



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

Dr D.G. Dawson, Wimbledon Park Residents' Association. September 2022

I am a professional applied environmental scientist, specialising in environmental methodologies. I worked on environment, biodiversity, ecology and nature conservation for London government from 1983 until 2006, when I retired from being joint Head of the Mayor of London's Environment Group. In the 1980s, I initiated and implemented the, then novel, Sites of Importance for nature conservation and Areas of Deficiency in Access to Nature, and in the 2000s I led work on the Mayor's Biodiversity Strategy for London. I worked extensively with London local government for biodiversity conservation in statutory planning. I have lived in Wimbledon Park for 29 years, making many ecological studies locally and I am skilled in ecological survey methodology. Since 2006, I have volunteered to assist local amenity societies.

I made a submission on proposal Wi3 for the consultation on the LB Merton Local Plan in September 2021, and submitted a statement endorsed by five local organisations suggesting agreed Main Modifications to this Proposal, for the Stage 1 hearings of this Inquiry. LB Merton has not agreed the suggested modifications.

Proposal Wi3 is for the land holdings of the All England Lawn Tennis Club (AELTC) on both the existing operational tennis grounds west of Church Road and the LB Merton part of Wimbledon Park Golf Course to the east of Church Road. In the Stage 1 hearings, we summarised our view of the incoherence of Wi3 as proposed. We submitted that the two parts of the AELTC holdings, the golf course to the east and the tennis grounds to the west, are "chalk and cheese". The purpose of this statement is to flesh out the differences either side of Church Road, so as to clarify the "chalk and cheese" and to urge modifications to ensure that appropriate policy is applied to each, rather than a single policy common to both.

In short, it's not good policy that is applied to both chalk and cheese.

The differences:

1. The golf course is 100% Metropolitan Open Land (MOL), whereas the tennis grounds are predominantly built development which is progressively encroaching on a small area of MOL, in what was originally Aorangi Park. Attrition has left around 20% of the tennis grounds as MOL, but this is proposed to be revised down to around 10%.
2. The golf course is wholly included in the Wimbledon North Conservation Area on account of mature trees, large scale open space, the history of the ornamental park, historic views and the nature conservation site. The tennis grounds had no features deserving of Conservation Area status until AELTC purchased the Southlands site, adjacent to the Victorian Queensmere House, which is included within the Bathgate Road Conservation Area. Grass courts were developed there

20 years ago, but the Conservation Area largely features early 20th century housing.

3. The golf course is 100% a Site of Borough Importance for nature conservation, Grade I. It has many old trees, including 41 Veteran trees in a pastoral setting. The oldest of these is an Ancient English oak of around 500 years old. It has two National Priority Habitats: Lowland Mixed Deciduous and Wet Woodland, supporting important species including 8 species of bat. The best that the tennis grounds has is a single 150-year-old oak.
4. As the sole surviving large remnant of the 18th century Wimbledon Park, the golf course is around half of a Grade II* historic park. Other areas included in this listing are the adjacent Wimbledon Club and public park (including the lake). Although other small remnants of the historic park exist, none qualifies for any grade of listing. This includes the open spaces of the tennis grounds.

The parts of Wi3 applying to the tennis grounds are appropriate for an intensive and strategically-important lawn tennis operation. There, they would be restricted to a very specific use across a homogeneous site. However, applying Wi3 to the golf course would wash that very specific policy over a totally different homogeneous area, a Grade II* historic park protected for strategically-important open space (MOL), biodiversity and heritage values. This precludes other futures for the golf course which could be more compatible with the character of the golf course. We submit that such a narrowing of policy is not effective planning.

The Grade II* historic park was listed as “at risk” in June 2016, in part because divided ownership results in discordant landscape management. Applying Wi3 to the golf course would compound the difficulties arising from three different visions for the future. As applied to the golf course, the local plan would not be Positively Prepared with a positive and effective vision for the Grade II* listed historic park.

Our suggested Main Modification to Wi3, submitted in Stage 1, outlined factors that should be considered, and approaches that could be explored, when planning the future of the golf course. Given that the golf course is nothing like the tennis grounds, this future would be more appropriately considered as part of planning for the future of the Grade II* historic landscape. The draft local plan is deficient in having no policy specific to this landscape. Such a policy would ensure that the golf course should be planned alongside other heritage land. We urged modifications to the local plan to ensure that the golf course is appropriately so planned.

Applying Wi3 to the golf course introduces uncertainty in determining planning proposals there. This is because proposals for a specific tennis development introduce a conflict with policies protecting open space, biodiversity and heritage. There is no such problem in applying Wi3 to the tennis grounds. We submit that the plan would be unambiguous, so giving certainty, should our suggestions be adopted.