



29 August 2023

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## **AELTC application to fell trees on Wimbledon Park Heritage Land 23/T2126**

These observations were prepared by Dr DG 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.

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

### **Summary**

These proposals parallel a recent application here (22/T3239), which was refused. We submit that:

1. Permission for removal of any tree should be refused because the trees are protected by a Tree Preservation Order and replacement trees are resisted by the applicant. The applicant regards the trees to be removed as being in the wrong place. As replacement trees would be in the same place, this precludes appropriate replacement trees.
2. Tree removal to reduce competition with old and veteran trees ("haloing") is desirable in only two cases, where there is an immediate threat to the oldest and most susceptible tree. Even here, it would be difficult to provide replacement trees.
3. Removal of two trees that threaten structures could be allowed, should replacements be possible.
4. These observations apply also to a large number of woodland trees described misleadingly as "scrub and saplings on the lakeside", where there are two additional reasons for refusal: that the detail is deficient and inaccurate and that removal here is an integral part of an existing planning application for intensive lawn tennis development which should not be prejudiced by this proposal.
5. Proposed pruning of 11 trees to reduce competition with nearby old or veteran trees might be allowed where clearly necessary. However, this necessity is not demonstrated in any case.



6. Seven trees are proposed for branch pruning, four of which are clearly not a current threat, so should not be approved. Two trees are proposed for experimental pollarding and a fifth tree may be a threat to users of the adjacent highway and only these three might be approved.
7. The coppicing of two trees is unnecessary for woodland management and should not be approved.
8. The proposals are claimed to involve work within a strategy providing for “appropriate management of the Brownian landscape, ecological improvements, climate resistance and biosecurity”. Whilst it is commendable that the applicant wishes to embrace these aspects of benefit from tree protection, unfortunately there is no such strategy, and the proposed works do not deliver what is claimed:
  - Sequestered carbon would be removed without any compensation.
  - The proposals for individual trees and groups of trees have no explicit landscape reason nor explicit, direct ecological benefit.
  - The sole landscape benefit claimed is from the removal of “regenerated scrub with self-seeded saplings” on four parts of the lake edge, but this is proposed for extensive, poorly defined areas of undefined composition, without reference to the 18<sup>th</sup> century landscape design, nor to proposed view lines. The biodiversity and heritage value of this wet woodland at the lake edge is not considered.
  - The retention of standing and fallen dead wood, hollows and climbing ivy on trees and other similar wildlife habitat features is not proposed.
  - Retaining the habitat of declining, rare, or protected animal species is not proposed.

## **Introduction**

Planning application **23T2126** was made in August 2023 by AELTC for autumn-winter tree works on the part of the Wimbledon Park Heritage Landscape that was formerly a golf course. The land is now employed mainly for car parking and other activities associated with the Wimbledon fortnight on the AELTC site across Church Road to the west of the application site.

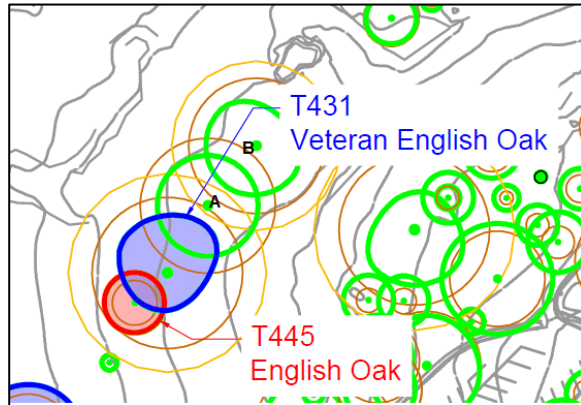
The application proposed works on some 42 trees or groups of trees. It proposes more works than a recent application for the same site (22/T3239), which was refused for reasons that apply also here.

## **Promoting old and veteran trees**

The site has some 41 veteran trees, including 34 English Oaks<sup>i</sup>. Three of these are older than Lancelot Brown’s landscaping of 1765, 7 date from around that time and a further 14 date from the time when the Earls Spencer continued to use the parkland<sup>ii</sup>. These, and other old trees, are valuable for biodiversity conservation<sup>iii</sup> and heritage, as identified in the National Planning Policy Framework (NPPF)<sup>iv</sup>. Old and veteran trees tend to lose their tallest branches, retrenching to a smaller size and acquiring holes, hollows and fungi that support a range of specialist animals. Veteran trees are afforded the same protection in the National Planning Policy Framework as is ancient woodland. Here, they are set in grassland and accompanied by blocks of woodland, reflecting their origin as parkland trees.



Some advocate clearing away younger trees nearby old specimens, in the belief that this reduces competition for light and for access to soil moisture and nutrients. However, there are no good studies demonstrating any benefit, or harm, from such “haloing”<sup>v</sup>. 16 Trees are proposed to be removed, mainly to protect old English Oaks from harm (English Oak T445, Red Oak T155, Turkey Oaks T157 & T287, Bird Cherry T289, Lime T310, Hybrid Poplar T465, Silver Birch T482 & T622, False Acacia T505, Sweet Gum T518, Sycamore saplings T545, Ash T579, Leyland Cypress Hedge C1, Norway Maple E2, Western Red Cedar WRC2). T287 and T289 are close to the veteran Tudor Oak (T288) and so are justifiable removals, if replacement planting should prove possible<sup>vi</sup>. No such need is evident for the other 14 proposed removals, as is illustrated by English Oak T445, which is said to be a “young tree suppressing the growth of branches on the west side of Veteran English Oak T431” (see the Figure).



**Figure. Part of the proposals map with annotations A and B added.**

The Figure shows that the veteran (in blue) is, in fact, equally “threatened” by another old tree “A”, which in turn is “threatened” by veteran “B”. Tree “A” clearly overlaps more than any of the other four, but is not proposed for removal. In fact, there is no significant threat to any of these four English Oaks from its neighbours, because the overlap is small. So, the healthy English Oak, T445, does not need to be removed. Similar analysis shows no need to remove any of the other 13 trees. Again, any removals would require replacement planting, and none is proposed.

Three English Oaks (T391, T431 & T673) are proposed for pruning to reduce the chance of natural limb loss. T673 extends over the highway, so the implied risk could be real and judicious pruning just may be appropriate. However, the other two are in the middle of the site. Natural limb loss is an integral part of the aging of a tree and to be encouraged for biodiversity and heritage reasons, so safety is the sole valid reason for such pruning. No safety concerns are expressed for T391 nor T431. Any risk would be best accommodated by planning nearby activities in such a way that people are kept away.

The canopy of 11 potential competitors of old and veteran trees is to be pruned in an attempt to reduce competition for light. There are no good studies demonstrating this theoretical benefit either. The trees proposed for such pruning are: English Oaks T201, N11, N12, N26 & T27, Ash T365 & T398, Red Oaks T393 & T461, Lime T646 and Field Maple T660. Some of these are in situations that parallel trees proposed for removal (see above), where the same considerations suggest no need for pruning. An example of this is Ash T398, a



healthy specimen that is recommended for pruning to favour an adjacent younger oak. There is little overlap between the two and no logic in preferring the oak to the Ash, and so no justification for meddling with the Ash. Other trees proposed for pruning are in clumps of trees, or belts of woodland where competition for light is a natural process and whether a particular tree should be favoured is a matter of opinion. For example, trees N11 and N12 are in a clump of trees and N26 and N27 are on a boundary where there has been a line of trees for the last 270 years. Competition of such trees with their neighbours is a natural woodland process, not to be disrupted without good reason.

A single Field Maple (E5) and a Goat Willow (E9) are proposed to be coppiced, to reduce competition with a “better quality” English Oak. As all three species are natural components of woodlands on the heritage land, they can compete naturally with no artificial help and provide biodiversity benefit accordingly.

A single English Oak (T670) is proposed for pruning to “improve shape” and a Lime (T672) because it has “decay”. Neither tree is unsafe and there is no good reason for this tinkering.

Haloing and pruning are described by AELTC as “arboricultural best practice”, without any further justification, but would be best reserved for cases where a nearby old tree is particularly valuable and ancient (as for the Tudor Oak T288). Even less well established as a positive measure is the pollarding or re-pollarding of two old trees, described in this application as “veteranisation” (English Oaks T309 & T623).

#### Two trees in the wrong place

A Turkey Oak (T324b) and a group of Ash saplings (T1353) are proposed for removal because they threaten adjacent structures. The Turkey Oak is said to be of very poor form and negligible long-term potential. Potential for what is not stated. Nevertheless, these could be removed with a condition imposed for replacement.

#### Ash dieback

Two Ash trees (T365, T398) are devalued in part because they are “liable to be affected by Ash Dieback Disease in due course.” This possible future is not a valid reason to devalue a healthy tree.

#### Tree clump with dead Hawthorn and dead birch

Tree E6 is said to be dead and so proposed for removal. This and other nearby trees scheduled for felling (E2 and T465) form a clump with other trees. It would be appropriate to manage the clump as woodland, and to recognise the value of dead wood as habitat. A single Silver Birch (L4) near Bigden Brook is proposed for removal because it is dead, not a hazard, so its removal is unnecessary removal of wildlife habitat.



### Water's edge woodland

Four areas of “regenerated scrub with self-seeded saplings” are proposed to be removed where “historic design intent of clear views down open slopes to open water have been lost through lack of management”. This justification for the removal of trees makes no explicit reference to Lancelot Brown’s actual design in his 1765 landscaping, as shown by the Richardson map of 1768 and the Montreal map of 1784. Reference to these excellently detailed maps shows that clear views down open slopes to open water were unusually few and there were none where the removals are proposed in this application. There, potential long views were obscured by clumps of trees or dense parkland trees, so that any clear views down to the water were over short distances. There is a different, and good, justification for works beside the southern shore of the lake, as dense, invasive Broad-leaved Bamboo (*Sasa palmata*) dominates some of the lake edge and suppresses the regeneration of the natural woodland here. Bamboo, however, can be removed without sacrificing trees or woodland.

Beside the southern edge of the lake, this natural woodland is an ecotone of only a few metres in width, between two National Vegetation Classification woodland types. First, a dry-land woodland<sup>vii</sup> dominated by English Oak, Ash, Birch, and Field Maple, with Bramble, Bamboo, Ivy, Hawthorn, Elder, Dog Rose and Bluebell below, and second, a wetland type<sup>viii</sup> dominated by Alder, Sallow, English Oak, Crack Willow and Birch with Common Reed, Yellow-flag Iris, Water Mint, Gypsywort and Great Willowherb below. These areas are recovering well from insensitive felling operations some 20 years ago by the AELTC’s previous tenants, the golf club. As the application does not provide any detail of the number or identity of the “saplings” to be removed from this wet woodland, I undertook an analysis of my own detailed data from the area where removals are proposed<sup>ix</sup>. In the southern areas, the “saplings” to be removed include some 200 or so trees of Alder, Crack Willow, English Oak, Birch, Grey Willow, and Ash not identified as “existing trees to be retained”.

Beside the northern edge of the lake, the woodland is younger, but of the same type as in the south, and there are fewer trees, with none indicated as to be retained. These trees have colonised the wet soils beside reedbeds in the lake shallows over the last 20 years or so and were present when the Tree Preservation Order was made. They grow through areas of Bramble, Common Reed and Common Bistort. There are around 20 trees proposed to be removed, including Crack Willow, Osier, Elder, Hawthorn, Ash, and Wych Elm.

### Habitat for Biodiversity

The proposals for old and veteran trees deal commendably with the form and survival of these as heritage features but take no account features that provide excellent habitat for biodiversity, an important element of their amenity value. These trees provide shelter, food and nesting sites for protected species: Nuthatch, Tawny Owl, Stock Dove, Kestrel and eight species of bat. The old trees also support a number of rare invertebrates and fungi. Pruning these old trees removes biodiversity habitat, resulting in a net loss of biodiversity. The proposed removal or pruning of younger trees in the hope that the veterans will benefit,



also removes habitat for biodiversity. Whilst this younger habitat is not so excellent as that provided by the veterans, these removals would also harm biodiversity. An example of this is the proposed removal of Poplar T576, a tree with unacknowledged biodiversity habitat value. This means that the claimed benefits for biodiversity are illusory.

Planning application 21/P2900 for intensive lawn tennis development.

The Rolfe Judd submission letter in support of the tree works states that *“There has been little opportunity for forward-looking tree management, and the outlook has been obscured by the prospect of the planning application for the park. Given that the application by the AELTC for the park doesn’t have a fixed determination date, it has been decided now to undertake proactive arboricultural management of the site.”* This introduces concern that elements of this proposed tree work may anticipate work that is for planning application 21/P2900 and so prejudice consideration of that application. We submit that this is clearly the case for the present proposals for the water’s edge woodland, as the claimed landscape benefit of this work is illusory and the landscape plans for application 21/P2900 show no retention of this woodland<sup>x</sup>. Clearly, the waterside woodland is in the way of AELTC’s proposals for intensive tennis development, making it convenient to have it removed before its value can be considered properly.

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<sup>i</sup> 34 oak, 6 willow and an ash.

<sup>ii</sup> These numbers are based upon state-of-the-art ageing methodology and differ from those cited (without justification) by the Rolfe Judd statement supporting the application.

<sup>iii</sup> Irreplaceable habitat.

<sup>iv</sup> National Planning Policy Framework: 180 C

<sup>v</sup> “As trees reach old age, they become smaller and their canopy becomes sparse because of the dieback of their outermost branches. As a result, ancient trees in dense forest stand the risk of being overtopped by younger, taller trees. Haloing involves the removal of these young, competing trees from around the ancient tree. This may release ancient trees from competition and allow them to survive for longer. However, sudden changes in environmental conditions (such as light availability) due to the removal of the surrounding canopy may also damage or kill ancient trees. We captured no evidence for the effects of haloing ancient trees on forests. ‘No evidence’ for an action means we have not yet found any studies that directly and quantitatively tested this action during our systematic journal and report searches. Therefore, we have been unable to assess whether or not the action is effective or has any harmful impacts.” From Agra, H., Schowanek, S., Carmel, Y., Smith, R.K. & Ne’eman, G. (2020) Forest Conservation. Pages 323-366 in: W.J. Sutherland, L.V. Dicks, S.O. Petrovan & R.K. Smith (eds) *What Works in Conservation 2020*. Open Book Publishers, Cambridge, UK.”

<sup>vi</sup> If a tree outside a woodland is removed, section 206 of the Act places the landowner under a duty to plant a replacement tree at the same place, as near as is reasonably practicable to the position of the original tree.

<sup>vii</sup> In the National Vegetation Classification: Ash, Field Maple, Mercury Woodland, Ivy subcommunity (W8d). This is the type found in Horse Close and Ashen Grove Woods and in younger woodland in the Heritage Landscape.

<sup>viii</sup> In the National Vegetation Classification: Willow, Birch, Reed Woodland (W2).

<sup>ix</sup> The definition of all four of these areas on the application plan is not accurate, as it includes substantial parts of the reed beds and wetlands at the lake edge and shows gaps in woody cover where none exist and woody cover where there is none. Nevertheless, I was able to identify its broad extent with reference to nearby features. These inaccuracies risk the works extending beyond the mapped areas of the planning application, no approval should be given unless these areas can be mapped more accurately.

<sup>x</sup> “PROPOSED GENERAL ARRANGEMENT”, drawing 51365-LUC-XX-XX-DR-L-02060 submitted with the planning application.