

Errors and omissions in the consultation material for the future of Merton's Wimbledon Park.

Dave Dawson, July 2016

The "site analysis" section of the online consultation documentⁱ provides much valuable background to the consultation. Unfortunately, there are also many errors and omissions in this. To assist those wishing to understand the background to the consultation, and perhaps use it also for other purposes, I have prepared a list of these. This list is confined to factual accuracy and so mainly to the "site analysis". Application of these facts to the options of the consultation is another matter, covered in the concepts and masterplan sections of the consultation. As my list is comprehensive and many items are of no great significance, I summarise the more significant points here:

Summary

There are many errors and omissions in the consultation material, but the most important of these are summarised here.

There is little policy background provided: omissions include London-wide and local planning policies on sustainable transport, the London-wide "parks hierarchy", Conservation Area assessment, and health, and details of the catchment area of the park and recreational facilities in the surrounds.

Much of the context detail for the wider Wimbledon Park Heritage site is omitted: significant here are historic viewpoints, significant buildings that can be viewed from the public park, land use on the boundaries with the Golf Course and details of angling provision.

No background is given to the proposal to desilt the Lake and create wetland areas around its edges. No detail is provided of the state of the lake: water depths, trophic status, biodiversity or use for angling, nor how its water level is controlled. Engineering considerations on the integrity of the dam are not provided. It's claimed that "poor water quality" is attributable to silt, without giving detail of the water quality, nor mentioning several other possible influences.

The flooding that has often occurred as a result of blockages at the upstream end of the outflow pipe is not mentioned. The key to the flood risk map is incorrect and no reference is made to the more accurate map by the Environment Agency.

Modifications to the brook are proposed so that it acts as Sustainable Urban Drainage, but without any evidence that these would in fact deliver on the promise.

No detail is provided of the existing water sports use of the lake.

"Green Corridors" are mistakenly included as a Landscape designation, where they are, in fact, for nature conservation. The value of the park as a habitat for priority species is not covered. The part of Ashen Grove that lies within the public park (beside the children's play area and the golf course boundary) is mistakenly omitted from a Site of Importance for nature conservation, nor do the maps make it clear that the hedgerowsⁱⁱ beside the tube line are included in another such site. No mention is made of the existing management plan for Horse Close Wood.

The map of historic landscape doesn't show most of the viewpoints from the 18th century "drives", some of which still exist, and mistakenly shows the major viewpoint as being from the Marlborough House. In fact, views north from that house were very

limited: the Lake could not be seen from the house. Other minor viewpoints shown also did not exist, whereas others that did are omitted. It's not made clear that the historic views included, not just the lake, but also its surrounds: sheep-grazed pasture, trees and perimeter woodlands.

Dog free areas are not identified.

Wimbledon Park tube station is not indicated on the access map.

No information is given of existing usage of the park, nor usage of the car parks.

An option to fence off a large area of the Great field for "throwing athletics" is not indicated on the three Masterplan diagrams.

Financial detail is largely confined to estimated capital costs, with no information on maintenance costs. There is no business plan. Claims are made about the financial "sustainability" of options without documentation, nor in a context of the overall open space budget of the borough.

Scope

Because of the narrow brief, the consultation documents omit contextual detail in the surrounding area, notably the other parts of the Heritage II* landscape: the Wimbledon Club and Wimbledon Park Golf Course. Significant items missing include:

1. Veteran trees, called "old trees of importance".
2. The temporary inflated structure at the edge of the Wimbledon Club, falling partly on land owned by LB Merton and The All England Lawn Tennis Club.
3. Most of the historic views from the "drives" of Capability Brown's design. Notably those from the present-day Church Road and Victoria Drive and from the drive that went from the Marlborough Manor House to Ashen Grove.
4. The woodlands of the historic landscape, which were significant in limiting views.
5. The hedgerow in the golf course abutting the park boundary north of the stadium and the part of Ashen Grove that lies within the Golf Course land.
6. Angling facilities.
7. Hydrology, where the Environment Agency surface water flood risk map shows significant risks.
8. Detail of the brooks.
9. The risk of flooding in "The Grid" from dam failure.

Mapping

The consultation map is from an aerial perspective, with a viewpoint approximately from above Southfields Station. This means that the north point on the "Site Survey – existing condition" map is misleading. It might imply that St Mary's church is west of the Home Park Road entrance rather than the actual SSW, for example.

Site survey (existing conditions) map

This omits the inflatable building at the eastern edge of the Wimbledon Club, which is a significant landscape feature.

Land ownership

This map fails to show a strip of land owned by LB Merton near the lake margin of the Wimbledon Club. It also indicates that there is an enigmatic “leasehold” interest in the eastern extremity of the lake, which is not otherwise specified (could this be the Angling Club?). It fails to indicate that the southern end of the park is bordered by private housing.

Designations

The “Landscape” map includes designations that have other purposes in statutory planning. The prime function of Metropolitan Open Land is the same as that of Green Belt, to contain built development and so prevent urban sprawl. So it is a “protected” undeveloped space, and any landscape is a secondary function. Green corridors were identified for connectivity of biodiversity, and so are a nature conservation designationⁱⁱⁱ. The most relevant designation for landscape, Conservation Area, is omitted from this map and shown instead on the heritage map. This Conservation Area is for landscape heritage. There is no reference to the Conservation Area assessments made by the two boroughs involved.

Landform

This map misleadingly marks the eastern corner of the stadium as “artificial embankment”. In fact there has been levelling work across the area of the running track involving excavation in the north and ground raising in the south. This is evident from an examination of the contour lines. The indication for the dam implies it stops at full height at the boundary with the the All England Tennis Club (golf course) land, whereas the full height is further north (near the waterfall garden) and the height tapers off from there into the All England Tennis Club land. Also, the dam is indicated, incorrectly, as ending short of the corner of the stadium. The indication of the Brook valleys is selective and diagrammatic, perhaps because the brooks are wholly underground outside the public park. A much better map of the brooks is available from Dave Dawson. The tube line is shown as on a low embankment where it goes beyond the corner of the park towards Wimbledon Park Station. In fact, it is in a cutting there, which deepens to the south. The contours fail to pick out small features, such as the ground raising in the eastern corner of the park.

Hydrology

The text states that “The Lake is heavily silted resulting in poor water quality”. This statement is not referenced to any study of the water quality and appears partial^{iv}. The areas of “poor drainage” are at odds with the Environment Agency flood risk maps for “risk of flooding from surface water”^v, which are considered under

“Flooding” (below). The litter screen at the entrance to the culvert from the “stilling basin” is omitted. Poor design and maintenance of this facility are responsible for the flood flows that frequently occur in the part of the public park around the toilet block. There is evidence that there are one or more springs beneath the waters of the lake^{vi}.

Historic landscape^{vii}

This map is seriously misleading as it shows a “main view from the house” that didn’t exist^{viii}. It also shows an erroneous route for the “carriageway^{ix} to Earl Spencer’s House” (the historians’ “Marlborough House”): this drive is wrong at each end. This error results in a fictitious “view of the house from carriageway”. A “drive” is shown along the line of the present-day Home Park Road, that was actually higher up the slope to the south-east. The drive that went from the dam to the eastern end of Horse Close Wood and beyond is omitted, so the historic view from Horse Close Wood across the lake towards St Mary’s is not identified. Another omission is views from the dam in other directions than that indicated. Also omitted are the views that could be obtained from the drives that lay outside the present public park. Significant among these were from the drive through Vineyard Hill Wood north-west across the lake and from the present-day Church Road across the lake to the perimeter planting beyond. Horse Close Wood and Ashen Grove are shown as extending east, where they did not. The distribution of arable land use is miss-mapped and meadow is indicated where it probably did not occur. Although the text might imply the map shows Brown’s design, it includes features that were added well after Brown’s landscaping (Lake Farm, the cottage and sheepwash). The purpose of the red asterisks on St Mary’s, the cottage and Lake Farm is not made clear. The text might imply that the heritage site is physically fragmented. It’s the ownership only that’s fragmented.

Nature conservation

The map uses three shadings, only two of which are in the key. This is presumably because the Site of Importance for nature conservation, grade I extends across The All England Tennis Club ownership as well as parts of the public park. More seriously, the map and text are erroneous in omitting the part of the Ashen Grove on the public park^x, also they do not make it clear that the hedgerows beside the tube embankment are included within the Borough grade II site there^{xi}. No mention is made of the existing management plan for Horse Close Wood, that was subject to wide public consultation on options. As mentioned under “designations”, above, Green Corridors are a nature conservation designation. No mention is made of advice to LB Merton, repeatedly provided in the past, that the lake has considerable potential for the restoration and enhancement of shallow water vegetation, so attracting more invertebrates and breeding birds, and the potential also for special provision for common tern and kingfisher nesting. The importance of the habitats in the park for priority species is not considered. One photograph illustrates a meadow, a habitat that probably did not exist in the public park in the past. The historic evidence is for arable and pasture. Cornfield annuals are not considered.

Flooding

This map is at odds with the Environment Agency surface water flood risk map. The second risk category is wrongly labelled as “low”; it should read “medium”. As the detail of the EA map accords well with experience of surface water flooding in the park, it’s unfortunate that the Flooding map omits much of the detail of the EA map. Additionally, and perhaps because it has not yet accommodated the recent landscaping of the golf course, even the EA map doesn’t show that there is a high risk of flooding from the golf course across the southern corner of the stadium (one possible site for new building). The dam failure flood risk envelope is simplified in comparison with that of the Environment Agency, leading to inaccuracy on both the north and south edges of the envelope. The most frequent, significant flooding originates from failure of the culvert to take high flows from the stilling basin (see Hydrology above). This risk is omitted. One photograph caption mentions the frequent overtopping to the dam, but fails to describe the control of water levels in the lake, which could minimise this. Another factor that is not considered in relation to the integrity of the dam is the vegetative cover of the slope down from the top of the dam. In Brown’s design much of this was woodland, as part of a larger Ashen Grove, but engineering considerations might dictate otherwise nowadays.

Land use and facilities

The un-coloured parts of this map could be entitled “Amenity landscaping”, as their land use is similar to that of the Amenity lawn. They are much used for informal recreation, picnicking, etc. They include the brook, hedgerows and avenues of landscape value. The planted avenue trees and individual specimen trees (younger than the old oaks), although on every map background, are not categorised as a facility in any map, and the brook is indicated only as an historical and hydrological feature but not for landscape. The boundary of the larger children’s play area omits its north-west portion. Dog free areas are not identified. One wonders if the “barbeque” identification on the dog-free picnic area is factual? The indication of the “planting” around the lake is inaccurate. The café building is identified, but nowhere described. Although the present building is a successor to previous buildings lost to fire, it is very much in the original design. The waterfall garden is proposed to be replaced by a “Brownian cascade”, without any detail of what this may mean beyond one photograph of a “natural cascade”^{xii}. The text is deficient in failing to mention perhaps the major attraction of the park, which is as a high quality landscape for informal recreational activity, such as jogging, cycling and dog walking.

Access and movement

A major omission on this map is Wimbledon Park Tube station, which is nearer to the Home Park Road entrance than is Southfields to the Wimbledon Park Road entrance. Nor is there any indication that there’s a bus stop down Revelstoke Road. The access map in the vicinity of Horse Close Wood is misleadingly creative. An accurate map is available as part of the management plan for the wood. Option 3 includes public access around the lake. How this access will be negotiated is not made clear, nor any design considerations in relation to the existing uses of golf and angling and the need to prevent disturbance of nesting birds. At present access here

is controlled by the Golf Club under a long-term lease from the All England Tennis Club.

Athletics track

The caption to this photograph claims that the track is being undermined by tree roots. This is contrary to a recent expert view, so should be justified.

The brook

The photograph is of the most heavily-shaded part of the brook and the caption does not do justice to the part upstream of the café. The brook is proposed to be re-landscaped partly for “flood protection”, but no hydrological study is referred to. Observations in the past suggest that floods in the park from the brook are caused largely from blockages at the intake to pipes around the café and to the screen where it departs under the railway embankment. Better maintenance might achieve as much as any re-landscaping. The proposed sinuous course for the brook and small “water storage areas” would be an interesting landscape feature and allow for more significant water-side vegetation, but it’s not clear how much better they would be for flood relief. Flood flows in the brook can be considerable and Sustainable Urban Drainage schemes for such flows usually require larger temporally flooded areas than are proposed here.

The lake

Although included within the scope of the consultation, there is little background factual information provided on the status of the lake as a facility for water sports and none for angling or biodiversity. The options all include de-silting of the lake, but no background factual information is given on why this may be needed. For example, there is no information on water depths, trophic status or angling facility. The caption to one lake photograph states that “Wildlife habitat is compromised by poor water quality”. This is not supported by any detail of water quality, nor of biological indicator species, and seems unlikely^{xiii}. In the concepts section, the lake is described as the “most defining aspect of the wider landscape” and views are described as “to the lake”, which is arguable, given that the main views were from a pastoral park across the lake to further pasture and woodland. The lake was a central feature, but would have limited landscape value without the grassland, trees and woodland around it.

Omissions

Although every option includes desilting the lake and creating wetland areas around the edges, there is no background given to either of these proposals. Similarly, every option includes “repairing” the dam, but no details are provided to show the need for this, nor what will be done. Obviating future risk with the integrity of the dam may require other changes to the park, for example the regulated depth of water in the lake.

No detail is provided of any improvements to drainage or flood control as a result of the proposals for the brook.

No detail is provided of the public access around the lake perimeter suggested in Masterplan option 3.

The proposal to fence off a large part of the “Great Field” in option A for the stadium is detailed only in the “Focus on sports and leisure” section of the consultation, although it alienates extra land from free public access. This is therefore an omission from the Masterplan option maps.

The re-location of the parks maintenance storage and staff facilities is in every proposal, but nowhere illustrated.

There appears to be no information on the existing usage of the park. Some of the wording in the Concepts section of the consultation could imply a priority for use as organised sport, in contrast to “informal” recreation, including such activities as kicking a ball around, dog walking, scooting, tree climbing, etc. An example is the contrast in labelling of the two main terrestrial uses as “people and activities” and “landscape and park”. The implication might be that people will focus on the (formal) activities. This would be unfortunate in the absence of information on this subject.

No factual information is given on the use of the two car parks, nor on the need, if any, for car parking in the context of all other modes of travel, special needs, nor sustainable transport policies. So, the reason why all the options freeze the present car parking provision and location is not given.

Little information is given on other public park, sports and open space provision in the two London Boroughs concerned. Some facilities may be particular to this park, including the Elizabeth splash pool and water sports. The relevant policies of the London Plan and local development plans are not adequately covered.

Policies on health and open space recreation are not covered.

The financial aspects of the options are presented as capital expenditure. Maintenance is not costed. Option 3 is presented as financially sustainable, but without any detail of this. At present the park is wholly owned and managed by LB Merton and it's understood that parks finance, both costs and income, is arranged across the whole of the borough. Income from this park helps to balance the budget across the borough, but this is not made clear, nor is the future funding of the maintenance of each facility.

Despite there being regular engineering inspections of the dam, no summary of the considerations raised is given. This would be helpful background.

No reference is made to the existing management plan for Horse Close Wood, which was subject to wide public consultation on policy options before adoption. Two photograph captions suggests that the condition and appearance of Horse Close Wood might be improved, as if this has not already, and recently, been considered.

ⁱ <http://wimbledonparkconsultation.com/site-analysis/> much of which is barely legible. I have placed more legible material kindly provided by Douglas Johnson of PPS group on WeTransfer (the link for which expires on 21st July: <https://we.tl/3Hkrr5uoSB>) and I hope it will soon be available for download elsewhere as well.

ⁱⁱ The options tables suggest that there is just one such hedgerow, there are two.

ⁱⁱⁱ They were identified for London Boroughs by the London Ecology Unit and Greater London Authority in the 80s, 90s and in 2000.

^{iv} Lakes in the south-east of England are almost all eutrophic for a variety of reasons, of which silt is but one. The quality of the water entering from the catchment is likely the most important single factor (both the routine quality and also pollution incidents, of which the Environment Agency map shows one “major” and four significant“). Others include the numbers of fish and birds, excessive feeding of the fish and birds, atmospheric deposition, disposal of vegetative waste into the lake, disturbance of silt and the scarcity of macrophyte vegetation. The London Lakes Study examined many such issues in detail and might be consulted for a more rounded consideration. LB Wandsworth received EU “Life” funding for that project and should be able to provide the detailed results.

^v <http://watermaps.environment-agency.gov.uk/wiyby/wiyby.aspx?layerGroups=default&lang=en&topic=ufmfsw&scale=9&ep=map&y=171928&x=525570#x=525165&y=172366&scale=11>

^{vi} Anglers report weed-free areas of gravel substrate which they attribute to this. Others claim that such springs are also marked by areas that remain free of ice when the rest of the lake surface is frozen.

^{vii} There are so many errors and omissions on this map that I have prepared a correct version to describe the actual historical situation.

^{viii} It's in good company in doing this, as previous writers have not examined the actual contours of the land north of the Marlborough House, nor realised that Brown planted woodland, which further curtailed the view. A suggested excavation to obtain a better view north from the house was not undertaken. The view in Brown's day was not over the lake, but entirely west of north to the high land in the direction of the present-day Tibbets Corner. The lake was not visible from the house, nor the house from the lake. The source of this misunderstanding is that historians have not followed the advice of Higham in his book *“Wimbledon Manor House under the Cecils”* to “get out some very careful levels”, this would have confirmed that any excavation was insufficient to obtain a view across the lake from the house. An excerpt from the Richardson map of the park, on display in the Museum of Wimbledon identifies “ground cut away to improve the view” in a location that could not give a view across the lake, and this same map shows trees in Brown's design that restrict any view from the house east of north.

^{ix} Actually a “drive”.

^x The definitive map of this site was agreed by LB Merton following extensive public consultation in the late 90s. The description on page 61 of “Nature Conservation in Merton” makes it clear that the whole remnant of this wood is included in the site, i.e. including the part in the public park beside the children's play area. If anything, the nature conservation value of this section of the wood is now better than it was in the 1990s.

^{xi} This is stated on page 77 of “Nature Conservation in Merton”. Following extensive engineering works to strengthen the railway embankment here, and the maturation of the hedgerows, these are of greater importance than when first described.

^{xii} The best-known cascade by Brown is a large feature requiring a large flow in Blenheim Palace, but otherwise of a similar design to the present waterfall. However, much more formal features at Chatsworth and Sheffield Park are also described as cascades. This leaves this concept quite undefined.

^{xiii} The water supports a good variety of waterbirds and is eutrophic, and such water normally supports a good biomass, if not variety, of underwater wildlife and floating vegetation. It has done in recent history and presumably could do so in the future.