



Friends of Wimbledon Park

Submission on Planning Applications Merton 21/P2900, Wandsworth 2021/3609 at Wimbledon Park Golf Club, SW19 7HR.

Introduction

The Friends of Wimbledon Park (FOWP) is a voluntary umbrella organization that aims to give a voice to local people, community groups and other interested parties, to protect and enhance this well-loved heritage landscape, Heritage Wimbledon Park, for future generations.

This is a fourth submission from FOWP and concerns the Environmental Impact Assessment and other related issues.

Comment

The fact of 101 documents for this application requires a staged response due to time constraints amongst the volunteers examining these documents. We have obtained further information on which we can comment. Also, we are aware of the 1993 Covenant, and this should take precedence where there is conflict.

Quotes from the planning application documents are in italics.

Our Objections

1) Summary

- a) To overcome the risks to the Grade II* heritage landscape, a holistic approach should be undertaken to the whole 61ha landscape.
- b) Without detailed consideration of possible land swaps, or other co-ordination with the two other owners of the heritage landscape, the obligation to consider reasonable alternatives has not been discharged. The failure to demonstrate that there are no reasonable alternatives is a reason for refusal of the application.
- c) A holistic approach to vistas, heritage, habitat, biodiversity, and assets needs to be followed for the whole 61ha park. The failure of the application to achieve this, leaves the heritage at risk and constitutes a reason for refusal.
- d) Failed to consider the effects on participating sports and how their facilities can be improved.
- e) Failed to fully explore the benefits to the local Community in line with their second core objective.
- f) Following the Stonehenge precedent:
 - i. There is no evidence that this application considered the impact on each individual asset in this historic site.
 - ii. Failed to fully consider alternative schemes.

2) Introduction

- a) Environmental Impact Assessment (EIA) is the process of systematically and objectively compiling, evaluating and presenting all the likely significant environmental effects, both positive and negative, of a Proposed Development, to assist the LPAs in considering a planning application. It enables the significance of these effects, and the scope for reducing negative, or enhancing positive, effects to be clearly understood.
- b) Under the EIA Regulations, the Environmental Statement (ES) is required to consider reasonable alternatives
- c) Grade II* Heritage Wimbledon Park (61ha) is shared between 3 owners¹, AELTC, The Wimbledon Club (TWC) and LB Merton (LBM). It needs a holistic approach to improvements particularly as it is on Historic England's 'At Risk Register'. A joint agreement on retaining and improving vistas and a biodiversity strategy are two examples of what could be achieved.

3) Heritage Vision for the AELTC Wimbledon Park Project

- a. In the Design and Access Statement it gives core objectives.
- b. *Our two core objectives, which underpin the aspirations and proposals for the AELTC Wimbledon Park Project are:*
 - *To maintain The Championships as the premier tennis tournament in the world, and*
 - *To deliver a positive impact for our communities, in particular our local community.*
- c. Extracts relating to the community are:
- d. *Creating the opportunity to improve community access to tennis and sport.*
 - *Safeguarding and enhancing biodiversity and wildlife in the parkland, contributing in a more meaningful way to the wildlife corridors in Southeast London.*



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- *Creating a management plan to maintain the park in a way that protects its heritage and its future potential for sport, recreation, and nature, in order to propose its removal from the Historic England 'At Risk Register'.*
 - *Working along with the other landowners to desilt and repair the lake and restore it as a historic feature and improve and protect the recreational use of the lake, such as sailing and angling.*
- e. The mention of its future potential for sport, recreation, and nature is noted as is the reference to just sailing and angling.

4) Heritage at Risk Register

- a) Briefly Capability Brown designed this landscape between 1765 and 1783. Only 61ha of the original 374ha remain and is now in three ownerships. In 1899 The Wimbledon Club bought the freehold (4 hectares) followed in 1915 by The Municipal Borough of Wimbledon who purchased the rest of today's heritage land.
- b) On October 1st, 1987, Wimbledon Park was included in Heritage Category: Park and Garden Grade II* List Entry Number: 1000852.
- c) In June 2016 the 3 owners were advised that The Grade II* Registered Park and Garden (RPG) has been included in the Heritage at Risk (HAR) Register for London due to the following issues:
- i. Uncertainty around the future [of the entire historic landscape:
 - ii. The impacts of divided ownership on landscape management:
 - iii. Obscured designed views: and
 - iv. The deteriorating condition of the Lake.
- d) A piecemeal approach to structures has led to obscured vistas. Examples are the 5 blots around the lakeside landscape. These are the Watersports building, the boat store, the green sports hall, the 6 monthly tennis dome and the AELTC Greenspaces compound. Only the Greenspaces compound has been addressed in this application.
- e) Vistas are a very important part of landscaping and that provided by Capability Brown here is of national standard. They have been neglected and need restoration.

5) Lancelot Brown

- a) Lancelot Brown landscaped Wimbledon Park. His great skill was in seeing the potential of an estate, describing its great 'capability' for improvement. Hence his nickname 'Capability' Brown.
- b) We have a remnant of the original 374ha estate and the remaining 61ha of the original estate and the vistas should be preserved and improved for the benefit of nature our grandchildren!
- c) What are the 'capabilities' for improving conditions for nature and the community?
- d) An appropriate question to ask is 'What matters and Why?'
- e) Prioritising 'landscapes, biodiversity and habitat' and then identifying the 'capabilities' of this shared landscape for visitor enjoyment of the facilities.
- f) A holistic approach rather than a piecemeal approach for the 61ha park will lead to a better deal for the owners; that is 'the whole is greater than the sum of its parts'.
- g) The owners' objectives can be briefly described:
1. LBM – income to help cover their costs of maintaining their portfolio of greenspaces.
 2. TWC – provision of participation sports facilities for their members and their significant outreach programme.
 3. AELTC – using the park to help maintain The Championships as the premier tennis tournament in the world.
 4. TfL² – to keep the railway bridge in good condition and to prevent trespassing onto the railway tracks.
- h) Input from the Community is also required, and this could be via the FOWP Forum. It should be noted that the Friends approached each of the 3 owners in early 2018 to ask them to work together for the benefits described above. We understand that there is a 'Memorandum of Understanding' between the 3 owners, but this remains a secret document.

6) Vistas

- a) The resulting vistas are varied from the casual to composed, from peep to panorama and prospect to bird's eye. His landscapes are spoilt by lakeside structures, tall trees around the stadium arena and imperfections. The remedy includes:
- b) Vistas audit:
- a. Identify the various vistas
 - b. Record what needs doing
- c) Restoration is concerned with three main issues:



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- a. the wellbeing of the historic lake:
- b. the restoration and preservation of historic views to and across the lake:
- c. the landscape setting around the lake.
- d) Historical re-interpretation is concerned with:
 - a. reinterpreting the atmosphere of Capability Brown's landscape within a diminished setting and without the benefit of access to, and views from, the historic house:
 - b. re-interpreting the evolution of the garden design styles that were so important in giving Wimbledon Park its historic status and which could involve the design and recreation of small 16th -18th century formal gardens within the public park.
- e) Restoration proposals concern:
 - a. the recovery of view lines and views to the lake:
 - b. the restoration of landscape character; necessitating not merely pure restoration but reinterpretation of Brownian concepts given the diminution of the park and the encroachment of development:
 - c. the restoration of the lake's ecosystem.
- f) Review footpaths:
 - a. new footpaths should be considered through this parkland allowing all year use of the park for walks.
 - b. the informal design of paths and their relationship with tree planting will promote the visual enjoyment of the restored park's character with key view lines created to the lake and distant hills from the park entrance areas

7) Biodiversity

- a) Important habitats include the lake and the lakeside, Horse Close Wood and Ashen Grove (ancient woodland). Only 2½ % of English woodland is ancient so this is valuable and half of it is in the Public Park.
- b) The owners should prioritise nature reserves in such a way that nature can thrive, and visitors can enjoy and learn.
- c) Further details are found in Dave Dawson's Special Places for Nature.
- d) A Citizen Science bat survey project was undertaken by the Friends in Wimbledon Park in 2017. This showed that 7 species of bat fed in Wimbledon Park. As bats don't recognize boundaries this is a good example of the need to consider the whole park for a biodiversity strategy (and beyond).
- e) 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.
 - a. A common tern raft and a bank for sand martins should be considered.
- f) The biodiversity strategy for the 61ha park should include records of sightings and locations of important species (such as Dog's Mercury an ancient woodland indicator species). This will aid conservation, assist educating visitors and enable nature to thrive.

8) Pollution

- a) Pollution is a continued threat to the lake and the species that live within.
- b) Information from the Environmental Agency indicates an average of two per year. Unfortunately this no longer includes fish kills which have numbered in the hundreds and has included the European Eel.
- c) A recent incident on 29/06/2021 near the island in the lake involved the discharge of raw sewage
- d) Steps need to be taken to prevent polluted water reaching the lake.

9) Habitat

- a) Species require places to live and areas to feed and rest.
- b) The Friends carried out a Citizen Science bat survey project in Wimbledon Park in 2017. The undergrowth under the trees in Owl Copse was important bat habitat where bat harping was best carried out. This area was cleared in December 2017.
- c) The best area for habitat is clearly in and around the lake particularly in the margins.
 1. The opportunity should be taken to create a nationally recognized nature reserve around Wimbledon Park Lake with access for visitors from a distance with viewing points and hides.



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2. Not only good for nature but this will also provide a great walk for visitors to enjoy and improve their wellbeing.
- d) Soil habitat is very important, and this is lost once covered by an artificial surface.
 1. A good example is shown in the Great Field which becomes saturated in winter but provides good feeding grounds for flocks of black headed gulls.

10) Sport

- a) Participating in sport has been an important activity in Wimbledon Park since 1890. Reports of polo and ice skating on the frozen lake can be readily found. Currently there are more than eight organised sports played in Wimbledon Park and run by different groups. Some for over 100 years and many of these operate at a national standard. Those for more than 50 years:
 - a. The Wimbledon Club³ (1890)
 - a. Cricket – Hockey – Tennis - Squash
 - b. Junior Sports
 - b. Wimbledon Park Golf Club⁴ (1898-2022)
 - c. Hercules Wimbledon Athletic Club⁵ (1967)
 - d. Wimbledon Park Bowls Club⁶ (1909)
 - e. Wimbledon Park Angling Club⁷ (1948)
- b) Comments worthy of mention include:
- c) Wimbledon Hockey club is one of the largest hockey clubs in the UK with 850 juniors and 15 Adult teams. With over 20 Olympians and International players, Wimbledon are one of the top performing clubs in the UK. Both the Men's and Women's 1st teams play in the National Premiership and the Women's 2nd team play one league below in the South National League. In 2017, Wimbledon's Men were the first UK team in 7 years to reach the final 4 of the coveted European Championships. With 15 adult teams and over 800 juniors Wimbledon is one of the largest and most successful clubs in English Hockey, offering high-performance, club and community hockey to players from 4 years to much older!
- d) Wimbledon Park Golf Club finishes at the end of this year 2022. However, there should be a place for their Junior Academy⁸ which has over 200 participants and requires a relatively small area.
- e) Hercules Wimbledon AC is a thriving community athletics club based at Wimbledon Park. We welcome new members of all ages and abilities and provide coaching geared towards competition in track and field, cross country and road racing. We compete in a variety of leagues at youth, senior and masters level, as well as county, regional, and national championships. The track at Wimbledon Park is the only one in the Borough, and a key London venue, attracting athletes and clubs from all over the country to compete. However it is now over 30 years old, is being undermined by the roots of the surrounding poplar trees and the surface is deteriorating.
- f) Wimbledon Park Bowls Club has achieved much recognition over the past one hundred years. Chief among its successes have been its England international players, Mrs Wolsey-Smith in 1952 and 1953, Mrs Jackson from 1954 through to 1963 and Mrs Linney in 1957, 1958 and 1959. More recently, in 2010 and 2013, Rachel Winter reached the quarter-finals of the National Under-25 singles and in 2011 and 2013 went one better reaching the semi-finals of the National Under-25 pairs.
- g) Wimbledon Park Angling Club is strictly limited to 150 members, the Club is a private not-for-profit organisation, run by a committee of volunteers elected annually by the membership. The Club is entirely self-funding and receives no monies from any other organisation. It has no associations or links with any public or commercial body but acts strictly in accordance with the demands and legal requirements of the Environmental Agency.
 - a. The objectives of the Club include the improvement of the fishing in the waters of Wimbledon Park Lake, and to this end the Club takes whatever opportunities are allowed to re-stock the Lake with native British species of fish. Additionally, and in accordance with the European Water Framework Directive, the Club is concerned to improve and maintain the overall ecological welfare of the Lake, including the re-establishment of native plants, such as water lilies, and the reduction of invasive species.
 - b. The Lake offers a mix of general coarse fishing for species such as **roach, perch, rudd, tench** and **breem**, and more specialist pursuits such as **carp fishing**.



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- c. Because of the limitation on membership numbers, prospective members can only join via a waiting list, having first been proposed and seconded by two existing Club members.
- h) Wimbledon Park Watersports⁹ provide sailing and paddle sport activities for school, groups, adults and children of all abilities in the stunning Wimbledon Park. The LBM Masterplan 2018¹⁰ says:
 - a. It is an unattractive, obtrusive building in a conspicuous location, providing a poor level of facilities despite recent expenditure. Its inadequate storage area impacts on other spaces, both within the Centre and in the Bowls Pavilion. Changing provision is inadequate: reported use of 250 people per day at peak times is enabled only by staggering times onto and off the water, existing changing room capacity is around 70 persons, excluding staff changing provision. It should be noted that the size of the lake is a limiting factor for watersports numbers and is probably already at a maximum. However, the Centre is significantly underused for 8-9 months of the year, peaking from June-August with school events and children's holiday courses. There is reportedly limited scope for expanding adult courses as the lake is unsuitable for advanced ability levels.

11) Assets

- a) As a shared Grade II* registered park and garden all the structural assets need to be considered in a holistic approach to avoid the piecemeal approach which has damaged the park particularly the vistas and improve the decision making and management of the whole 61ha site.
- b) The main ones can be listed:
- c) Owned by LBM and further comments in LBM Masterplan 2018
 - 1. White Pavilion rented by Metropolitan Police
 - 2. Wimbledon Park café which LBM Masterplan suggested enlarging with relocated playground toilets.
 - 3. Bowling Pavilion can be enhanced at rear with space for activities once the watersports and greenspace equipment are relocated.
 - 4. Watersports should be relocated to the arena. This will free up space for primary use activities.
 - 5. Arena needs a radical improvement.
- d) Owned by AELTC
 - 1. Golf club house is in good condition.
- e) Owned by TWC
 - 1. The Wimbledon Club house is in good condition.

12) Land swaps

- a) These should be beneficial to all 3 owners and result in great benefits to the community in the activities provided.
- b) For example in the LBM Masterplan 2018 two deals¹¹ with AELTC were suggested.
 - i. **5.5. Possible future land purchase/acquisition**
 - ii. *5.5.1. Two land purchases would greatly assist the functioning and aesthetics of the park and lake, and as small wedges of land, are currently not especially usable by AELTC who owns them.*
 - iii. *5.5.2. Section of Ashen Grove Wood adjacent to the lake. This acquisition would enable better public access to the lake and any future lakeside path.*
 - iv. *5.5.3. Access around the existing Athletics compound. This access would be much improved if this land was in public ownership. Similarly, access and the setting of the proposed Watersports and Outdoor centre would be better placed with more space around it, while not compromising the potential access to the proposed lakeside access path*
- b. *Further comment is made later in this submission.*

13) Harm

- a. Wimbledon Park is an important landscape designed by Lancelot 'Capability' Brown in the mid-18th century. The very high degree of significance is recognised in its designation as a Grade II* Registered Park and Garden. The condition of the Park has been allowed to deteriorate and as a result has been included on Historic England's Heritage at Risk Register since 2016.
- b. The proposed development represents considerable change within the part of the Registered landscape containing the Wimbledon Park golf course. It introduces:



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- a. major new structures,
 - b. extensive surfaced paths,
 - c. enclosures and other hard-landscape elements with associated drainage, services and
 - d. modification of landform.
 - e. These introductions mean the permanent loss of existing areas of open parkland and associated visual impacts.
- c. NPPF 200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional,
 - b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
- d. Wimbledon Park is still a Grade II* registered park so **wholly exceptional applies**. The application only considers part of the registered landscape.
- e. There is a failure to consider the whole registered site and the harm proposed to the site within the application fails the test of wholly exceptional.

14) Wellbeing

- a) Both LBM & LBW declared a climate emergency in July 2019.
- b) The recent Intergovernmental Panel on Climate Change (IPCC) Feb 28¹² report goes on to say “The scientific evidence is unequivocal: climate change is a threat to human wellbeing and the health of the planet. Any further delay in concerted global action will miss a brief and rapidly closing window to secure a liveable future,”
- c) The Space to Thrive report¹³ is a rapid evidence review of the benefits parks and green spaces have for people and communities. Comments include:
 1. Access to and use of parks and green spaces enhance physical health, mental wellbeing, and life satisfaction
 2. People need parks and green spaces nearby, but they need to be of a sufficient quality to encourage regular visits. The quality of green spaces has a stronger bearing on health outcomes than quantity.
 3. Visiting parks can help reduce obesity, diabetes and heart disease. Visits to green spaces support mental wellbeing and stress relief.
- d) Satisfying wellbeing isn't a commercial activity but failure to look after this need will incur costs due to the deterioration of mental and physical health of individuals. These costs will be borne by the NHS, Councils and Government. It will also lead to reduced productivity in the workforce.
- e) In Wimbledon Park wellbeing can be improved by providing entrances that give an uplift, great walks that include the restored vistas and to see and learn from and about nature.
- f) Decent facilities should be made available for community activities such as:
 1. Junior parkrun¹⁴ (2km)
 2. Walk and talk¹⁵
 3. Parkrun (5km) not available but it should be available in a 61ha park!
- g) Although primary use facilities are provided free at the point of usage it must be funded. One source of income are events which usually take place on the areas provided for wellbeing. Many events damage the grass and as a result are out of use until the area is returned to grass. This takes months. One solution is to hold events on artificial surfaces so the area can be returned to its previous state immediately.
- h) LBM Wimbledon Park & Lake Masterplan page 34 2.9.6. ‘The Park hosts numerous regular and one-off events throughout the year, including an annual fireworks display and The Queue during Wimbledon Fortnight. These are popular and valuable for income generation, but place specific pressures on the Park’s infrastructure, character and management’.
- i) Discussions between the three owners can mitigate the loss of wellbeing space to events.

15) Communities

- a) The big change announced in the WP Project is the move from participation sports to spectator sport and that for a period of just 3 weeks per year.
- b) Formal participation sports require a fee to enjoy the facilities. Golf will cease at the end of 2022. TWC and about 56% of the public park provide fee paying participation sports.
- c) *From D&A Statement:*



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- d) *Our two core objectives, which underpin the aspirations and proposals for the AELTC Wimbledon Park Project are:*
 - 1. *To maintain The Championships as the premier tennis tournament in the world, and*
 - 2. *To deliver a positive impact for our communities, in particular our local community.*
- e) *Community Benefit¹⁶s*

The AELTC Wimbledon Park Project has sought to provide significant community benefits part of the Proposed Development.

Where opportunities affect neighbouring land they will be undertaken in negotiation and collaboration with the appropriate landowner.

Community benefit will be in the form of:

 - 1) *New access to high quality green space*
 - 2) *New access to heritage*
 - 3) *New access to nature*
 - 4) *New access to Wimbledon Park Lake*
 - 5) *New green connections and active travel routes*
 - 6) *New green infrastructure*
 - 7) *New opportunities for local residents to experience The Championships*
- f) *The community consists of individuals and groups particularly those involved in sport. Sport is part of the heritage of the 61ha park. For example, a positive impact could be provided by helping to find space for a hockey pitch, space for rugby for St Cecilia's School & others, and assistance in revamping the athletics track and surrounding area.*
- g) *Walking is the most important activity and linked with water and nature assists wellbeing which is an important consideration. A public lakeside walk in a nature reserve fits well with core objective of a positive impact for our local community.*

16) Specific comment

- a) *De-silting, in collaboration with LBM to create deeper water for sailing and a cleaner and safer environment for water-based activities¹⁷.*
 - 1. *The deeper water will facilitate agreement between the owners to lower the level of the lake which then lowers the water table on the western side allowing much better conditions for the grass growing there. This would be a big benefit to both AELTC and TWC and should have been mentioned in the application.*
 - 2. *Following the lowering of the level of the lake to facilitate the Dam Safety works both WPGC members and TWC report on significant improvements for playing golf and 'Our drains into the Lake are above the level of the lake so are working'.*
 - 3. *As noted before sailing is mentioned.*
 - 4. *We have a separate submission on desilting which argues that it should be a separate application. **A full cost benefit analysis is required.***
- b) *Our proposals adapt Church Road so that during The Championships this space becomes the main artery of the event, connecting the two sides and providing circulation, orientation and an animated, people-filled heart right outside Centre Court. Church Road would be closed to traffic in day-time hours through the event period¹⁸.*
 - 1. *A bridge over as in the past or a permanent underpass needs to be addressed.*
- c) *The new Parkland Show Court¹⁹, an 8000 seat, medium-sized show court stadium, will be sensitively integrated into the new parkland landscape providing a focal point for Championships tennis in this part of the site. At this stage, the proposals for the show court have been submitted in outline.*
 - 1. *Accommodation at the upper level provides an opportunity to locate high-quality hospitality space with spectacular views of tennis and through the new landscape to the lake.*
- d) *Northern Location²⁰ on Main Grounds: Impact on Parkland*
 - 1. *The show court in this location displaces the Aorangi Pavillion player facilities, dynamic warm-up area and 14 tennis courts. The 14 tennis courts would need to be relocated in the parkland along with the new parkland facilities.*
 - 2. *The permissive public access AELTC Parkland is reduced from 9.4ha to 3.8ha and the entrance and connection from Church Road is lost.*
- e) *Southern Location²¹ on Main Grounds: Impact on Parkland*
 - 1. *The displaced No.2 Court and Court 12 would need to be relocated elsewhere in order to maintain ambitions for the grounds capacity. These, alongside the 5 hard courts which can not be situated in the parkland site, could only realistically be relocated to the northern grounds.*



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2. *This in turn displaces 11 practice courts from the north which would move into the parkland along with the new parkland facilities.*
3. *The public access AELTC Parkland is reduced from 9.4ha to 5.4ha and the entrance and connection from Church Road is lost.*
4. *This show court is 22m high covering 6000m² or 0.6ha. This will have roads around possibly 3m wide. Whilst acknowledging the steps taken to minimize the impact on the landscape and elsewhere it would be admired. However, in our view it is not suitable for a Capability Brown landscape, nor appropriate for Metropolitan Open Land (akin to green belt land) and should not be built in the parkland.*
5. *This means either the northern or southern location and a consequential reduction in land for permissive access and loss of the permissive path to Church Road.*
6. *Instead agreement should be reached between the owners for a 5ha nature reserve around the lake with access for visitors and a public path through to Church Road. This can be overseen by a Community Trust.*

17) Comment on some sections in the Environmental Impact Assessment

A holistic approach to improving the shared Heritage Park should include land swaps so that all visitors and users can benefit. This approach from **Environmental Impact Assessment: Volume Three-Non-Technical Summary page 9** is dismissed below:

1) **Exclusion of The Wimbledon Club**

- a. *Various options were explored that would have involved a 'land swap' with the Wimbledon Club to enable a more efficient use of land within the Site. These options were all discounted as unviable and subsequently any option that included the Site of the Wimbledon Club was discounted from further consideration.*

Also in EIA: Volume Three-Non-Technical Summary page 9

Inclusion of Wimbledon Park Lake

- a) *Wimbledon Park Lake is currently heavily silted. This has a detrimental effect on water depth and quality and also limits the potential use for fishing, sailing and other recreational activities. Although the Wimbledon Park Lake is not owned by the Applicant, they are funding significant restoration works to the Wimbledon Park Lake as part of the Proposed Development.*
- b) *These works could have been funded by the Applicant and delivered (as works in kind) separately to the Proposed Development, these works would then have been outside of the planning application. Including the works to the Wimbledon Park Lake within the Proposed Development boundary allows for the effects associated with these works to be subject to an integrated environmental assessment, alongside the other works proposed.*
- c) *The option to exclude the works to the Wimbledon Park Lake was therefore discounted to enable a **holistic approach** to impact assessment.*

But:

- 1) Water quality is dependent on the water flowing in from the tributaries and the claim in c) above that a holistic approach has been made by just considering recreational activities is also wrong.
- 2) While recreational activities are valuable, the biodiversity of the Lake is beyond price and must be fully discussed and protected. For example nature (European eel, kingfishers and a common tern raft) and wellbeing must also be considered!
- 3) If including the lake desilting in the application is justified 'to enable a holistic approach to impact assessment', then the whole project should be looked at holistically. Blots on the landscape and parking arrangements during the Championships need a holistic approach just as much as management of the Lake does. A holistic approach would also consider the impact on local residents, traffic management, and enjoyment of the park, during and after the building phase. We think this should be an overarching point.
- 4) The biodiversity strategy should apply to the whole 61ha park and not just the enclosed area. We also make the point that following years of heavy excavation and activity all over the site, the creatures who regarded it as their home whether on land or water will have disappeared and may never reappear.

18) **Conclusion**

- 1) Grade II* Heritage Wimbledon Park is on the 'At Risk Register' partly because it is in divided ownership, so the onus is on the 3 owners to work together so that the whole park is considered. Further thought should be given to land swaps and other co-operation, as these can provide the opportunity to agree a biodiversity strategy, remove blots on the landscape, restore vistas, improve wellbeing by providing great walks, meet the requirements of all 3 owners and provide for the benefit of nature, heritage, health, and the Community.
- 2) The IPCC report is a wake-up call and Heritage Wimbledon Park should do all it can to improve things for nature. Many species need help.



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- 3) Habitat requires proper consideration including soil biodiversity and its proposed loss due to artificial surfaces.
- 4) The Community and participation sport need consideration so that facilities can be improved. Also, how events in the public park can be provided with existing hard surfaces so that many months of repairing damaged grassland is avoided and wellbeing is enhanced.
- 5) There is no evidence that this application considered the impact on each individual asset and other sports in this historic site and failed to fully consider alternative schemes

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¹ TfL own the land under Revelstoke Road railway bridge which is very important for the entry to the park but minor in terms of ownership.

² TfL own the land under Revelstoke Road railway bridge

³ <https://www.twcsport.co.uk/>

⁴ <https://www.wpgc.co.uk/>

⁵ <https://www.herculeswimbledonac.org.uk/>

⁶ <http://www.wimbledonparkbowlsclub.co.uk/>

⁷ <https://www.wpac.org.uk/>

⁸ https://www.wpgc.co.uk/junior_membership_and_academy

⁹ <https://www.merton.gov.uk/leisure-recreation-and-culture/wimbledon-park-watersports-centre>

¹⁰ LBM Wimbledon Park & Lake Masterplan page 42; 2.10.25

¹¹ Wimbledon Park & Lake Masterplan 2018 page 74.

¹² https://report.ipcc.ch/ar6wg2/pdf/IPCC_AR6_WGII_PressRelease-English.pdf

¹³ <https://www.heritagefund.org.uk/about/insight/research/space-thrive>

¹⁴ <https://www.parkrun.org.uk/wimbledonpark-juniors/>

¹⁴¹⁴ <https://www.facebook.com/groups/wimbledonparkwalkandtalk>

¹⁶ D&A Statement P161: Community Benefits

¹⁷ D&A statement P163: Wimbledon Park Lake

¹⁸ D&A statement P301: Wimbledon Park Lake

¹⁹ D&A statement P357: Wimbledon Park Lake

²⁰ D&A statement P365: Wimbledon Park Lake

²¹ D&A statement P377: Wimbledon Park Lake