



GLA planning department

8 June 2024

GLA Consultation on Revisions submitted by All England Lawn Tennis Ground plc to Planning Application LB Merton Ref 21/P2900 LB Wandsworth 2021/3609 Wimbledon Park Golf Club, Home Park Road SW19 7HR

(GLA Stage III Mayoral Call in Ref: 2024/0045/S3 and 2024/0047/S3)

Heritage Assessment of the landscape and the effect of the proposed development

Mark Service for Save Wimbledon Park, c/o 124 Home Park Road, London SW19 7HU

1. Summary

This application should be rejected on the following heritage grounds:

1.1 It seeks to take advantage of degradation to the historic landscape, contrary to NPPF 202.

1.2 It fails to quantify the full impact of such extensive development on the Grade II* Wimbledon Park Registered Park and Garden. This failure has led to confusion as to the level of harm the asset would receive as a result of the proposed development and is complicating the decision-making process. An independent assessment of the scale of harm and resulting loss of significance would be helpful, to enable the weight of public benefits to be assessed in the heritage context.

1.3 It fails to comply with appropriate local, regional and national planning policy, regulations, and good practice.

1.4 It fails to explore the full potential to enhance the RPG's significance in order to balance the harm done to the asset as a result of the development.

2. Introduction

2.1 Save Wimbledon Park

The Save Wimbledon Park campaign is supported by a large number of national and local organisations,¹ who have been responding and objecting to this application as it has developed since

¹ CPRE London, Friends of the Earth Merton, Save Britain's Heritage, The Wimbledon Society, The Wandsworth Society, Friends of Wimbledon Park, Merton and Wandsworth Tree Wardens; and Residents' Associations for all the surrounding areas, namely Belvedere Estate, Osborne House, Parkside, Raynes Park and West Barnes, Southfields Gardens, Southfields Grid, Southfields Triangle, Sutherland Grove Conservation Area, Victoria Drive Conservation Area, West Wimbledon, Wimbledon East Hillside, Wimbledon House and Wimbledon Park, and the Wimbledon Union of Residents' Associations.

2021. All papers have been produced by volunteers, many of whom have considerable, relevant professional experience, which is highlighted in some sections.

This Heritage assessment is submitted in coordination with representations from Save Wimbledon Park in its paper dated 8th June 2024 and additional expert submissions of the same date from Richard Rees RIBA (addressing Green Belt Policy, Very Special Circumstances and “Need”), from Parkside Residents and their chair Sue Cooke (addressing Social, Community and Economic Benefits), and from Environmentalist Dr David Dawson (addressing Biodiversity Net Gain and other Environmental issues).

2.2 Expert Author

This paper has been contributed by Principal Heritage Consultant Mark Service MA, acting *pro bono*, who has significant experience of historic building, landscape and archaeological appraisals at a major international consultancy. Mark is a local Southfields resident and volunteer with Save Wimbledon Park. Mark’s qualifications include BA Prehistory and Archaeology (University of Sheffield); MA Archaeology – Merit (Birkbeck, University of London); MA Archaeology of Buildings – Distinction (University of York).

3. Significance

Wimbledon Park (NHLE 1000852) is a grade II* Registered Park and Garden (RPG) and is an asset of high heritage significance. It is one of only four RPGs in the London Borough of Merton (LBM) alongside Cannizaro Park, Morden Hall Park and South Park Gardens. Of these, only Cannizaro Park shares Wimbledon Park’s grade II* designation, the others being grade II. Wimbledon Park was listed in 1987 for its specific historic interest.

Lancelot ‘Capability’ Brown (1716-83) set up his landscaping and architecture consultancy in Hammersmith in 1751. Over the next 30 years he worked on five authenticated commissions in the Wimbledon, Roehampton and Putney areas. Of these, Wimbledon Park is the only surviving Brownian landscape.

Wimbledon Park appears on Historic England’s “at risk” register mainly due to its divided ownership and lack of a comprehensive management programme.

4. Impact

The applicant’s Environmental Statement Heritage Chapter (EIA Vol. 01 Part 01, Chapter 10) does not quantify impact. While this does not contravene EIA regulations, this omission, the lack of a clear process, hinders decision-making. Given the size and potential impact of the proposed development which includes a large stadium, 39 tennis courts with (in season) perimeter netting and lighting; roadways and service hubs the use of a clear process would have aided decision-making and would have helped prevent the subsequent and wide disagreement between LPA Officers and statutory consultees as to the degree of harm to which the RPG would be subjected and the consequent loss of significance.

5. Degree of Harm and loss of Significance as a result of Impact

As the applicant’s Environmental Statement Heritage Chapter fails to quantify impact on the RPG it is difficult to see how conclusions as to the harm that impact will inflict have been reached. Between the LBM and the statutory consultees Historic England and SAVE Britain’s Heritage there are three widely differing assessments of the degree of harm to the asset that would result from the scheme.

At the highest end of the scale the Merton Conservation Officer concluded (Merton OR 6.4.40) that there would be substantial harm. Under the terms of the NPPF (Para. 206) substantial harm to or loss of grade II* registered parks and gardens should be wholly exceptional.

Merton's Planning Officers overrode the Conservation Officer's findings (Merton OR 6.4.44) but still concluded that harm resulting from the proposed development would be less than substantial in the upper half of that range. Again, under the terms of the NPPF (Para. 208), where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Further confusion is caused by the conclusions of Historic England's Inspector (24/09/2021) that harm to the RPG resulting from the proposed development would constitute less than substantial harm in the lower half of that range. Historic England's conclusions go against that of a further statutory consultee, SAVE Britain's Heritage (24/09/2021) whose Conservation Officer concluded that harm would be substantial. The SAVE Britain's Heritage Conservation Officer (19/08/2022) reaffirmed this conclusion after further consultation.

Given the range of assessments from less than substantial harm to substantial harm an independent assessment of the scale of harm and resulting loss of significance would have been helpful in order to allow the GLA's Officers to assess the ability of the scheme's public benefits to outweigh that harm.

6. Current baseline

The applicant's Desk-based assessment and Environmental Statement Heritage Chapter concludes that Wimbledon Park has been degraded over time through landscaping of its western extent for the golf course and through later accretions in the form of building within the golf course, The Wimbledon Club and the public part of Wimbledon Park to the east of the lake. While this is acknowledged it is important that the GLA's Officers are mindful of the survival within Wimbledon Park of several of its original features. These are noted in Historic England's advice to LBM and include the lake; multiple veteran parkland trees; areas of woodland and open grassland of sufficient scale to give the impression of parkland; and historic vistas to focal features within and outside the park (e.g. the grade II* St Mary's Church). All these original features will suffer impact from the proposed development resulting in a loss of significance.

7. A neglected and damaged Heritage Asset, at risk

The deteriorated state of a heritage asset does not allow an applicant to assume that further deterioration will have no effect. Furthermore, according to NPPF Para. 202 if there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision. All the degradation mentioned above has come about through the deliberate interventions of owners of Wimbledon Park.

It should be noted that while Wimbledon Park is on the Heritage at Risk Register the stated reason is that 'Divided ownership results in differential landscape management.' The applicant gives further reasons for the asset's inclusion (EIA Vol 01 Part 01, 10.56). These are uncertainty about the asset's future, views of the original designed landscape being obscured, and the deteriorating condition of the lake. They do not appear in the description of the asset on the current Register.

8. Heritage Benefits?

LBM's Officers identified (Merton OR 6.4.120) three heritage benefits as part of the applicant's masterplan. These are:

- 8.1 restoration of the southern tip of Wimbledon Park's Lake, Bigden Brook and Margin Brook.
- 8.2 the recreation of parkland aesthetic within the wider landscape via tree planting. and
- 8.3 the creation of acid grassland.²

The Officers reported that these initiatives would be of 'some benefit in terms of better understanding the historic function of the RPG.'

9. Failure to maximise potential for enhancement

The Design and Access Statement contains an abundance of information about Wimbledon Park and its development through time, but the applicant has failed to use this information to explore the potential to enhance the RPG's significance by recreating some of its original Brownian features. The resulting scheme therefore includes some cosmetic enhancements but fails to maximise its potential for enhancement resulting in a lost opportunity, which may not present itself again for many decades, or ever if this development goes ahead.

10. Missing Landscape and Environmental Management Plan (LEMP)

For an EIA development of this magnitude, it is usual to present a LEMP as part of the application. The LEMP would have set out in some detail the applicant's intentions regarding the enhancement of the RPG. The lack of such a document, as with the failure to use a clear process with which to quantify impact and therefore harm, is considered to be a barrier to accurate decision-making with the potential for flawed assessments.

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² Note that this is questioned in Dr Dawson's paper of 8 June 2024 because of the environmental and ecological harm which this development will cause.