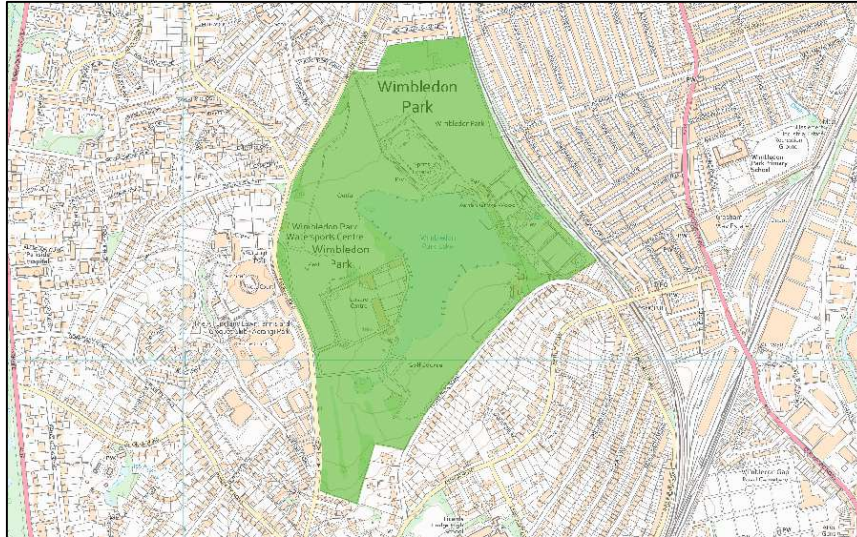
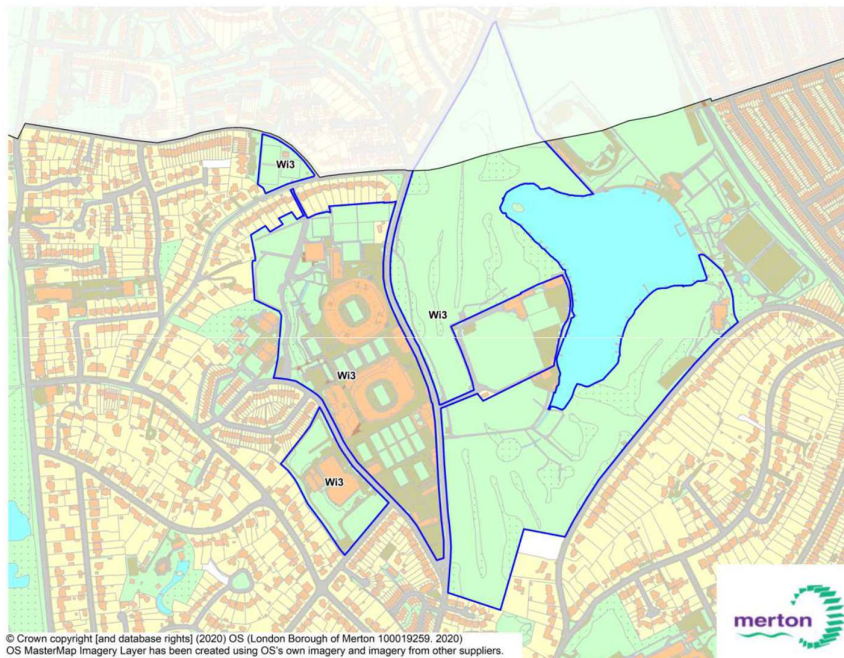


**Submission on Wimbledon Park in the consultation on the LB Merton draft Local Plan.**

**Dr D.G. Dawson, September 2021**



**The Wimbledon Park Heritage Landscape (from the Historic England listing)**



**The proposed new Site Allocation for the AELTC land holdings**

## **Submission**

**The Wimbledon Park heritage landscape spans the London Boroughs of Merton and Wandsworth and is in divided ownership, making it at risk from uncoordinated management.**

**It is threatened by an unnecessary new site allocation Wi3, which would make incoherent a previously coherent policy across two boroughs and three land owners and prejudice planning decisions in favour of development incompatible with Metropolitan Open Land policy. The proposed new site allocation should be revised to apply solely to the land holdings of the All England Lawn Tennis Club west of Church Road.**

**Two cartographic errors in the boundaries of the nature conservation sites should be corrected, so as to add the part of Ashen Grove Wood within the public park and the railsides between the park and the Arthur Road bridge.**

**An old error that omitted the Wimbledon Park Grade II\* landscape from the Wandle Valley Regional Park should be redressed by including it within the Regional Park.**

**The sustainability appraisal for Wimbledon Park is wishful thinking.**

## **Reasons for the objections**

### *Evidence base*

I am a professional environmental scientist. When employed by the *London Ecology Unit*, I initiated, developed and established the London hierarchy of *Sites of importance for nature conservation* and took a leading role in *Biodiversity action planning*. I provided much expert evidence for both forward and development control planning for some 20 London Boroughs. As joint head of the Mayor of London's Environmental Group, I led the work on the Mayor of London's biodiversity strategy. Locally, I was joint author of the handbook *Nature conservation in Merton* and have been studying the history and ecology of Wimbledon Park for some 38 years, including extensive documentation of the birds, flora and the lake. I advise the Friends of Wimbledon Park on environmental and historical matters and wrote the booklet: *Capability Brown's Wimbledon Park, a history* and many topic papers, including one on *Ashen Grove Wood*.

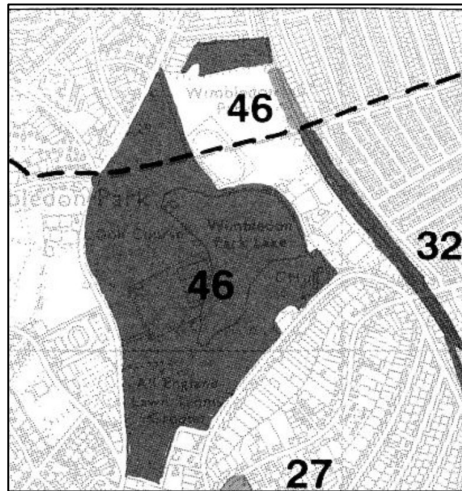
### *Background*

The open Space called Wimbledon Park (mapped above) is the subject of these observations. It is recognised by Historic England as a grade II\* historic park (list #1000852) but is in generally unsatisfactory condition, with localised problems and declining quality. It was added to their at-risk register in June 2016 because of the condition of the lake, designed views being obscured and that the divided ownership results in discordant landscape management. It is owned by the London Borough of Merton, the Wimbledon Club and the All England Lawn Tennis Club and spans two London Boroughs: Merton and Wandsworth. The whole heritage landscape should be planned as one to help overcome its problems.

*Existing policy.*

The existing local plans of Merton and Wandsworth have coherent policies applying to the whole historic landscape to help overcome the problems and to ensure that any development balances economic gain against the various values of open land:

1. The historic park is indicated on both boroughs' *Proposals Maps*. Wandsworth policies PL4, IS3, DMS2 & DM01, and Merton policies CS14 and DMD4 apply.
2. It is shown wholly as *Metropolitan Open Land*, on the two proposals maps. MOL is to be protected in the same way as Green Belt, as is described in the London Plan and the National Planning Policy Framework. Wandsworth policies PL4, IS3, & DM01 and Merton policies CS13 and DM01 apply.
3. It is also shown as *The Wimbledon North Conservation Area*, on the proposals maps. There are character assessments for the parts in each borough which are to be taken into account in determining planning applications. The character in LB Wandsworth includes mature trees, large scale open space, the history of the ornamental park and the nature conservation sites (see below). The character in LB Merton is the same, but also includes the whole of the historic lake and identifies a need to restore the historic shape of the lake and views across it. Merton policies CS14 and DMD2 apply.



4. Two *Sites of Borough Importance for nature conservation* are described in the London Ecology Handbook, *Nature conservation in Merton*. The first ("46" in the plan) includes Horse Close Wood, Wimbledon Park Golf Course, Wimbledon Park Lake and the whole of Ashen Grove Wood (which spans the boundary between the golf course and public park). The second ("32" in the plan) is a grade II site which includes the railsides and hedgerows that parallel the tube line in the east of the public park.

**Sites from *Nature conservation in Merton***

These sites are protected by Wandsworth policy DM04 and Merton policies CS13g and DM02.

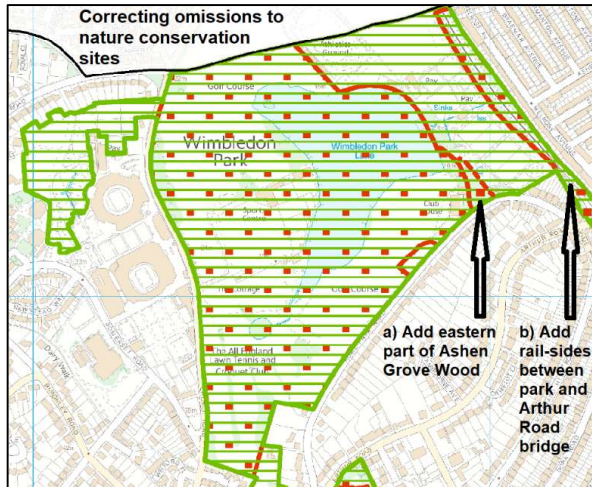
5. *Archaeological Priority Areas* are identified by both Wandsworth and Merton local plans, with corresponding policies TBE14 and TBE15 in Wandsworth and CS14 in Merton.
6. *The Capital Ring* long-distance footpath passes through the public park on the boundary of Ashen Grove Wood, along the lakeside and beside the boundary hedgerow of the golf course in the north.
7. There is no *Development Site* identified by either borough within the heritage landscape.

### *Proposed AELTC development site in the draft revisions*

1. A new site allocation Wi3 is proposed over the land holdings of the All England Lawn Tennis Club (AELTC), including the present-day golf course across Church Road to the east of the existing AELTC development. The claimed justification is the considerable economic impact of visitors to the Grand Slam and tennis museum. The plan that I reproduce in the headline to this submission (above) shows the great extent of this proposal.
2. This new allocation is linked into a proposed Wimbledon Policy (9.1q and 9.1.35) which seeks an upgrade and improvement of the AELTC facilities either side of Church Road.
3. The existing protection of the golf course is continued in the proposed new plan as it continues to show the Merton section of the heritage landscape as Historic Park, Metropolitan Open Land and Archaeological Priority. The nature conservation site is mapped, if erroneously (see below). These designations (and the Wimbledon Club) are mentioned in the new site allocation, Appropriate policies are included in the proposed revisions to the plan (O15.1-4). However, Wi3 gives no detail of the nature of the open space values on the golf course.
4. In the site allocation, reference is made to improving public access to Wimbledon Park Lake, presumably the walkway around the lake that is required once golf ceases under the terms of the sale of the golf course by LB Merton to the AELTC in 1993.
5. This new allocation is appropriate for the intensively built-up parts of the AELTC west of Church Road, which cannot realistically be considered to the open space of any category. This view is supported by the revisions to open space and Metropolitan Open Land designations there as recommended in the *Green Infrastructure, Biodiversity and Open Space Study*. However, the effect of the new allocation to the east of Church Road is to introduce incoherence to a previously coherent policy, in that a substantial part of Heritage Wimbledon Park is now proposed for development to attract visitors.
6. The incoherence is evident where the proposed site allocation is wrapped right around another ownership, the Wimbledon Club, and cut short at the borough boundary to the north and LB Merton land holdings to the east, none of which are subject to a site allocation for development. This piecemeal view compounds the existing problems from multiple ownership of the land and so the risk to the Grade II\* historic park. The introduction of any substantial built development on Metropolitan Open Land would necessitate revision of its boundaries, as has already become necessary on the existing AELTC land on the ex-Aorangi sports ground. Opening a door for such damaging development is entirely inappropriate, so it is clear that the site allocation should be confined to the AELTC land west of Church Road. This would leave the golf course protected by policies that already include appropriate provision for achieving a balance between protection and development.
7. The threat to the golf course land is illustrated by a planning application presently under consideration by LB Merton. This proposes 38 new grass courts, reprofiling of land, many access pathways, loss of trees, new access and car parking and new buildings, including an 8000-seat show court. Achieving the right balance between amenity, historical, biodiversity and heritage and economic development in any such proposal would be best achieved without the prejudice introduced by site allocation Wi3.

## Nature Conservation Sites

The Wimbledon Park nature conservation sites were depicted accurately in the character assessment of the Conservation area, but inaccurately in the proposed revisions to the local plan. These are presumed to be drafting errors, because there



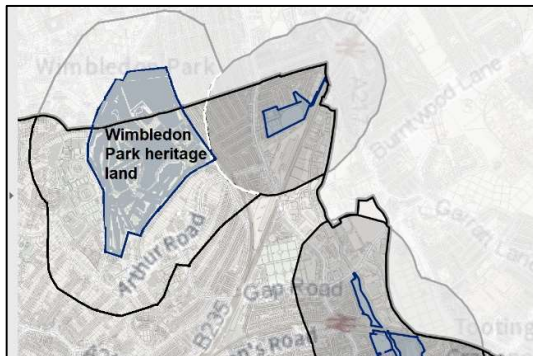
has been no material change to the nature conservation interest since the original designation, but the error was not addressed by the *The Environment Partnership (Proposed changes to Wimbledon Environmental Maps, November 2020)*. Ashen Grove Wood is ancient, and the omitted part has several old trees. Extensive engineering work by London Underground Limited to the tube line adjoining Wimbledon Park did not affect the eastern linesides and the western sides were restored to nature.

## Corrections to nature conservation sites

Two corrections are needed to restore the nature conservation sites to the boundaries as confirmed, after extensive consultation, in the handbook *Nature conservation in Merton*. These are shown on my plan.

## Wandle Valley Regional Park, policy O15.6

The plan of the Regional Park excludes Wimbledon Park. This reflects an error dating back many years, when submissions were made that the heritage site belongs within the Regional Park for two reasons. First, is that Wimbledon Park Brook flows to the Wandle at Earlsfield, demonstrating hydrological continuity between the lake, its catchment and the River Wandle. Second, is that the Capital Ring London orbital footpath crosses the Wandle at Earlsfield and continues west to pass through Wimbledon Park, providing a strategic footpath link. There is no logic to including Mitcham Common and Cricket Green, which are separated from the course of the Wandle by a comparable distance, when Wimbledon Park is excluded, but the submission was ignored. This should be redressed, and the whole Wimbledon Park heritage landscape should be included within the Regional Park.



**Wandle Valley Regional Park revised to include the Wimbledon Park heritage land and a buffer strip around it.**

### *Sustainability appraisal*

Some of the proposed monitoring of Heritage features in the sustainability appraisal is confined to the built heritage, so omitting the heritage of the historic park. This is a very significant omission, biasing the appraisal. The appraisal for heritage features and biodiversity in Wi3 is wishful thinking, unless the land east of Church Road should be excluded from the site allocation.