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**AELTC application to develop Wimbledon Park Golf Course  
Merton 21/P2900, Wandsworth 2021/3609**

**Urban Greening in Wimbledon Park**

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**

We commented on the applicant's original Urban Greening Factor Calculation in February 2022 and have now been invited by LB Merton Planning Department to comment on the applicant's "File Note Updated Calculation" dated 22 September 2023.

The application area is a Site of Importance for Nature Conservation.

The London Plan Guidance on Urban Greening seeks to *achieve an overall gain in biodiversity* through urban greening. The main emphasis of Urban Greening is to ameliorate the environmental harm from the hard surfaces which predominate in residential and commercial development. The proposed development of an industrial tennis complex introduces to an existing green site a significant amount of such hard surfaces.

The current Urban Greening Factor is 0.99. This will inevitably reduce, yet the applicant has claimed a "near perfect" score, which we have demonstrated is unsupportable and wrong.



The applicant has now revised its original claim of a Factor of 0.95 down to 0.90. In fact, on a correct calculation, this development will result in reduction of this down to at least 0.80, probably nearer 0.70.

As the applicant has failed to address the London Plan Guidance accurately, our earlier conclusions remain: there will be a substantial loss of urban greening and so the proposals fail the requirement of the London Plan Guidance.

The applicant has made at least two attempts to calculate the factor accurately and has also failed to demonstrate any overall gain. In fact, *there is a substantial net loss in biodiversity and greening*. We see no reason why this application should be approved as it stands.

A generous local planning authority might offer the applicant yet another chance, insisting it should withdraw, recalculate, and resubmit an accurate urban greening calculation. Even if it were to do so, we see no grounds for believing that there will be any net gain and expect a substantial net loss to be confirmed.

If the local planning authority wishes to conclude this application now, more than 2 years after it began, it has no choice but to reject the application and refuse consent based on a material failure to comply with the London Plan.

## **2. Introduction**

On 25 September 2023 Merton Planning Department wrote to us that the applicant had submitted an Urban Greening Factor Calculation Update "File Note" dated 22.09.2023, inviting comments by 10 October 2023. This Update appears to respond to comments from Dr D Dawson dated 22 February 2022.

We must protest that the time allowed for response (15 days) is out of all proportion to the time which it has taken the applicant to provide it. We are not a huge, expensively resourced organisation able to engage consultants at a moment's notice; nor indeed does it seem that the applicant can provide even a consultant's "File Note" at a moment's notice. We are lucky indeed to have the benefit of advice from Dr Dawson, who has contributed to this response, and applied his considerable experience and expertise pro bono.

This paper summarises the original and new calculations, sustains our objection to the application, and adds as an appendix Dr Dawson's February 2022 paper which is not visible on the Merton Planning department website for 21/P2900. This paper also includes End Notes applicable to both the paper and the appendix.



### 3. Policy requirement

The London Plan Guidance on Urban Greening was adopted in February 2023. Its Paragraph 2.4.2 expects that greening here should achieve a gain to biodiversity, see the highlighted text:

*“Where protected species, or priority habitats or species, are found on a development site, or where a proposed development **may impact a Site of Importance for Nature Conservation (SINC)**, the requirements of Policy G6 (Biodiversity and access to nature) to manage impacts on biodiversity should be met, in addition to any relevant UGF targets. In these cases, any new urban greening should prioritise helping to avoid or to mitigate the impacts of the proposed development on biodiversity; and providing locally relevant greening that complements the site’s existing wildlife value and achieve an **overall gain in biodiversity.**”*

### 4. Original calculation

In his 22 February 2022 submission, Dr Dawson showed that the original calculation failed to follow the Mayor of London’s guidance and had serious errors, which made it fatally flawed and badly misleading.

Dr Dawson established that the planning application site has a current Urban Greening Factor score of 0.99. The applicant has nowhere, so far as we can tell, assessed the current score for the site, nor has it contested Dr Dawson’s calculation. The applicant originally claimed a factor score of 0.95 for their proposed development. When the mathematical errors were corrected, Dr Dawson proved that the applicant’s score came down to 0.82. Through his assessment of the individual components of the score, however, Dr Dawson established that the score should reduce to 0.7. Dr Dawson concluded that this planning proposal for the golf course and lake would cause substantial harm to urban greening.

### 5. The new calculation.

The new submission does not provide an Urban Greening Factor calculation for the present state of the application site, so it does not address the guidance to achieve an overall gain in biodiversity.

The new Urban Greening Factor calculation is given in Table 1.1 of the “File Note”, on which LB Merton have just consulted us. As in the earlier flawed calculation, this employs eight surface cover types selected from the Mayor of London’s 16 types<sup>a</sup>. These surface cover types are not mapped but are said to be taken from an earlier Biodiversity Net Gain assessment<sup>b</sup>.



Surface cover type	Area in the 2023 File Note (ha)	Area in the 2021 original application (ha)	Difference 2023-2021 (ha)	Difference as a % of the whole site
Semi-natural vegetation	22.3	18.2	4.1	10
Wetland or open water	10.4	10.2	0.1	0
Flower-rich perennials	0.08	0.08	0	0
Vegetated sustainable drainage	0.3	0.4	-0.1	0
Hedges	0.2	0.1	0.1	0
Amenity grassland	5.1	8.4	-3.2	-8
Permeable paving	6.8	3.2	3.6	9
Sealed surfaces	2.0	0.8	1.1	3
<b>Total</b>	<b>47.1</b>	<b>41.4</b>	<b>5.7</b>	<b>14</b>
Total as a % of 39.7ha	119	104		

**Table 1. The areas of each surface cover type in the 2023 re-calculation compared with those in the original application. The application site is 39.70ha (397000m<sup>2</sup>) in area.**

Table 1 shows clearly that the 2023 assessment is radically different: the area of 7 of the 8 surface cover types differs between the two, and four of these differences are not trivial in size. The 2021 surface cover types summed to 41.4 ha, approximating the application site area of 39.7 ha. However, the 2023 types summed to 47.1 ha, fully 19% greater than the application site area. From the size of this discrepancy, it must be that some parts of the site have been given an erroneous area or counted twice. The 2023 recalculation does not identify this significant discrepancy and does not provide any explanation for it. A



remarkable aspect of this discrepancy is the more than doubling of the area of permeable and sealed surfaces, for an application which does not appear to have changed materially.

The London guidance allows double-counting where there is a layering of value, such as trees over grassland<sup>c</sup>. The 4.1 ha increase in semi-natural vegetation (Table 1) might reflect a new assessment taking layering into account, as 5.6ha of trees<sup>d</sup> contributes to this surface cover type. However, even if all the difference in semi-natural vegetation might be accounted for by vegetation beneath trees, semi-natural vegetation is but 10% of the total application site area (Table 1), leaving a residual 9% discrepancy unaccounted for. So, there remains a substantial discrepancy in area that cannot be accounted by layering. This means that there must be substantial errors in the areas of surface cover types in Table 1. As the applicant has failed to provide a clear map or plan of the surface cover types proposed, we are unable to speculate on what caused these errors.

The large effect of errors can be illustrated by substituting the area of semi-natural vegetation from the original (2021) assessment (18.2ha) for that in the recalculation (22.3ha). This brings the total of area of surface cover types down to 43ha, which is closer to the application site area and corrects the Urban Greening Score to 0.80. This is like the figure of 0.82 that Dr Dawson obtained when he simply corrected the mathematical errors in the 2021 assessment.

We conclude that there is a sizeable error in the areas of surface cover types given in the 2023 re-evaluation of Urban Greening Factor. This invalidates the assessment and hence the applicant's claimed score of 0.90. In the absence of any clear map and coherent account of the basis for the new assessment, the planning authorities must prefer the values obtained by Dr Dawson in his previous analysis. He found the existing score to be 0.99. His best assessment of the score from the proposals gives 0.70 and the score is certainly no larger than 0.80. Our earlier conclusion that there will be a substantial loss of Urban Greening as a result of the AELTC proposals is confirmed.

## **6. Objection**

These errors are so significant, and misleading, that we must object to the application and urge both Merton and Wandsworth planning departments to invite the applicant formally to amend its application on this basis. This is the more important because biodiversity net gain or net loss is a cornerstone of environmental and planning policy. A decision made on inadequate or misleading data will be invalid and susceptible to judicial review.

We do not make this objection and request lightly: it is based on direct recent experience of errors and deficiencies in the application, which were ultimately addressed after a great deal of delay. The Wimbledon Society pointed out (letter to the applicant dated 20 July 2022)



that there were considerable deficiencies in the calculation of lorry movements within the application documents. That letter was never answered by the applicant, but it was published on the planning websites. As a result, the applicant's advisers recalculated both the numbers and methodology and later in 2022 lodged further application documents correcting gross errors, and as a result substantially increasing the number of movements estimated.

The issues raised in this paper have been raised in various personal submissions and are brought together here because the applicant has failed to take any notice of them.

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### **Appendix: The Urban Greening Factor in Wimbledon Park**

Dave Dawson, February 2022

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#### **Summary**

In their proposals for intensive tennis development on the Wimbledon Park Golf Course and Lake, the All England Lawn Tennis Club (AELTC) have made much of an increase to a nearly perfect "Urban Greening Factor" of 0.95.<sup>e</sup> This aspiration to meet the Mayor of London's expectations for environmental improvements through development is most welcome. However, a closer examination of the calculation of the factor shows that the promise is illusory. Use of the Mayor of London's Urban Greening Factor Calculator shows that the proposals site currently has a Factor of 0.99, as might be expected for a Site of Borough Importance for nature conservation, so a Factor of 0.95 represents a 4% loss of greening. However, the AELTC entered erroneous land areas into the Calculator. The most important of these errors was that the greening contribution was correctly summed across the whole application area but attributed to only part of the application site: the golf course alone. Correcting the calculation errors gives a Factor of 0.82, a loss to greening of 17% compared with the present. Even this figure is an overestimate, because AELTC failed to follow the Mayor of London's Guidance for calculating greening contributions. Applying the guidance correctly shows that the proposed development scores 0.70, a loss of 28% of greening. AELTC's planning proposal for the golf course and lake would cause substantial harm to urban greening.

#### **Calculating the Urban Greening Factor**

The Mayor of London's consultation Urban Greening Factor Guidance is linked to a spreadsheet calculator, which requires data on the area of each category of ground cover within the development area and the total area of the proposed development. The ground cover types given in the spreadsheet are explained in detail in Appendix 1 of the Guidance<sup>f</sup>. Top grade wildlife habitat is given the highest score of "1" and other ground cover is given lower scores according to the greening value of each. A score of "1" is given to Priority Habitats<sup>g</sup>. The overall Urban Greening Factor score is the average of those for the individual ground cover types weighted by their areal cover.



### **The existing Urban Greening Factor**

The whole development area is included in a Site of Borough Importance for nature conservation (Grade I), and so would be expected to have a high urban greening score. This is confirmed by almost all the ground cover of the area<sup>h</sup> being England or London Priority Habitats: Eutrophic Standing Water, Wood Pasture and Parkland, Wet woodland, Lowland Mixed Deciduous Woodland and Reedbed. Use of the calculator confirms a near perfect score of 0.99.

### **The score after the proposed development**

Following the Mayor's guidance, AELTC's planning application reproduced the Mayor of London's Calculator with cover type entries for their proposed development<sup>i</sup> and showing an Urban Greening Factor of 0.98. There were two errors in this use of the calculator. First, the area of Amenity grassland was entered in hectares, rather than the m<sup>2</sup> required. Second, the total site area was entered as 296000 m<sup>2</sup>, which is the area of the golf course, but the Mayor's guidance requires the whole red-line application area, 397000 m<sup>2</sup>. Using the calculator with these two errors corrected gives an Urban Greening Factor for the proposed development of 0.82, 0.16 less than given by AELTC. Although the second error was large, I could find no explanation for such a very material departure from the Mayor's guidance. The substantial reduction in the Factor cannot be described as a "nearly perfect" score.

### **Contributions to the score**

AELTC entered eight cover types in the calculator but did not map these on the accompanying plan, making it very difficult to understand where the contributions to the Factor came from. The plan gave the areas of 19 land cover types, but most of these were not readily related to the categories in the Mayoral calculator. I could not find a way to add up the areas of the 19 types to match those of the calculator.

So, I took the accompanying plan and allocated the 19 areas according to the Mayor's types as follows:

1. Semi-natural vegetation (e.g. trees, woodland, species-rich grassland maintained or established on site), Factor Score 1. In the south, this top-grade terrestrial habitat comprises some 8 ha of parkland and woodland. Some of the woodland is proposed new planting, but it also includes half of the ancient Ashen Grove Wood. There is also a large area indicated as "new scrub". Whether or not the proposal to strip soils here to establish acid grassland should succeed, the parkland grass will be better than at present<sup>j</sup>, so some 8 ha will remain top grade: parkland and woodland. Most of the rest of the golf course is proposed to be intensively managed lawn tennis courts set in a matrix of "amenity grass" and "long grass" with many paths and some of the retained, planted and transplanted trees and a little of the "new scrub". There is no proposal to restore natural grass there, so parkland is lost. The scrub, and such



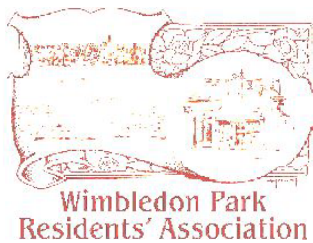


- trees as survive the intensive works, would provide canopy cover of around 5 ha. In total, this gives some 13 ha of Factor score 1 terrestrial habitat.
2. Wetland or open water (semi-natural; not chlorinated) maintained or established on site. Factor score 1. The lake and its southern extension, reedbed<sup>k</sup> and deculverted brook give a total area of some 10.2 ha. There is a significant risk here that the lake will become hypertrophic and lose its Priority Habitat status through pollution from the catchment and the intensively managed grass courts areas. This would require a much lower Factor score, but I assume not.
  3. Flower-rich perennial planting. Only 0.8 ha of “native-rich ornamental planting” might fall here, with a Factor score of 0.7.
  4. Rain gardens and other vegetated sustainable drainage elements. The 0.3 ha of “swale” might fall here<sup>l</sup>, also with a Factor score of 0.7.
  5. Hedges (line of mature shrubs one or two shrubs wide). Factor score 0.6. The plan gives a linear measurement for these, so I take the 0.0954 ha from the AELTC calculator figure.
  6. Amenity grassland (species-poor, regularly mown lawn). The intensive grass courts areas are surrounded with amenity grassland, the 5.1 ha of which certainly falls here. Without any further detail of its composition, the 3 ha of “long grass” is also given a score of 0.4, giving a total of 8.1 ha.
  7. Permeable paving. Factor score 0.1. None of the paths or entrance zones is identified as permeable, yet AELTC gave a figure of 31553 m<sup>2</sup> of this in the calculator. This is close to the 3.55 ha of paths given on the plan, so I take the AELTC figure for this feature. Unsurprisingly, the Mayor’s calculator provides no factor score for grass tennis courts, which are rare in London. These are very intensively managed and protected from the wildlife that may damage them, so that they are comparable to permeable paving in their habitat value. The Mayoral criteria would give the same score, making a total of 6.8 ha.
  8. Buildings. Factor score 0. The plan gives 0.6 ha of buildings, comprising mainly the golf clubhouse, maintenance hub and show court. I add here, also, the 0.39 ha of entrance zones as these could be similarly impermeable. This gives a total of 0.45 ha.

As a simple check that these figures are of the right order, they sum to 40 ha, close to the 39.7 ha given as the site area in the planning application. Entering the figures into the calculator gives an Urban Greening Factor of 0.7, a decline of 29% from the present condition of the site. The main reason for this being much less than estimated by AELTC is that they had 18.2 ha of Factor score 1 terrestrial habitat, whereas I made it only 13 ha. I submit that the 0.12 difference between my Factor and that based upon the AELTC classification reflects a misunderstanding by AELTC of the Mayor’s typology.

Clearly, the AELTC’s proud claim that they will increase greening to give a nearly perfect score is wrong because of their errors in using the Mayor’s calculator. Further, the





implication that a good score reflects gains from the proposals is faulted because the site has a considerably better score in its present state. That an independent application of the Mayoral typology provides a significantly worse score reflects the difficulty in applying the Mayor's calculator to a large site where many ambitious operations are planned. The actual score would lie somewhere between the very optimistic AELTC score of 0.82 and my more realistic 0.7. Either way, the proposals will appreciably harm urban greening.

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<sup>a</sup> The Mayoral guidance is given in adopted Urban Greening Factor (UGF) guidance, published 2023. This links to a UGF spreadsheet calculator which is the same as that employed by ourselves and AELTC for both their initial calculation and for this one.

<sup>b</sup> Referred to as "BNG 3.1 (May 2022)".

<sup>c</sup> London Plan Guidance, Urban Greening Factor, 2023, Paragraph 3.22: "Where tree canopies will grow over another permeable surface, the area of the surface underneath the canopy can also be included in the UGF calculation – see Figure 3.3."

<sup>d</sup> The notes for this cover type in table 1.1 of the recalculation give 2.5ha veteran trees, 2.7ha other retained trees and 0.38ha of trees zoned for transplant.

<sup>e</sup> For example, in the magazine *Tennis threads*: "This project will deliver enduring and sustainable benefit for the Community by opening up a large area of private land to become a new publicly accessible 9.4-acre park, achieving a 10 per cent biodiversity increase that includes the restoration of a number of habitats and planting of 1500 trees of a variety of sizes, and an increase in our 'Urban Greening Factor' score to a nearly perfect 0.95"

<sup>f</sup> *Categorising and measuring surface cover types.*

<sup>g</sup> Appendix 2 of the Guidance states that the priority habitats are not just the London Priorities, but also the National Priorities. The London Priorities that occur within the red-line application site are in the list given in Appendix 2B of the Mayor's London Environment Strategy: London Biodiversity Action Plan – Priority Habitats 1998. These are: *Acid Grassland, Woodland, Standing Water* and *Reedbeds*. National Priority Habitats are those listed by JNCC in 2011 (<https://jncc.gov.uk/our-work/uk-bap-priority-habitats/#list-of-uk-bap-priority-habitats>). These include two London Priorities: *Acid Grassland* and *Reedbeds*. They also add detail to *Standing Water*, which is represented here by *Eutrophic Standing Waters*, and to *Woodland*, which is represented here by *Wood Pasture and Parkland, Wet Woodland* and *Lowland Mixed Deciduous Woodland*. The application red-line site comprises 99% Priority Habitat as so defined.

<sup>h</sup> Small areas occupied by the golf clubhouse, its car park and a few paved paths contribute only about 1% of the site area.

<sup>i</sup> This is to be found on the *Urban greening factor site wide plan* in Appendix C of AELTC's *Biodiversity Net Gain Assessment*.

<sup>j</sup> AELTC consider the natural vegetation there to be acid grassland, but I have shown that the species found there indicate that it is neutral grassland. Any attempt to establish acid grassland is likely to be overcome by species that are more appropriate to the soil, but even this would be an improvement over the existing, intensively managed grassland.

<sup>k</sup> Although the reedbed would displace existing reedbed, wet woodland and open water, all of which are National Priority Habitats, it would also qualify as national priority. So, we are replacing three priority habitats with a larger area of one of them.

<sup>l</sup> The soil investigations for the planning application suggest that the soils here are too heavy and impermeable for swales, so the viability of this habitat remains in doubt.