

**From:**  
**To:** [Future Merton](#)  
**Cc:**  
**Subject:** LBM31- FEBRUARY 2024 MERTON LOCAL PLAN 2021/22 - 2037/38  
**Date:** 10 March 2024 17:28:03  
**Attachments:** [CHAPTER 08 03a.pdf](#)  
[Wandle Valley Regional Park 01.docx](#)

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Dear Future Merton

Please find our highlighted response in the attached documents.

Regards

Chair Friends of Wimbledon Park



# Friends of Wimbledon Park

LBM31– FEBRUARY 2024 MERTON LOCAL PLAN 2021/22 – 2037/38

Consultation on post hearings Main Modifications

*Please provide comments on the Main Modifications by Friday 22nd March 2024 by emailing [future.merton@merton.gov.uk](mailto:future.merton@merton.gov.uk) or by writing to FutureMerton, Merton Civic Centre, London Road, Morden SM4 5DX*

*The council is proposing a new policy to cover the whole of Wimbledon Park following discussions that took place during the Hearings and with regard to the 2012 Town and Country Planning (Local Plan) (England) Regulations and NPPF paragraph 190. It should be noted that the policy only covers the part of the Wimbledon Park Registered Park and Garden that lies with the London Borough of Merton as Local Planning Authority.*

## CHAPTER 08. WIMBLEDON PARK

### WIMBLEDON PARK – POLICY N8.1 **Suggested amendments highlighted.**

To address the reasons why the Grade II\* Wimbledon Park is on Historic England's Heritage at Risk Register and to recognise and support its sporting, recreation, ecological and amenity functions.

We will do this by supporting development proposals that:

- a. Support the park's sport, recreation, play and amenity uses and enhancing access to them, ensuring their successful integration with historic and biodiversity designations.
- b. Prepare a landscape management plan, in collaboration with all landowners, to co-ordinate the long-term management and maintenance of Wimbledon Park.
- c. Secure investment in the former golf course to conserve and enhance the historic landscape, biodiversity, sport and recreation functions and secure public access.
- d. Improve public access around the whole lake, alongside protecting the lake's functions in relation to biodiversity, sport, public safety and flood risk, while ensuring compliance for reservoir safety.
- e. Address the lake's poor condition and seeking restoration of its historic shape and form.
- f. Identify and protecting historic trees and other trees of significant amenity value and considering a programme for their renewal.
- g. Consider the removal of insensitive tree and other non-native planting, particularly on the former golf course and around the athletics track.
- h. Protect and enhancing biodiversity, increasing the ecological interest of the park and its waterbodies.
- i. Respect the site's historic setting, enhancing historic and new views to and across the lake, and to St Mary's Church, and supporting greater public access to these views.
- J. Improve and maintaining ancillary facilities in Wimbledon Park, such as paths, bridges, fencing drainage and public toilets, to facilitate and improve access for all sections of the community.



# Friends of Wimbledon Park

## SUPPORTING TEXT

8.1.1. Wimbledon Park is a Grade II\* Historic Park and Garden, lying to the north of the borough and crossing the borough boundary between Merton and Wandsworth. The majority (c48ha) of the park lies within the London Borough of Merton; a smaller proportion (c12ha) lies within the London Borough of Wandsworth.

8.1.2. Wimbledon Park is the remnants of a larger Lancelot “Capability” Brown landscape, designed in the late 1700s originally for a nearby Manor House (since demolished). The Wimbledon Park Conservation Area Character Appraisal for Wimbledon Park contains details of the successive Manor Houses and the evolution of Wimbledon Park to what it is today.

8.1.3. Wimbledon Park is in three ownerships: Merton Council, the All England Lawn Tennis Club and the Wimbledon Club. About a third of Wimbledon Park, owned by Merton Council is currently publicly accessible, although the former golf course was a municipal facility on which the public were able to pay and play with discounts for local residents. The All England Lawn Tennis Club’s main grounds lies to the west of Wimbledon Park across Church Road and a commercial arrangement with the other owners to provide land for car parking, overnight camping, the Queue and concessions in the whole park has been used for many years to support the successful functioning of the Wimbledon Tennis Championships each summer. Planning application 21/P2900 has been submitted to Merton and Wandsworth Councils relating to the former golf course within Wimbledon Park.

8.1.4. The whole of Wimbledon Park is designated as Metropolitan Open Land, designated Open Space and Green Corridor. Wimbledon Park lies within Wimbledon North Conservation Area and a Tier 2 Archaeological Priority Area. Except for the public park, the site lies within a Site of Importance for Nature Conservation (SINC) Borough Grade 1. These designations are addressed by other policies in the Development Plan

8.1.5. Wimbledon Park lake is the clearest surviving feature of Capability Brown’s original design. Other surviving landscape features over 200 years old include veteran trees and the presence of woodland at Horse Close Wood and Ashen Grove (ancient woodland). The lake is also a registered ‘large raised’ Reservoir under the Reservoir Act 1975, an active watersports destination and a Site of Importance for Nature Conservation, containing protected species and their habitats. The Lake connects via the Wimbledon Park Brook and surface water sewer network into the River Wandle downstream in Earlsfield.

8.1.6 In addition to the historic and natural environment designations, Wimbledon Park is an intensively used sporting venue across all three land ownerships, hosting watersports, tennis, beach volleyball, cricket, hockey and golf until 2023. The public part of the park is also important for recreation, play and amenity. Wimbledon Park meets multiple priorities for green and blue infrastructure and associated amenity, education, health and wellbeing benefits as set out in Merton’s Green Infrastructure Study 2020.

### **Sports, recreation and play**

8.1.7. NPPF 2023 paragraph 98 states “Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change.” The London Plan supports retaining and enhancing formal and informal sporting and recreational facilities to encourage physical activity and deliver a range of social, health and



# Friends of Wimbledon Park

wellbeing benefits. The London Plan also recognises that the co-location of sporting facilities can increase participation.

8.1.8. Wimbledon Park supports a wide range of sports and recreational uses including angling, watersports, athletics, bowls, hockey, cricket, mini-golf, tennis, **squash, netball**, and beach volleyball. It also provides open space for informal sports and recreation, particularly on the Great Field in the public park, walking around the park and parts of the lakeshore, the recently deculverted brook and in the children's playgrounds and splash play. In line with policy IN14.3 we will safeguard existing sport and recreation facilities, encourage further opportunities for sport, recreation and play, encourage co-location of services and improve community access.

8.1.9. The public park is intensively used and this policy seeks to maintain this and improve public access to private land ownership where possible. This policy supports the provision of well maintained and adequately sized paths, bridges, toilets, drainage and other ancillary services to support access to and enjoyment of more of the park for people of all ages and abilities.

## **Enhancing biodiversity and access to nature**

8.1.10. Wimbledon Park, including the lake, has multiple land use designations to support biodiversity and nature conservation. Protected species including different species of bat and birds, stag beetle, common frog and toad, European eel, veteran trees and other flora. There is also potential to improve biodiversity resilience by better habitat management, for example addressing the poor condition of the lake, removing recent planting located too close to veteran trees, replacing non-native with native species, and reducing pollutants in grassland management. In line with policy O15.3 biodiversity and access to nature we will protect and enhance biodiversity and improve accessibility to nature; these matters will be included in the landscape management plan.

## **The historic environment**

8.1.11. Paragraph 190 of the NPPF 2023 state "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) The desirability of new development making a positive contribution to local character and distinctiveness; and
- d) Opportunities to draw on the contribution made by the historic environment to the character of a place.

8.1.12. In 2016 the Wimbledon Park Registered Park and Garden was added to Historic England's Heritage At Risk Register due to the following issues:

- Uncertainty around the future [of the entire historic landscape].
- The impacts of divided ownership on landscape management.



# Friends of Wimbledon Park

- Obscured views.
- The deterioration of the Lake.

## Addressing the future of the historic landscape and landscape management

8.1.13. Wimbledon Park is currently owned by three freeholders. The 9 hectare lake and c18 hectares of Wimbledon Park is owned by Merton Council and used as a public park, including part that lies within the London Borough of Wandsworth.

8.1.14. The remainder is privately owned and is not openly accessible to the public, although the former golf course granted rights for the public to pay and play. 30 hectares is the freehold of the All England Lawn Tennis Club. In 2016 when Wimbledon Park was added to Historic England's "Heritage at Risk" register, Wimbledon Park Golf Club was the leaseholder of this land which was used as a golf course for many decades until January 2023. The remaining c4 hectares is owned by the Wimbledon Club.

8.1.15. Wimbledon North Conservation Area Character Appraisal 2006 (sub-area 2) describes the remnants of the Capability Brown landscape at Wimbledon Park, and positive and detrimental features. For many decades landscape management has been divided across four organisations (the council, the Wimbledon Club, AELTC and their leaseholder, the Wimbledon Park Golf Club). The sites were being managed intensively and largely independently in accordance with their main purpose: either as a public park including sporting and recreational uses, a private sporting venue or a golf course.

8.1.16. Wimbledon north conservation area character appraisal 2006 identifies positive and negative landscape features within and just beyond Wimbledon Park. Addressing the negative features in Wimbledon Park's landscape, enhancing the positive features and, where possible, better co-ordinating landscape management across the whole site will help to address the reasons that Wimbledon Park is on the Heritage at Risk Register.

8.1.17. To this end we will secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward. This will 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.

## Addressing obscured views

8.1.18. In the eighteenth century the original Capability Brown landscape was curated across a larger area in the "English Landscape" style, using the existing topography and man-made features including the creation of the lake with spurs to resemble river entrances, open parkland interspersed by carefully placed trees and woodland all giving rise to curated views, including of St Mary's Church spire. Veteran trees, particularly oak and some dating or pre-dating the 1800s, remain across the former golf course and within the council-owned public park. The woodland belts at Horse Close Wood and Ashen Grove were also part of the Brownian layout.

8.1.19. Younger, faster growing trees have been planted to frame fairways as part of the former golf course operations; sometimes obscuring the views and parkland setting and sometimes in too close proximity to veteran trees. Faster growing conifers and poplars planted to screen the athletics track also dominate the landscape negatively.



# Friends of Wimbledon Park

8.1.20. Due in part to the reservoir dam face, trees, and C20th buildings and structures built within the park, the parkland and lake are difficult to see from key publicly accessible points, including Home Park Road, the closest entrance to Wimbledon Park Station. The topography (rising at either end and including the lake's dam face) both helps and hinders views across the area. Buildings on or adjacent the lakeshore in the public park and the Wimbledon Club site obscure views across the lake.

8.1.21. The following measures should be considered for addressing obscured views, including those derived from Wimbledon North Conservation Area Character Appraisal 2006:

8.1.22. To improve the historic view lines across the lake:

a) Removing insensitive tree planting, particularly around the athletics track and on the former golf course.

b) Improving the appearance of buildings or removing them and to co-locating their services within other facilities while maintaining easy access to the lakeshore for watersports equipment and people.

8.1.23. To improve views across the whole park and lake, improving historic views and creating new views:

a) Removing insensitive fairway tree and other planting on the former golf course and anywhere else it is found,

b) Improving public access to currently private land and particularly around the whole lake.

c) Ensuring that viewing points are accessible to people of all abilities by creating or maintaining paths, fences and planting so as not to create a barrier to access or views.

d) Ensuring that buildings or development are co-located wherever possible and designed to minimise their impact on the landscape.

## **Addressing the deterioration of the lake**

8.1.24. Wimbledon Park lake is the largest and most visible remaining feature of Capability Brown's man-made landscape. The spurs that feed into the lake have been partially filled in, reducing the lake's size, form and shape. The Lake is fed by overland flow paths and the surface water sewer network, principally by two large surface water sewers and outfalls both of which are currently adopted by Thames Water. The total catchment area which feeds the lake is approximately 230ha of which 40ha is direct catchment and 190ha is indirect catchment from urbanised areas, including highway runoff.

8.1.25. It is registered as a Grade A large, raised reservoir, regulated under the Reservoir Act 1975. The reservoir is retained by an earthfill embankment, some 320m long. The height of the embankment varies from approximately 1m to a maximum of about 4m. The Lake flows into the River Wandle downstream in Earlsfield via the Wimbledon Park Brook and the surface water sewer network. **For this and the fact that Wimbledon Park is in the Wandle Valley it should be included in the Wandle Valley Regional Park.**

8.1.26. The Lake is not used for drinking water supply purposes. The current poor quality of the Lake and its setting is one of the reasons that Wimbledon Park is on the "heritage at risk" register.



# Friends of Wimbledon Park

8.1.27. As well as being a large, raised reservoir, the lake is intensively used for a variety of activities including angling, watersports and by wildfowl (including visitors feeding the birds) and has high localised amenity value. Over the years, the lake has suffered from pollution incidents, as a result of flytipping waste into drains or via drainage misconnections from private properties which inadvertently connects household foul drains to the surface water sewer network which ultimately feeds into the lake. Several of these pollution incidents have resulted in fish kills, particularly in summer when oxygen levels in the lake are low and water depths are shallow.

8.1.28. The lake is generally shallow in depth, sited in an urban area and in terms of water quality it is nutrient rich. During summer, when the water heats up and oxygen levels are low and nutrient levels are high, it suffers from algal blooms, some of which can be hazardous to wildlife, pets and the public. Since its formation, the Lake has over time silted up quite considerably. This siltation is in part due to detritus ingress through the outfalls into the Lake, vegetation (leaf fall) and wildfowl habitat, combined with a relatively stagnant water passage through the lake being artificially dammed over hundreds of years.

8.1.29. A Section 10 Reservoir Act inspection report was carried out in 2014 which included statutory requirements that needed to be actioned to ensure compliance with the Act for Reservoir Safety. The council carried out a bathymetric survey of the silt levels in 2015. The council completed the Wimbledon Park Lake Reservoir Safety scheme in 2022, which has addressed reservoir safety requirements and made some improvements to the landscape and lake edge. As part of the wider opportunities of this project, the Council were able to deculvert an open section of the Wimbledon Park Brook in the public park to help create additional flood storage but without fully and properly addressing the improvement of the landscape and biodiversity. The lake may need de-silting to ensure its amenity and historic value, to ensure water quality is not compromised, as the climate changes and hotter summers become more frequent. This however needs further assessment. De-silting will be likely to help to reduce the number and length of algal blooms, improve its ecological capacity, increase oxygenation and continue to use the Lake safely and fully for watersports, angling, heritage, biodiversity and amenity. However desilting operations may threaten the valuable ecology of the current lake margins, would be extremely expensive to implement requiring long distance off site disposal, and there may be alternative means of promoting improved water quality for example by pumped recirculation and mechanical aeration and by restricting further siltation with silt traps at inlets. Capability Brown's lakes were quite often very shallow.

8.1.30. Given the size of this historic asset and its London location, the lake shoreline currently has very limited public access. We will work with all landowners to improve public access around the whole lake, taking into account biodiversity habitats, sporting, safety and reservoir management considerations.



# Friends of Wimbledon Park

## Policy O15.6

### Wandle Valley Regional Park

We are committed to protecting the Wandle Valley Regional Park and maintaining it as a strategic, biodiverse and accessible corridor through the borough. We will:

- a. Support the Wandle Valley Regional Park as one of London's major green networks, protecting biodiversity and supporting opportunities for formal and informal recreation through enhanced accessibility.
- b. Protect and enhance the River Wandle, including its green and blue infrastructure, biodiversity and wildlife corridors.
- c. Support opportunities for green infrastructure improvements to the Wandle Valley Regional Park and along the River Wandle.
- d. Support the **protection and completion of the Wandle Trail, as shown on the 'Wandle Trail /National Cycle Network Route 20 (NCN20)' Policies Map and the 'Indicative Cycle Network' Policies Map.**
- e. Require development within 400m of the Wandle Valley Regional Park boundary to consider its relationship to the park in terms of visual, physical and landscape links, and ensure that new development positively enhances accessibility to the park through improvements to walking and cycling.
- f. Expect all new development within 400m of the Wandle Valley Regional Park to provide green infrastructure elements on site through **Urban Greening**.
- g. Work with the Environment Agency, Thames Water, the Greater London Authority, landowners and developers to implement flood risk reduction measures which include **Green Infrastructure**, that manage river and surface water flooding while delivering wider benefits for water and air quality, people and wildlife.
- h. Encourage the celebration of the Wandle Valley Regional Park through community celebrations, arts, cultural events and sporting activities that will support and promote tourism and recreation in Merton.
- i. Work with neighbouring boroughs and relevant bodies to support and encourage increased accessibility through the Wandle Valley Regional Park.

**15.6.1.** The Wandle Valley Regional Park is made up of a number of sites that run along or nearby to the River Wandle. These spaces, particularly the Wandle Trail, are especially important for the quality of life of residents in Merton, positively contributing to their health and wellbeing.

**15.6.2.** For the purposes of this document, the Wandle Valley Regional Park is taken to mean the areas of land in the borough which correspond to the area defined in the All London Green Grid Wandle Area Framework, as shown on the Policies Map.

**15.6.3.** The Wandle Valley Regional Park Trust was established in 2012 to provide leadership and coordination of a sub-regional partnership to improve the effectiveness, coherence, resilience and quality of the Wandle Valley Regional Park. The 2016-2021 Strategy identifies the Wandle Valley Regional Park as a strategically important asset for London. The Trust supports the promotion of the park not just as a collection of green spaces, but as an interconnected system that can benefit communities living and working in the wider Wandle Valley area.

**15.6.15.** There are also future opportunities for the Wandle Valley Regional Park

- a) to incorporate a large area of open space stretching from Mitcham Common and Three Kings Piece to Beddington, in the neighbouring borough of Sutton. We will continue to work with the relevant bodies to support the expansion of this green space and enable access to and from the borough.
- b) To include Wimbledon Park which is in the Wandle Valley and linked to the River Wandle by Wimbledon Park Brook.