

Justin Smith
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By email to jsmi@aeltc.com

26 April 2023

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 write to follow up on our letter of 20 July 2022 (attached separately) and refer now to the Buro Happold “Construction Traffic – Estimated Vehicle Movements” Planning Addendum document dated 21 October 2022 [Ref.1] but only posted on the Wandsworth planning website on 3 April 2023.

This Construction Traffic document neither acknowledges nor addresses several outstanding issues in our July letter. Specifically:

- A bulking factor has been ignored in calculating lorry loading in both the original Hybrid Planning Application and this Planning Addendum (see point 4 in the table on p2). We believe this should be at least 25%, and with Wimbledon clay potentially considerably higher. Therefore, rather than the 4,525 lorry arrivals (HGVs with 12 cubic metre capacity fully loaded) implied by the AELTC’s figures, using a 25% bulking factor we believe at least 5,657 lorry arrivals, or 11,314 lorry movements, will be required to transport the net cut of 54,305 cubic metres. (point 2 of our letter)
- The original Construction Logistics Plan (“CLP”) [Ref.2] from July 2021 does not allow for site roadways and paths totalling approximately 9km and requiring almost 3,000 lorry movements of materials. These continue to appear to be missing from Figure 2 on p3 of this document. (point 3 of our letter)
- There is no explanation for the 2:1 split between estimated numbers of HGV:LGV arrivals. (point 4 of our letter)
- It remains unclear what is included in the traffic numbers for the Northern and Southern Courts construction in Figure 2 on p3. The original CLP did not allow for the necessary gravel, much of the concrete required for these courts, nor the hard standing beside these courts; we estimate at least an additional 2,900 lorry movements for these elements. (point 5 of our letter).

We note that the AELTC now refers in the text of this document to “lorry movements”, though confusingly still includes “lorry arrivals” in Figures 1 and 2. We continue to believe that “lorry movements” is a more accurate

representation of the traffic that will be on local roads and that “lorry arrivals” is misleading. (point 1 of our letter).

We have not researched the details of lake desilting but acknowledge that if the AELTC is granted permission to use centrifugal desilting and is able to use 12 cubic metre tankers for transporting filter cake, this will reduce the number of lorries required for desilting works. The discharge of centrifuged water back into the lake poses a significant risk of contamination and centrifugal desilting has yet to gain approval as a method for the project.

Given the outstanding inconsistencies and omissions, we believe that this Construction Traffic document remains a serious underestimate. Just the points above add, at a minimum, over 8,100 lorry movements (2,264 bulking factor, 3,000 roadways and paths, 2,900 court gravel and concrete) to this document’s estimate of 40,400 construction movements.

With the end date of May 2030 remaining consistent, this construction period is being squeezed into an ever shorter timeframe and will result in more congestion on the roads of Merton and Wandsworth.

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. Buro Happold “Construction Traffic – Estimated Vehicle Movements” dated 21 October 2022; listed on the Merton Site as “Outline Construction Logistics Plan Design Note Construction Traffic Estimates Clarification Submitted 24.10.2022”; posted on the Wandsworth Site on 3 April 2023

2. Outline Construction Logistics Plan, Doc. No. 51365-BHE-XX-XX-RP-Y-00022, July 2021, Rev. P02
Appendix E: Construction Traffic Forecasts

