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AELTC application to develop Wimbledon Park Golf Course

Merton 21/P2900, Wandsworth 2021/3609

Problems with the “GLA Stage 1 Report – Applicant Response”

Biodiversity net loss

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

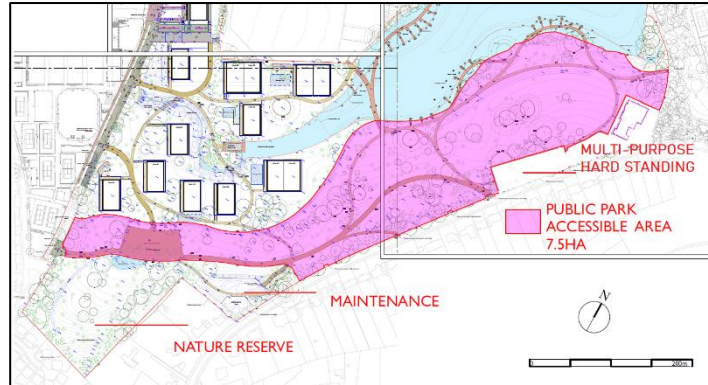
The All England Lawn Tennis Club (AELTC) proposes a major, intensive tennis development on Wimbledon Park Golf Course and Lake, which must be scrutinised by the Greater London Authority (GLA), under its planning powers. An AELTC document was posted on planning application websites, claiming to be an update on the topic-by-topic Stage 1 comments of the GLA; AELTC's responses or comments; and the GLA response to those. Very little reference is made to third party submissions or comments, so it is inferred that they were not sent to the GLA at the same time. In this paper Dr Dawson examines topics where his



submissions on the planning application introduced matters that were not properly considered in the dialogue between the applicant and the GLA.

2. Correcting the measured area

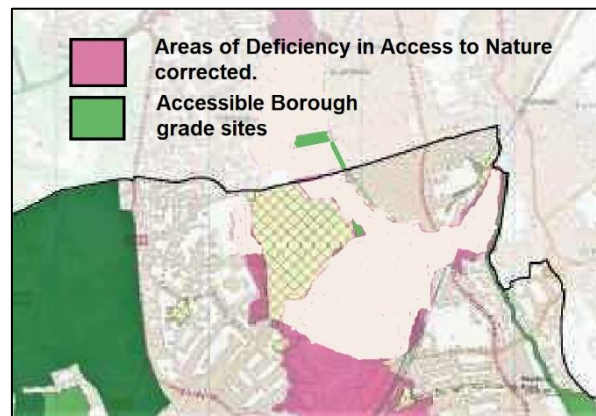
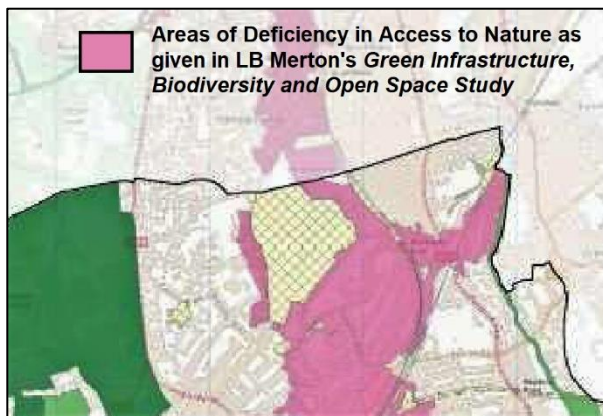
The area of the proposed “public park” is given as 9.4 ha in three places (pages 1, 2 and 3) and “almost 10 hectares” on page 4. In fact, the public will have permissive access to 6.8 ha of open space, not 9.4 ha. This is because the Maintenance Hub, the fenced-off southern nature reserve, the golf clubhouse and a multi-purpose hard standing area will be inaccessible (accessible area coloured pink on the plan).



3. Further problems with the “Permissive Park”

- 3.1 The permissive public park will be closed for at least six weeks according to the latest proposals,
- 3.2 to justify the applicant’s biodiversity claim, the grass will not be mown, so it is inappropriate for public use as a park,
- 3.3 it will still be used for car parking during the qualifying and main event, which causes considerable wear especially in wet conditions,
- 3.4 it will have “estate railings” along the paths so preventing free access for the public to the grass areas,
- 3.5 the hectare or so of hardstanding for the southern entrance is hardly appropriate in a park, and
- 3.6 it will still have maintenance vehicles criss-crossing it from the “central” maintenance “hub”.

4. Correcting the Assessment of Deficiency in Access to Nature





The GLA note that *“the site is in an area identified as being deficient in access to nature...”* and that *“the proposal submitted could meaningfully address the above-mentioned deficiencies”*. Dr Dawson has disputed this claim¹. The Area of Deficiency was wrongly determined, because the public park was inexplicably excluded from Merton’s Greenspaces *Green and Blue Infrastructure, Biodiversity and Open Space Study*. In fact, there is public access to nature close to all three entrances to the public park. Recalculating the deficiencies with this error corrected shows that the site is not in an area identified as deficient, so there is nothing to address.

5. Failure to enhance the condition and appearance of the lake

As a heritage benefit, the AELTC claim that the proposals will enhance the condition and appearance of the lake². Except for the restoration of the lost southern arm to the lake, I have submitted that this is not the case³. Sediment accumulation is not a threat to the shape of the lake, but Brown’s designed views would be harmed by the visual intrusion of proposed large, new boardwalks and reedbeds. The net result would be a loss to heritage.

6. Biodiversity net loss, not net gain

The GLA comments that *Biodiversity net gain has been demonstrated*⁴. Dr Dawson’s submissions show that this is not the case. Even taking into account the proposal to “daylight” two of the three tributaries and the provision of nesting and roosting sites, Dr Dawson identified a biodiversity net loss to four National Priority Habitats⁵: Wood-pasture and Parkland, Wet Woodland, Reedbeds and Eutrophic Standing Waters, compromising almost all of the application site. The GLA “net gain” calculation was updated in 2022 to be slightly more realistic, but the fundamental flaws remain, resulting in a substantial net loss.

6.1 AELTC claims biodiversity gains for both grasslands and woodlands. Dr Dawson shows that the golf course is very largely on poorly drained, neutral to alkaline soils⁶. Proposals to strip existing soil⁷ to establish new grassland and woodland will fail because of a mismatch with the subsoil, so no biodiversity gain will be achieved from the proposed acid grassland and acid woodland. Further, the GLA comments that *“direct impacts on the Woodland SINC would be avoided”*. This is partial or incorrect as there is much woodland on the golf course SINC which is directly impacted⁸.

6.2 The AELTC proposes⁹ to remove 21% of the documented trees “to facilitate the development” and these are said to be predominantly trees that are not safe or having a short “useful” life. The Construction Environmental Management Plan (CEMP) claims that the losses¹⁰ will be *“many of the young and semi-mature trees”*, so failing to mention the losses of many mature trees. It is just such mature trees that are the future veterans and so of considerable biodiversity value. The loss of all trees, and especially future veterans, is significant and it cannot be redressed by plantings¹¹.



6.3 A net gain is claimed from the removal of sediment from the lake and the introduction of new, larger reedbeds. The GLA states¹² that *“There would be some construction phase impacts on the lake, but these would be minimised.”* AELTC claim that the lake is *“certain to return to a habitat of increased ecological value in the short to medium term.”*¹³ To the contrary, Dr Dawson shows that proposals for the lake would result in a net loss¹⁴. Sediment is proposed to be removed with a method that would cause long-term and great harm to biodiversity, amenity and fishery. Proposed reedbeds would harm biodiversity by replacing existing National Priority Habitats, affecting special species that depend upon these.

6.3 AELTC claims that lighting schemes will be *“sensitive”* and that *“access infrastructure”* would be *“carefully considered”*¹⁵. To the contrary, the introduction of lighting and access for people, however well designed, takes away from undisturbed habitat and dark skies, seriously compromising bat and bird habitat¹⁶. The proposed *“Quiet zones”* in the arms of the lake would prove to be *“Disturbed zones”*, as they would have significant, close human disturbance, preventing wildlife from flourishing¹⁷. So, lighting and access proposals will cause losses.

6.4 AELTC celebrates a proposal for permissive *“public access”*¹⁸ to nature but fails to acknowledge that an existing positive obligation requires unrestricted access to a circular walkway around the lake once golf should cease¹⁹. This would better serve the London Plan policy than would a walkway which is proposed to be gated²⁰. Further, LB Merton saw a *potential conflict with Policy CS13, in respect of the impact of the boardwalk on existing recreational activities.*²¹

6.5 The GLA accepts the AELTC’s Urban Greening Factor calculation²², stating that *“The proposed development is therefore compliant with Policy G5 of the London Plan.”* The UGF calculation did not follow the London Plan guidance. Following the correct protocol demonstrates a decline of UGF from the present 0.99 down to 0.70²³.

Submissions in this application made by Dr Dawson on the biodiversity implications of the proposals.

Submission on Planning Applications Merton 21/P2900, Wandsworth 2021/3609 at Wimbledon Park Golf Club, SW19 7HR. September 2021.

The water quality and biodiversity of Wimbledon Park Lake. December 2021.

The Urban Greening Factor in Wimbledon Park. February 2022.

The soils of Wimbledon Park Heritage Landscape. March 2022.

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

Trees and woodland in the proposals for Wimbledon Park Golf Course. September 2022.

WPRA Urban Greening in Wimbledon Park. October 2023.



¹ In his paragraph on Biodiversity and access to nature in his June 2022 submission. Dr Dawson also made a submission on the error in evidence to the LB Merton Local Plan Inquiry, in response to which the LB Merton officer acknowledged that there was no Area of Deficiency in access to nature in the area of proposal site Wi3.

² *Heritage benefits*, on page 4.

³ Originally in his September 2021 submission and further detailed in his June 2022 submission, Dr Dawson found that the detail of the proposals for the lake are insufficient to support the claims made. The proposed boardwalks and reedbeds would harm views that survive from Lancelot Brown's design. Realistic alternatives would allow the retention and restoration of Brown's design. Sedimentation is so slow that it does not pose a threat to the shape of the lake.

⁴ A *Biodiversity Net Gain of 12.94%* is cited under *Ecology and Biodiversity benefits*, page 5.

⁵ In his September 2021 submission.

⁶ Dr Dawson's March 2022 submission.

⁷ In the Construction Environmental Management Plan, Page 31.

⁸ It is assumed that the GLA reference is not to the actual Site of Importance for nature conservation ("Sinc"), but to the two old woodlands. Horse Close Wood is outside the red-line development proposal and would be affected, as now, should the public queue still be in the public park. The ancient Ashen Grove Wood lies half on the golf course, and it will be affected by the proposed permissive access from LB Merton's existing public park. This adverse effect on the ancient wood will be real, but small. The main impact within the Site of Importance for Nature Conservation, however, would be on the other woodlands of the golf course, which are younger, but a significant component of the site. These will certainly be affected as the proposals are for extensive clearance and replanting to a technically flawed protocol. The GLA is deficient in not addressing these other woodlands.

⁹ In the *Arboricultural Impact Assessment*.

¹⁰ Page 31.

¹¹ Dr Dawson's submission *Trees and woodland in the planning proposals for Wimbledon Park Golf Course*.

¹² Page 5.

¹³ In the Construction Environmental Management Plan, Page 31

¹⁴ In Dr Dawson's June 2022 submission (referring also to his September 2021 submission), he shows that the removal of the sediment by the preferred method would release such large quantities of nutrient pollutants into the lake water as to cause long-term harm to the lake water quality and consequently to amenity use, fisheries and biodiversity. The new reedbeds and walkway would harm biodiversity by encroaching into the lake, so harming three National Priority Habitats and the special species that these habitats support. No species, reedbed specialist or not, is shown to benefit from the proposals for the lake and there would be a net loss of biodiversity there.

¹⁵ Page 5.

¹⁶ In his September 2021 submission.

¹⁷ Dr Dawson's June 2022 submission.

¹⁸ Page 7.

¹⁹ Dr Dawson's June 2022 submission.

²⁰ Page 16.

²¹ Page 10.

²² Page 34, "UGF".

²³ Dr Dawson's submission of February 2022. Why the GLA failed to notice glaring errors in the application of the Mayor's Urban Greening Factor calculator is a mystery.