

Justin Smith
Head of Estate Development
The All England Lawn Tennis Club
Church Road
London SW19 5AE
By email to jsmi@aeltc.com



20 July 2022

For Justin Smith and the planning departments at Merton and Wandsworth

Dear Justin,

THE AELTC WIMBLEDON PARK PROJECT
Merton Planning 21/P2900
Wandsworth Planning 2021/3609

I refer to the AELTC's amended planning application documents for its development of the Wimbledon Park Golf Course Land and need to raise concerns about the extent of earth and soil movements. These go to the heart of the data provided by the AELTC within the planning application documents, suggesting they are often incomplete, misleading or contradictory. We would like to give the AELTC the opportunity to correct this, but in view of the timetable for responses to the further planning documents are sending this letter also to the planning departments as a further objection.

In a nutshell, we have noted major inconsistencies within some of the documents (both original and new) and, more significantly, between some of the new documents and the original documents, which are inter-dependent, but which have not also been revised.

As detailed in our analysis below, we believe the environmental impact of the soil movements and substantial increase in construction traffic has been dramatically underestimated by the planning documents. This serious underestimate casts doubt on the proposed timetable as well as its environmental figures and calculations in this complex application. Without further clarity, the application should be rejected or withdrawn and further amended.

Specifically, the revised version of the Cut & Fill Plan dated December 2021, released onto the Merton Planning site on 21 June 2022, significantly increases the volume of excess earth said to be moved, but still omits the soil movement effect of major elements of the proposed development. This should have been followed by consequential changes to all the other documents. However, the Construction Logistics Plan ('CLP') has not been revised for this nor for materials needed to be brought on site. Further, according to the Planning Statement Addendum, issued May 2022, construction phasing has been shortened from 8.5 to 6.5 years but we can find little additional detail on how this will be accomplished.

Will the AELTC be releasing another set of amended documents prior to the Planning Applications Committee meetings? If so, will these have more extensively tracked changes or an enhanced description of changes than in the recent release of documents? Will these be released in a time frame that allows for appropriate review?

The Society would appreciate your comments on our review of original (July 2021) and revised (May 2022) documents. In this analysis, the Ref numbers refer to the documents listed at the end of this letter.

1. Estimates of off-site construction traffic (original unrevised documents, July 2021)

a) In the AELTC's construction traffic forecasts in the Construction Logistics Plan ('CLP') [Ref.3] and elsewhere, vehicle movements are generally shown as arrivals only, which is misleading as off-site lorry movements will almost certainly be double this figure, at least on neighbouring roads. This is confirmed by the access maps in Ref.3 which state that "egress is in the opposite direction" [to ingress].

b) We have used the same vehicle capacities as the AELTC in estimating lorry movements: 12 cubic metres for earth-moving lorries and 6 cubic metres for trucks delivering fresh concrete. However, it should be noted that not all vehicles will be fully laden when leaving site, particularly at busy times.

c) A bulking factor has been ignored in calculating lorry loading in the original July 2021 Cut & Fill Plan [Ref.1]. As this factor is typically 25% for soils, the number of lorries required to remove soil should be increased by 25%.

d) As a consequence of the above points, we estimate that a more realistic estimate of construction traffic to remove the 28,384 cubic metres of excess earth arising from (original) Cut & Fill operations will be $28,384 \text{ (excess earth)} \times 1.25 \text{ (bulking factor)} \times 2 \text{ (lorries both directions)} / 12 \text{ (size of lorries)}$ **will be 5,913 movements, rather than 2,365 arrivals estimated by the AELTC.**

2. Re-estimate of off-site construction traffic from revised Cut & Fill Plan (dated Dec 2021 submitted May 2022)

a) The revised Proposed Cut & Fill Plan [Ref.2] shows that the volume of excess soil to be taken off site will now be 54,396 cubic metres, **an increase of 92%** over the original Cut & Fill Plan [Ref.1] dated July 2021. However, no detail or breakdown of cut and fill volumes is given as there was in the original.

b) Using the same calculating method as above in 1(d), we estimate that $54,396 \text{ (excess earth)} \times 1.25 \text{ (bulking)} \times 2 \text{ (lorries in both directions)} / 12 \text{ (size of lorry)} = \mathbf{11,332 \text{ lorry movements}}$ will be needed just to remove this volume of excess soil.

c) However, the expected position of the Stadium on the revised Cut & Fill Plan appears primarily as a mound of earth, rather than as a large excavation. Why is this so, and has the

original Cut & Fill [Ref.1] estimated at 22,000 cubic metres (**approximately 3,600 lorry movements of capacity 12 cubic metres**) of Stadium excavation been allowed for in the revised earthworks? We understand that the Stadium application is in outline form only, however the Stadium is clearly part of the proposed development, appears on other drawings and will require excavation.

d) Additionally, it is unclear if this revised Cut & Fill Plan includes excavation for the new tunnel under Church Road from the existing Court 1 to the new Stadium. How large will this volume be, and is it included in the totals? While the stadium is stated to be in Outline only, presumably the tunnel is a detailed application?

e) Where and how will topsoil be stored on site? The original Grass & Soil Stripping Works drawing [Ref.4] merely states that stockpiles will be stored in 'areas TBC'. The revised Proposed Cut & Fill Plan [Ref 2] shows this as a volume of 34,569 cubic metres, presumably additional to the net Cut and Fill volume of 54,396 cubic metres.

3. Construction Logistics Plan (original unrevised, July 2021)

a) No revision has yet appeared to the CLP [Ref.3], which includes a construction sequencing programme and assessments of offsite traffic, both now in need of revision.

b) The original CLP does not detail or allow for site roadways and pathways, of which there are now approximately 9 km (revised General Arrangement [Ref 7]). How and when will the necessary imported material be delivered to site? Assuming a typical roadway of 4m wide and 0.5m deep (including sub-base), approximately 18,000 cubic metres of material will be required, **demanding almost 1,500 lorries**. No allowance has been made in the original CLP for delivering this volume of material.

c) Some paths and roadways on the site are shown in the Revised General Arrangement [Ref.7] as **crossing tree root protection zones**, which is surely not permissible. How will this be resolved?

4. Construction Logistics Plan Appendix E Construction Traffic Forecasts (original unrevised July 2021)

a) The AELTC's general use of monthly averages in traffic assessments is misleading, as peak movements could realistically be up to double these at certain times of the day.

b) The (unnumbered, untitled) bar chart in Ref.3 shows only HGVs, unlike the preceding spreadsheets in that document, which show both LGVs and HGVs. This chart should be revised to include LGVs to avoid confusing inconsistency.

c) We note that Fig. 6.2 of the CLP shows the ratio of HGVs to LGVs reversed, in contradiction of the accompanying text in paragraph 6.1.6.

d) The construction traffic access maps [Ref.3] are cropped at the intersection of Church/Burghley/St Mary's and do not show how the secondary access route from Parkside runs through Wimbledon Village High Street and Church Road. We consider this to be disingenuous.

e) Prior to and after the Championship fortnight we can see how parked vehicles block traffic on Church Road. We have also seen queues of lorries on Marryat Road waiting to enter the Somerset Road site. What will happen at 8 am during the construction phase when there is a queue of lorries on Wimbledon Park Road or Church Road waiting to enter site?

5. Concrete for court ring beams (revised May 2022)

a) We welcome the reduction in concrete required for the ring beams and court cover slabs. We now estimate, from the revised Court Layout Plans [Refs. 5,6], that approximately 50 cubic metres of concrete will be required for a single court and 70 cubic metres for a double, a decrease from the volumes estimated for the original design. However, the (original unmodified) CLP allows for only 30 cubic metres per single court. **This remains a serious underestimate.**

b) The construction sequencing plan in (original) Appendix E of the CLP shows 35 deliveries per month for loam, using larger 24 cubic metre articulated lorries, as indicated in the accompanying text.

c) Although concrete ring beams are now just 0.5 metres deep in the revised drawings (vs 1.0 metre originally), no allowance has been made for importing material for the beams nor the granular sub base and blinding layer. We estimate that **a further 600 lorry movements** will be required in total for the concrete beams. Assuming the gravel drainage layer is similar in volume to the 13,794 cubic meters of loam (363 bags of loam x 38 courts) we estimate this would require an **additional 2,300 lorry movements** (13,794 / 12 (size of lorry) x 2 (lorries in both directions)).

d) No allowance has been made for hard standing beside the courts, as shown in the General Arrangement drawing [Ref.7].

Given the above analysis, **the Society believes that the AELTC's construction vehicle forecasts have seriously underestimated the true scale of the impact** on the environment, on the road network and on neighbouring communities during the construction phase of the Wimbledon Park Project, by:

- using vehicle arrivals rather than movements
- using monthly rather than daily averages, and ignoring increased traffic at peak times
- not taking account of major excavations, such as for the proposed Stadium
- omitting the import of material for roadways and paths and their subbase
- underestimating volumes of materials required to construct e.g. concrete ring beams for 38 courts and their subbase.

We estimate, just to remove the stated volume of excess soil generated from Cut & Fill operations, 11,332 lorry movements versus the AELTC's estimate of 2,365 lorry arrivals. If our assumptions above for HGV lorry movements regarding roads (3,000), concrete rings (600), court gravel (2,300) as well as the missing Stadium (3,600) are also correct, we estimate a total of 20,832 lorry movements or 16,108 more than the AELTC's figures. This is without other omissions, particularly of works for the tunnel, which could well be substantial.

This number of HGV lorries is a factor of nine greater than the AELTC's headline figure and is now squeezed into a construction programme shortened by almost a quarter. Such excessive numbers of heavily laden lorries on neighbouring narrow streets are likely to cause major damage to roads and potentially to properties in the near vicinity through vibration. Is the AELTC willing to commit to Merton to make good any damage to roads and to indemnify local residents for damage to their homes caused by this intensive construction programme?

The dramatic discrepancy between our calculations and the AELTC's numbers means that, in addition to the need for a revision to the CLP, the AELTC's timetable and figures not only of traffic congestion on surrounding roads, but also of air and noise pollution, must all be seriously questioned.

More generally, we would welcome a full reconciliation between original documents released in July 2021 and revisions issued May 2022. This applies to the Outline Construction Logistics Plan and the Transport Assessment, as well as other documents dependent on the revised Cut & Fill Plan. In our view, the application documents are incomplete as well as misleading without this, and should not be validated.

Should the AELTC release additional amended documents to address these concerns, the Society expects that the planning departments will allow adequate time for review and have extensive detail and/or tracked changes.

Please note that this letter is also supported by the Wimbledon Union of Residents' Associations (WURA), Wimbledon Park Residents' Association (WPRA), Parkside Residents' Association (PRA) and Belvedere Estate Residents' Association (BERA).

Yours sincerely,

Chris Goodair
Chair, Wimbledon Society Planning & Environment Committee

Please send all correspondence by email to chairmanpc@wimbledonsociety.org.uk

cc:
Stephen Hammond MP
Fleur Anderson MP
Merton Planning Department ref 21/P2900

Wandsworth Planning Department ref 2021/3609
GLA Planning Department ref 2021/0914/S1
Hannah Doody, Chief Executive, Merton
James McGinley, Planning Department, Merton
Dan Sitch & Nick Hammick, Arboricultural & Tree Officers, Merton
Pat Langley, Arboricultural Manager, Wandsworth
Village & Wimbledon Park Ward Councillors (Merton)
West Hill Ward Councillors (Wandsworth)

DOCUMENTS REFERENCED

1. Cut & Fill Layout Plan, Doc. No. 51365-BHE-XX-YY-SU-C-01300, July 2021, Rev. P03
2. Proposed Cut and Fill Plan, Doc. No. 51365-BHE-XX-XX-SU-C-01300, December 2021, Rev. P04
3. Outline Construction Logistics Plan, Doc. No. 51365-BHE-XX-XX-RP-Y-00022, July 2021, Rev. P02
Appendix E: Construction Traffic Forecasts
4. Grass & Soil Stripping Works, Doc. No. 51365-LUC-XX-XX-DR-L-02140, July 2021, Rev. P02
5. Proposed Court Layout Plan Single, Doc. No. 51365-AAM-XX-XX-DR-A-00060, April 2022, Rev. P05
6. Proposed Court Layout Plan Double, Doc. No. 51365-AAM-XX-XX-DR-A-00061, April 2022, rev. P04
7. General Arrangement, Doc. No. 51365-LUC-XX-XX-DR-L-02062, May 2022, Rev. P02
8. Planning Statement Addendum, Doc. No. 51365-RJP-XX-XX-RP-T-00004, May 2022, Rev. P01