

To Merton DPAC members and  
Wandsworth PAC members



8 June 2023

Dear Sirs

**AELTC Proposals for the former Wimbledon Park Golf Course and Lake  
References: 21/P2900 (Merton) & 2021/3609 (Wandsworth)**

It is anticipated that these applications will be heard by the Merton DPAC and Wandsworth PAC during the summer or autumn.

This letter summarises the environmental objections to these applications and is based on work undertaken by environmental scientist and local resident Dr D.G. Dawson, who has made 7 submissions.

1. Biodiversity net gain is promised by AELTC, but this is faulted by poor surveys missing much of the present value, and by over-optimistic evaluation of paper promises. They claim to surpass the planning requirement for 10% net gain over a 30-year period. We are sure there will be a net loss. The headlines of the loss are:

a) Retaining 35 veteran oaks is good, but these are there already, so this is no gain. Set against this is the loss of well over 300 existing mature trees and destroying the existing parkland grassland. These are immediate losses and no planting can result in any real compensation for this within the 30-year period.

b) The Lake already supports the endangered Eel, the declining Swift and 8 species of specially-protected bats. As with the veteran trees, retaining the lake is no gain. Insects emerging from the lake support the birds and bats. The proposed method to desilt the lake will release huge amounts of pollutants presently locked away at depth, making the lake toxic. This will harm the eels, birds and bats. Again, the losses will be immediate and any recovery is theoretical, at best.

c) AELTC used the right Biodiversity Gain and Urban Greening calculators but made serious errors in doing so. The Gain calculation was compromised by the deficiencies listed above and also by the failure to recognise that the whole ex-golf course is a National Priority Habitat, Wood Pasture and to recognise another priority habitat, Wet Woodland, on the lake margin.

2. The national planning framework requires pollution reduction. AELTC's management of the intensive tennis development requires extensive use of fertilisers and biocides, which will leach into the lake, essentially untreated. These pollutants will prevent any improvement of lake water quality.

3. The national planning framework requires carbon sequestration through the retention of existing trees. Felling more than 300 mature trees will release at least 770,000 kg of carbon dioxide, which is a huge and immediate loss of sequestered carbon. At best, the loss will not be redressed for 50 years, which is far too long for any meaningful effect on global heating.

4. The national planning framework seeks to avoid conflict with heritage conservation. The intensive tennis development harms the contours of Capability Brown's design and imposes on existing viewlines with access ways, buildings and the over-lake boardwalks. The trees are kept well clear of the planned new facilities, cramming them into areas dictated by the proposed development, not by landscape design.

These intrusions sacrifice the Lancelot Brown heritage, and accordingly we submit that the applications should be refused.

Yours sincerely

Chris Goodair

Chair, Wimbledon Society Planning & Environment Committee

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Dr Dawson is a professional environmental scientist. He has been working on the history and biodiversity of the Wimbledon Park heritage landscape for many years. Before retirement, he was joint head of the Greater London Authority Environment Section. He worked on biodiversity in planning for London Boroughs for some 33 years and was responsible for developing the London hierarchy of Sites of Importance for Nature Conservation and the Areas of Deficiency in Access to Nature.

Dr Dawson's submissions provide the detailed background to this letter. They are:

- A. Submission on Planning Applications Merton 21/P2900, Wandsworth 2021/3609 at Wimbledon Park Golf Club, SW19 7HR. Dr D.G. Dawson, September 2021.
- B. The water quality and biodiversity of Wimbledon Park Lake. D. Dawson, December 2021.
- C. The Urban Greening Factor in Wimbledon Park. D. Dawson, February 2022.
- D. The soils of Wimbledon Park Heritage Landscape. D. Dawson, March 2022.
- E. Proposed development of Wimbledon Park Lake and surrounds. Planning submission on AELTC proposals. June 2022. Dr D.G. Dawson.
- F. Problems with the "GLA Stage 1 Report – Applicant Response". D. Dawson, August 2022.
- G. Trees and woodland in the planning proposals for Wimbledon Park Golf Course. Dr D. G. Dawson, September 2022.

Dr Dawson's summaries of his submissions are reproduced below as an Appendix to this letter.

**Submissions on the AELTC planning application for Wimbledon Park Heritage Land and Lake by Dr D.G. Dawson.**

I have made 7 submissions to the two planning authorities, which are not readily accessible to others. Most are long and technical. To assist others to understand their content, I reproduce their titles and summaries here (A-H below). The full submissions are available on request.

**A. Submission on Planning Applications Merton 21/P2900, Wandsworth 2021/3609 at Wimbledon Park Golf Club, SW19 7HR. Dr D.G. Dawson, September 2021**

I am a professional environmental scientist. I have been working on the history and biodiversity of the Wimbledon Park heritage landscape for many years. Before retirement, I was joint head of the Greater London Authority Environment Section. I worked on biodiversity in planning for London Boroughs for some 33 years and was responsible for developing the London hierarchy of Sites of Importance for nature conservation.

**Objections**

The analysis of biodiversity in the Environmental Impact Statement supporting the application claims a net gain, as is expected by the National Planning Policy Guidance. This claim is seriously faulted for six reasons. I estimate that these faults prevent there being a net gain within any reasonable time period.

**Reasons:**

1. The data on the application site were inadequate because the surveys were minimal and largely at the wrong time of year. This deficiency was not remedied by recourse to existing independent information based upon much better surveys. Failure to find is equated wrongly with absence, so biasing the comparisons in favour of the predicted value of the habitats proposed seeming better than the underestimated existing value.
2. The extent of a national priority habitat, Wood pasture and parkland, was grossly underestimated because of a miss-reading of the habitat definition, leading to the exclusion of many valuable trees and almost all of the grassland. This is compounded by an under-valuing of the grassland component of the priority habitat, which has potential as neutral (mesotrophic) grassland. Most of the parkland is to be sacrificed to intensively-managed sports facilities, amenity grass and built development and the remainder (in the south of the golf course) is to be sacrificed in an attempt to replace the naturally fertile soil with an infertile sandy acid soil. The supposed "gain" of acid grassland from this expensive substitution is very unlikely to be achieved.
3. Wimbledon Park Lake was seriously undervalued because no recourse was had to the findings of a five-year study of lake water quality and the habitat value of the lake. Large areas of the lake shallows are proposed for disposal of sediment dredged from the centre of the lake, dressed up as reedbed, and as a habitat gain. In fact, the lake is a national priority habitat supporting a rich biota, including 8 species of bats that come for the insect food emerging from the water, making the landscape one of the best for bats in London. Replacement of a large area of this with reedbed is a net loss to biodiversity.

4. Sediment excavated from the lake bed is proposed to be dumped around the edge of the lake. This compromises water's edge vegetation and a national priority habitat, wet woodland. These losses are underestimated, so tipping the balance incorrectly towards net gain.

5. The surveys of birds were inadequate, so missing a large proportion of the species that breed, pass through on migration or winter in the heritage landscape, including a good number of priority species for conservation. This omission, too, introduces a fictional "gain" when compared with a purely theoretical species composition in future. Many of the species supposed to be gained already occur in the heritage landscape and others are most unlikely to come because of the proposals. Many existing species will be harmed by the losses of trees and reduction in the area of shallow eutrophic water and the food that thrives in and above the water.

6. The adverse effects of the proposed buildings, tennis courts and access paths are not properly accounted for. The introduction of lighting and access for people, however well designed, takes away from undisturbed habitat and dark skies, seriously compromising bat habitat. The intensive management of the grass courts risks nutrient and herbicide pollution, affecting the parkland grasslands and water quality in the lake. A very large number of existing trees are to be removed to make way for these developments and this is not redressed by new planting, which will take well over 100 years to achieve replacement quality.

I broadly support the conclusions of the fisheries survey, but regret that these seem not to have been incorporated into the detail of the proposals.

## **B. The water quality and biodiversity of Wimbledon Park Lake.** Dave Dawson, December 2021.

### Summary

According to Historic England, Heritage Wimbledon Park is "at risk" partly because of the "deteriorating condition of the lake". In 2021, the All England Lawn Tennis Club (AELTC) applied to develop, not only the Wimbledon Park Golf Course, but also parts of the lake, owned by the London Borough of Merton. AELTC proposed reinstating the lost southern arm of the lake, de-silting the lake, developing a new reedbed around its fringes and creating a walkway, largely over the shallows of the lake. These proposals were claimed to remove pollutants, assist with flood control and enhance the amenity of the lake and its biodiversity, but these were not supported with information on the condition of the lake and its biodiversity, nor on precedents elsewhere. To test the claims, I give the results of studies of the lake over the last five years and cite expert reviews of the relevant science. The water quality of lakes depends upon low concentrations of plant nutrients (mainly phosphates and nitrates) in the water, so that reducing nutrients improves lakes. The water quality of our lake declined around 1990 and recovered around 2011. Phosphates did not change over those 20 years, but nitrates reduced by 90%, so the recovered lake water quality in 2011 was due to a reduction in nitrogenous pollution. There is an annual cycle of plankton abundance and waterweed growth in the lake. This cycle was disrupted by blooms of blue-green bacteria (once thought to be algae) in three out of the last five summers. The blooms threaten the biodiversity of the lake and human health. Blooms are caused by excess nutrients, so this suggests that the lake is on the cusp of a decline to the previous poor water quality, caused by nutrient pollution.

Sources of nutrient pollution are not remedied in the AELTC planning application:

1. Pollutant nutrients arrive in the lake in the water of its three main tributaries. The Environment Agency and Thames Water have failed to monitor this, nor do the proposals address nutrients arising upstream. This should be done.

2. Nutrients from the golf course now leach into the lake. This will change with the proposed 39 new, intensively-managed, grass tennis courts and a great increase in irrigation, so that more nutrients will leach than before. A few swales (long, grassy wetlands) and vegetated pools are proposed to catch pollutants, but these are too few and small. New, detailed proposals to secure a great reduction in nutrient pollution from the proposed development are needed. Without this, the quality of the lake is doomed.

3. Greylag, Egyptian and Canada geese transfer nutrients from the grassland where they feed, to the lake where they defecate. Although this cannot account for previous changes to the lake, non-lethal deterrence of geese would be sensible.

4. Many nutrients are locked away in the sediment on the bottom of the lake. Disturbing the sediment can bring nutrients back up into the water. Disturbance can come from bottom-feeding fish (Carp, Tench and Bream) or cutting waterweeds to make room for watersports. Preventing sediment disturbance should be integral to the proposals.

5. About 15% of the fringes of the lake are proposed as new reedbeds, claimed to remove pollutants. However, the positioning of the proposed reedbeds is wrong and there is not enough room in the lake for sufficiently large reedbeds. This means that the reedbeds would be ineffective.

The lake has three “National Priority Habitats” for biodiversity: eutrophic standing water, reedbed and wet woodland. Each of the three is rich in species in comparison with other lakes in London, so the lake is rich. This existing richness is not acknowledged in the planning application, nor is the great potential to enhance the existing habitats, rather than replace them. The planning application proposes replacing most of the existing reedbed and wet woodland and some open water with new species-poor reedbeds. This will result in a net loss of biodiversity. The new reedbeds should not be approved.

The lake supports animals that are uncommon regionally or nationally. These include the European eel and eighteen other London Priority Species. Among these are Swifts, Martins, Swallow and eight species of bats that commute long distances to feed on insects that emerge from the lake. Other London Priority Species include: Pochard, Kingfisher, Common sandpiper, Lesser black-backed gull and Gadwall. The planning application does not recognise the importance of the lake for these special animals nor the damage that the proposals would do to them. Reedbeds support many fewer flying insects than does open water. AELTC claims that the new reedbeds will benefit biodiversity. However, most of the special birds of reedbeds already occur at the lake. Those that are missing (breeding Bitterns, Bearded tits and Marsh harriers) require areas of reedbed larger than the whole lake. The implication that such species will benefit from the proposed small extra area of reedbed is misleading. The new reedbeds would harm special species and so should not be approved.

The proposal to restore the lost southern arm of the lake will be a welcome landscape benefit but, unfortunately, adds only 3% to the area of the lake, so benefitting biodiversity only a little.

The lake provides local amenity: the fishery and the birds, bats and insects that people enjoy. AELTC propose a walkway, which would help deliver on planning policies for access to nature. However, implementing the legal undertaking made when the AELTC acquired the golf course from LB Merton in 1993 for a 1.25 public walkway around the whole lake would provide a much better walkway. The alternative proposal in the planning application is inferior. It is 20% shorter, is buried in dull reedbeds, proposes no bird hides and it would disturb sensitive birds, so harming the biodiversity of the lake. Implementing the superior, existing obligation should be required.

The lake has lost around 35% of its depth through sedimentation over the 250 years since it was created. The proposed removal of sediment would gain some depth. It is essential, also, that effective silt traps are installed to minimise future sedimentation. Much more detail is needed for a full evaluation of the sediment removal. Apart from an increase in depth, other supposed benefits of sediment removal are illusory:

1. There would be no benefit to flood control, because all the sediment is below the regulated level of the lake.
2. Nutrients more than 10 cm below the surface of the sediments are locked away. Removing sediment releases some of these deep nutrients. Also, some sediment would evade removal, settling back onto the bottom. So, the existing problems from the top 10 cm would not be remedied.
3. The proposal is to remove sediment only in the middle 80% of the lake and to dump some of this into the shallows. This local disposal would release much nutrient into the lake water. So, the moving of sediment around the lake should not be permitted. The proposals should be revised to take sediment wholly away from the lake.

### **C. The Urban Greening Factor in Wimbledon Park** Dave Dawson, February 2022

#### 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. 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.

### **D. The soils of Wimbledon Park Heritage Landscape.** Dave Dawson, March 2022

In the 2021 planning proposals by the All England Lawn Tennis Club (AELTC) for their golf course and the LB Merton lake, it is claimed that the soils of the golf course are acid, so that the natural grasslands of the golf course would be those of acid soils. It is also suggested that proposed woodland should be that of acid soils: Oak-Bracken-Bramble Woodland. The existing grassland is dismissed as of no value for biodiversity conservation and the proposals plan to strip the existing topsoils and establish new grassland seen as appropriate to the acid soils. These proposed habitats are counted as biodiversity net gain in comparison with the present habitats of the heritage landscape. This note examines the evidence for these claims and compares this with evidence that AELTC chose not to take into account.

#### Summary

The claims of widespread acid soils on the golf course are erroneous. The evidence for this is extensive botanical survey that AELTC chose to ignore, and observations of various excavations across the heritage landscape. So, the proposed new habitats would be unnatural and difficult or impossible to establish and

would not constitute a net gain. The aims for habitat enhancement should be for habitats of poorly drained, neutral to alkaline soils, for which there is good evidence. The woodlands should be similar to the existing ancient and old woodlands of the heritage landscape and the grasslands should be lowland meadows, both of which are National Priority Habitats of neutral to alkaline soils. A small area of degraded acid grassland near the northern tip of the site is the only place where an acid soil habitat is appropriate, but there seems to be no proposal to retain this area in the landscaping. It is inappropriate to strip the existing topsoil across the site in an attempt to create a new acid soil. Only where the existing soil proves irreparably damaged should stripping be undertaken to help restore neutral or basic soils. This analysis of the soils shows that the predicted biodiversity net gain from acid grassland and woodland creation would not eventuate. Gain would be possible should the error be corrected and appropriate habitats encouraged.

**E. Proposed development of Wimbledon Park Lake and surrounds. Planning submission on AELTC proposals. June 2022. Dr D.G. Dawson**

Summary

In May 2022, new details were given of the July 2021 All England Lawn Tennis Club proposals for new reedbed and circular walkway, following “de-silting” Wimbledon Park Lake. These details include the preferred method of sediment removal and the aims that led the All England Club to propose a circular walkway largely within the lake, rather than around it. I consider that the lake would benefit from the removal of sediment, as this would restore Lancelot Brown’s original design and increase its depth by an average of 0.7m but this operation could cause immeasurable harm to the lake, so full detail is required before any grant of planning permission. This submission seeks to remove the factors that make the Grade II\* heritage park at Risk.

1. The planning application is deficient because the locations of the sediment to be left in the lake and that to be removed are not detailed, nor is the method of removal decided. Some existing information on pollutants in the sediment is not considered. The purpose of bunds at the edge of the proposed reedbeds is not given. The disposal of material removed from the lake is not detailed. It is not appropriate to grant planning permission for sediment removal without much better information on its consequences.
2. 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. This is adequate reason to refuse planning permission for the “de-silting”.
3. 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. Approval should not be given to proposals that would result in a net loss to biodiversity.
4. The proposed “Quiet zones” in the two arms of the lake would prove to be “Disturbed zones”, as they would have significant, close human disturbance, preventing wildlife from flourishing. Realistic alternatives to the proposed walkway exist on land owned by, or which could readily be acquired by, AELTC. Such walkways would avoid the harm to biodiversity and could be dedicated as public rights of way.
6. The proposed boardwalks and reedbeds would harm views that survive from Lancelot Brown’s design. Realistic alternatives would allow the restoration and enhancement of this design.



7. All of the reedbed and most of the walkway are proposed on land not owned by AELTC. Both will require regulation of access, and maintenance, but no provision is made for arranging this with the owner.

#### **F. Problems with the “GLA Stage 1 Report – Applicant Response”**

Dave Dawson, August 2022.

The All England Lawn Tennis Club (AELTC) proposes a major, intensive tennis development on Wimbledon Park Golf Course and Lake, which may be scrutinised by the Greater London Authority (GLA), under its planning powers. The Stage 1 report gives the GLA response on some topics. My report examines topics where my submissions on the planning application introduced matters that were not properly considered in the dialogue between the applicant and the GLA.

1. The area of the proposed “public park” is given as 9.4 ha. In fact, the public will have permissive access to only 6.8 ha of open space.

2. 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”. LB Merton corrected this in the Local Plan Inquiry, and stated that the site is not in an area identified as deficient, so there is nothing to address.

3. AELTC claim that the proposals will enhance the condition and appearance of the lake. Sediment accumulation is not a threat to the shape of the lake. 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.

4. The GLA comments that Biodiversity net gain has been demonstrated. My 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, I identified a biodiversity net loss to four National Priority Habitats: Wood Pasture and Parkland, Wet Woodland, Reedbeds and Eutrophic Standing Waters, compromising almost all of the application site. The “net gain” calculation was updated in 2022 to be slightly more realistic, but the fundamental flaws remain, resulting in a substantial net loss:

a) Proposals to strip existing soil 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 new acid grassland and acid woodland. Further, AELTC proposes to remove 21% of the documented trees and these are said to be predominantly trees that are not safe or having a short “useful” life. The loss of all trees, and especially future veterans, is significant and it cannot be redressed by plantings.

b) A net gain is claimed from the removal of sediment from the lake. Rather, 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.

c) AELTC claims that lighting schemes will be “sensitive” and that “access infrastructure” would be “carefully considered”. To the contrary, lighting and access proposals will cause losses.

d) Proposed permissive “public access” to nature, fails to acknowledge that an existing positive obligation requires unrestricted access to a circular walkway around the lake once golf should cease. This would better serve the London Plan policy than would a walkway which is proposed to be gated.

e) The GLA accepts the AELTC’s Urban Greening Factor calculation, 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 and so is not compliant.



**G. Trees and woodland in the planning proposals for Wimbledon Park Golf Course.** Dr DG Dawson, September 2022.

Summary

The All England Lawn Tennis Club proposals for intensive lawn tennis development on Wimbledon Park Golf Course fail to deliver national planning goals for biodiversity, amenity and carbon sequestration.

1. The Club's tree survey is grossly deficient, having missed out some 1000 tree seedlings, saplings and young trees. Not accounting for the harm to these trees contributes to the calculation of a fictional biodiversity net gain and ignores a loss of stored carbon.
2. A proposal to transplant 18 mature trees that stand in the way of development is an expensive and insubstantial gesture as most will fail or take many years to resume normal growth.
3. The proposal to protect some 41 veteran trees, as required by the National Planning Policy Framework (NPPF), is welcome but two essentials for biodiversity conservation are omitted: the retention of large quantities of standing and fallen deadwood and retaining a pastoral setting. Also, there is no provision similarly to protect future-veterans, so the future prospect is biodiversity loss.
4. It is proposed to remove some 300 other mature trees, with a median age of 45 years (28% of the total), many of which provide wildlife habitat features. Understating this loss allows the calculation of a fictional biodiversity net gain.
5. The golf course has a history as an Ancient Wood Pasture, identified in the NPPF as equivalent to other Ancient Woodlands and so of highest priority for protection. The failure to protect the 300 trees proposed for removal is contrary to paragraph 180 (c) of the NPPF, as the application "should be refused, unless there are wholly exceptional reasons".
6. Felling the 300 trees will release some 210,000 kg of carbon. This substantial loss of carbon store will cause global heating and not be redressed for 50 years, far too long for any meaningful effect.
7. Many of the trees on the golf course originated by "passive rewilding" – the germination of seeds that arrived naturally from nearby mature trees. These young trees are thriving already, have a local genetic heritage, and are preferable to planting new trees, many of which will not thrive.
8. The landscape proposals retain a few surviving 18th century tree clumps and enhance a peripheral woodland on the golf course. However, trees are kept well clear of the planned new facilities, cramming them into areas dictated by the facilities, not by landscape design. Long views across pastoral slopes down to the lake are missing. Lancelot Brown's landscape tradition is very compromised.
9. The species proposed for planting are mainly those of native woodlands, so failing to reflect the range employed by Lancelot Brown. Much of the proposed planting merely replaces the many undocumented young trees that are to be removed. Taking these into account would greatly reduce any need for new plantings.