

To Merton Planning: planning.representations@merton.gov.uk

13th August 2023

Dear Sirs

Application 23/P1939

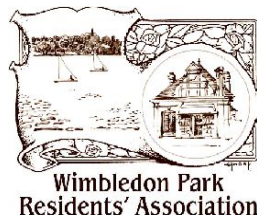
Full Planning application for localised earthworks involving the removal of earth deposits associated with the former golf course use, land north of the Wimbledon Club

This submission was prepared by Dr D.G. Dawson for the Residents' Association. We welcome the proposal to remove polluted material from this area. We agree that the proposal is an engineering operation, requiring planning permission. We also welcome the precautions designed to protect the larger trees that adjoin the application area. However, the detail of the proposals is seriously deficient, so that any approval should be subject to conditions that remedy the deficiency. The numbered paragraphs below outline the deficiencies. Any grant of planning permission should be conditional on achieving biodiversity net gain by restoration of the site to woodland as detailed in paragraph 2 below, with explicit mention of the importance of woodland habitat to the bats and other protected species that occur on site. A condition for restoration to woodland also serves to replace trees that are to be lost, as is appropriate in a conservation area, and helps to redress loss of sequestered carbon.

1. The application site lies within a Site of Borough Importance for nature conservation (Grade I), protected in the LB Merton Local Plan and by London and National biodiversity policies. The planning application form is deficient in that the section on "Biodiversity and Geological Conservation" denies the presence of "Designated sites, important habitats or other biodiversity features". The Rolfe-Judd letter dated 14 July 2023 under "Ecology and Biodiversity Considerations", refers to London Plan Policy G6, but without reference to the Site of Importance and the features that it protects, nor to the relevant Local Plan Policy. The planning application has a tree survey, which serves to document trees as landscape features, but no biodiversity survey.

2. The biodiversity importance of the application site is evident from its earlier state before this was compromised by AELTC allowing their tenants to use it as a tip. Google Earth aerial views from June 2015 and earlier show continuous vegetative cover, including flowering Elders and other small trees and shrubs and a temporary water body. The area was mapped as woodland in the 1984-85 London Wildlife Habitat Survey. It is surrounded by woodland today. So, it is appropriate to restore the site to woodland once the polluted material is removed, not with grass and "wildflowers". The self-established trees that are to be removed are young, but have colonised naturally from the surroundings and so are indicative of the woodland types that are natural here. Their removal would also constitute a loss of sequestered carbon, which would not be redressed by a grassland replacement. There are two natural woodland types in the surroundings that should inform this restoration. To the east and south is the remnant of Wet Woodland on the fringes of the lake and other wet ground, with willows, Alder and sedges and to the north and west is Oak, Ash, Elm, Field Maple and Hawthorn woodland, as is typical elsewhere in this Heritage landscape. Restoration with these woodland types would constitute a biodiversity net gain in comparison with its recent state. Restoration to grass and wildflowers

From the Chairman, Iain C Simpson
56 Home Park Road
Wimbledon SW19 7HN
Tel: 020 8947 1301 Mob: 07836 361 782
E-mail: iainsimpson@imi-consulting.com



would introduce habitats that do not belong in this situation and would not constitute a biodiversity gain.

3. This woodland habitat supports eight species of specially-protected bats that may be found feeding on the insects that emerge from the nearby lake and wet woodland. These bat species are an important reason for restoring the site to woodland. Other woodland species would benefit, including birds such as the locally-resident Tawny Owl, Nuthatch, and a range of other woodland species. The planning application fails to mention these species that come to the area because of its habitats, but focuses instead on the possibility of fox earths or badger setts. Neither species hibernates, so this description of them is misleading. Whilst there are no records of setts or earths in this small area, both of these mammal species occur in the wider Heritage Landscape, so the precautions undertaken are welcome.

4. The tree survey adhered to the relevant British Standard (BS5837: 2012) and so has documented only the larger specimens of trees and shrubs. The proposed tree works are appropriate in this amenity context, but are not informed by biodiversity considerations. In particular, no regard is had to smaller trees and shrubs nor ground cover. Where these features adjoin the application area, they are not protected.

5. The Rolfe-Judd letter refers to a benefit to the heritage character of this Lancelot Brown landscape, but with no reference to the character of the site as created by Brown and evident in the 1784 Montreal Map. This map confirms that a line of trees followed the present-day northern boundary of the Wimbledon Club, which lies adjacent to the application site to the south. There was a clump of trees at the eastern end of the tree line on the edge of the lake. The application site itself lies right by the historic location of the tree line and clump of trees. There was also a large block of parkland trees in the late 18th century to the north and west of the present-day application site. An aerial photograph from 1950 shows this woodland and parkland trees survived the intervening 170 years more or less intact. These trees and woodland are the main elements of Brown's design that needs present-day conservation. Restoring a tiny site to grass and wildflowers would not achieve that. Woodland is appropriate to the heritage character.

6. The trees of the application site are included within a Tree Preservation Order which is applied to the whole Conservation Area within LB Merton. Replanting with trees is appropriate to redress the loss of 10 of these existing trees.

Yours faithfully

From the Chairman, Iain C Simpson
56 Home Park Road
Wimbledon SW19 7HN
Tel: 020 8947 1301 Mob: 07836 361 782
E-mail: iainsimpson@imi-consulting.com