

Submission on Planning Applications Merton 21/P2900, Wandsworth 2021/3609 at Wimbledon Park Golf Club, SW19 7HR.

Introduction

The Friends of Wimbledon Park (FOWP) is a voluntary umbrella organization that aims to give a voice to local people, community groups and other interested parties, to protect and enhance this well-loved heritage landscape, Heritage Wimbledon Park, for future generations. There are Voting Members of Friends of Wimbledon Park (about 150) and Non-voting Associates of Friends of Wimbledon Park (About 10,000+).

We have submitted nine objections to AELTC Wimbledon Park Project (AELTC WPP). This, our tenth objection, responds to the Community Benefits listed in 2 of the 38 updates (April 2024) to AELTC WPP. Our comments on the extractions from the updates are in italics. The offsite proposals require a reply.

Our previous comments remain and in brief:

- 1) The application would harm Metropolitan Open Land (MOL) and there are no special circumstances which overcome this harm.
- 2) Wimbledon Championships has no real rivals as a summer grass court tournament.
- 3) The qualifying rounds do not need to be based in Wimbledon Park.
- 4) Public benefits need to be properly considered with Community input.

AELTC WPP Community Benefits Statement

Page 2: Access to sport can inspire and drive the next generation of British talent and bring local people together. Yet ticket demand for The Championships significantly outstrips supply. With 8,000 additional tickets available from the new Show Court alone, this is a unique opportunity to expand access to the sport, a key aim of the Mayor of London's 'Sport for all of us' strategy.

Comment: Although Mayor of London's 'Sport for all of us' strategy mentions major sports events it is clearly focused on participation activities not spectator entertainment. Spectator sport does encourage participation in the viewed sport whether online or in person, but this shouldn't be at the loss of space for participation sport.

Page 2: Whilst once part of Earl Spencer's private Wimbledon Park, for over a hundred years the existing golf course has remained private and not been open to the wider public nor offered any general public access. Merton residents with proof of address and who paid a fee could access the golf course (to play golf), but otherwise it was operated as a private membership, fee-charging club on private land within part of what remains of the original Wimbledon Park from the original 18th century estate.

Comment: This was a membership and pay to use facility for golf. Also, FOWP arranged several Capability Brown walks over this area including in 2016 fixing Blue Badges commemorating Capability Brown's tercentenary, to each of the five entrances to the 61ha park. The Wimbledon Club (TWC) is membership, and the Public Park has about 56% pay to use (tennis; bowls; stadium; water sports, and beach volleyball). Land set aside for participation sport is restricted to that use or shared use such as a Multi-Use Games Area (MUGA). The similarities here are obvious.

Page 4: Supporting LB Merton in preparing a Landscape management Plan for the entire RPG. Comment: AELTC know that there are four Management Plans for Wimbledon Park: Glasspoole Thompson 1998; FOWP Conservation Management Plan 2016; LBM Masterplan 2018; The Capability Brown Society 'A Vision' 2021. FOWP has kept AELTC informed of plans and requested each owner to work together with FOWP to deliver our park from the 'At Risk Register'. There is no indication that this is going to happen soon and a look at the WPP shows TWC land as isolated. FOWP will take the lead in identifying a plan for delivering Wimbledon Park from HE At Risk Register. Preserving vistas and maximizing biodiversity are key issues. The review of the Local Plan currently with the Inspectors will assist in this project.

Page 4: The Lake has been silting up and urgent, but costly, action is required to reverse this. *Comment: Whilst the urgency needs explanation¹ why hasn't action been taken to fit silt traps to stop the silt entering the lake?*



Page 5: The positioning of the boardwalk has been agreed with LB Merton's Green Space team and will ensure that main extent of the Lake continues to be available for use by the Wimbledon Park Water Sports and Outdoor Centre.

Comment: The vistas and nature should be addressed first. For example, the European Eel is endangered, and emerging insects attract 8 species of bat, swift, swallow and martins, so more thought needs to be taken and this should be a separate item to allow for proper examination of the outcomes. The ugly buildings around the lakeside need relocating. The boardwalk will harm vistas and deter shy species.

Page 5: This development is also the only credible financial plan to de-silt and restore Wimbledon Park Lake, the key feature of the "Capability" Brown landscape.

Comment: Mistakes in execution here could be disastrous for nature and desilting should be considered separately as a major project.

Page 5: Remodelling of the Lake to reflect its historic alignment and opening/daylighting of the two brooks serving Wimbledon Park Lake which "Capability" Brown dammed to form the Lake. *Comment: LBM have already daylighted Wimbledon Park Brook and although landscaping is still to be carried out is a great improvement for nature and visitors. Daylighting brooks shouldn't be dependent on gaining planning approval for a controversial project.*

Page 6: The Golf Clubhouse will be converted into a space for wider community use. The use(s) of these new community space have been shaped and developed through input from local residents and local community groups.

Comment: FOWP, a community organisation, is learning about the proposed community space for the first time in this document. There has been no attempt by AELTC to seek input from FOWP. One would have expected such discussions would have involved the FOWP Forum and local Residents Associations. An AELTC officer regularly attends FOWP Forum meetings and RA meetings but there is no record of this, and other matters being raised by attending officer.

Page 8: The AELTC therefore proposes to establish a working group with the landowners (the Wimbledon Club and the London Borough of Merton) to identify and coordinate improvements to the entire Registered Park & Garden, beyond the application boundary. Furthermore, the AELTC will make a significant financial contribution to facilitate and support improvements to the existing Wimbledon Park to deliver (a) wider heritage benefits and (b) public benefits in terms of improved recreational facilities.

Comment: The omission of community involvement is noticed. This should be led by the local council not a private members club, and FOWP can help with this task.

Page 8: Subject to agreement with the GLA and Councils (and the London Borough of Merton as landowner), it is anticipated that the improvement measures will include: (a list follows but not reproduced here). *Comment: A list of works follows that fails to identify and address the deep seated design problems in the public park. It fails to acknowledge the work carried out by FOWP and duplicates some of these such as planting trees in the Central Railway Hedge and ignoring the planning consent for the Revelstoke Road entrance improvements. AELTC are aware that FOWP has circulated and discussed with owners and the community many projects which include obtaining planning permission for Revelstoke entrance improvements, café & Wimbledon Park Brook, and outlining ideas for Wimbledon Park Arena. Clearly a mismatch here.*

Page 9: The provision of gates and new footpaths around the existing Wimbledon Park boathouse to help manage pedestrian flows around Wimbledon Park Lake when the boathouse is in use. *Comment: Walking routes are poor in the public park and restrictions on the dam promenade will make this deficiency worse. A sensible solution to problems is required.*

Page 10: (On car parking) This reduction will include targeting the closure of Car Park 10, which is situated in Wimbledon Park (however the world renowned "Queue" will remain) and the phased removal of general public car parking within the application site (note: blue badge parking and parking for those with specific mobility/accessibility requirements will remain).

Comment: FOWP requested that car parking in the public park should cease from this year as it displaces visitor activities, such as the Junior Parkrun, in the public park and causes damage. AELTC have 30ha to provide for car parking if it is really needed.



WPP AELTC GLA Landscape Planning Addendum

Page 17: 2.2.3 As described above, off site design proposals within Wimbledon Park include additional planting, funding of which will be secured in the S106 Agreement, as part of the package of wider improvements. It is estimated that this could include a minimum of 45 additional trees.

Comment: as described later this ignores trees already planted by Wimbledon Park Volunteers (WPV) and the proposals that need to be considered before trees are planted. The black poplars are slowly dying so hornbeam replacements have been planted. The existing black poplars will remain until they are a danger to visitors or have died. The trunks will remain on site as now, for benefit of children, adults, and nature.

Page 23: 2.4.4 Substantial improvements to LB Merton-owned Wimbledon Park Road park entrance are planned to enhance pedestrian, cycle and vehicular access into the public park. These enhancements will dramatically improve both the functionality and visual aesthetic of this major park entrance and will be fully accessible to all park users.

Comment: Wimbledon Park Road entrance needs improving but this is not the answer. For example, historic Horse Close Wood is an important place for nature and visitor wellbeing and shouldn't have a car park within it. The entrance is also a key location for vistas.

Page 34: Appendix B - Biodiversity Net Gain (BNG) Update

This breaks down as the following when considering onsite & offsite proposals:

Wimbledon Park Project	Indicative on site Biodiversity Net Gain	Indicative off site Biodiversity Net Gain
Hedgerow Units	+6.28%	+12.81
Habitat Units	+22.95%	-
River Units	+100%	-

Page 34. The figures in the table are disputed. FOWP considers maximising biodiversity gain to be the correct approach. The LBM local plan should endorse maximising biodiversity gain in development projects. This identifies special places for nature and include, the lake and lake shore, Horse Close Wood (historic), Ashen Grove Wood (ancient), Owl Copse, Wimbledon Park Brook, Rushmore Brook, and Bigden Brook.

Plan showing BNG 2024 Assessment with measured habitat are	as Comment
Plan showing BNG 2024 Assessment with measured habitat are generating +10% BNG. May 2022 DAS reference 3.3.6 Ecological Proposals - BNG Plan, p.2	 The dotted brown and green lines in the public park are where AELTC propose to plant trees. These ignore proposals from FOWP concerning the Wimbledon Park Arena, the Café & Water Garden area, and the granted planning permission for Revelstoke Road Entrance improvements. The location of trees in these areas needs careful consideration to avoid clashing with these proposals. The Central Railway hedge was planted in 2022 and the Northern Railway Hedge extension (117m²) recently planted but more to do in November. FOWP main objectives are landscape, biodiversity, and habitat. Consequently, FOWP have led in the public park creating the Glade in Horse Close Wood,
	park creating the Glade in Horse Close Wood, fencing in the veteran tree, planting around 3000 trees and negotiating the daylighting of Wimbledon Park Brook with more to do.
	 7) This work by FOWP provides a significant biodiversity gain towards maximizing biodiversity gain.



In summary:

- 1) Desilting should be a separate application so that harm to nature can be carefully considered.
- 2) The boardwalk harms lakeside vistas and will deter shy species.
- 3) The community benefits are not very special circumstances.
- 4) The Wimbledon Park Road entrance needs improving but the AELTC proposal isn't a solution.
- 5) The Landscape Management Plan should be led by the local Council and involve the 3 owners (TfL own the area under Revelstoke Road bridge) and take a holistic approach prior to major works being agreed. This is not a repair and maintenance project but identifying what matters and why for landscape, biodiversity, habitat, all owners (including TfL), and visitors.
- 6) Views from the Community have been ignored, TWC clearly isolated as an empty space on the plans and discussion on delivering Wimbledon Park from the 'At Risk Register' deferred until after the planning application. This is a Grade II* Heritage Park that needs to be rescued not developed as described in AELTC WPP. The application should be refused.

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So based on these reasons I think there are few ecological grounds for de-silting. Silt of itself is not a pollutant.

¹ Dave Dawson: all lakes silt up slowly, but ours was always shallow and has lost only 1/3rd on its depth in 250 years, so there's no urgent need. More recently AELTC have come up with a version of 1 claiming that extensive shallows show that the lake will shrink soon. This was based on observations when the level was drawn down well below the regulated level to allow engineering works on the dam. Their evidence is spurious. So there's no hurry and even more worrying is that all the myths are still being recited and the preferred method of desilting involves returning pollutants currently locked away at depth into the lake, so making pollution much worse.

Tony Borkowski: As a previous Chairman of the angling club, and a witness to some de-silting exercises that have gone badly wrong, I very much concur with your comments. The only reason why this option has been presented by AELTC to Merton is to increase water depth for the sailing club. De-silting would very likely release the heavy metals shown to be present in the current silt. Charlotte Hall of UCL in her doctorate thesis has covered this topic specifically including Wimbledon Park Lake (see https://discovery.ucl.ac.uk/id/eprint/1409852/). AELTC has been sent a copy of this research but failed to explain how they would mitigate these risks. Finally, the disruption to the marginal plants and especially the invertebrates would take many years to overcome.