

Planning Division
Environment & Regeneration
London Borough of Merton
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31st August 2022

For the attention of Calum McCulloch, Case Officer

AE LTC Development of Wimbledon Park Golf Course and Lake

Merton ref: 21/P2900

Wandsworth ref: 2021/3609

Proposed development by the AE LTC on Wimbledon Park golf course and lake: environmental impacts

Dear Mr McCulloch,

The Wimbledon Society has noted with considerable concern the views of an eminent environmental scientist on the impacts that the proposed AE LTC development will undoubtedly make on the ecology and biodiversity of Wimbledon Park. The Society fully endorses these views, summarised below, which are supported by extensive citations in previous submissions to LB Merton and LB Wandsworth on environmental issues connected with this development.

1. Biodiversity and Heritage

The entire planning application site is within a Borough Grade I Site of Importance for Nature Conservation and is part of a Grade II* Historic Park, designated as a Conservation Area. This means that any development proposals are required to deliver biodiversity net gain and enhance the parkland. The AE LTC's proposals demonstrably do not.

2. Net loss of Biodiversity and of 'Urban Greening Factor'

The AE LTC claim their proposals will result in a biodiversity net gain and a high 'Urban Greening Factor' as defined by the Mayor of London/GLA. Both claims are incorrect, as erroneous information was fed into the evaluations. Applying these two measures correctly shows that AE LTC's proposals will in fact cause a net loss to biodiversity and a very significant loss in 'Urban Greening Factor'.

3. Overlooked existing Biodiversity

The AE LTC failed to look adequately for existing biodiversity and ignored better information from others. As a consequence, they missed 45% of the breeding birds and 32% of the migrants and winter visitors, overlooked the nature and value of the old soils and misidentified the grassland type. This led to a devaluation of the area and allowed the AE LTC to promise a deceptive 'gain' from providing what is, in fact, already there.

4. Loss of valuable trees

The AE LTC focuses on keeping some 40 veteran trees, mainly English oaks. This is commendable, but huge numbers of other trees are in the way of the intensive development and are to be sacrificed. Established trees are vastly superior to any number of new saplings for

carbon storage, heritage and biodiversity. So, there is a huge loss of valuable trees, and a 150-year-old tree cannot be replaced without waiting another 150 years: the loss is effectively permanent. By celebrating veterans and the numbers of proposed, inadequate, replacement trees, the AELTC attempts to divert attention away from the losses.

5. Destruction of National Priority Parkland

The Park was created in 1765 as a grassland with scattered trees. Grassland is essential to parkland, and parkland is a National Priority Habitat. The AELTC dismisses the value of the grassland, thus ignoring the National Priority Habitat. Most is to be destroyed to make way for all the new tennis courts, access roads and maintenance buildings, not to mention the Show Court. Sacrificing parkland results in a great loss to biodiversity and heritage. The AELTC want us to look at the veteran trees, so that we don't notice that the grassland between them is to be trashed.

6. Loss of National Priority Habitats around the lake

Wet woodland fringes the lake, and reedbeds are in the shallows. These, and the open water, are National Priorities. New, bigger reedbeds are proposed, so we get more of just one priority, but at the expense of the other two, wet woodland and open water. That amounts to a net loss to Priority Habitat.

7. Water pollution from the new tennis courts

The lake is on the cusp of becoming murky because excess, polluting nutrients flow into it. This will be exacerbated by runoff of the chemicals used in the intensive management of the 39 tennis courts. The ALTEC supposes that pollutants will be removed by opening out the tributaries and adding small ponds and reedbeds to treat the pollution, but these are too small to make any real effect in delivering pollution control.

8. Lake water quality harmed by de-silting

The AELTC propose to remove polluted silt from the middle of the lake to deepen it, using methods described only in outline. The silt is to be pumped out together with a large quantity of water and then dried, returning the supernatant water to the lake. This will wash out pollutants which are currently locked away at depth in the sediment, and return them to the lake. The lake will become murky with blue-green algae - a hazard to people, pets, fish and wildlife - taking a decade or more to recover.

9. Access to nature and heritage harmed by intensive development

Capability Brown designed the lake as the focal point of the park. The view from the lakeside promenade across the lake and parkland up to St Mary's Wimbledon is still much loved today. The AELTC are already obliged to provide a freely-accessible circular walk around the lake when golf ceases but they don't want us to know that. Rather, they extol the values of their much shorter walk which has been moved into the lake on boardwalks, to make room for their intensive development. Positioned there, the boardwalk compromises views and disturbs sensitive wildlife, and the AELTC would be able to close it off whenever they please. Avoiding over-development would allow a much better design for people to enjoy year-round and with uncompromised views of wildlife and heritage.

10. Failure of acid grassland creation

The southern part of the golf course has naturally moist, fertile soils which support a National Priority Habitat, lowland meadow. The AELTC has failed to appreciate this and proposes to strip the soils and replace them with acid soils. This is described, wrongly, as restoration of another National Priority Habitat, acid grassland. Acid grassland would fail in this situation and there would consequently be no gain.

11. Harm to special species

The harm to four National Priority Habitats (*wet woodland, reedbeds, lowland meadow, acid grassland*) will harm protected and endangered species. Eight species of specially protected bats come to the lake and parkland for food and shelter. Stock doves, Nuthatches, Tawny owls and Green woodpeckers thrive in the parkland. Threatened Swifts commute to the lake to feed on insects above it. The declining Pochard (a diving duck) does well on the lake, but will be disturbed. Equally threatened European eels depend upon the lake for food and shelter. Common sandpipers visit on migration. A badger sett survives undisturbed. Special insects and fungi depend upon the old trees. None of these can benefit from the anticipated harm to Priority Habitats.

Yours sincerely

Wojtek Katny

Deputy Chair, Wimbledon Society Planning & Environment Committee

Please send all correspondence by email to chairmanpc@wimbledonsociety.org.uk