



City Hall Greens

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Jules Pipe,
Deputy Mayor for Planning, Regeneration and Skills
City Hall
Kamal Chunchie Way
London E16 1ZE

(By email)

15 March 2024

Dear Jules,

Re: Stage 3 decision for Wimbledon Park Golf Course; LPA reference numbers 21/P2900 (Merton) and 2021/3609 (Wandsworth)

A number of very concerned constituents have contacted me and my fellow Assembly Members, Caroline Russell and Zack Polanski, regarding their large range of objections to this application. We share their worries and urge you to refuse this application for the following reasons, which given time and space, cover only some of those that have been raised with us.

1. Loss of Metropolitan Open Land

I don't have to tell you that only 'Very Special Circumstances' can justify inappropriate development on Metropolitan Open Land (MOL). As the GLA planning officers' stage 2 report clearly lays out:

"At consultation stage (Stage 1) it was noted that the redevelopment of the site to provide tennis infrastructure and a new publicly accessible park was supported in strategic planning terms. However, whilst the proposal represented facilities for outdoor sport, the scale of the proposal and the increase in spectators meant the proposal is unlikely to be appropriate MOL development in accordance with Paragraph 154(b) of the NPPF. For these reasons, exceptions test (b) is unlikely to apply in this instance. Therefore, the proposal was considered to constitute inappropriate development on MOL which must be robustly justified by VSC."

And:

"Wandsworth Council's first reason for refusal relates to the substantial harm to and loss of visual and spatial openness identified to Metropolitan Open Land. As such,

they consider that the development would constitute inappropriate development and did not consider that there were any VSC that outweighed this harm.”¹

I appreciate that the report also notes that Merton Council took a contrary position:

“They noted that the NPPF requires that the development should not be approved except in very special circumstances. In this circumstance, Merton Officers considered that the weight of the benefits would clearly outweigh the harm identified to MOL and other harm and therefore the benefits are considered to amount to VSC.”²

However, I contest this conclusion regarding the harm to MOL because, as GLA planning officers state in the Stage 2 report, under the National Planning Policy Framework (NPPF), para 154 (b), one of the exceptions for allowing development on MOL, which is afforded the same status and level of protection as Green Belt (as outlined in the London Plan 2021) is for:

“The provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, [...]; as long as the facilities preserve the openness of the Green Belt.”³

Although the plans from the All England Lawn Tennis Club (AELTC) constitute a change of use to outdoor sport, in order to support the new tennis courts, it proposes installing a number of structures on the site to support the courts and Championships, which will entirely detract from the openness of the site. These include, but are not limited, to:

- a 93 m long, 49 m wide and 31 m high central grounds maintenance hub,
- seven maintenance hubs with a total floor area of 555 sq m, all with 4 m boarded fences around them,
- Two player hubs, one with a height of 17 m, the other 6.5 m, with a total floor area of 652 sq m, and
- a 104 m long, 28 m high stadium with roof, which is similar in size to the existing Number 1 court. Schematics provided by the applicants clearly show the detrimental impact and substantial harm a structure of this size and scale will also have on the openness of MOL.⁴

2. Harm to local heritage and community use

The proposed designs for 38 additional tennis courts, 8,000-seat stadium, maintenance and player hubs, car parking and footpaths will also impose substantial harm on Wimbledon Park, which Capability Brown laid out in the 18 century and is Grade II* listed. As the Capability Brown Society says:

“A complete remodelling of the landscape with regrading and resoiling, levelled tennis courts, show court, multiplicity of player and maintenance hubs and 9.4km of

¹ GLA Wimbledon Park Golf Course; LPA reference numbers 21/P2900 (Merton) and 2021/3609 (Wandsworth) Planning Application, <https://planapps.london.gov.uk/planningapps/21-P2900>

² Ibid.

³ National Planning Policy Framework, Dec 2023, https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

⁴ Site context section, BB existing and proposed planning, P03 revision, 25 Jul 2021, <https://planning2.wandsworth.gov.uk/iam/IAMCache/5486690/5486690.pdf>

paths and drives gives rise to significant impacts. This is excessive development which has no regard to Capability Browns open flowing pastoral landscape.”⁵

Furthermore, the lake in Wimbledon Park, upon which AELTC plan to impose a boardwalk, also dates back to this era and is one of the largest in London. It is currently owned by Merton Council for public use, yet AELTC propose to remove some of this access while damaging its setting and character.

Indeed, public access is one of the main points the applicant makes for saying there are very special circumstances to allow this development on MOL:

“From the end of The Championships until the end of the grass court season (typically Mid-July to Mid-September) a minimum of 7 courts will be available to the local community for:

- Wimbledon Junior Tennis Initiative (WJTI) participants and existing AELTC junior community tennis programme,*
- A community tennis experience inviting local residents to come and play on the courts for free.”⁶*

To clarify: mid-July to mid-September is just two months, a mere 16 per cent of the year, while seven courts out of 38 is 18 per cent. This means that the courts will be out of use by the community (or anyone) – while they are being prepared for the Championship – for 84 per cent of the year. This is pitiful offer and does not constitute very special circumstances.

3. Harm to landscape and biodiversity

The construction of the tennis courts themselves will also cause substantial harm. My understanding is that almost the entire 70 acres of the site needs to be excavated to between one and nine metres to provide a level surface for the 38 tennis courts. Each individual court then requires a rectangular ring beam of concrete to be sunk into the ground, filled with gravel and crushed down to make it as hard as possible, then topped with loam, soil and finally, an eight mm surface of grass that has been laced with pesticides, and possibly plastic (as is routinely used on football pitches).

Residents are also concerned about the loss of trees on the site and contest the assertions of the AELTC in its application that only 296 mature trees will be felled. Residents have collaborated with an environmental scientist, Dr Dave Dawson, who has been surveying Wimbledon Park for around 40 years. He has calculated that the 296 trees to be lost will release around 210,000 kg of captured carbon.⁷

⁵ Merton Officer’s Report on the AELTC Application in Wimbledon Park, Capability Brown Society, 24 Oct 2023, https://planning.merton.gov.uk/MVM.DMS/Planning%20Application/1000115000/1000115659/21P2900_Comments_The%20Capability%20Brown%20Society_24.10.2023.pdf

⁶ Wandsworth Council Planning Committee report, 27 Nov, 2023, <https://planning2.wandsworth.gov.uk/iam/IAMCache/5823304/5823304.pdf>

⁷ Friends of Wimbledon Park, Submission on Planning Applications Merton 21/P2900, Wandsworth 2021/3609 at Wimbledon Park Golf Club, Jan 2023, https://planning.merton.gov.uk/MVM.DMS/Planning%20Application/1000115000/1000115659/21P2900_Comments_Friends%20of%20Wimbledon%20Park_12.01.2023.pdf

The proposal to plant 1,500 trees by AELTC has been made much of in the planning reports, but it is likely that the majority of these will be whips, so the massive loss of the mature trees will entirely outweigh any additionality. Furthermore, trees – given the shading, leaf drop and birdlife they provide – are incompatible with highly manicured and managed tennis courts, so it is difficult to see how this many trees could be planted around them.

I urge you to refuse this incredibly harmful application and I hope to hear from you shortly.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Siân Berry', with a stylized flourish at the end.

Siân Berry
Green Party Member of the London Assembly