



22 October 2023

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AELTC application to develop Wimbledon Park Golf Course

Merton 21/P2900, Wandsworth 2021/3609

Far too many trees have been ignored, leading to further significant harm to biodiversity.

These observations were prepared by Dr D.G. Dawson for the Residents' Association. He is a professional applied environmental scientist, specialising in environmental methodologies. He worked on environment, biodiversity, ecology, and nature conservation for London government from 1983 until 2006 and he was joint Head of the Mayor of London's Environment Group. He developed Sites of Importance for Nature Conservation and Areas of Deficiency in Access to Nature and led work on the Mayor's Biodiversity Strategy for London.

Dr Dawson has lived in the area and taken a keen interest in Wimbledon Park flora and fauna for more than 35 years. We are most grateful to him for his knowledge and expertise.

Please treat this paper as a further planning objection.

For the Wimbledon Park Residents' Association, 56 Home Park Road, SW19 7HN.

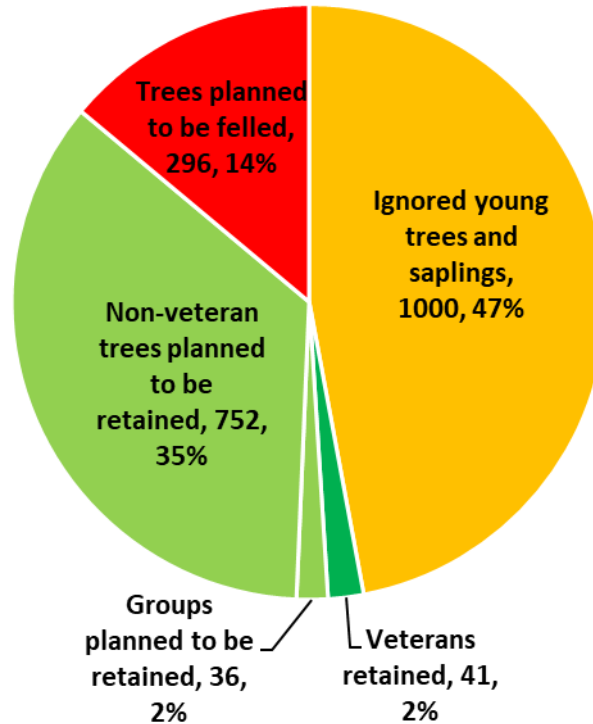
Iain C. Simpson Chairman, Dr D. Dawson, and C.B. Coombe, Planning and Environment Committee.

1. Summary

A detailed examination of the trees and shrubs of the 80-year-old Northern Hedgerow confirmed earlier conclusions that the AELTC planning application for intensive development of the Wimbledon Park Heritage Landscape would result in a biodiversity net loss. This examination is the subject of our paper dated 21 October 2023. Having established his methodology in this way, Dr Dawson applied it to the whole application and its site. The inescapable conclusion is that there will be a very significant net loss to the environment. This further paper explains why and how that loss should be calculated.



Planned fate of the 2000 trees in the Wimbledon Park Planning Application



2. How many trees are there?

There are around 2000 trees on the Heritage Land that are affected by the planning application and around 800 of these will be lost^a. However, AELTC, listed only 1125 in their tree survey^b, 296 of which (26%) they plan to fell.

3. Why is the AELTC tree list misleading?

There are two deficiencies in the AELTC tree survey.

3.1 83% of the trees in one part of the site (the Northern Hedgerow) were ignored by AELTC but should have been listed according to the British Standard^c. AELTC should have listed all trees and shrubs 10-years-old or older, but missed many that were under about 45 years of age. Extrapolating from the Northern Hedgerow to the whole application area would give some 5500 trees ignored by AELTC.

3.2 Many seedlings and saplings on the application site are under 10-years-old and so do not qualify as “trees” under the British Standard. However, these are an important part of the value of the site. An estimate of the number of these can be made from the typical survivorship curve of trees^d.



4. How many trees were ignored by AELTC?

Whilst it is clear that the AELTC missed many trees, neither the Northern Hedgerow, nor the typical survivorship curve, can give a precise figure. As the Northern Hedgerow may not be representative of the rest of the application area, we preferred an estimate based on the typical survivorship curve, which suggests that the ignored trees (which are under about 45-years-old) are about as numerous as the listed trees, so about 1000 trees were ignored^e.

Ignored trees are at risk, because their presence is nowhere acknowledged in the planning proposals and the proposals involve construction and earth movement affecting most of the site.

The ignored trees are mainly found in and around the existing clumps of trees, woodlands and in the roughs of the old golf course, but we do not have enough information on their distribution to estimate how many would be sacrificed to the development proposals. At worst, all these trees would be sacrificed, giving a total of 1296 trees (61%) lost. At best, all these trees would be retained, giving a total of 296 trees (14%) lost. The actual figure will lie somewhere in this range, perhaps 800 trees (35-40%) lost.

The serious failure of AELTC to adhere to British Standard BS 5837:2012 is not the whole story. The British Standard does not require documenting trees under 7.5cm diameter (10 years of age). There is a very large number of these saplings and seedlings, the presence of which is also ignored, and which are also at risk from the proposals.

AELTC claims that their proposals will result in a net gain to biodiversity. Counting the loss of these ignored trees, however, means that there would be much larger losses than those acknowledged by AELTC. These will have to be redressed before any theoretical future gain is possible. Also, the loss is not just of trees and shrubs, because these provide habitat (food and shelter) for many other species. Clearly, the proposals will result in a substantial net biodiversity loss.

^a The trees are on the part of the Heritage Land that was the Wimbledon Park Golf Course.

^b This survey is in their July 2021 *Outline Arboricultural Method Statement* submitted as part of the planning application for intensive lawn tennis development.

^c The AELTC schedule claimed to use British Standard BS 5837:2012, which recommends documenting all trees greater than 7.5cm diameter (approximately 10 years of age). The deficiency in the schedule was revealed by more detailed survey by Dr D.G. Dawson, who found many trees missed by AELTC. In his report on the northern hedgerow, Dr Dawson found that 83% of the qualifying trees and shrubs were undocumented.

^d A survivorship curve gives the number of organisms of each of several age groups. The shape of the curve shows the effect of mortality as the organisms age. Woodlands naturally have many more young trees and shrubs than they have mature specimens in a "type 3" survivorship curve (www.britannica.com/science/population-ecology/Life-tables-and-the-rate-of-population-growth). Mortality rates of young trees are much greater than those of older trees.

^e *The northern hedgerow, Wimbledon Park*. Dr D.G. Dawson, September 2023.