

Development Control (FAO Calum McCulloch)
Merton Council
Civic Centre
Morden SM4 5DX

10 August 2022

Dear Mr McCulloch

**21/P2900 (Amended) The AELTC Wimbledon Park Project
Wimbledon Park Golf Club Home Park Road Wimbledon Park SW19 7HR**

Thank you for bringing to our attention the amended plans that were recently submitted by the AELTC in support of its objective to expand its tennis complex facilities into Wimbledon Park.

Having reviewed the latest documents, Merton Friends of the Earth remain convinced that the plans represent potentially irreversible damage to the local environment, biodiversity, air quality and the natural heritage. We believe that the application, in its amended form, is incompatible with local and national policies relating to the protection of Metropolitan Open Land (MOL), Heritage Assets and Conservation Areas. The proposed plan, if allowed to go ahead, would also undermine Merton Council's goal of achieving carbon neutrality in the borough by 2050.

For the above reasons, we believe strongly that the application should be rejected.

Please find below a list of some of our objections:

1) In our assessment, the huge scale of the proposed project makes it incompatible with Merton Council's aim—contained in its 2019 declaration of a Climate Change Emergency—to work with the local community to make the borough carbon neutral by 2050. During AELTC's estimated seven-year construction phase the many thousands of lorry movements required for building an 8,000-seat stadium ("Show Court"), 38 new tennis courts, a service hub and access roads will result in a huge increase in fossil fuel use and pollution.

2) If the project is allowed to go ahead, and is completed, it will increase the number of daily spectators from 42,000 to 50,000, resulting in additional congestion, disruption and pollution. The series of heat waves of the past few weeks have demonstrated the lack of resilience of the transport infrastructure (including the disruption of train services). For this reason and given the consensus among climate change scientists that global heating is set to continue, it would be irresponsible, in our view, to allow an increase in the size of mass entertainment events in built up areas, particularly in the hot summer months.

3) As Merton Friends of the Earth previously noted, the proposed development is on MOL, in a registered Park and Garden of Special Historic Interest (Grade II*), which is also a site of Importance for Nature Conservation and a defined Green Corridor. The latest amendments to AELTC's proposal, which are described as "minor", do not make any material change to the nature of the project. The proposed project will do irreversible harm to the appearance and public health benefits of Wimbledon Park, with the construction of a 28-metre tall stadium (the

height of a nine-storey block of flats), along with 38 additional tennis courts (each with concrete ring beams) and ancillary facilities. The completed project will mean concreting over a large area of much-needed green space and reduce biodiversity.

4) The AELTC plans to cut down approximately 300 mature trees, move some others and uproot around 500 younger trees. As Merton Friends of the Earth has previously noted, this will result in a serious loss of biodiversity, harm wildlife and lead to further deterioration in air quality. Any saplings planted to replace the mature trees felled under AELTC's proposal will not have the same capacity to remove carbon dioxide and pollutants from the air for at least 30 years. The project will also undermine Merton Council's goal of increasing tree coverage in the borough by 10% by 2050. Merton Friends of the Earth is committed to working with the Council to achieve this objective, and is actively engaged in tree planting and preservation projects in the borough, having planted 840 saplings since December 2020.

5) If the AELTC's proposed expansion into Wimbledon Park were to proceed, in contravention of existing national and local policies intended to protect MOL ("Green Belt") and other highly valued parkland, then no green space of special conservation value or heritage status would be safe from large-scale construction projects. It would, therefore, set a dangerous precedent.

Merton Friends of the Earth strongly believes that the AELTC's amended plans contain no substantive changes addressing our initial objections and we reiterate our call that the application should be rejected.

Regards,

Mariana Pacheco and Gabriel Partos
Co-ordinators, Merton Friends of the Earth

Merton FoE

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