



ES STATEMENT OF CONFORMITY

WIMBLEDON PARK PROJECT

April 2024

51365-LUC-XX-XX-RP-T-10004-S2-P01

LUC

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Chapter 1

Introduction

1.1 This Environmental Impact Assessment (EIA) Statement of Conformity (SoC) has been prepared by LUC on behalf of The All England Lawn Tennis Ground PLC (AELTG) ('the Applicant') in relation to land at Wimbledon Park Golf Course, Home Park Road and Wimbledon Park Road ('the Site'), within the administrative boundary of the London Borough of Wandsworth (LBW) and the London Borough of Merton (LBM) as the Local Planning Authorities ('the LPAs').

1.2 A Hybrid Planning Application (part full and part outline) was prepared and submitted on behalf of the Applicant to the LPAs (LBM ref: 21/P2900 and LBW ref: 2021/3609) on 30th July 2021 and validated on 24th August 2021. The description of the 'Proposed Development' is as follows:

'Cross boundary (Merton/Wandsworth) Hybrid planning application (comprising part full permission and part outline planning permission) for expansion of The All England Lawn Tennis Club Grounds onto Wimbledon Park Golf Course with the introduction of new tennis courts, tennis related infrastructure and new buildings.

Full planning permission for the provision of 38 grass tennis courts and associated infrastructure, comprising of the re-profiling of the landscape and the removal, retention and replanting of trees; provision of 7 no satellite maintenance buildings; the provision of a boardwalk around the perimeter of and across Wimbledon Park Lake, lake alterations (including lake edge, de-silting & de-culverting), highway works to Church Road; new pedestrian access points at the northern and southern ends of the site; new vehicular access points; and the creation of a new area of parkland with permissive public access.

Outline planning permission (with appearance, means of access, landscaping and scale reserved - layout only considered in detail) for the erection of new buildings and structures, including an 8,000-seat parkland show court incorporating a qualifying player hub, guest facilities and associated event operational facilities; a central grounds maintenance hub and 2no. players hubs.

*An Environmental Statement has been submitted with the application under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017
[RECONSULTATION ON: Additional Environmental statement*

chapters, additional pontoon, paths and public access plans, amended Travel Plan].'

1.3 The Hybrid Planning Application was supported by an Environmental Statement (ES) which was produced in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('The 2017 EIA Regs'), and reported whether there would be any likely significant effects as a result of the Proposed Development.

Revised ES – May 2022

1.4 Comments from Statutory Consultees, the LPAs and local residents were received following the submission of the Hybrid Planning Application. This led to the Applicant making small design changes to the proposed development captured in a pack of additional information submitted to the LPAs in May 2022, which provided clarification on certain aspects of the proposed development and included revisions to certain documentation forming part of the Hybrid Planning Application.

1.5 This pack of additional information included the Revised ES (dated May 2022) which replaced the previous ES (dated July 2021), a series of new documents, addendums to existing documents and replacement drawings.

ES Addendum – October 2022

1.6 The Revised ES was reviewed by an external consultant on behalf of the LPAs. This led to an additional ES Addendum to the May 2022 ES being submitted to the LPAs in October 2022 which included two new ES Chapters (Energy and Sustainability, and Waste and Materials) and a Revised Non-Technical Summary.

1.7 Following this additional submission, the Hybrid Planning Application was considered by the LPA's planning committees. The London Borough of Merton Council resolved to grant planning permission (subject to conditions and entering into the S.106 agreement) at their October 2023 planning committee, however, the London Borough of Wandsworth resolved to refuse consent in their planning committee in November 2023.

Proposed Minor Design Amendments – April 2024

1.8 Subsequently, in January 2024 the Hybrid Planning Application was called in by the Greater London Authority (GLA) and deferred to the Deputy Mayor of London for determination. A number of design comments were set out by the GLA in relation to the Proposed Development, which has led to further minor amendments to the design in relation to opening up the northern portion of parkland within the Site to the public outside The Championships period, and a minor re-

alignment of the railings in the southern portion of the Site. Chapter 2 sets out the design changes in more detail.

1.9 This Statement of Conformity has been prepared by LUC with input from the ES technical chapter authors and the Applicant's design team. It accompanies the submission of these minor design amendments to the LPAs and confirms that these are considered non-material in the context of the ES and result in no changes to the results and conclusions reached in the ES. Further detail with regards to specific topics is set out in Chapter 3, with conclusions set out in Chapter 4.

Chapter 2

Schedule of Design Amendments

2.1 As noted in Chapter 1, minor amendments have been made to the Proposed Development and to some of the documents which form part of the Hybrid Planning Application, as a result of opening up the northern-most corner of the Site allowing public access to this area outside The Championships period. There has also been a very minor re-positioning of the railings within the southern area of the Site.

2.2 Figures 2.1 and 2.2 show the existing plans for these areas and the proposed plans following the design amendments. Figures 2.3 and 2.4 show an overlay of the changes.

2.3 A summary of the design amendments is included below. It is noted that this only includes those within the application site boundary.

Northern Parkland

- Increase public access to the Northern Parkland by 1.7ha, by partly removing the permanent railing to the north of the Athletics track, and by adding a removable new east-west railing boundary further south.
- Creation of a circular walking route linking to the wider path network, which will allow park users to have greater access and experience a variety of landscape types.
- Minor amendments to this area including the adjustment and location of entrance gates, railing boundaries, access road and path alignments, site furniture and planting to cater for increased public access outside The Championships and Qualifying Event period.
- In order to accommodate the new pedestrian connections and east-west views between AELTC land and the public park, there are 4no. additional tree removals proposed along the ownership boundary. All are C -category trees and are not of high amenity or green infrastructure value. The total number of proposed tree removals has therefore increased from 296 to 300no.
- Improvements to AELTCs Northern Parkland entrance to enhance pedestrian, cycle and vehicular access.

- A further stepped pedestrian entrance on Wimbledon Park Road, located just south of Princes Way junction, will be made public.

South East Parkland

- A small estate rail boundary is proposed to be re-aligned to increase (by 0.3ha) the physical space available to the public within the proposed public park (to 9.4ha).

Drawings and Plans

2.4 A number of the application drawings and plans have been updated as a result of the proposed design changes. A full list of the updated plans can be found within the planning

addendum submission package. With regards to the ES, Table 2.1 below sets out the planning drawings that were submitted as part of the EIA (either within the ES or within the Technical Appendices) which have now been updated and superseded.

2.5 This table does not record any other plans included within the ES that have not been updated in connection with these design amendments.

2.6 It is noted that a full, detailed description of all of the proposed design changes is included in the Landscape Addendum report, submitted with the updated planning package.

Table 2.1: Schedule of minor amendments to plans and drawings

Existing Plan reference	ES Location	Changes	New Plan reference
Proposed General Arrangement 51365-LUC-XX-XX-DR-L-0262 Revision P01	ES Vol 1, Chapter 5: The Proposed Development Figure 5.6 General Arrangement	Updated to reflect the latest design (April 2024)	Proposed General Arrangement 51365-LUC-XX-XX-DR-L-02062 P03
Site Context Section BB - Existing and Proposed Planning 51365-AAM-XX-XX-DR-A-00051 Revision P03	ES Vol 1, Chapter 5: The Proposed Development Figure 5.7b Site Context Section BB Existing and Proposed	Updated to reflect the latest design (April 2024)	Site Context Section BB - Existing and Proposed Planning 51365-AAM-XX-XX-DR-A-00051 P04
Soft Landscape General Arrangement Sheet 1 51365-LUC-XX-XX-DR-L-02411	ES Vol 2, Appendix 5.1 Supporting Application Drawings and Plans	Updated to reflect the latest design (April 2024)	Soft Landscape General Arrangement Sheet 1 51365-LUC-XX-XX-DR-L-02411 P05
Hard Landscape General Arrangement Sheet 1 51365-LUC-XX-XX-DR-L-02211	ES Vol 2, Appendix 5.1 Supporting Application Drawings and Plans	Updated to reflect the latest design (April 2024)	Hard Landscape General Arrangement Sheet 1 51365-LUC-XX-XX-DR-L-02211 P05
Hard Landscape General Arrangement Sheet 3 51365-LUC-XX-XX-DR-L-02213	ES Vol 2, Appendix 5.1 Supporting Application Drawings and Plans	Updated to reflect the latest design (April 2024)	Hard Landscape General Arrangement Sheet 3 51365-LUC-XX-XX-DR-L-02213 P04
Proposed Earthworks Sheet 1 51365-LUC-XX-XX-DR-L-02301	ES Vol 2, Appendix 5.1 Supporting Application Drawings and Plans	Updated to reflect the latest design (April 2024)	Proposed Earthworks Sheet 1 51365-LUC-XX-XX-DR-L-02301 P05
Soil Works Sheet 1 51365-LUC-XX-XX-DR-L-02311 –	ES Vol 2, Appendix 5.1 Supporting Application Drawings and Plans	Updated to reflect the latest design (April 2024)	Soil Works Sheet 1 51365-LUC-XX-XX-DR-L-02311 P05

Existing Plan reference	ES Location	Changes	New Plan reference
Proposed Tree Planting and Transplants Sheet 1 51365-LUC-XX-XX-DR-L-02401	ES Vol 2, Appendix 5.1 Supporting Application Drawings and Plans	Updated to reflect the latest design (April 2024)	Proposed Tree Planting and Transplants Sheet 1 51365-LUC-XX-XX-DR-L-02401 P05

Figure 2.1: 2022 and updated 2024 designs for the northern area of the Site



Figure 2.2: 2022 and updated 2024 designs for the southern area of the Site



Figure 2.3: Overlay of changes to the northern area of the Site



Figure 2.4: Overlay of changes to the southern area of the Site



Chapter 3

Outcome of Review of Design Amendments

3.1 The nature of the design amendments set out in Chapter 2 is such that the Applicant has revisited the chapters in the 2022 ES regarding the Proposed Development's Townscape Visual Impact Assessment (TVIA), Historic Environment assessment and Ecological assessment, in order to assess whether the design amendments would change the conclusions as to the Proposed Development's likely significant effects as reported in the 2022 ES.

3.2 The other chapters in the ES have been reviewed (including Traffic and Transport, Air Quality, Noise and Vibration, Soil and Ground Conditions, Water Resources and Flood Risk, Socio-economics, Lighting, Climate Change, Energy and Sustainability, and Waste and Materials), and it is confirmed that the results and conclusions of these will not be changed by the minor design amendments (see below).

- Traffic and Transport – No significant effects to receptors predicted during construction and operation. The proposed minor design changes will not change these conclusions.
- Air Quality – Following the mitigation set out in the ES, no significant effects to receptors predicted during construction and operation. The proposed minor design changes will not change these conclusions.
- Noise and Vibration - No significant effects to receptors predicted during construction and operation. The proposed minor design changes will not change these conclusions.
- Soil and Ground Conditions - Following the mitigation set out in the ES, no significant effects to receptors predicted during construction and operation. The proposed minor design changes will not change these conclusions.
- Water Resources and Flood Risk - Following the mitigation set out in the ES, no significant effects to receptors predicted during construction and operation. The proposed minor design changes will not change these conclusions.
- Socio-economics – No significant effects to receptors predicted during the construction phase. Moderate and major beneficial effects to employment, spending and

wider economic impact, and provision of public realm during the operational phase. The proposed minor design changes will not change these conclusions.

- Lighting - Following the mitigation set out in the ES, no significant effects to receptors predicted during construction and operation. The proposed minor design changes will not change these conclusions.
- Climate Change - No significant effects to receptors predicted during construction and operation. The proposed minor design changes will not change these conclusions.
- Energy and Sustainability – Following the mitigation set out in the ES, no significant effects to receptors predicted during construction and operation. The proposed minor design changes will not change these conclusions.
- Waste and Materials – Potential significant adverse effect to London landfills during construction. No significant effects to receptors predicted during operation. The proposed minor design changes will not change these conclusions.

Townscape and Visual Impact

3.3 This section considers the proposed design amendments within the red line planning boundary (as described in Chapter 2) and whether they are likely to change the results and conclusions reached in the TVIA (May 2022). In line with the TVIA, this considers the effects during the construction phase and the operational phase at Year 1 (both outside The Championships and during The Championships) and at Year 15 (during The Championships).

3.4 As the amendments to the south of the Site comprise only the re-positioning of proposed estate railings, they are not considered likely to give rise to any changes in the findings of the TVIA and are therefore not considered further. There are a larger number of amendments proposed to the north of the Site and so the assessment findings for the following townscape and visual receptors in proximity to this part of the Site have been reviewed (for the other townscape and visual receptors assessed within the TVIA, the assessment findings are not considered likely to change):

Townscape receptors:

- Trees and woodland within the Site; and
- Character Area D5: Wimbledon Park Estates (as defined within the Wandsworth Urban Design Study (2021).

Visual receptors:

- Recreational users of Wimbledon Park (Viewpoint 5); and

- Recreational users of the Capital Ring, the local community on Wimbledon Park Road and motorists on Wimbledon Park Road (Viewpoint 16).

Townscape receptors

Trees and woodland within the Site

3.5 The design amendments to the north of the Site will result in a very small change in the number of trees to be removed during the construction phase – increasing from 296 to 300. The additional four trees are, however, in poor condition and with limited lifespan (i.e. classified as grade C). There will be no change in the total number of trees and woodland planted across the Site. The vast majority of the proposed design amendments involve the relocation of proposed trees and woodland and re-shaping of proposed planting such that there will be very little appreciable difference from the original scheme assessed in the TVIA.

3.6 Overall, there will be **no change** to the assessment's conclusions during both the construction phase and the operational phase at Year 1 and Year 15.

Character Area D5: Wimbledon Park Estates

3.7 There will be **no change** to the assessment's conclusions for the construction phase as a result of the proposed design amendments. The main source of impact on the character area will remain the movement of construction plant and traffic; removal of vegetation; creation of new paths and entrances to the Site; construction of new parkland satellite maintenance hubs; and construction of five grass tennis courts.

3.8 Similarly, there will be **no change** to the assessment's conclusions for the operational phase at Year 1 and Year 15. The amendments within the red line planning boundary will comprise the relocation and re-shaping of proposed trees and planting, and the re-positioning of paths and fences. There will be very little appreciable difference from the original scheme such that it will change the level of effect reported in the TVIA. As assessed in the TVIA, the Proposed Development will help restore the parkland character with reference the original 'Capability' Brown design, open up views towards Wimbledon Park Lake and St Mary's Church, introduce sinuous paths, and increase public access to the Site.

Visual receptors

Recreational users of Wimbledon Park (Viewpoint 5)

3.9 There will be **no change** to the assessment's conclusions for the construction phase as a result of the proposed design amendments. The main source of impact on the character area will remain the construction works

associated with the reinstatement of wooded parkland; removal of vegetation; creation of new paths and entrances to the Site; construction of Hub 2 and several tennis courts; and tall plant and machinery used in the construction of the parkland show court.

3.10 The relocation and re-shaping of proposed trees and planting and addition and relocation of paths along the north-eastern boundary of the Site will help strengthen the visual connection between the north of the Site (red line planning boundary) and the adjacent areas of Wimbledon Park (Merton landholdings). However, this will not have an appreciable impact on views from northern areas of Wimbledon Park during the operational phase such that it will change the level of effect reported in the TVIA. As assessed in the TVIA, intermittent views into the Site will be available through gaps in the existing vegetation on the Site's north-eastern boundary, particularly where vegetation clearance is proposed (e.g. to open up views or facilitate new paths and entrances). Therefore, there will be **no change** to the assessment's conclusions at Year 1 and Year 15.

Recreational users of the Capital Ring and the local community and motorists on Wimbledon Park Road (Viewpoint 16)

3.11 There will be **no change** to the assessment's conclusions for the construction phase as a result of the proposed design amendments. The main source of impact will remain the construction traffic and works associated with the new northern entrance; selective vegetation removal and the introduction of new trees and woodland/woodland edge planting along the north-western boundary of the Site; and tall plant and machinery used in the construction of the parkland show court.

3.12 The amendments to the northern entrance, including path and fence re-positioning, the relocation of proposed trees and re-shaping of proposed planting will help improve the visual aesthetic of the northern park entrance. However, this will not have an appreciable impact on views from Wimbledon Park Road during the operational phase such that it will change the level of effect reported in the TVIA. As assessed in the TVIA, the new northern entrance and proposed woodland/woodland edge planting, along with retained vegetation and fencing, will be visible at proximity on the north-western boundary of the Site along Wimbledon Park Road. Through this, intermittent filtered oblique views will be available towards Hub 01 and 03, the Northern Player Hub, Hub 02/Public WCs and proposed tennis courts set within the reinstated wooded parkland. Therefore, there will be **no change** to the assessment's conclusions at Year 1 and Year 15.

Conclusion

3.13 Due to the minor nature of the proposed design amendments, there will be **no change** to the results and conclusions reached for townscape and visual receptors in the TVIA during both the construction phase and the operational phase at Year 1 (both outside The Championships and during The Championships) and at Year 15 (during The Championships). The proposed amendments will cause very little appreciable change to the original scheme such that it will change the level of effect reported in the TVIA.

Historic Environment

3.14 The appraisal of the validity of the conclusions of the 2022 ES was informed by review of the revised plans and a site visit. The site visit was undertaken to check for any alterations to the baseline since preparation of the 2022 ES and occurred on 9th April 2024, conditions overcast with intermittent rain but fair visibility. Aside from cessation of active use of the Site as a golf course, no changes were noted to the baseline. The Site continues to be experienced as a golf course, with fairways and bunkers still legible.

3.15 The ES identified effects to the following heritage assets:

- On site:
 - Wimbledon Park – Grade II* Registered Park and Garden (RPG) [NHLE ref: 1000852].
 - Wimbledon North Conservation Area (CA).
 - Archaeology relating to Wimbledon Park (incl. Wimbledon Park Archaeological Priority Area).
- Off site:
 - St Mary's Church – Grade II* Listed Building [NHLE ref: 1080917].
 - The Old Rectory – Grade II* Listed Building [NHLE ref: 1080951].

3.16 The design changes are spatially discrete and minor so only have the potential to change the effects reported to heritage assets on site.

3.17 No change is considered likely to the level of effect reported to archaeology relating to Wimbledon Park. This is as the design changes represent minor reconfigurations of groundworks already proposed in these locations rather than areas of entirely novel, or deeper, excavation. The effect reported in the ES stands:

- Residual effect – Adverse (varying between total loss, substantial harm and less than substantial harm), in EIA terms not significant to significant effect.

3.18 The site lies wholly within the Wimbledon Park RPG. The park forms a character area within the Wimbledon North CA. As such, change within Wimbledon Park has the potential to affect both the RPG and the CA.

3.19 The design change in the south of the Site relates to realignment of a proposed fence. This will not meaningfully alter how the Proposed Development appears or alter the character of the RPG. Accordingly, no change in the level of effect reported in the ES would be generated by the design change in the south of the Site.

3.20 The design changes in the north of the Site relate to alteration of fencing around the ownership boundary with the Wimbledon Park Public Park (also part of the Wimbledon Park RPG) and slight changes to pathway location and vegetation layout. These will slightly soften the northern extreme of the boundary between the AELTC and Merton ownerships. This boundary is currently entirely vegetated and also fenced meaning the two are experienced as separate land parcels. The change would create a more gradual transition between the two ownerships and make them more legible as being derived from the same historic parkland. As it would affect only a very short section of the boundary between the AELTC and public ownership in the RPG, there would be no change in the level of effects reported by the ES to these assets. The effects reported within the ES stand:

- Wimbledon Park RPG:
 - Construction period – Residual effect of less than substantial harm and, in EIA terms, would vary from not significant to a significant effect in EIA terms, in the worst-case scenario.
 - Operational Effects Outside of The Championships – Residual effect of less than substantial harm, not a significant effect in EIA terms.
 - Operational Effects During The Championships – Residual effect of less than substantial harm, not a significant effect in EIA terms.
- Wimbledon North CA:
 - Construction period – Residual effect of less than substantial harm, not a significant effect in EIA terms.
 - Operational Effects Outside of The Championships – Residual effect of less than substantial harm, not a significant effect in EIA terms.
 - Operational Effects During The Championships – Residual effect of less than substantial harm, not a significant effect in EIA terms.

Ecology

3.21 The design amendments to the north of the Site will result in a very small change in the number of trees to be removed during the construction phase – increasing from 296 to 300. The additional four trees are, however, in poor condition and with limited lifespan (i.e. classified as grade C). There will be no change in the total number of trees and woodland planted across the Site. The vast majority of the proposed design amendments involve the relocation of proposed trees and woodland and minor re-shaping of proposed planting such that there will be very little appreciable difference from the original scheme assessed in the Ecology Chapter of the ES.

3.22 Due to the minor nature of the proposed design amendments, there will be no change to the results and conclusions reached for Ecological receptors in the ES during both the construction phase and the operational phase.

3.23 It is noted that the proposed changes, including those around the northern entrance, were discussed with Historic England and the GLA on 22nd March 2024. The divided ownership of the RPG has been highlighted as an issue and is a factor in why it is on the Heritage at Risk Register. Therefore, Historic England expressed support for measures to blur the boundary between two landholdings in achieving a more coherent experience of the RPG.

Chapter 4

Conclusion

4.1 It is concluded that the minor proposed design amendments will have no material bearing upon the results and conclusions of the ES dated May 2022 and the ES Addendum submitted in October 2022. Therefore, the EIA remains valid.