

From:
To: [Future Merton](#)
Cc:
Subject: Local Plan policy N8.1 Wimbledon Park. The Gardens Trust response.
Date: 15 March 2024 11:14:53
Attachments: [Merton Local Plan N8.1.pdf](#)

Hello,

Thank you for consulting The Gardens Trust on a new draft policy, N8.1 Wimbledon Park. We have responded to this consultation on account of our previous engagement with planning proposals at the site, namely the proposed expansion of the AELTC into other areas of the Grade II* registered historic park and garden of Wimbledon Park. Please note: our engagement here is an exception, we do not normally comment on emerging Local Plans.

Please contact us should you require any further clarification or information.

Yours sincerely,

Chair, Conservation Committee, The Gardens Trust



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Research - Conserve - Campaign

15th March 2024

London Borough of Merton
Civic Centre
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Dear Tara,

Merton Local Plan, Policy N8.1 Wimbledon Park

Thank you for consulting The Gardens Trust on this new and specific policy for Wimbledon Park, a Grade II* Registered Historic Park and Garden of Special Historic Interest included on Historic England's Heritage at Risk register.

The Gardens Trust does not usually comment on Local Plan policies. We are advising you on this occasion on account of our previous engagement with the planning application 21/P2900 for the expansion of the All England Lawn Tennis Club grounds onto Wimbledon Park Golf Course. Our advice was set out in two letters dated 13th May 2021 and 30th September 2021 (substantive advice to your Council). The Gardens Trust is broadly supportive of the proposed scheme, accepting it as a better way to secure the future of the registered landscape as a whole. However, we also expressed concerns such as the lack of a unified management vision across the site ownership, the lack of clarity about the provision of free and reasonable public access to the landscape in perpetuity and the scale of the new Parkland Stadium as proposed.

Having considered the draft policy and its supporting text, we feel it will help deliver sustainable heritage benefit for Wimbledon Park, subject to the suggested amendments, and should help remove the site from Heritage at Risk.

Our proposed amendments (in italics) to the policy text and to its supporting text, together with some suggested re-ordering and queries, are as follows:

WIMBLEDON PARK – POLICY N8.1

~~To address the reasons why the Grade II* Wimbledon Park is on Historic England's Heritage at Risk Register and to recognise and support its sporting, recreation, ecological and amenity functions:~~

To sustain and protect the heritage, ecological and amenity values of Grade II Wimbledon Park Historic Park and Garden of Special Historic Interest by recognising and supporting its sporting and recreational function in such a way as to remove it from Historic England's Heritage at Risk Register.*

We will do this by supporting development proposals that:

- a. *Promote integrated and holistic solutions for any new development proposals, as far as is practicably possible, within the whole registered landscape.*
- b. *Respond sympathetically to the historic design intention and scale of the registered landscape.*
- c. *Support the park's sport, recreation, play and amenity uses, and ~~enhancing~~ securing permanent and free access to them in perpetuity while taking into account any agreed and reasonable restrictions. This would ensure ~~ensuring~~ their successful integration with historic and biodiversity designations.*
- d. *Prepare a landscape management plan, in collaboration with all landowners, to co-ordinate the long-term management and maintenance of Wimbledon Park.*
- e. *Secure investment in the former golf course to ~~conserve and enhance~~ conserve and restore the historic landscape, thereby securing biodiversity, sport and recreation functions and ~~secure~~ public access.*
- f. *Address the lake's poor physical condition and, through doing so, seek restoration of its historic shape and form.*
- g. *Improve public access around the whole lake while securing its function alongside ~~protecting the lake's s functions~~ in relation to biodiversity, sport, public safety and flood risk, while and ensuring compliance for ~~reservoir safety~~ with the Reservoirs Act 1975.*
- h. *Identify and ~~protecting~~ protect historic trees and other trees of significant amenity value and ~~considering~~ instigate a long-term programme for their renewal.*
- i. *~~Consider~~ Prioritise the removal of insensitive tree and other non-native planting, particularly on the former golf course and around the athletics track.*
- j. *Protect and ~~enhancing~~ enhance biodiversity, thereby increasing the ecological interest of the park and its waterbodies.*
- k. *Respect the site's historic setting, ~~enhancing~~ enhance historic and new views to and across the lake, and to St Mary's Church, and ~~supporting~~ support greater public access to these views.*
- l. *Improve and ~~maintaining~~ maintain ancillary facilities in Wimbledon Park, such as paths, bridges, fencing, drainage and public toilets, to facilitate and improve access for all sections of the community as part of a holistic approach to enhance historic landscape character and amenity.*

SUPPORTING TEXT

8.1.1. Wimbledon Park is a Grade II* Historic Park and Garden, *of more than special interest*, lying to the north of the borough and crossing the borough boundary between Merton and Wandsworth. The majority (c48ha) of the park lies within the London Borough of Merton; a smaller proportion (c12ha) lies within the London Borough of Wandsworth.

In 2016 the Wimbledon Park Registered Park and Garden was added to Historic England's Heritage At Risk Register due to the following issues:

- *Uncertainty around the future [of the entire historic landscape].*
- *The impacts of divided ownership on landscape management.*
- *Obscured views.*
- *The deterioration of the Lake.*

8.1.2. Wimbledon Park is the remnants of a larger Lancelot "Capability" Brown landscape, designed in the late 1700s originally for a nearby Manor House (since demolished). The Wimbledon Park Conservation Area Character Appraisal for Wimbledon Park contains

details of the successive Manor Houses and the evolution of Wimbledon Park to what it is today.

8.1.3. Wimbledon Park is in three ownerships: Merton Council, the All England Lawn Tennis Club and the Wimbledon Club. About a third of Wimbledon Park, owned by Merton Council is currently publicly accessible. The All England Lawn Tennis Club's main grounds lies to the west of Wimbledon Park across Church Road and the whole park has been used for many years to support the successful functioning of the Wimbledon Tennis Championships each summer. Planning application 21/P2900 has been submitted to Merton and Wandsworth Councils relating to the former golf course within Wimbledon Park *to be partially developed with additional tennis facilities.*

8.1.4. The whole of Wimbledon Park is designated as Metropolitan Open Land, designated Open Space and Green Corridor. Wimbledon Park lies within Wimbledon North Conservation Area and a Tier 2 Archaeological Priority Area. Except for the public park, the site lies within a Site of Importance for Nature Conservation (SINC) Borough Grade 1. These designations are addressed by other policies in the Development Plan.

8.1.5. Wimbledon Park lake is the ~~clearest~~ *largest* surviving feature of Capability Brown's original design. Other surviving landscape features over 200 years old include veteran trees and the presence of woodland at Horse Close and Ashen Grove. The lake is also a registered 'large raised' Reservoir under the Reservoir Act 1975, an active watersports destination and a ~~Site of Importance for Nature Conservation SINC~~, containing protected species and their habitats. The Lake connects via the Wimbledon Park Brook and surface water sewer network into the River Wandle downstream in Earlsfield.

8.1.6. In addition to the historic and natural environment designations, Wimbledon Park is an intensively used sporting venue across all three land ownerships, hosting watersports, tennis, beach volleyball, cricket, hockey and golf until 2023. The public part of the park is also important for recreation, play and amenity *as valuable urban greenspace*. Wimbledon Park meets multiple priorities for green and blue infrastructure and associated amenity, education, health and wellbeing benefits as set out in Merton's Green Infrastructure Study 2020.

Sports, recreation and play

8.1.7. NPPF 2023 paragraph 98 states "Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change." The London Plan supports retaining and enhancing formal and informal sporting and recreational facilities to encourage physical activity and deliver a range of social, health and wellbeing benefits. The London Plan also recognises that the co-location of sporting facilities can increase participation.

8.1.8. Wimbledon Park supports a wide range of sports and recreational uses including angling, watersports, athletics, bowls, hockey, cricket, mini-golf, tennis and beach volleyball. It also provides open space for informal sports and recreation, particularly on the Great Field in the public park, walking around the park and parts of the lakeshore, the recently deculverted brook and in the children's playgrounds and splash play. In line with policy IN14.3 we will safeguard existing sport and recreation facilities, encourage further opportunities for sport, recreation and play, encourage co-location of services and improve community access *where they do not unacceptably harm the wider heritage and ecological interests of the registered landscape.*

8.1.9. The public park is intensively used and this policy seeks to maintain this and improve public access to private land ownership where possible. This policy supports the

provision of well- maintained and adequately sized paths, bridges, toilets, drainage and other ancillary services to support access to and enjoyment of more of the park for people of all ages and abilities.

Enhancing biodiversity and access to nature

8.1.10. Wimbledon Park, including the lake, has multiple land use designations to support biodiversity and nature conservation. Protected species including different species of bat and birds, stag beetle, common frog and toad, European eel, veteran trees and other flora. There is also potential to improve biodiversity resilience by better habitat management, for example addressing the poor condition of the lake, removing recent planting located too close to veteran trees, replacing non-native with native species, and reducing pollutants in grassland management. In line with policy O15.3 biodiversity and access to nature we will protect and enhance biodiversity and improve accessibility to nature; these matters will be included in the landscape management plan.

The historic environment

8.1.11. Paragraph 190 of the NPPF 2023 state "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) The desirability of new development making a positive contribution to local character and distinctiveness; and
- d) Opportunities to draw on the contribution made by the historic environment to the character of a place.

8.1.12. *moved to 8.1.1*

Addressing the future of the historic landscape and landscape management

8.1.13. Wimbledon Park is currently owned by three freeholders. The 9 hectare lake and c18 hectares of Wimbledon Park is owned by Merton Council and used as a public park, including part that lies within the London Borough of Wandsworth.

8.1.14. The remainder is privately owned and is not *freely* publicly accessible. 29 hectares is the freehold of the All England Lawn Tennis Club. In 2016 when Wimbledon Park was added to Historic England's "Heritage at Risk" register, Wimbledon Park Golf Club was the leaseholder of this land which was used as a golf course for many decades until January 2023. The remaining c4 hectares is owned by the Wimbledon Club.

8.1.15. Wimbledon North Conservation Area Character Appraisal 2006 (sub-area 2) describes the remnants of the Capability Brown landscape at Wimbledon Park (*the registered landscape*) and positive and detrimental features. For many decades landscape management has been divided across four organisations (the council, the Wimbledon Club, AELTC and their leaseholder, the Wimbledon Park Golf Club). The sites were being managed intensively and largely independently in accordance with their main purpose:

either as a public park including sporting and recreational uses, a private sporting venue or a golf course.

8.1.16. Wimbledon north conservation area character appraisal 2006 identifies positive and negative landscape features within and just beyond Wimbledon Park. Addressing the negative features in Wimbledon Park's landscape, enhancing the positive features and, ~~where possible, actively supporting~~ better ~~co-ordinating~~ *co-ordination of* landscape management across the whole site will help to address the reasons that Wimbledon Park is on the Heritage at Risk Register.

8.1.17. To this end we will secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward (*Tara, do you need a mechanism to achieve this without it being reliant on a development proposal? The individual landowners could each contribute to a stand-alone plan independent of a proposal*). This will provide a comprehensive plan for the conservation, enhancement and ongoing management of the entire registered park and garden that takes full account of the site's historic development and significance, acting as a common agreed baseline for all parties to work from.

Addressing obscured views

8.1.18. In the eighteenth century the original Capability Brown landscape was curated across a larger area in the "English Landscape" style, using the existing topography and man-made features including the creation of the lake with spurs to resemble river entrances, open parkland interspersed by carefully placed trees and woodland all giving rise to curated views, including of St Mary's Church spire. Veteran trees, particularly oak and some dating or pre-dating the 1800s, remain across the former golf course and within the council-owned public park. The woodland belts at Horse Close Wood and Ashen Grove were also part of the Brownian layout.

8.1.19. Younger, faster growing trees have been planted to create fairways as part of the former golf course operations; sometimes obscuring the views and parkland setting and sometimes in too close proximity to veteran trees. Faster growing conifers and polars planted to screen the athletics track also dominate the landscape negatively.

8.1.20. Due in part to the reservoir dam face, trees, and C20th buildings and structures built within the park, the parkland and lake are difficult to see from key publicly accessible points, including Home Park Road, the closest entrance to Wimbledon Park Station. The topography (rising at either end and including the lake's dam face) both helps and hinders views across the area. Buildings on or adjacent the lakeshore in the public park and the Wimbledon Club site obscure views across the lake.

8.1.21. The following measures should be considered for addressing obscured views, including those derived from Wimbledon North Conservation Area Character Appraisal 2006:

8.1.22. To improve the historic view lines across the lake:

- a) Removing insensitive tree planting, particularly around the athletics track and on the former golf course.
- b) Improving the appearance of buildings or removing them and to co-locating their services within other facilities while maintaining easy access to the lakeshore for watersports equipment and people.

c) Siting and scaling new development in response to the historic landscape design and its intended views.

8.1.23. To improve views across the whole park and lake, improving historic views and creating new views:

a) Removing insensitive fairway tree and other planting on the former golf course and anywhere else it is found,

b) Improving public access to currently private land and particularly around the whole lake.

c) Ensuring that viewing points are accessible to people of all abilities by creating or maintaining paths, fences and planting so as not to create a barrier to access or views.

d) Ensuring that buildings or development are co-located wherever possible and designed to minimise their impact on the landscape.

Addressing the deterioration of the lake

8.1.24. Wimbledon Park lake is the largest and most visible remaining feature of Capability Brown's man-made landscape. The spurs that feed into the lake have been partially filled in, reducing the lake's size, form and shape. The Lake is fed by overland flow paths and the surface water sewer network, principally by two large surface water sewers and outfalls both of which are currently adopted by Thames Water. The total catchment area which feeds the lake is approximately 230ha of which 40ha is direct catchment and 190ha is indirect catchment from urbanised areas, including highway runoff.

8.1.25. It is registered as a Grade A large, raised reservoir, regulated under the Reservoir Act 1975. The reservoir is retained by an earthfill embankment, some 320m long. The height of the embankment varies from approximately 1m to a maximum of about 4m. The Lake flows into the River Wandle downstream in *Earlsfield* via the Wimbledon Park Brook and the surface water sewer network.

8.1.26. The Lake is not used for drinking water supply purposes.

Insert new item: The current poor quality of the Lake and its setting is one of the reasons that Wimbledon Park is on the "heritage at risk" register.

8.1.27. ~~As well as being a large, raised reservoir, the~~ The lake is intensively used for a variety of activities including angling, watersports and by wildfowl (including visitors feeding the birds) and has high localised amenity value. Over the years, the lake has suffered from pollution incidents, as a result of flytipping waste into drains or via drainage misconnections from private properties which inadvertently connects household foul drains to the surface water sewer network which ultimately feeds into the lake. Several of these pollution incidents have resulted in fish kills, particularly in summer when oxygen levels in the lake are low and water depths are shallow.

8.1.28. The lake is generally shallow in depth, sited in an urban area and in terms of water quality it is nutrient rich. During summer, when the water heats up and oxygen levels are low and nutrient levels are high, it suffers from algal blooms, some of which can be hazardous to wildlife, pets and the public *and likely contribute to fish kills*. Since its formation, the Lake has over time silted up quite considerably. This siltation is in part due to detritus ingress through the outfalls into the Lake, vegetation (leaf fall) and wildfowl

habitat, combined with a relatively stagnant water passage through the lake being artificially dammed over hundreds of years.

8.1.29. A Section 10 Reservoir Act inspection report was carried out in 2014 which included statutory requirements that needed to be actioned to ensure compliance with the Act for Reservoir Safety. The council carried out a bathymetric survey of the silt levels in 2015. The council completed the Wimbledon Park Lake Reservoir Safety scheme in 2022, which has addressed reservoir safety requirements and made some improvements to the landscape and lake edge. As part of the wider opportunities of this project, the Council were able to deculvert an open section of the Wimbledon Park Brook in the public park to help create additional flood storage and improve the landscape and biodiversity. However the lake needs de-silting to ensure its amenity and historic value, to ensure water quality is not compromised, as the climate changes and hotter summers become more frequent. De-silting will be likely to help to reduce the number and length of algal blooms, improve its ecological capacity, increase oxygenation and continue to use the Lake it safely and fully for watersports, angling, heritage, biodiversity and amenity.

8.1.30. Given the size of this historic asset and its London location, the lake shoreline currently has very limited public access. We will work with all landowners to ~~improve~~ *secure greater public access in perpetuity* around the whole lake, taking into account biodiversity habitats, sporting, safety and reservoir management considerations.

I hope this advice is helpful to you. Please contact us should you require any clarifications.

Thank you and best wishes,

Chair, Conservation Committee