



Observations on the LB Merton's topic paper on the historic environment of Wi3.

Dr D.G. Dawson, for The Wimbledon Park Residents' Association, October 2022

We submit that the topic paper, being focused on land ownership (proposal Wi3) rather than heritage landscape (the Grade II* heritage park) is an unreliable and inappropriate vehicle for heritage planning of the whole heritage park on which it is really focused. Our objections in this respect are consistent with our general submissions that Wi3 should exclude the golf course altogether. We submit that Wi3 is not the place to deal with the Wimbledon Park Heritage-at-risk issues. To remind, these were notified to the three landowners on 6 June 2016, and still remain, as

- Uncertainty around the future;
- Impacts of divided ownership on landscape management;
- Obscured design views; and
- Deteriorating condition of the lake.

At this very late stage in the current Local Plan process, it seems to us remarkable that we are now seeing some comments from Historic England and Merton which aim to deal with these chronic problems, but there has been no opportunity for further public consultation about them. We do agree that these are very important, and would welcome a suitable and separate exercise, which is not dominated by the exclusive wishes of a minority land-owner, at which they can be resolved.

It may well be that the Inspectors are minded to exclude the golf course from Wi3, in which case the Inspectors may ask Merton to find another home for the Topic Paper and its proposals, which we would support, along with a suitable consultation exercise.

If, contrary to our arguments, the Inspectors prefer to retain the golf course within Wi3, it is hard to make the Topic Paper and Main Modifications fit part only of the "at risk" Park. We have done our best in the short time available to review it to see if it could work on that basis, and while we understand the main thrust of the proposed Main Modifications, this geographic oddness, compounded by some inaccuracy and a limited information base, lead to deficiencies. The detailed observations below provide the basis for our suggested revisions to the proposed Main Modifications better to achieve an adequate planning framework for the whole heritage landscape.

We take the main modifications from Table 1 of the Topic paper and recommend changes. Our changes are in red text below and the original Main Modifications of the Topic Paper are in black text, crossed out where we recommend deletions:

Registration as historic park and garden and Heritage at Risk register: ~~Secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward, to provide a comprehensive plan for the conservation, enhancement and ongoing management of the entire registered~~

~~park and garden that takes full account of the site's historic development and significance, acting as a common agreed baseline for all parties to work from.~~

We will work with the local community, LB Wandsworth, and the owners of the Historic Park, which is a Grade II* listed site, to prepare a Masterplan to guide the future of the Historic Park. This will secure the future of the park, taking full account of alternative ways of achieving its heritage, amenity, biodiversity, play, sports, informal recreation and economic potential. We will ensure consistency with existing covenants and heritage, employ rewilding, retain ancient and heritage features, views and soils, enhance landscapes, remove the listed park from the “at risk” register, conserve and increase priority species, priority habitats and tree cover and enhance free public access.

Wimbledon Park lake is the clearest surviving feature from the Capability Brown landscape and its poor ~~quality~~ **condition** is one of the reasons that Wimbledon Park is on the “heritage at risk” register.

Development proposals will need to:

- a. ~~improve~~ **provide free** public access around, **not within**, the whole lake, alongside **heritage**, ecological, sporting and reservoir management considerations.
- b. address the poor condition of the lake **by controls on fish stocks, and nutrient and sediment input**.
- c. ~~Seek restoration of~~ **restore** the historic shape **and depth** of the lake.

Development proposals **s** must respect the site's historic setting including the views to St Mary's Church, **the Old Rectory** and the surrounding area and the views **to and from** the Grade II* listed Wimbledon Park and those identified in the ~~Wimbledon north conservation area appraisal~~ **1989 Wimbledon Park Restoration Proposals**.

Development proposals must:

- a. identify and protect **the openness of the parkland landscape, including the sweeps of grassland**, historic trees and other trees of significant amenity value and consider a programme for their renewal and replanting as appropriate.
- b. Consider the removal of insensitive tree and other planting ~~on the former golf course~~.
- c. increase the ecological interest of the site, **its National Priority Habitats, their parkland trees, tree clumps and woodlands, wetlands, open water and reed beds**.
- d. **avoid releasing sequestered carbon by removing trees or soil, so avoiding contribution to global heating**.

The following paragraphs provide our reasons for our proposed amendments to the Main Modifications.

Statement of common ground with Historic England.

In paragraph 5.5, of the draft statement LB Merton said that “*The council will work with Historic England on statements of common ground to be submitted at least five days prior to the hearing date for Site Wi3.*” This statement was made available less than 24 hours before the Local Plan Hearing date, so breaking that undertaking. Subject to just one small change, the statement endorsed LB Merton’s topic paper.

LB Merton Topic Paper on the historic environment of Wi3.

LB Merton have agreed with Historic England a “*Topic paper – historic environment Site allocation Wi3 All England Lawn Tennis Club, Wimbledon Park*”. This is welcome, as there is no current policy in the draft plan to guide planning of the whole Grade II* heritage parkland, and community groups have called for this¹.

However, the proposed Wi3 applies to only 44% (27 ha) of the heritage landscape: the Wimbledon Park Golf Course within LB Merton. Outside Wi3 is a further 6%, the golf course in LB Wandsworth (4 ha), another 6%, the grounds of the Wimbledon Club (4 ha), and LB Merton own the remaining 44% (27 ha)², including the 9 ha lake. Whilst most of the heritage landscape lies within LB Merton, some 22% lies in LB Wandsworth. The proposed Wi3, the subject of this topic paper, is not wholly within the heritage landscape: 40% lies west of Church Road and is already extensively developed. Given these disparities, it is inappropriate that the focus for planning the future of the heritage landscape should be based upon land ownership (Wi3) rather than the actual boundary of the listed site. We have already called for a much more sensible approach to the planning of the heritage land³ which would overcome this difficulty.

Heritage at Risk Register.

LB Merton propose a Main Modification undertaking to prepare a *single landscape management and maintenance plan* for the whole heritage landscape⁴ (reproduced above) which goes just a little way towards what we have advocated, in that it is positively worded and provides for the future of the landscape. We are of one mind with LB Merton and Historic England on the need to provide for the future of the heritage landscape but the proposed Main Modification may never be implemented, because it is predicated on development proposals coming forward. The cart is put before the horse. We submit that the Local Plan should commit to preparing a Masterplan, which would be prepared regardless of any specific development proposal and provide a locally-agreed framework to guide what may be appropriate in any development proposals. We also submit that the proposed Main Modification is about landscape management and maintenance, rather than land use. The Local Plan would be silent on what range of land use might be appropriate within the landscape. Our substitute paragraph ensures ownership by all interested parties and a comprehensive range of uses and features for consideration.

As Wi3 applies to only 44% of the heritage landscape, it is misleading to state that “*the allocation relates to the largest of the now three landowners for Wimbledon Park*” and that it covers “*approximately two thirds of the site*”⁵.

The "condition" of the lake.

The "*condition*" of the lake is one of the four factors given for the Grade II* heritage park to be listed as at risk, but the detail of the problem has been elusive⁶. Before September 2022, the only detail was in the LB Merton *Masterplan* for the public park and lake. There, Merton plans to "*remove the silt to improve water quality and the lakes [sic] capacity for water sports use*". Also, Merton cited "*infilling*" and "*flood storage*" in this context⁷. All of these concerns have been subject to expert scrutiny, as is summarised in the following sections of this report. The issue is further confounded by the inappropriate departure from the Heritage England wording by substitution of the word "quality" for "condition" in the proposed Main Modification on the lake. "Quality" might be read, narrowly, as water quality, whereas "condition" is not so ambiguous and is the word employed by Historic England when notifying the owners of the risk.

Reversing the infilling.

Table 1 states "*Parts of the lake have been infilled compared to its original Capability Brown design*", but provides no further detail. A Main Modification "c" is proposed to *Seek restoration of the historic shape of the lake*. In fact, the lake survives remarkably intact, having lost only 3% of its area (0.25 ha, from the southern and eastern arms). Sadly, the eastern arm is now occupied by a new lake outfall and so is irrecoverable. Restoration of the southern arm would be readily achieved and has long been advocated⁸. Such restoration would restore a vital feature of Brown's design and we welcome its inclusion in the topic paper and the proposed Modification "c".

Access for water craft.

Table 1 states that: *Lake has been reduced indepth since construction*. Yes, sedimentation has reduced water depth, but by only a third⁹ over the 255 years since 1766 and water laps the surviving shore today, just as it did back then. The lake was shallow when created by Brown in 1766, was so when the watersports centre was developed in 1972, and remains shallow today. Current use for watersports proves that no part of the lake is so shallow as to prevent access by canoe. Nevertheless, the snail's pace loss of depth would ultimately limit the size, and hence draught, of vessels that can use the lake. A potential watersports problem decades into the future is hardly a significant heritage issue and certainly not a serious impairment of "*condition*" during the life of the Local Plan. In this context, removal of sediment to a sensible plan is desirable, but far from urgent.

Silting-up

We were surprised at the claims by AELTC, in response to consultation feedback in early 2021, that sedimentation threatened the shape of the lake. To check this claim, I investigated near-shore lake depth in June 2021. Depths ranged from 10 cm to 110 cm, but only 10% of my measurements were less than 30 cm, those being in the west and south arms of the lake. The rate of sedimentation is so small, and preventative measures so straightforward¹⁰, that there is clearly no present threat to

the integrity of the lake from the build-up of sediment. Again, this cannot be described as a significant threat to “*condition*” during the life of the Local Plan.

Water quality, flood storage and biodiversity

Table 1 states that: *The lake is fed by gullies from the public highway, which can have an impact on water quality.* The LB Merton Masterplan⁶ asserts that silt affects *storage capacity and recreational use, but also influences water quality by increasing nutrient levels and lowering oxygen levels.* I have examined water quality, oxygen levels, flood storage and biodiversity in detail in submissions on the AELTC planning application for intensive lawn tennis development on the golf course¹¹. There I show that concerns that loss of depth affects flood storage are based upon technical misunderstandings. Water quality depends upon nutrient concentrations in the lake water, which are driven primarily by concentrations arriving in the lake from its whole catchment (not just from public highway gullies, but notably also from the adjacent golf course and the AELTC facilities west of Church Road), and the adverse effects of some species of fish: those that disturb sediment and consume zooplankton. Biodiversity, fish and water clarity depend upon water quality. Removal of sediment would not remedy any of these problems. The topic paper should be revised to identify the link between nutrient inputs to the lake from its catchment and its water quality and biodiversity. No link is appropriate for flood storage.

Public access around the lake.

Table 1 recommends a Main Modification “a” to improve *public access around the whole lake, balanced with ecological, sporting and reservoir management considerations.* Free public access around the lake is most desirable and options for this were considered in detail in a submission on the AELTC application for intensive lawn tennis development¹². As some alternatives (including that proposed in the planning application) would cause significant harm to heritage views, heritage should be added as a factor to be balanced in any Main Modification on this topic and access over the lake should be precluded.

Global heating

Table 1 states that: *Hot summers (changing climate) are causing the lake to dry out, particularly around the tips, and the remaining water quality to worsen.* No Main Modification is suggested to acknowledge this concern, which is well and good.

Water quality has been considered above: currently, and over the life of the Local Plan, it is driven primarily by nutrients, not by summer temperatures.

The conclusion on drying out is based upon a miss-interpretation of the evidence. For the first time in history, small parts of the lake shallows were exposed in the three months January to March 2022. Although this time period overlapped a little with the summer drought, the exposure was wholly caused by the temporary lowering of lake level by LB Merton’s contractors undertaking safety works to the dam holding back the lake. This took the lake level down some 40 cm below the usual regulated level. When the works were completed, despite the drought, the levels returned to cover all the shallows. My six-year record of lake levels shows that

there is no risk of any significant effect of drought periods on the lake levels. The unfounded speculations on drying out should be deleted.

A gross omission from the Topic paper, however, is any consideration of global heating in planning the future of the heritage landscape. The trees, grasslands and soils of the heritage landscape sequester carbon. This consideration should be added to the proposed Main Modifications.

Views.



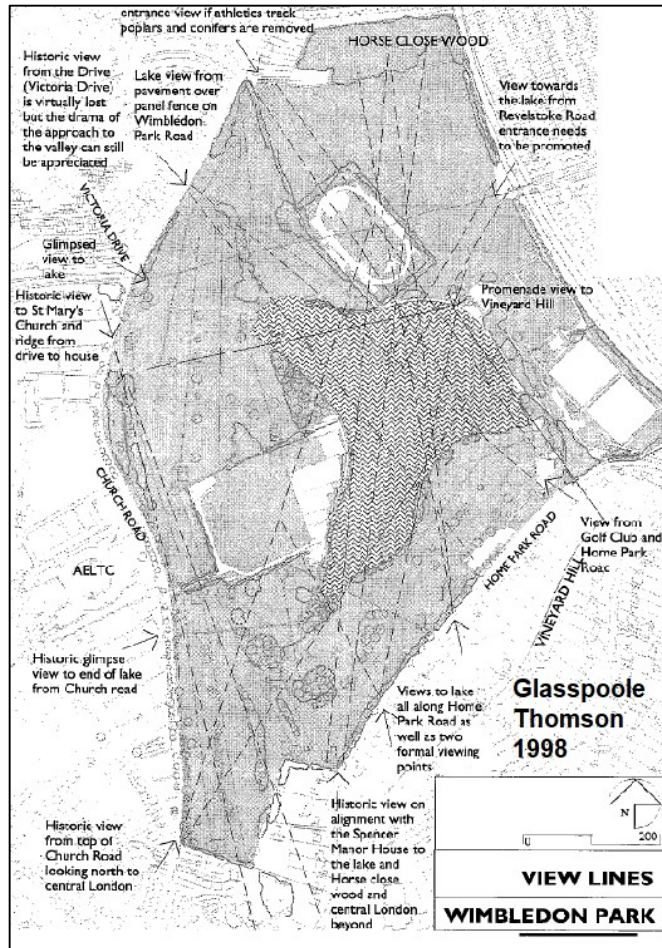
Holman-Hunt, 1849. *The haunted Manor* (painted in Wimbledon Park).

Table 1 cites the *Wimbledon North Conservation Area Character Assessment (part 2)*¹³ as one of the few sources of main background historic evidence for Wi3, and *Image 6* reproduces the *Character analysis* from it. The base map of this analysis is misleading in showing features surviving from the 1766 landscaping by Lancelot Brown, but plotting the Elizabethan Manor House (which was gone by 1720) and not the house at the time of Brown's commission (the 1733-85 Marlborough Manor), nor its replacement (the 1802-1949 Spencer Manor¹⁴), which was there in 1827 when the Earls Spencer became absentee landlords. Also omitted are the Old Rectory and St Mary's Wimbledon, both of which predate Brown's landscaping and are extant. The omission from the assessment of the 22% of the heritage land that lies in LB Wandsworth artificially truncates the consideration of views.

An 1849 painting by William Holman Hunt *The haunted manor* (above) features Dirty Pond and its brook with a view through the Coppice up to the Old Rectory¹⁵ a view line that still exists today, but is omitted from the character assessment.

Only one of the three “historic view lines” of the assessment was in Brown’s design: that from Church Road south towards St Mary’s Wimbledon. The Statement of

Common Ground between LB Merton and Historic England adds a second Brownian view: from the Park Road of Brown’s design (now Church Road) towards the lake, but this is not mapped and Church Road is the western boundary of the heritage land for some 900 metres, so making this view line undefined. Another view of the character assessment is from the Tudor Manor (long gone in 1766) across the 1766 lake. The view along the Tudor Great Avenue was not towards the later lake, but towards Harrow-on-the-Hill. The last view of the assessment, is from the southern end of the present-day Church Road across the lake. There was never a view from the Marlborough, nor the Spencer, Manor down to the lake¹⁶. The southern end of Park Road (the present-day Church Road) was in woodland (The Coppice, since lost) and so did not afford a view across the lake.



View lines from Merton’s Restoration Proposals.

Many more actual views, both those designed by Brown, some of which are extant, and those coming about later, were described in the 1998 *Wimbledon Park Restoration Proposals*¹⁷ (reproduced above), and this was updated and corrected in 2016¹⁸. It is quite wrong to promote the few, truncated and partly erroneous views of the character assessment as a guide, so reference to the character assessment in the proposed modification should be deleted and replaced by reference to the 1998 analysis as updated and corrected.

Table 1 states that: “Views [are] constrained by topography and the dam face, lack of public access all around the site, trees and vegetation, C19th and C20th buildings built on the lake shoreline and around the site. Whilst all of this is correct and some of the features are adverse, it fails to acknowledge that a signature of Lancelot Brown’s designs is constraints, so that vistas come in and out of view as one moves along carriage drives. Brown was practiced at excavation and infill to modify topography, he designed the dam that holds back the lake and he retained the pre-existing Ashen Grove and Horse Close Woods. This means that constraints from the topography, the dam and woodland were deliberate and should be celebrated and

retained, not regarded as adverse. One can still follow the line of an historic carriage drive, passing north out of Ashen Grove Wood and rising to the lakeside promenade today, and be surprised by a view opening out across the lake to the spire of St Mary's Wimbledon and another across the Great Field of the public park to Horse Close Wood.

Clearly, the guidance on views in the Topic paper is unreliable. It must be replaced by an authoritative source.

Trees and landscape.

The section of Table 1 on this topic is adequate for trees, but misses the point on landscape. This key point is that the "English landscape" of Lancelot Brown comprised parkland features, where the individual trees, clumps and woodlands were set in a pastoral grassland. The landscape thus comprised not just the trees but also the design of the grassland matrix. Such parklands are a National Priority Habitat "*Wood pasture*". Details of the background to this are available in my submissions on the AELTC planning application and so I will not repeat them here.

¹ Wimbledon Park Residents' Association. *LB Merton Local Plan Inquiry. Statement on Matter 5, Proposal Wi3, questions 2, 4 & 5, also Matter 8, question 1. Chalk and cheese.*

² Including the 9 ha lake

³ In our proposed agreed Main Modification, rejected by LB Merton, paragraph 14 sought a new Local Plan paragraph 9.1.36: "The Historic Park, Wimbledon Park, lacks a coordinated masterplan. With the anticipated cessation of golf use on Wimbledon Park Golf Course, an opportunity arises to remedy this. We will work with the local community, LB Wandsworth, and the three owners of the Historic Park, which is a Capability Brown designed, Grade II* listed site. Here, we will seek an agreed masterplan securing the future of the historic park, which takes full account of alternative ways of achieving its heritage, amenity, biodiversity, play, sports, informal recreation and economic potential and the London Plan Good Growth Objectives. We will seek a strategy consistent with existing covenants and heritage, which employs rewilding, retains ancient and heritage features, views and soils, enhances landscapes, removes the listed park from the "at risk" register, conserves and increases priority species, priority habitats and tree cover and enhances free public access."

⁴ Under Historic England Registration in Table 1.

⁵ In Table 1, under opportunities for views and Historic England Registration.

⁶ In an informal meeting between the Friends of Wimbledon Park and English Heritage on May 1st 2018, English Heritage would not enlarge upon the headline "*condition*", nor cite any others who might be able to enlighten us.

⁷ *Wimbledon Park and Lake Masterplan* 2018, paragraph 5.8.10: *This high volume of silt not only reduces water depth, affecting flood storage capacity and recreational use, but also influences water quality by increasing nutrient levels and lowering oxygen levels.*

⁸ For example, in Yarham *et al.* *Nature conservation in Merton*. 1998.

⁹ Dawson, submission on the AELTC planning application: *The water quality and biodiversity of Wimbledon Park Lake*. December 2021. This is substantially less than the 50% cited in LB Merton's *Masterplan* paragraph 2.4.9, which is based upon an inadequate survey.

¹⁰ We have been urging the installation of hydrodynamic vortex separators to intercept sediment on the tributaries of the lake for some five years.

¹¹ Dawson: *The water quality and biodiversity of Wimbledon Park Lake*. December 2021

¹² Dawson: *Proposed development of Wimbledon Park Lake and surrounds. Planning submission on AELTC proposals*. June 2022.

¹³ Incorrectly cited as an "appraisal".

¹⁴ Which is ambiguously referred to as Wimbledon Park House in parts of the topic paper.

¹⁵ The painting was in the collection of the Tait: Tait Catalogue of the 1984 exhibition *The Pre-Raphaelites*, painting number 19.

¹⁶ Dawson: *The view that never was*. Wimbledon Society Newsletter, September 2018.

¹⁷ Glasspoole Thompson, for LB Merton, plan of *View lines Wimbledon Park*.

¹⁸ Dawson: *Capability Brown's Wimbledon Park, a history* and *The future of Wimbledon Park*. Wimbledon Society Newsletter. Much further detail of the history of the landscape can be found in Comrie-Smith: *the landscapes of the Manor houses of Wimbledon*. Thesis, Architectural Association School of Architecture. 1992.