

Director of Environment and
Regeneration
London Borough of Merton
Civic Centre
London Road
Morden SM4 5DX



29 August 2023

For the attention of Rose Stepanek, Tree Officer

Dear Ms Stepanek,

23/T2126 – AELTC: Proposed Works to Trees on the Former Wimbledon Park Golf Course

This application seeks planning permission for the removal of several trees and saplings and the pruning of others.

The golf course site is within the Wimbledon North Conservation Area. It is Metropolitan Open Land and Grade II* parkland. It is also on Historic England's Heritage at Risk Register because of the lack of a shared vision for the whole historic landscape. Its MOL status gives it the highest protection of any open land in London. All the trees on the former golf course are specifically protected by the Tree Preservation Order MER (748).

The AELTC's application to develop the whole of the former golf course for tennis purposes (21/P2900) remains undecided.

An earlier application for tree works on the golf course site (22/T3239) was refused for a great many reasons, including:

*The proposed work will reduce the amount of tree canopy coverage in the park;
The tree work is not considered to be necessary as compared to removal of trees on grounds of being dead or dangerous;
The proposed work will be detrimental to the setting of the landscape;
The proposed work will be detrimental to the character and appearance of the conservation area;
There has been no assessment of the historical value of the vegetation and whether it should be retained as part of the protected heritage landscape;
The application does not include any information concerning replacement planting for these .. trees;
Given that the current planning application reference 21/P2900 proposes a review of the landscape setting of the former golf course including planting numerous Oak trees across the landscape, this would be a more appropriate time for such a proposal to be considered. This will also allow for replacement planting to be carried out as part of those proposals;
Merton Council has published a Climate Strategy and Action Plan, and the retention of existing trees helps to protect against climate change.*

We expect that similar considerations will be applied to this application as well. In particular,

- i) we would not expect the Council to authorise removal of any healthy trees:
- ii) where, exceptionally, the removal of a tree is justified, further trees should be planted on site in accordance with the Council's developing policy of "tree girth replacement":
- iii) dead trees can have a value for biodiversity and providing habitats for wildlife, and therefore the removal of dead trees should only be approved where they are dangerous: &

iv) given that Biodiversity Net Gain is to be a planning requirement when Regulations are published by the Secretary of State in the autumn, one would expect to see applications of this type anticipating the new BNG thinking.

Accordingly, we believe that this application should be refused.

Yours sincerely

Chris Goodair
Chair, Wimbledon Society Planning & Environment Committee

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