL and Green Belt have been summarily dismissed in the past. This would become a test case that would cause inexorable damage to the status of MOL and Green Belt in the UK.

13. Appropriateness of the Concept of the development

In looking at the nature of the AELTC tournament, it is worth putting it in its British context and particularly defining its cultural role. Wimbledon is part of the English Summer Festival of sport. It is possible from March through to September to attend the Cheltenham Gold Cup, the Boat Race, Aintree, Ascot, Henley, Epsom, Wimbledon, the British Grand Prix and test matches at Lords. The Chelsea Flower Show can be thrown in as another cultural marker of this summer jamboree.

All of these events have a limited capacity which they are generally satisfied with. They play on the fact of being in the summer and use positively the temporary accommodation they put up every year such as marquees. The approach of the AELTC to create another huge solid all year structure in the stadium goes against the nature of its role as a two-week summer event.

14. A two-week summer event

Wimbledon is a summer event because its grass has a limited playable life and, in this context, differs from the other Opens as they could be played at any time of the year within climate constraints. The Australian and USA Opens have more than one ticket session per day and play can run into the early hours of the morning, which the players do not like. Wimbledon therefore distinguishes itself from these Grand Slams in being quintessentially English and of the Summer. Spectators expect it to be the sort of summer event experience (as listed above) so a large-scale approach to expansion poses the danger of changing the feel of the event radically.

Anyone suggesting that Wimbledon might have to change due to pressure from the Saudi sporting juggernaut or others to expand is ignoring the automatically fixed timing and nature of this event.

15. The new tennis stadium proposed is effectively a Multi-Use Stadium

By placing an 8,000-seat roofed stadium in Wimbledon Park the AELTC will be creating not a tennis stadium, but a potential multi-use stadium that could be used year-round. The grass court could be covered with protective flooring similar to that used in venues like Wembley Stadium. The new venue could be operated outside of the core AELTC tennis club, making it a very attractive proposition for any stadium purpose at any time of the year. This may be why the AELTC has not proposed a stadium without a roof, or a lower volume building with temporary seating as options in the planning application.

16. The Scale of the proposed new stadium

The scale of the new court cannot be disguised by some green cladding. At 104m long and 28m high it is more massive than the front of Buckingham Palace (108m and only 24m high). It would have one and a half times the capacity of the Albert Hall and is as tall as the existing stadium courts due to the insistence by the AELTC that it cannot be sunk into the ground.

The proposed stadium is bigger in footprint than the Albert Hall and of a comparable volume. Please see plan and sections appended to this paper. When it was designed, the new Number 1 Court was sunk three stories underground with similar constraints, which proved a good design decision. The result of this maximalist approach to the new stadium is that a new element similar to the scale of the financial district of the City of London is proposed in the MOL that adds to the already massive bulk of the two existing stadia in the area.

17. Urban aggregation

Another result of accepting the massive scale of the new stadium is that the three main stadia will now crowd out Church Road BY BEING ON BOTH SIDES OF IT, creating a 'canyon' effect and giving the impression of passing through part of a city centre. The role of Church Road in defining the western edge of the MOL will be lost if it is hard landscaped to link both sides of the road. The perception of the AELTC's heavily developed existing site sprawling into Wimbledon Park, taking over the landscape and destroying its character will be reinforced by this encroachment. The recent expansions by the AELTC along Church Road already give the impression of some large linear corporate headquarters, due to their bulk and large elevations of unrelieved glazing.

Adding a new stadium comparable to the Albert Hall and larger than Buckingham Palace across the road will increase the sense of an urban city extension rather than 'Tennis in an English Garden'.

18. An industrial/commercial tennis development

The massive expansion proposed in the planning application by the AELTC is in effect an industrial scale tennis development. Tennis courts are ecological deserts and the nature of the MOL in Wimbledon Park will be permanently compromised. It is worth noting that definitions of harm to MOL are not only physical, but also perceptual and the unnatural grid layouts of the courts will destroy the perception of a picturesque park setting.

All these proposed new courts are designed to Grand Slam size and standards as mentioned above and rigidly orientated to the alignment of the Grand Slam Courts on the existing Wimbledon site. Even if this questionable number of courts were to be accepted, the alignment of all of them to the Grand Slam court orientation removes far more trees than a less rigid arrangement. The Roehampton qualifying courts and the existing Wimbledon practice courts do not align with the Grand Slam courts. Making all the courts Grand Slam standard also opens the way for the tournament to spread right across Wimbledon Park at some future date, with an inevitably large increase in tennis equipment and paraphernalia.

19. Tennis Courts and Trees

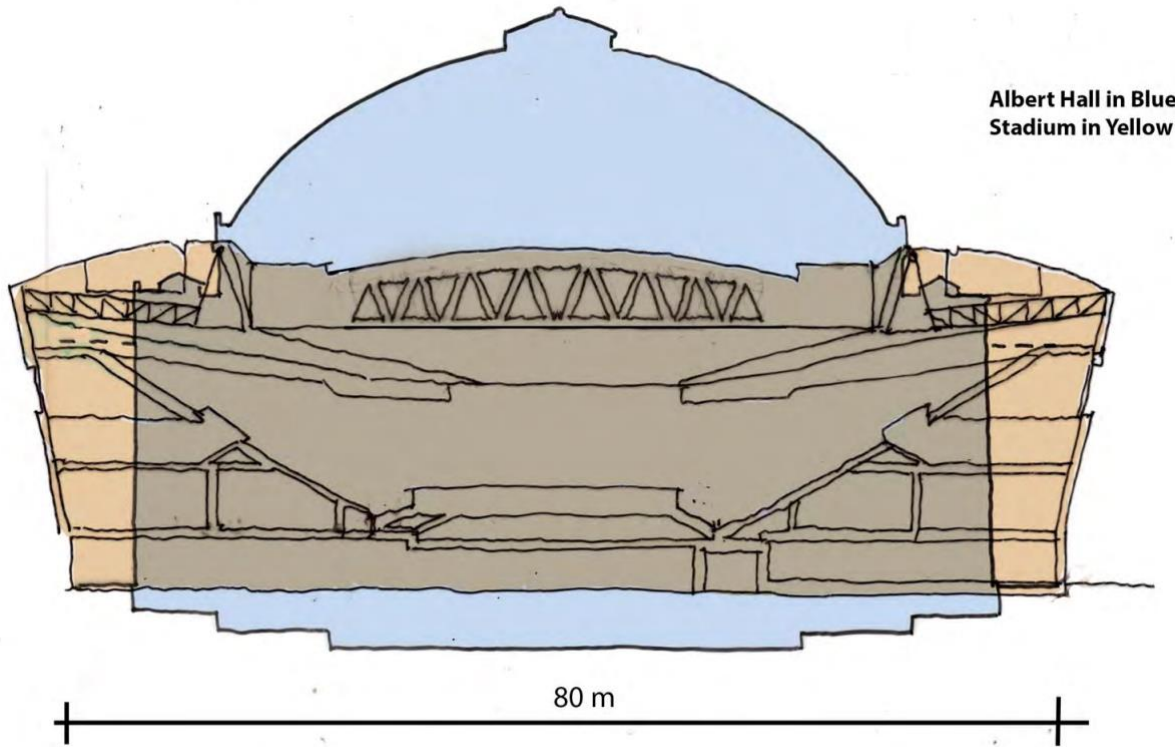
Trees are anathema to tennis courts and approximately 300 would be removed in these proposals. However, the new courts would still be surrounded by trees. They would throw dappled and irregular patterns of shade onto the courts, potentially disturbing play. Players would also be disturbed by line-of-sight trees moving in any wind.

There is a good reason there are no trees on any major Grand Slam and senior tournament sites anywhere in the World.

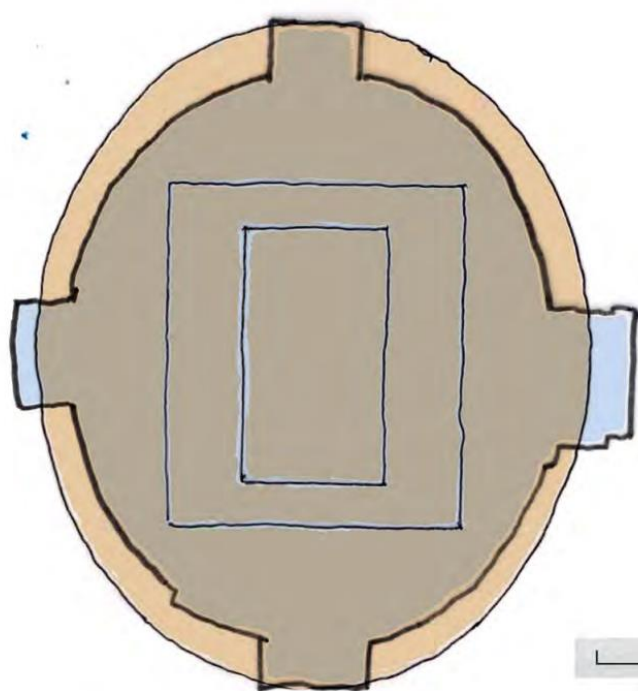
Autumn leaf fall would be a problem. Such a large area of irrigated lawn and drainage runs would also disturb the ecological balance of established tree root systems. Even more trees would inevitably be lost if this proposal goes through. Compensatory landscaping has been offered in part of Wimbledon Park, but it pales into insignificance against the impact of this development.

Appendix

Section and Plan comparing proposed stadium with the Royal Albert Hall.



Section Comparison Stadium Court 2 and Royal Albert Hall



**Albert Hall in Blue -
Stadium in Yellow**

Plan Comparison Stadium Court 2 and Royal Albert Hall