

# Wandsworth Society

Please respond to  
49 Wandsworth Common West Side  
London SW18 2EE  
12<sup>th</sup> April 2023

Planning and Highways  
**London Borough of Wandsworth**  
Town Hall  
Wandsworth High Street  
London SW18 2PU

Planning  
**London Borough of Merton**  
Civic Centre  
London Road  
Morden London SM4 5DX

Attention Mr Ben Hayter Extn 8319

Attention Mr Stuart Adams Extn3147

Dear Sirs,

**RE: Application Nos Wandsworth 2021/3609, Merton 21/P2900  
Supplementary Wandsworth Society objections to AELTC Tennis Expansion**

We set out below a supplementary objection to the applications currently with your Councils. We trust that these comments will be taken into consideration when reporting to your Planning Application Committees. They take into account the JAM consultants review findings.

## WPP's WLC CO2 emissions

The JAM Review report commissioned by LBM states in regard to climate change and CO2 emissions: *The ES lacks suitable evidence to support the conclusion that there are no significant effects prior to mitigation for... ..Climate Change.*

WPP's Whole Life-cycle Carbon CO<sub>2</sub> (WLC) emissions are detailed in an [extensive suite of reports regarding emissions and mitigation](#). [Although substantial the report's data is to a large extent purely tentative estimates](#). The report also declares, "there are few industry standards that can be applied to such a large-scale project and indeed the industry standards are themselves in need of verification and will be updated in the light of further experience gained through the WPP project". Chicken and egg?

**How any country, corporation or council, Merton and Wandsworth, could justify an estimated, non-essential WLC CO<sub>2</sub> release of 148,106 tons – [more than the combined weight of the Navy's two new aircraft carriers put together], when we are so desperately trying to persuade councils, corporates and the community to reduce every kg of CO<sub>2</sub> emissions – should beggar belief but clearly doesn't. We are not talking about an essential hospital or blocks of flats for the homeless, the application is about extending exposure of an already nationally well exposed sport, the application is about increasing AELTC excellence and dominance in a sporting sector in which it is already the dominant national force and a leading power globally.**

## Omitted CO2 emissions

There are also a number of significant omissions that may be covered elsewhere, but if not would add even more to the WPP's environmental footprint – making the CO<sub>2</sub> issue even more significant. As the 'WLC' formula includes a 60 year operating period this should also apply to biomass and tree gains and losses, and of course the major part, construction, is concentrated at the front end of the period.

Merton Council **confirm** the importance of trees and biomass as [CO2 emission mitigators](#) in their very accessible residents Environment Advisory Brochure, as essential CO<sub>2</sub> mitigators. Now scientists have recently

reported that mature trees absorb up to 70% more CO<sub>2</sub> and other pollutants than previously thought, making them even more significant. This added to the following omitted sources affecting WLC CO<sub>2</sub> creates a potentially critical loss over 60 years:

a. The WPP Biodiversity Net Gain report focusses on types of habitat for specific species but not biomass density in terms of CO<sub>2</sub> absorption potential (WLC). If not included elsewhere the net loss of biomass including soil across the whole site compared with current levels is likely to dramatically reduce CO<sub>2</sub> absorption.

b. The length of time for replacement trees to mature to peak CO<sub>2</sub> absorption levels averages approx. 20 very critical years.

c. It is not clear if the WLC data includes spectator and participants travel to the site, over and above levels to current sites - relevant as presumably the rationale for the WPP apart from financial gain, is to expand public access, to tennis - a worthy aim in normal times – but NOT NOW.

d. In WPP's reports no WLC emissions are included for 'Module D'.

This relates to expansion of facilities beyond the site boundary, difficult to calculate, but it is fair to conclude it will be substantial. In the long term WLC figures should therefore include an estimated allocation for it boosting the CO<sub>2</sub> emissions higher still.

Apart from vandalising the heritage of the park, to undertake this otherwise grandiose project at this time, in terms of setting an example to every household it is, we submit, far worse than say - partying during lockdown!

### **The WPP Domain v Public park domain**

AELTC and local residents have aspirations regarding this unique open space especially residents of the Southfields grid. Clearly a compromise that is fair and intelligent seems the only solution to providing the Club with a worth -while part of their plan AND fulfilling promised community access covenants, plus a share of the huge potential gains in expanding community access zone.

To reach a solution needs an independently appointed park planner. AELTC and Merton's (Wandsworth less so) council planning/environmental services, all have vested interests and are therefore not ideal arbiters of:

- AELTC's rationale for the balance between public park and tennis.
- Council / Historic England heritage red lines.
- Independently gauged potential gain for the community.

**Independent** conclusions should provide a better result than the current offer whilst avoiding a complete rejection of the WPP.

### **Establishing Environmental Standard Assessment**

The WPP Biodiversity Net gain Assessment, a formidable document, appears to incorporate many standard parameters for assessing the impact of the project on biodiversity. Two points on this:

1. Such a complex document is a central criterion in judging the impact of the project on nature and the environment. Because of the complexity of the topic it needs an independent very accessible review for presentation to the community and the non- specialist councillors and officers whose task it is to make judgements and recommendations.

2. Without independent specialist interpretation the community is being asked to trust a report commissioned by those who would gain from its approval and any inadvertent inherent bias, even its

sheer weight of data or technical obfuscation within the report may not be apparent to the lay reader.  
(We note that LB Merton has used such a contractor.)

**The issue of scale for an unusual project.**

As stated throughout the various studies of WLC carbon emissions “This is a unique project for which there are few prior benchmarks” ‘*so the absence of data is reasonable*’. Whilst not competent to challenge such a statement it does ring alarm bells. The conclusion stated is that it would be WPP itself, that could provide benchmarks for similar future projects. **This is unrealistic as the project is admittedly, inherently atypical.**

Normally “test bed standard setting” projects would be a series of small-scale projects which build up a picture and guide standards, weeding out poor results without major consequences but instead we have this “ocean liner” of a project potentially setting standards for open space, pocket parks and paddling pools across the country!

This is clearly the wrong way round. The view that key data is optional and can reasonably be ignored or a ‘we’ll suck it and see’ approach applied by WPP, could result in costly, possibly irreversible, damage. Specialists should propose interim standards favouring the precautionary principle and applied in phased small areas. These would then be reviewed for acceptance by the relevant specialists and accepted or rejected accordingly.

**Conclusion**

It is hard to imagine a worse time to launch such a WLC CO<sub>2</sub> generating project even when factoring in an increased proportion of green energy over the next 5 years. **The CO<sub>2</sub> measure should be the priority benchmark for all such projects.** When everyone is being urged to do their bit in cutting CO<sub>2</sub>, what example does WPP set.

**It is appreciated that this statement could have ramifications on many types of major projects across the UK but the priority must be the continued existence of civilised society, by minimising radical changes to our way of life, threatened, as we are, by Global Warming that is at stake.**

The **JAM Review** on its own raises so many short comings and unanswered questions that in view of the Climate Change imperative, clearly indicates that this project be severely down sized if not cancelled entirely.

In view of the matters set out above, we trust that you will recommend refusal of the applications now before the Planning Application Committees of both Councils.

The Wandsworth Society’s thanks go to Bruce St Julian-Bown, a Wandsworth Society member for the preparation of this response.

Yours faithfully,

**Philip Whyte**

Chairman and Leader of the Planning Group  
Wandsworth Society.