

# GREATER **LONDON** AUTHORITY

**(by email)**

Our reference: MGLA211024-3398

6 November 2024

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 21 October 2024. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

**You requested:**

I request a copy of the Arup report that was referred to in the Planning Officer's Stage 3 report (Representation Hearing Report GLA/2024/0045/S3 & GLA2024/0047/S3 27 September 2024: paragraphs 359, 571, 578, 604, 608, 765, 766 and 767).

**Our response to your request is as follows:**

Please find attached the information that the GLA holds within the scope of your request.

Please note that the names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA211024-3398.

Yours sincerely

**Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

Greater London Authority

## Wimbledon Park Project

Wimbledon Park Golf Club, Home Park Road, Wimbledon Park, SW19 7HR

Case officer: [REDACTED], Greater London Authority

### Technical Review

Reference:

Final | 7 August 2024

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 302551-00

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# 1. Introduction

- 1.1.1 Ove Arup & Partners Ltd (Arup) has been appointed by Greater London Authority (GLA) to undertake a technical review of the landscape, biodiversity (including ecology) and socio-economics elements of the hybrid planning application(s), as well as to provide advice in relation to the Environmental Statement (ES) submitted for the Wimbledon Park Project (from herein the ‘proposed development’), located in London Borough of Wandsworth (LBW) and London Borough of Merton (LBM). The site location is shown in Figure 1 and illustrative masterplan is shown in Figure 2.
- 1.1.2 The proposed development was subject to environmental impact assessment (EIA) under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017<sup>1</sup>, as amended<sup>2</sup> (the ‘EIA Regulations’) and accompanied by an Environmental Statement (ES) prepared in July 2021 by Land Use Consultants Ltd (LUC) in association with Buro Happold and Quod (the ‘2021 ES’). Following consultation and updates to the design, new information was submitted which was accompanied by a Revised ES (May 2022) which replaced the 2021 ES. An ES addendum (October 2022) and various clarifications were submitted following a formal ES review undertaken by JAM Consult Ltd. (JAM), consultation and further design changes. The May 2022 ES and October 2022 ES addendum, together comprise the ‘Wimbledon Park ES’ and report the findings of the EIA process.
- 1.1.3 Following conflicting committee decisions by LBW and LBM, the proposed development was called in by the London Mayor and is currently awaiting a Hearing. Further design changes have been made since the call-in and a revised set of information was submitted in April 2024. This information was accompanied by an Environmental Statement of Conformity.
- 1.1.4 This technical review considers the landscape, biodiversity (including ecology) and socio-economic elements of the application documentation and advises on the robustness of these technical assessments as well as the wider conclusions contained within the ES and standalone reports. The review has been informed by consultation responses received by each of the boroughs, as well as LBW and LBM committee reports.
- 1.1.5 In addition, a review of the Wimbledon Park ES has been undertaken which considers whether the EIA has been carried out in accordance with the EIA Regulations and if the ES is based upon the adopted EIA Scoping Opinion. This review excludes technical consideration of other scoped in topic chapter assessments which have been reviewed separately by competent GLA officers and statutory bodies.
- 1.1.6 A review has also been undertaken of the appropriateness and robustness of the April 2024 Environmental Statement of Compliance and consideration has been given to whether there would be any resulting new or different significant effects as a result of the revised proposals, beyond those already reported in the Wimbledon Park ES.

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<sup>1</sup> The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Available at: <http://www.legislation.gov.uk/ukxi/2017/571/contents/made>

<sup>2</sup> The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 Available at: <https://www.legislation.gov.uk/ukxi/2018/695/regulation/2/made>

Figure 1 Site location and red line planning boundary [blue line shows other land within the applicant's ownership]

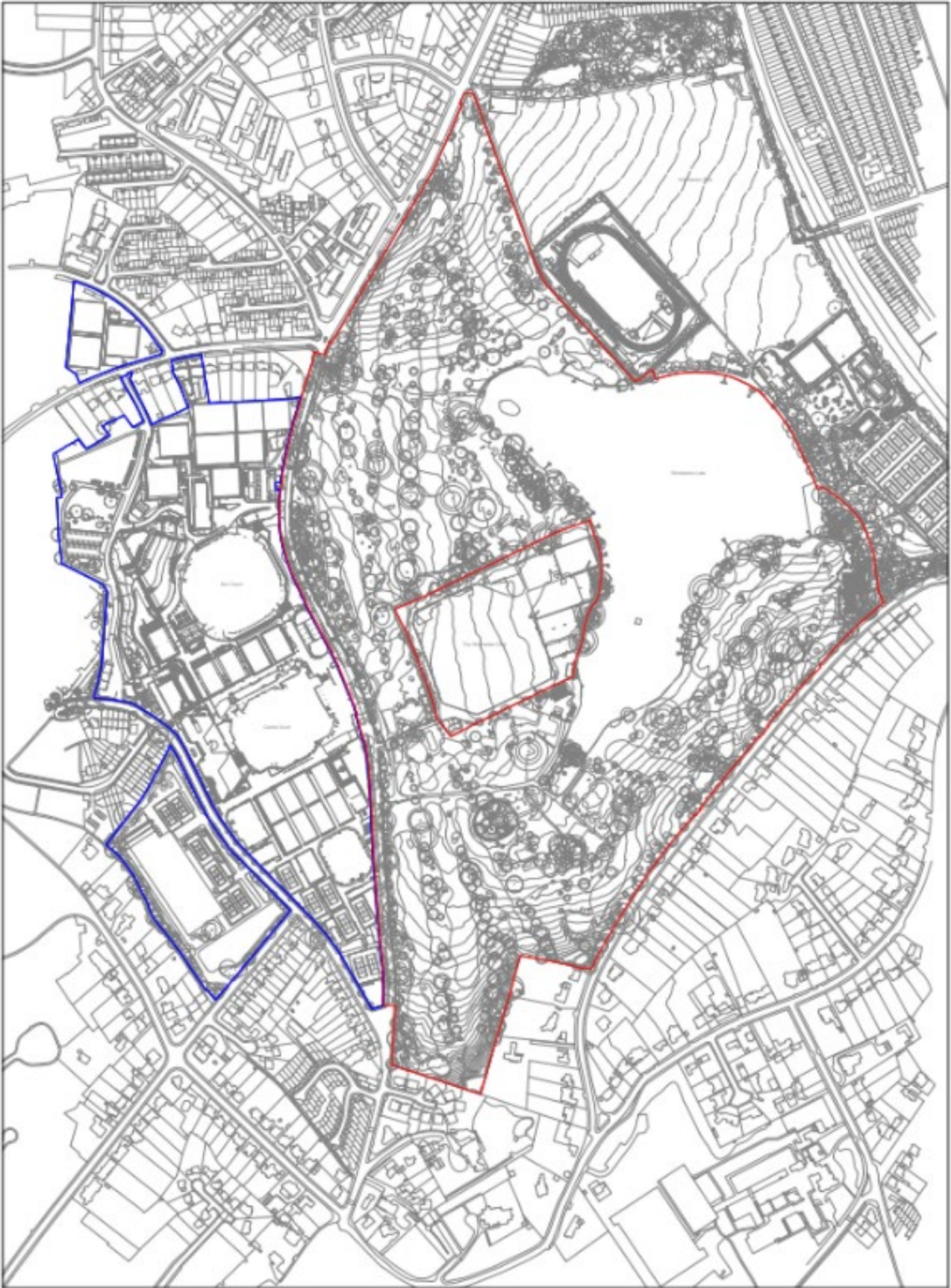




Figure 2 Illustrative masterplan [red line is the planning boundary; blue line is the borough boundary across the site]



## 1.2 Documents reviewed

1.2.1 The following documents have informed and/or been taken account within Arup's technical review:

- Wimbledon Park Project ES (July 2021) – landscape and visual impact assessment (LVIA), 12 – ecology (LUC, Burohappold, Quod) - '2021 ES'
- Wimbledon Park Project ES (May 2022) – relevant front-end and end chapters 1-6, 11 – landscape and visual impact assessment (LVIA), 12 – ecology, 17-18, (LUC, Burohappold, Quod) - 'May 2022 Revised ES'
- Wimbledon Park Project ES Addendum (October 2022) (all volumes) – relevant front-end and end chapters 1-6, 11 – landscape and visual impact assessment (LVIA), 12 – ecology, 17-18, (LUC, Burohappold, Quod) - 'October 2022 ES Addendum'
- Review of the May 2022 Revised ES (27 September 2022) - JAM
- Review of the October 2022 ES Addendum (02 December 2022) – JAM
- Applicant response to JAM review of the May 2022 Revised ES and October 2022 ES Addendum (06 March 2023) – LUC
- LBM consolidated officer response to the JAM review of the May 2022 Revised ES and October 2022 ES Addendum
- Objections to the hybrid planning application received from Save Wimbledon Park
- Consultation responses received to the planning application from London Wildlife Trust
- LBM independent tree consultant (Ivan Button of Crown Tree Consultancy) responses to the hybrid planning application dated 26 January 2022, 07 August 2022 and 03 October 2023)
- LBM Case officer report to Planning Committee, 26 October 2023
- LBW Planning Committee report, 27 November 2023
- Revised plans submitted by the applicant in April 2024 which included:
  - ES Statement of Conformity (April 2024) (51365-LUC-XX-XX-RP-T-10004-S2-P01)
- Design and Access Statement (DAS) and various updates - Allies and Morrison, Buro Happold, LUC, Rolfe Judd Planning and Turner & Townsend (51365-AAM-XX-XX-RP-A-0010)
- The following proposed plans prepared by LUC (including updates received in the April 2024 submission):
  - Tree planting and transplant plans (51365-LUC-XX-XX-DR-L-02401 P05);
  - Tree Removals, LUC (51365-LUC-XX-XX-DR-L-02121- P03)
  - Earthworks plans (51365-LUC-XX-XX-DR-L-02301 – 04 P03);
  - Soft landscape general arrangement plan (51365-LUC-XX-XX-DR-L-02411 – 14 P03/P04);
  - Hard landscape general arrangement plan (51365-LUC-XX-XX-DR-L-02211 – 14 P04/P05) and
- Cut and fill site plan - Buro Happold (51365-BHE-XX-XX-SU-C-01300 P05)
- Arboricultural impact assessment (July 2021) (Treework Environmental Practice) (51365-TEP-XX-XX-RP-X-00002 P01)
- Outline arboricultural method statement (July 2021) (Treework Environmental Practice) (51365-TEP-XX-XX-RP-X-00002 P01)
- Urban Greening Factor calculation update File Note (22 September 2023) (LUC)

- External Lighting Strategy Report (July 2021) – Buro Happold
- Outline Construction Logistics Plan (CLP) (July 2021) and update note (51365-BHE-XX-XX-RP-Y-00022)
- Biodiversity net gain assessment and metric calculation (51365-LUC-XX-XX-RP-YE-00010 P02 Biodiversity Net Gain Assessment, April 2024, LUC)
- Ecological mitigation strategy (21P2900\_Ecological Mitigation Strategy, July 2021)
- Ecological impact assessment (Chapter 12 of the Environmental Statement, LUC)
- Economic, Social and Community Benefits Report, July 2021 (Quod) (21P2900\_Economic Social & Community Benefits Report)
- Social, Community and Economic Benefits Addendum Report, April 2024 (Quod) (51365-QUO-XX-XX-RP-Z-0001 P05 Social, Community and Economic Benefits - Addendum Report)

### 1.3 Site visit

- 1.3.1 To inform the technical review, members of the Arup team ([REDACTED] and [REDACTED], EIA; [REDACTED] – ecology; [REDACTED] – TVIA) visited the site on Tuesday 14 May 2024 with representatives from Rolfe Judd Planning and AELTC.
- 1.3.2 A further site meeting / walkover was undertaken on Friday 07 June 2024 by [REDACTED] (Arup – landscape), again with representatives from LUC, Rolfe Judd Planning and AELTC.



## 2. Planning history and EIA conclusions

### 2.1 August 2021 Original hybrid application

- 2.1.1 Hybrid applications were submitted in August 2021 by All England Lawn Tennis Ground Plc (the ‘applicant’) to LBW (reference: 2021/360) and LBM (reference: 21/P2900) for the expansion of the All England Lawn Tennis Club (AELTC) grounds onto approximately 39.7 hectares (ha) of land within Wimbledon Park Golf Course. Permission is being sought as follows (from herein the ‘proposed development’):

*“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 7no 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 construction 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.”*

- 2.1.2 The proposed 39 tennis courts (including one new show court – the Parkland Show Court – with a seated capacity for up to 8,000 spectators, a retractable roof, changing facilities, amenities, single basement level, community and hospitality facilities) are to be used for the Wimbledon Qualifying Event, as well as providing practice facilities for the Main Draw players during the Championships, and some replacement facilities for existing courts to be removed from the main site. The proposed development will increase the operating capacity for the Championships from 42,000 visitors per day to 50,000 visitors per day.

- 2.1.3 In addition to the new courts, key aspects of the proposals comprise:

- closure of the existing members’ golf club and removal of golf course features;
- reprofiling / remodelling of the site topography;
- removal of existing fairway trees (circa 300 trees);
- retention of veteran trees, relocation of trees and new tree planting (circa 1,500 new trees) throughout the site;
- habitat improvements;
- creation of a new parkland area with permissive public access;
- creation of two new entrances to the north and south;
- desilting and extension of the Wimbledon Park Lake to restore the historic lake layout – approximately 70,000 cubic metres of material will be removed for offsite treatment/disposal;
- introduction of sustainable drainage systems (SuDS) and de-culverting of existing streams;
- improvements to Church Road including public realm enhancements, works to the roadway and landscaping;

- construction of a new tunnel (eastern end only) beneath Church Road that will connect the new show court with the existing AELTC site and be used primarily for servicing;
- construction of seven single storey satellite maintenance hubs;
- construction of two single storey satellite player hubs;
- construction of a partly subterranean centralised maintenance facility (Central Grounds Maintenance Hub) split across two levels (basement and ground) to provide storage for maintenance and a staff base; and
- new cycle and car parking.

2.1.4 The entire site is designated as Metropolitan Open Land (MOL) and also forms part of a historic landscape designed by Lancelot ‘Capability’ Brown which is designated as a Grade II\* Registered Park and Garden (RPG), for which the Wimbledon Park Lake water body is an important feature. The Lake, along with the golf course, are designated as London Sites of Importance for Nature Conservation (SINC). Part of the site located within LBW, is within the Wimbledon North Conservation Area. All trees within the site located in LBM are covered by a Tree Preservation Order (TPOs).

2.1.5 The site also contains some restrictive covenants which date back to AELTC’s acquisition of the freehold from LBM in 1993. These covenants require the land to be used as a golf course but also the provision of a public lakeside walkway once operation as a golf course ceases (operation of the golf course ceased in 2022).

## 2.2 Adopted EIA scoping opinion

2.2.1 An EIA scoping opinion (LBM reference: 21/P1709) was adopted by LBM<sup>3</sup> on 16 July 2021 following a request made by the applicant. The opinion was informed by a report prepared by JAM. The scoping opinion considered the following topics were likely to result in significant effects and would require detailed assessment in the ES:

- traffic and transport;
- air quality;
- noise and vibration;
- historic environment;
- townscape and visual impact assessment (TVIA);
- ecology;
- soil and ground conditions;
- water resources and flood risk;
- socio-economics; and
- lighting.

2.2.2 In addition, the scoping opinion stated that the following topics should also be scoped in as some impacts associated with these disciplines were to be assessed but not all:

- major accidents and disasters;
- population and human health;
- waste and recycling;

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<sup>3</sup> LBM EIA scoping opinion (21/P1709) [Online Standard Details \(merton.gov.uk\)](https://merton.gov.uk)

- energy and sustainability; and
- climate change mitigation and adaption.

2.2.3 The topics of daylight, sunlight and overshadowing, wind microclimate, electronic interference and aviation were not considered likely to give rise to significant effects and could be scoped out of detailed assessment within the ES.

## **2.3 July 2021 ES (Original ES)**

2.3.1 The original 2021 ES was submitted with the hybrid applications to LBW and LBM in August 2021. The assessments concluded the following residual significant effects:

- Significant adverse townscape and visual effects during construction which would be managed through the implementation of standard construction practices to be set out within a detailed construction environmental management plan (CEMP).
- Significant adverse effects on non-statutory designated sites, habitats, breeding birds, wintering birds, bats, fish, badgers and reptiles during construction, predominantly as a result of habitat loss, degradation and disturbance. Mitigation embedded into the design to address habitat and tree loss. Survey work carried out to inform detailed ecological clerk of works and sensitive construction programme to minimise impacts on species and habitats.
- Significant beneficial effects on landscape and visual amenity once the proposed development is in operation due to improved accessibility of site, new areas of tree planting, habitat creation and landscaping.
- Significant beneficial effects on ecology (both habitats and species) arising from the proposed landscaping and habitat management.
- Significant beneficial effects on socio-economics as a result of employment uplift outside the Championships, local and borough level spending and economics impact and public realm provision.

2.3.2 The July 2021 ES was reviewed by JAM in October 2021 on behalf of LBM with several rounds of comments raised in October 2021 and January 2022.

## **2.4 May 2022 Revised ES**

2.4.1 Following comments received from Statutory Consultees, LBW, LBM, JAM, local residents and groups, and other interested parties during the hybrid application consultation, updates were made to the proposed development. The changes were submitted to LBW and LBM within an updated pack of information that included the May 2022 Revised ES, which replaced the July 2021 ES, and a series of new drawings, documents and addendums to various previously submitted reports.

2.4.2 In line with the adopted scoping opinion and comments raised by JAM on the July 2021 ES, an additional chapter – Chapter 17 Climate Change – was included in the Revised ES.

2.4.3 The updates to the proposed development comprise minor design changes which were informed by consultation with the LBM Tree Officer to reduce impacts on retained trees:

- path alignment changes to improve accessibility for users, maintenance activities and emergency vehicles;
- repositioning of several gates;
- adjusted layout of two bridges (Bridge 1 and Bridge 5);
- repositioning of four satellite maintenance hubs;
- reduction in the amount of concrete used for the construction of the new tennis courts;
- repositioning of several tennis courts;

- updates to car parking management and details on how Park and Ride and use of sustainable modes of transport will be promoted; and
- enlarging and modifying the shape of several attenuation ponds to address LBM Hydrology Officer consultation comments.

2.4.4 The Revised ES was reviewed by JAM (commissioned by LBM) with an initial review report prepared in August 2022 and a final review report issued in September 2022.

## 2.5 October 2022 ES Addendum

2.5.1 In response to the JAM review of the May 2022 Revised ES, the applicant prepared a clarification note and an ES Addendum which were submitted in October 2022. The October 2022 ES Addendum included two new ES chapters (Energy and Sustainability and Waste and Materials) and supporting technical reports, as well as an updated Non-Technical Summary (NTS), both of which were to be read in conjunction with the May 2022 Revised ES. The May 2022 Revised ES and October 2022 ES Addendum together comprise the ‘Wimbledon Park ES’.

## 2.6 Key aspects raised in the JAM review of the Wimbledon Park ES

2.6.1 LBM prepared a consolidated report of the various JAM reviews of the Wimbledon Park ES in October 2023 to support its reporting of the hybrid application to its committee<sup>4</sup>.

2.6.2 The key issues raised by the JAM review, along with consideration from LBM and LBW Officers presented in the report referenced above and LBW committee report, are summarised in Table 1.

2.6.3 Both LBM and LBW officers conclude in the respective committee reports that the Wimbledon Park ES has been prepared in accordance with the EIA Regulations and is sufficient for the purposes of decision making.

**Table 1 Summary of issues raised in the JAM review**

No.	Issue raised	LBM / LBW consideration	Arup comment
1	Not all documents have been updated to reflect the latest policies, guidance and Regulations that occurred since the original July 2021 ES	Updates to relevant policy, guidance and Regulations would not materially alter the ES conclusions.  LBW do not refer to this specifically.	The ES has taken into account the requirements of the adopted London Plan (such as urban greening) and recent adoption of mandatory biodiversity net gain. If the changes to the policy, guidance and Regulations do not alter the findings of the ES or reported residual impact significance, then there is no requirement to fully update the ES documentation.
2	Scoped out topics – the adopted scoping opinion required full technical chapters to be prepared for topics where only aspects of that topic were to be scoped in. Climate change, Energy & sustainability and Waste & materials should form separate, scoped in chapters. The baseline position	LBM acknowledge additional technical chapters were prepared for the three topics in the May 2022 Revised ES/October 2022 ES Addendum and the baseline position was clarified.  Site-wide strategies will be in place to manage effects relating to these topics.  LBW do not refer to this specifically in relation to the ES, but acknowledge various updates made to the site-wide	It is agreed that the ES should include a clear description of the relevant site-wide strategies, such as the Energy & Sustainability Statement, Circular Economy Statement and outline Construction Logistics Plan. It would be assumed that these strategies would form part of the proposed development’s embedded mitigation and therefore considered as part of the pre-mitigation assessment.  There is no prescribed structure or presentation of the ES within the EIA Regulations. The need to ensure all information is in one place should not be the driver for whether a topic assessment is scoped in; but rather, whether there is a likelihood for significant environmental effects.

<sup>4</sup> LBM consolidated officer response to the JAM review of the May 2022 Revised ES and October 2022 ES Addendum, available on the LBM planning portal: [21P2900\\_EIA\\_Consolidated Officer Response to JAM Review of revised ES and ES Addendum\\_16.10.2023.pdf](#) (merton.gov.uk)



No.	Issue raised	LBM / LBW consideration	Arup comment
	for each of these topics should be made clear. Equally, where information submitted as part of standalone documents is relied upon, this should be included within the ES to avoid a 'paper chase'.	strategies e.g. energy, in response to GLA comments.	For any future changes to these site-wide strategies, implications for the ES significance conclusions will need to be considered as updates may require ES addendums.
3	Alternatives – options for fewer new courts or leaner design options should have been considered, as well as alternative lake desilting options and pedestrian/cycle routes.	LBM and LBW officers both satisfied with the information provided in Chapter 4.	Agree that the EIA Regulations require ' <i>a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.</i> ' Agree Chapter 4 provides sufficient information to satisfy the requirements of the EIA Regulations. See also Table 2.
4	Construction work programme – the proposed programme length varies across the submitted documentation.	LBM acknowledge the construction programme has been clarified as being eight years.  LBW acknowledges mitigation measures, to be secured by appropriate conditions, to manage effects.	It is not a requirement for all documentation to be updated as the applicant clarified the construction programme was eight years and there would be no material change to the construction effects reported. The technical sections of this review report consider these aspects in more detail.  Conditions to ensure appropriate and robust construction management will be required.
5	Outline / detailed elements of the proposed development are not clearly described.	LBM acknowledges Chapter 5 provides a clear description of relevant aspects of the scheme. LBW provides a clear description in the committee report.	Planning conditions for the future reserved matters applications should include a requirement for the applications to be accompanied by an appropriate level of environmental assessment to demonstrate the detailed design will not result in any new or different significant environmental effects beyond those reported in the Wimbledon Park ES. This could either be as an ES addendum, Supplementary ES or Environmental Statement of Compliance.
6	Missing information – similar point raised under point no. 2.	See Point No. 2	See Point No. 2
7	Inconsistencies in the documents and associated errors	LBM acknowledges applicant provided sufficient clarification to ensure it is clear which figures should be referred to or that any differences would not materially alter findings.	With numerous updates to reports, figures in the ES can sometimes not necessarily reflect the final position. There is no requirement to provide further environmental information if the changes do not alter the residual effects conclusions or project described. The majority of document updates sit outwith the scope of with ES.
8	Cumulative impacts – agreed list of developments has	LBM satisfied with committed schemes included and acknowledge there must	The list of committed developments was agreed with LBM as part of the scoping process. There

No.	Issue raised	LBM / LBW consideration	Arup comment
	changed since the original submission	be a cut off. LBW makes no comment.	are no new schemes identified that are of a scale that could alter the reported effects.
9	Technical appendices – no page numbering	LBM satisfied no material difference. LBW – no comment	It is agreed that the ES must be readily understandable, but the structure and presentation of the ES is not prescribed. The lack of page numbers does not materially alter the Wimbledon Park ES conclusions.

## 2.7 Arup high-level review of the EIA aspects of the Wimbledon Park ES

- 2.7.1 Arup EIA practitioners have undertaken a general review of the Wimbledon Park front end ES chapters (1-6, 18 and 19) of the May 2022 Revised ES and October 2022 ES Addendum, which has taken into account the LBM adopted scoping opinion, reviews carried out by JAM and also comments raised by LBM and LBW in their committee reports, as relevant. This review has not been undertaken in line with any established ES review guidance or criteria but provides an overall EIA professional opinion on the EIA approach, methodology and conclusions with reference to the requirements of the EIA Regulations.
- 2.7.2 No other technical input or technical competence has informed the commentary provided in Table 2. Specific consideration of the ecology, landscape, townscape and visual amenity, and socio-economics assessments is set out in later sections of this report.

**Table 2 High level commentary on the EIA aspects of the Wimbledon Park ES**

ES Chapter		Review commentary
1	Introduction	The Wimbledon Park ES has been prepared in accordance with the EIA Regulations.
2	Approach to EIA	<p>This chapter sets out the proposed ES scope, providing a summary of consultation responses on the proposed scope and topics to be scoped in and out of detailed assessment. The additional topics of climate change, energy and sustainability, and waste and materials, have been scoped in (the latter two as part of the October 2022 ES addendum), in response to comments raised by JAM. The general scope of the topics to be scoped in/out of the ES is agreed.</p> <p>The applicant notes that there is no prescribed guidance for preparing an Energy and Sustainability chapter. As stated in Table 1, it would be usual to consider the measures within the site-wide energy strategy as embedded mitigation, particularly as the chapter conclusions are reporting no significant effects.</p> <p>It is noted that the EIA Regulations require the ES to be <i>‘be based on the most recent scoping opinion or direction issued (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion or direction)’</i>.</p> <p>The ES chapter would have benefitted from a more defined description of embedded mitigation (primary, secondary and tertiary measures are not distinguished), either in this chapter or as part of the proposed development description so that it was clear what site-wide strategies were being taken into account within the pre-mitigation assessments. However, this inclusion would be for ease of understanding. It is assumed that embedded mitigation measures were taken into account within the pre-mitigation assessments. Therefore, more definitive reporting of the embedded measures would not materially alter the overall approach to the EIA or ES conclusions, on the basis that delivery of the site-wide strategies will be secured through appropriately worded planning conditions.</p> <p>The Revised May 2022 ES, paragraph 2.8.8 also states: <i>“[...] secondary effects have been considered where appropriate however, it is not within the scope of the ES to consider these in detail.”</i></p>

ES Chapter		Review commentary
		The need to report secondary or indirect effects is a requirement of the EIA Regulations. Whether or not these effects are assessed, is determined by whether or not they are likely to be significant. Reference should be made to the recent Supreme Court case regarding indirect effects associated with downstream greenhouse gas (GHG) emissions: <u>R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents) - The Supreme Court</u> . The proposed development does not relate to a new fossil fuel or high carbon-emitting project. Therefore, it is reasonable to assume causation of any downstream GHG emissions would be difficult to establish and downstream carbon effects would not be significant.
3	Site description and context	No comments on the site description. Technical comments on the existing baseline are provided in Section 3 and Section 5 of this report.
4	Alternatives and design evolution	<p>This chapter sets out the evolution of the proposed development and how environmental constraints influenced the design iterations. In response to JAM review comments, which state that the assessment of alternatives is inadequate, the applicant notes that in accordance with the EIA regulations only the “<i>reasonable alternatives... studied by the developer</i>” are required to be presented.</p> <p>Chapter 4 of the ES presents various proposed development alternatives with regards to the ‘do nothing’ scenario, the Parkland Show Court location, red line boundary extents and the various landscape design iterations. Table 4.1 summarises the beneficial, adverse and neutral effects of the alternatives considered against the scoped in environmental topics and this is considered sufficient to meet the EIA Regulations.</p> <p>LBM officer report reiterates this point and considers the alternatives assessment to be in accordance with the EIA Regulations with no additional environmental information or justification required.</p>
5	The Proposed Development	<p>This chapter describes both the outline and detailed elements of the proposed development as well as presenting the various anticipated stages of construction and operational phase scenarios (during the Championships and outside the Championships) that are used in the topic assessments.</p> <p>A management plan should be implemented when ‘<i>the first qualifying event in site is expected to be held in 2028. Though all works are not expected to be complete until 2030</i>’ to ensure the safety of staff, players and visitors to the site during the Championships.</p> <p>Overall, it is considered sufficient information has been provided at this stage and the detailed and outline elements have been presented clearly.</p>
6	Planning policy context	See Table 1 of this report.
18	Cumulative effects	<p>This chapter presents the effects for both Type 1 (intra) and Type 2 (inter) cumulative assessments.</p> <p>The description of “The Spatial Parameter” and “Temporal Parameter” used in the assessment is clear and easy to understand. However, as there is no official guidance on how to undertake intra and inter cumulation effects assessments, the chapter could benefit from including more detail around the methodology used for the assessments.</p> <p>It is acknowledged and accepted that the list of other developments has been agreed with LBM.LPA. LBM officers conclude that sufficient information has been provided to understand the potential cumulative effects.</p>
19	Summary of significant residual effects	No comments. A more detailed review of the ecology, landscape/townscape and visual amenity, and socio-economic assessment conclusions is provided in later sections of this report.

## **2.8 Planning committee decisions**

- 2.8.1 Conflicting decisions were made on the hybrid planning application with LBM resolving to grant permission in October 2023 (subject to conditions and signing the Section 106 agreement) and LBW resolving to refuse planning permission in November 2023.

## **2.9 April 2024 Statement of Conformity and revised documents**

- 2.9.1 In January 2024, the hybrid planning application was called in by GLA. The GLA issued some design comments that led to minor amendments which can be summarised as:
- increasing public access in the northern portion of the parkland outside of the Championship period;
  - creation of a circular walking route that links to the wider network;
  - minor amendments to railings, entrance gates, access road and path alignments, site furniture and planting;
  - improvements to the AELTCs Northern Parkland entrance;
  - additional stepped pedestrian entrance on Wimbledon Park Road;
  - removal of an additional 4 no. category C tree; and
  - minor realignment of railings in the southern portion of the site to increase the space available to the public within the proposed public park.
- 2.9.2 The applicant reviewed the Wimbledon Park ES to assess whether the design amendments would result in changes to the reported conclusions. This was reported in the April 2024 EIA Statement of Conformity (SoC).
- 2.9.3 Arup has reviewed the April 2024 EIA SoC and in summary agrees that it is appropriate for the changes to be accompanied by a SoC, and that the overall conclusions of the report and the proposed amendments will not materially alter the conclusion of the submitted Wimbledon Park ES, which will remain valid for the purpose of decision-making.
- 2.9.4 A summary of the review is provided in Table 3.



**Table 3 Topic-by-topic review and comments on the April 2024 SoC**

Topic or type of effects	Summary and review of proposed amendments as contained within April 2024 SoC	Arup comments
Traffic and transport	The Transport Assessment Addendum, submitted as a supporting document to the SoC, confirms that proposed changes remain in line with relevant transport policy guidance and the proposed changes to the gateway and reduction in parking would not result in significant changes to the environmental effects reported in the Wimbledon Park ES.	Agree there are no new or significant effects relating to traffic and transport as a result of the proposed amendments.
Air quality	The proposed changes are not considered to have a material impact on the air quality effects reported in the Wimbledon Park ES.	Agree there are no new or significant effects relating to air quality as a result of the proposed amendments.
Noise and vibration	The proposed changes are not considered to have a material impact on the noise and vibration effects reported in the Wimbledon Park ES.	Agree there are no new or significant effects relating to noise and vibration as a result of the proposed amendments.
Historic environment	<p>Since the Wimbledon Park ES, the golf course has ceased operations. However, the site is still experienced as golf course due to the existing fairways and bunkers and therefore the baseline conditions remain largely the same.</p> <p>The proposed changes are relatively small in scale and therefore only likely to affect heritage assets on site. The proposed changes to fencing, pathway location and vegetation layout in the north of the site only apply to a small section of the boundary and would not result in significant changes to the environmental effects reported in the Wimbledon Park ES.</p> <p>The proposed realignment of fencing in the south of the site will not result in changes to any of the heritage assets on site or the overall character area within the Wimbledon North Conservation Area.</p>	Agree there are no new or significant effects relating to the historic environment as a result of the proposed amendments.
Townscape and visual impact	<p>The GLA Landscape Planning Addendum has been submitted as a supporting document to the SoC.</p> <p>The proposed changes in the north include the removal of an additional four category C trees, which relative the scale of the overall development and total number of trees to be replanted, reshaped and/or relocated, is not considered the to result in significant changes to the environmental effects reported in the Wimbledon Park ES. The proposed changes in the north of the site will strengthen the visual connection between the north of the site and Wimbledon Park and</p>	Agree there are no new or significant effects relating to townscape and visual impacts as a result of the proposed amendments.

Topic or type of effects	Summary and review of proposed amendments as contained within April 2024 SoC	Arup comments
	<p>improve the aesthetic of the northern site entrance. However, this is not considered to be a significant change.</p> <p>The proposed changes in the south of the site, which comprise fencing realignment, are considered too minor to result in significant changes to the townscape or visual effects reported in the Wimbledon Park ES.</p>	
Ecology	<p>An updated Biodiversity Net Gain (BNG) Assessment, submitted as a supporting document to the SoC, presents differing results compared to those presented in the Wimbledon Park ES. The difference in results is largely attributable to changing the habitat classification types and the condition assessments used in the BNG calculations (following expert advice from LWT) and not as a result of the proposed 2024 design changes.</p> <p>The proposed changes in the north include the removal of an additional four category C trees, which, relative to the scale of the overall development and total number of trees to be replanted, reshaped and/or relocated, is not considered to result in significant changes to the ecological effects reported in the Wimbledon Park ES.</p> <p>The proposed changes in the south of the site, which comprise fencing realignment, are considered too minor to result in significant changes to the ecological effects reported in the Wimbledon Park ES.</p>	Agree there are no new or significant effects relating to ecology (biodiversity) as a result of the proposed amendments.
Soil and ground conditions	The proposed changes are not considered to have a material impact on the soil and ground condition effects reported in the Wimbledon Park ES.	Agree there are no new or significant effects relating to soil and ground conditions as a result of the proposed amendments.
Water resources and flood risk	The proposed changes are not considered to have a material impact on the water resources and flood risk effects reported in the Wimbledon Park ES.	Agree there are no new or significant effects relating to water resources and flood risk as a result of the proposed amendments.
Socio-economics	A Social, Community and Economic Benefits Addendum, submitted as a supporting document to the SoC, concludes that the proposed changes will still result in increased visitor numbers, additional employment opportunities and economic benefit to the local, regional and national economies.	Agree there are no new or significant effects relating to socio-economics as a result of the proposed amendments.

Topic or type of effects	Summary and review of proposed amendments as contained within April 2024 SoC	Arup comments
	The proposed changes are not considered to have a material impact on the socio-economic effects reported in the Wimbledon Park ES.	
Lighting	The proposed changes are not considered to have a material impact on the external lighting effects reported in the Wimbledon Park ES.	Agree there are no new or significant effects relating to lighting as a result of the proposed amendments.
Climate change	The proposed changes are not considered to have a material impact on the climate change effects reported in the Wimbledon Park ES.	Agree there are no new or significant effects relating to climate change as a result of the proposed amendments.
Energy and sustainability	The proposed changes are not considered to have a material impact on the energy and sustainability effects reported in the Wimbledon Park ES.	Agree there are no new or significant effects relating to energy and sustainability as a result of the proposed amendments.
Waste and materials	The proposed changes are not considered to have a material impact on the waste and material effects reported in the Wimbledon Park ES.	Agree there are no new or significant effects relating to waste and materials as a result of the proposed amendments.

## 3. Technical review of landscape proposals

### 3.1 Overall review summary

- 3.1.1 This review has been prepared by [REDACTED] (Associate Director | Team Lead London - Landscape Architecture BA (Hons) DipTP(UD) MLA CMLI ). [REDACTED] (Senior Landscape Architect | BSc (Hons) Dip LA CMLI) and [REDACTED] (Senior Landscape Architect | BA (Hons) PgDip CMLI).
- 3.1.2 Overall, the landscape design proposals and the TVIA are considered generally sound. The vision for achieving a restored parkland character is ambitious given the extent of development proposed, including 38 tennis courts, a show court and numerous smaller buildings, and the design appears to have undergone a considerable amount of work, with due consideration of the sensitivities of the site and surroundings.
- 3.1.3 We agree with the applicant that many elements of the proposed design will be beneficial, including the proposals to the lake, the management plans for some of the retained veteran trees, the proposed tree planting and proposals for ecological grassland enhancements. The key elements of concern are listed below and described in more detail in the following paragraphs. These are:
- **Trees:** In our view, whilst the approach to protecting the most valued veteran and category A trees is to be welcomed, the approach to the remaining trees seems to be more quantitative than qualitative. Both the design and assessment appear to under-value the trees being lost and overstate the effect of the new trees proposed – particularly in the short term, given the size of proposed tree planting and the extent of development across the site. The value of the trees lost should at least be replaced if not exceeded. It is acknowledged that LBM appointed an independent tree consultant, Ivan Button (N.C.H. (Arb), FDS (Arb), BSc. (Hons), P.G.C.E. M. Arbor A.) of Crown Tree Consultancy (LBM tree consultant), to review the proposed plans for tree removal, retention, relocation and planting. The LBM tree consultant concluded the proposed tree removals were modest and *'the value of the replacement planting an obvious improvement on the existing planting.'* (Response dated 03 October 2023). Further detail on the proposed tree removals and proposed replacement species (size/level of maturity on planting and type) will need to be provided prior to works commencing. Arup has advised on suggested planning condition wording to ensure future details provide sufficient confidence in the long-term establishment and value of the proposed tree planting.
  - **Urban Greening Factor (UGF)** may not be as high as reported, due to the factor used for the proposed trees.
  - **The effect on trees as a resource** is considered to have been under-reported in the TVIA, particularly in the short term.
  - **The effect on local character** is considered to have been under-reported in the TVIA, in particular, the extension of an urbanising influence as a result of the proposed development on a site that is currently perceived as green and open, particularly in the short term.

### 3.2 Tree loss

- We agree with the positive outcomes reported with regards to the protection of veteran and category A trees within the site, and the considerable number of new trees proposed, in the order of 1,500 trees. However, 300 trees will be lost (28% of existing trees on site), including 28 category B trees and 252 category C trees.
- Policy G7 of the London Plan states that trees of value should be retained wherever possible, which covers both category A and category B trees. LBM and LBW both indicate this in their Local Plan policy.



- With regards to the arboricultural impact assessment, it is felt that the value of existing category B trees to be lost is not clear due to the limited information provided in the assessment to justify the loss (in particular the number and life expectancy of the mature trees in good condition to be lost and a generally limited commentary). Tree loss appears to be required beyond that of facilitating the proposed development, partly as a result of restoring the original Capability Brown landscape. As raised by the LBM tree consultant in their earlier consultation responses, a greater level of detail and commentary on category B trees to be lost would help to understand their value and inform where retention and/or translocation should be implemented. As recommended by the LBM tree consultant, it is expected details of further design work to develop the precise specifications for soil volumes, exclusion zones, removal methodologies, will be provided for each tree prior to the commencement of works. Arup has reviewed the proposed planning condition wording and made recommendations to ensure it requires a sufficient level of information.
- In addition to the 28 category B trees being lost, we would note that the tree survey includes a number of category C large trees noted as in good condition to be lost (for example, oaks, limes, ash, poplar and scots pine that are 10 metres (m) -20 m in height; T933 and T934 are 20 m high oaks, early mature and in good condition). These trees may be of particular value and we would note, could be category A trees in 10 years' time. This level of detail or assessment should be considered when evaluating whether the value of trees lost will be sufficiently replaced.

### 3.3 Proposed trees

- Proposed trees are reported in the DAS as extra heavy standard (EHS) 20 - 25 centimetres (cm), which is semi-mature, not extra heavy which, for the industry, the standard is predominantly 14 - 16 cm but some 16 - 18 cm girth. The same is stated on the drawings. It is expected that the precise specification of each of the proposed trees to be planted will be a requirement of a planning condition.
- Proposed trees in the parkland are all intended to 12 - 18 cm. This equates to heavy standards (12 - 14 cm girth) and extra heavy standards (14 - 16 cm and 16 - 18cm girth). The proposal will result in predominantly same level canopy height across the proposed development on day one. Whilst we note that where development is not to occur, trees across the landscape are predominantly being retained, the replacement tree planting proposal appears monotonous and to lack day one impact. It would be better if some trees could be larger to achieve the parkland character envisioned in the photomontages/drawings/assessment, and to compensate the size of trees being lost. The replacement parkland trees should range from beyond the tight constraint of 12-18 cm to include select species at key points in the design to be approximately. 50cm girth. This range of planting would greatly enhance the look and feel of the proposed development – implementing trees of a size and nature to reflect the existing landscape and seeking to better replace and mitigate the loss of trees being removed.
- It is not clear from the proposed tree planting plan how many of the proposed trees are to be planted as whips and how many will be specimen.
- Some of the proposed trees are located underneath existing tree canopies and on paths – we would question how realistic this could be and plans would benefit from a greater level of detail on the planning approach.
- In general, we consider a more detailed set of planting plans (in particular, tree planting), with clearer definition of species location and sizing, is required.

### 3.4 Other notes on trees:

- **Proposed cut and fill site plan:** The submitted drawings appear to show that the extent of cut and fill across the site and within the Root Protection Areas (RPAs) is exceeding guidance within BS5837, particularly with regards to category A and Veteran trees. The drawings provide a range and no detailed information. A planning condition would be

expected requiring detailed cut and fill drawings and RPAs (designed in line with relevant guidance) to be submitted for approval, prior to commencement of works.

- **Outline arboricultural method statement:** There is no distinction between the approaches for different categories of trees.
- **Transplanted trees:** An appropriate planning condition / obligation would be expected requiring the submission of a detailed arboricultural method statement, along with a suitable watching brief and associated monitoring arrangements throughout felling and construction works, to be submitted for approval prior to works commencing on site.
- **DAS:** Several tree surveys are referenced as having been carried out but there only appears to be one arboricultural impact assessment report.

### 3.5 Urban Greening Factor (UGF)

- All proposed trees are given a factor of 1 which aligns with the delivery of woodland.
- GLA UGF guidance (February 2023<sup>5</sup>) recommends trees being planted to be a factor of 0.8 rather than 1.0 as used by the applicant. As noted on Page 24 of the GLA UGF guidance: *“Groups of standard trees that would be maintained as such should be awarded a UGF of 0.8 or 0.6, depending on the relationship between canopy and soil volume, as set out below.”*
- It is our opinion that this is an incorrect interpretation of the GLA UGF guidance and that under the guidance, trees should be either 0.6 or 0.8 (dependent upon sufficient soil volume being available as stipulated). The provision of soil volume is of particular importance where trees are planted in clusters, or if trees are planted in hard landscaped areas. The soil volume available for each tree, given their proximity to hard areas and built development, must be understood. It is acknowledged that even applying this more conservative approach to planted trees, the proposed development would still surpass the UGF target score to achieve compliance against Policy G5 Urban Greening of the GLA London Plan. .
- In general, a far more detailed set of planting plans (and in particular tree planting), with clearer definition of species location and sizing is required. It is expected these would be a requirement of a suitable planning condition, prior to commencement of works.
- This detailed set of information should include for a clear demonstration of the soil volume to be provided for each tree, to provide suitable evidence that the UGF guidance has been acknowledged, as well as ensure the success of the proposals.
- It is noted that under the GLA Policy, the proposed development demonstrates benefits locally through the delivery of green routes that promote active travel, in an area where current opportunities are limited, as well as an increment on publicly accessible open space.

### 3.6 Recommendations

- 3.6.1 The rationale behind the tree loss was further explained by the applicant team on-site. There is clearly a lot of work in progress which is not yet in the public domain which is seeking to refine the detailed proposals. We would expect the applicant to develop and deliver proposals that will best address and alleviate comments made in this note through detailed submissions made to discharge any future planning conditions and obligations.
- 3.6.2 Whilst this does not, in our opinion, diminish from the immediate overall impact of the tree loss as noted, due to the need for changes to be made to the landscape to allow for the proposed development, compiling of robust conditions, obligations and alterations/refinement to improve the scale and detail of tree planting proposals, this can provide a level of mitigation towards addressing the concerns raised.

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<sup>5</sup> Greater London Authority, London Plan Guidance, Urban Greening Factor, February 2023 [Urban Greening Factor LPG \(london.gov.uk\)](https://www.london.gov.uk/plan-and-policy/london-plan-guidance/urban-greening-factor)

## 4. Technical review of the Townscape and Visual Impact Assessment (TVIA)

- 4.1.1 This review has been prepared by [REDACTED] (Associate Director | Team Lead London - Landscape Architecture BA (Hons) DipTP(UD) MLA CMLI), [REDACTED] (Senior Landscape Architect | BSc (Hons) Dip LA CMLI) and [REDACTED] (Senior Landscape Architect | BA (Hons) PgDip CMLI).
- 4.1.2 A high-level review of the TVIA is set out in Table 4. Generally, the TVIA is considered sound, and the approach reasonable. The main elements of concern are noted below.
- **Effects on trees:** Where effects on trees at year 1 of operation have been reported by the applicant as ‘minor-moderate beneficial’, with no adverse effects noted, it is our view that the assessment has not given due consideration to the impact of the loss of 300 trees, many of which are mature and in good condition, and that in the first year of operation the proposed trees will have considerably lesser impact, being planted as whips and 12-18 cm. We would consider the effect at year 1 to be significant adverse, beginning to improve to beneficial at year 15 depending on the detail of the proposed tree planting and its positive management. Effects on trees as a resource has been under-reported as a result of:
    - Effects on trees being assessed as a construction impact rather than an operational impact, meaning that the effect is only considered a short term and reversible effect;
    - Double counting the effect of proposed trees (during construction and operation) but only considering tree loss during construction;
    - Existing trees on site being given low value and susceptibility, which we consider should be high; and
    - No adverse effects noted in the reporting of effects of tree loss.
  - **Effects on character:** We consider the extension of urbanising influences of development on the existing sense of green/open/natural character has been under-reported. We agree that in the long term there will likely be a number of beneficial effects as a result of the development, however, in our view there will likely be adverse effects in the shorter term. We consider the extent to which a parkland character will be restored has been over-emphasised given the scale and extent of development across the site and the size and scale of tree planting proposed. The perception of development will be increased during the tennis season when the courts are surrounded by canvas screens.
  - **Lighting:** With regards to proposed lighting, we understand from the Exterior Lighting Strategy (Buro Happold) that proposed lighting will be confined to the Championships and Qualifying events only, with only sensor-controlled lighting on hub buildings and accesses when needed for access after dark. On this basis we agree that effects on lighting are unlikely to be significant on landscape and views, and do not require assessment as part of the TVIA.
  - **Effects on views:** The visual assessment and the impacts on the whole seem reasonable. Whilst all operational effects are reported as beneficial, we would note that there will be some adverse effects as a result of the show court lending an urbanising influence in views which are currently characterised by green and openness of the golf course.

Table 4 TVIA review

TVIA – review commentary	
Baseline	<p>All relevant receptors appear to have been considered, although it would have been helpful to have the site being identified as a single character area/receptor rather than split between two, given it has a consistent and distinctive character.</p> <p>It is not clear whether the LPAs commented on the receptors or viewpoints as recommended by the EIA scoping opinion.</p>
Methodology	<p>The methodology is considered broadly reasonable and in accordance with Guidelines on Landscape and Visual Impact Assessment Third Edition (GLVIA3<sup>6</sup>).</p> <p>The definitions for geographical extent in relation to townscape mean it would be difficult in practice to assess the effects on some of the receptors (such as landscape/townscape elements) as being anything other than small given their size, which seems confusing.</p>
Assessment	<p><b>Value and susceptibility of trees</b></p> <ul style="list-style-type: none"> <li>• The value and susceptibility of ‘other trees and woodland within the site’ seems to be under-reported (‘low’ susceptibility and ‘community’ value). We would consider the susceptibility should be ‘high’ and value at least ‘local’ with reference to Table A.2 and A.3 in the methodology.</li> <li>• With reference to the arboricultural impact assessment, most of even the category B and category C trees appear to be either early mature or mature, and most in good condition. Overall, there are numerous large and mature trees on the site, with inherent natural and perceptual value, and making a positive contribution to the site and surroundings. The trees are located in a Grade II* RPG, conservation area and have a TPO, and in addition, in our view also have importance for character and natural capital value being in an urban area.</li> <li>• Given the age and height of the majority of trees, they would take a long time to replace. The description of the existing trees as ‘relatively immature’ and ‘generally utilitarian in character’ making ‘little contribution to the site’ feels like it is underplaying the importance of these trees to the site and local character.</li> </ul> <p><b>Assessment of effects on trees</b></p> <ul style="list-style-type: none"> <li>• ‘Other trees and woodland within the site’ - the loss of 296 trees has been assessed as a construction effect rather than an operational effect. This means that the effects are reported as medium-term duration and partially reversible. The suggested mitigation is stated as being standard construction practices in the Construction Environmental Management Plan (CEMP). However, the CEMP cannot mitigate the loss of trees, which can only be mitigated through planting post construction. Proposed trees planted in the parkland at 12 - 14 cm or 14 – 16 cm girth will take considerable time to deliver the same landscape value as the trees lost.</li> <li>• Proposed tree planting is double counted, whilst tree loss is only counted once - whilst the proposed tree planting is taken into consideration for both the construction assessment and the operational assessment, tree loss is only considered for the construction assessment.</li> <li>• Effects on ‘other trees and woodland within the site’ – we consider is under-reported (‘minor adverse’ during construction and ‘minor-moderate beneficial’ at year 1). We consider this is too low, and under-values the existing trees lost and over-emphasises the value of the trees proposed, particularly in the short term, as described in the points above. The geographical extent of the tree removals is assessed as ‘small’</li> </ul>

<sup>6</sup> Guidelines on Landscape and Visual Impact Assessment Third Edition (GLVIA3) [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](#)



which seems on the low side given that 300 trees will be removed across the whole site.

- Whilst at year 15 the proposed tree planting will be starting to mature, at year 1 the proposed trees will be small and the effects of the mature trees lost will be noticeable. We would consider the effects at year 1 to be adverse rather than beneficial given the scale of the tree loss and the length of time needed for the proposed trees to mature.
- There are no adverse effects noted in the assessment on trees, which is considered to under-represent the likely nature of effects on the trees as a landscape resource.
- The arboricultural impact assessment (which is referred to in the TVIA), illustrates that, in addition to the 28 category B trees to be felled, there are many large (15 -20 m in height), mature trees in good condition to be felled, which are rated as category C (e.g. T933 and T934). This is not adequately addressed in the assessment on trees in the TVIA.

#### Effects on character

- Susceptibility of the site (i.e. Neighbourhood 28 Wimbledon Park): With reference to Table A.1 in the methodology, the site reflects many of the indicators of higher townscape susceptibility listed (e.g. sense of naturalness, high time depth, prominent skylines, scenic quality and components in good condition). We would consider the susceptibility should be high rather than medium.
- Effects on the site (Neighbourhood 28 Wimbledon Park): we consider the assessment underplays the extent to which the proposed development will have an urbanising impact on local character. Whilst it notes that there will be a number of permanent built elements including the show court and nine hubs, in addition to 38 tennis courts and pathways, the assessment reports effects as neutral due to there being existing development nearby. We would consider the fact that urban influences extend into a currently green and open site (including its MOL designation) as an adverse effect.
- Whilst we agree that there are many aspects of the proposed design which are beneficial, we consider the assessment overplays the extent to which the development will achieve a restored parkland character in line with the original ‘Capability’ Brown design, given the extent of development within the site (as illustrated by Viewpoint 7 and Viewpoint 2), and particularly before the proposed trees have matured.

#### Effects on views

- We generally agree with the reported effects on views and that the proposed show court has been well-sited to minimise visual impacts from the surrounding areas.
- We might have expected some greater emphasis on the adverse effects of extending urbanising influence (particularly from the show court) into currently more open views, (e.g. VP2 and VP7), where at year 1 of operation these may be better expressed as adverse or neutral, rather than beneficial effects.

#### Visualisations

- Generally, the methodology and production of the visualisations appears sound.
- The Type 4 Accurate Visual Representations (AVRs) are presented as summer views when new tree planting has matured (at 2030). It is not clear how and why this approach was scoped. It would have been easier to understand the proposals had they been overlaid onto the winter baseline photograph, which would illustrate a ‘worst case’.
- Some of the visualisations show only the proposed show court whilst some show just the landscape proposals. It is not clear why the visualisations do not all show the

TVIA – review commentary	
	<p>same level of information. It is also not clear whether the visualisations show the canvas screens around the tennis courts.</p> <ul style="list-style-type: none"> <li>• It is not clear why the visualisations are prepared at the year 2030, which does not relate to the years assessed in the TVIA (which are year 1 and year 15). It is not clear how many years post completion 2030 is intended to show.</li> </ul>
Residual impacts	<p>There may be opportunity to use greening to integrate some of the hubs into the landscape more effectively, following the approach of the proposed show court. This would serve to reduce the perception of development across the site. There could be opportunity for the hubs to have their own character whilst still remaining part of the same family.</p>

## 5. Technical review of biodiversity (and ecology)

### 5.1 Overall review summary

- 5.1.1 This review has been undertaken by [REDACTED], CEnv MCIEEM Associate Director | Climate and Sustainability Services - Nature Team Lead.
- 5.1.2 Broadly speaking, the ecological data collection, assessment and reporting provided in support of the planning application is considered to be appropriate, robust and sufficient to inform decision making. There are a small number of details that may need further thought or evidence (and much of that evidence may be in development or exist in the background, beyond the documents currently being reviewed).
- 5.1.3 Ecological assessments are necessarily high level and focus in on significant ecological effects (not all ecological effects exhaustively), as per the requirements of the EIA Regulations. Furthermore, biodiversity net gain calculations use habitat area and condition as a proxy for biodiversity value and do not consider species. Both approaches mean that there is a tendency to understate the cumulative, overall ecological impact to be felt, when viewed in isolation.
- 5.1.4 However, we suspect that many of the objections made have also overstated the likely level of ecological impact, particularly in the context of the longer-term opportunities, where the benefits of better, more sensitive management should start to outweigh the shorter-term costs of disturbance to existing resources (to both habitats and species).
- 5.1.5 Nevertheless, it is the case that the delivery of any level of gain in terms of ecological and biodiversity value is wholly contingent on the full implementation of all the measures set out and their continued monitoring and management across the 30-year period and beyond (ideally this should be viewed as an ‘in perpetuity’ commitment). Without robust application and commitment on all sides, the reported gains are unlikely to be realised in full and therefore it is essential that this is committed to, planned, programmed, and financed in full, in order to ensure the validity of the assessments carried out to date. There is no reason to suggest that these beneficial outcomes cannot or will not be achieved.
- 5.1.6 In addition, several outputs that have not yet been provided, such as CEMP, Landscape and Environmental Management Plan (LEMP) and detailed lighting strategies will be fundamental in determining the actual ecological impact of the proposals in the short and long-terms. Whilst the production and agreement of these outputs will be conditioned, it is essential that the condition wording is as prescriptive as possible in setting minimum targets and aspirations to be achieved. Arup has reviewed the potential planning conditions to ensure that beneficial outcomes for biodiversity can be delivered at the next stage. There is no reason to suggest that these beneficial outcomes cannot or will not be achieved.
- 5.1.7 In summary, the reality of this type of complex application is that it is possible (or even likely) that the true biodiversity value of the existing site has been slightly underplayed (trees to be lost and ‘rougher’ areas of the golf course and lake margins) and that the claimed benefits to biodiversity that can be accrued from the proposed development have been pushed to their maximum limit (whilst acknowledging some efforts on the part of the applicant to moderate this). Given the limitations associated with the EIA process, this has not been to the extent that either (evaluation of baseline or future condition) is considered to be fundamentally misleading. A minor gain may be achievable in the longer term given a fully committed and implemented set of management and monitoring plans over a 30-year period and beyond, assuming a steering role for the London Wildlife Trust in that process and the ability to intervene, amend and rectify any shortcomings across that period. At the same time, it is recommended that the reported potential for gain is not overplayed in any justification for permitting the development, and that other benefits are given greater weighting and priority in this regard.
- 5.1.8 A high-level summary of the review is set out in Table 5 with a more detailed consideration of the specific impacts is set out in the following sections.

**Table 5 Biodiversity (and ecology) high-level review summary**

<b>Biodiversity (and ecology) - review summary</b>	
Baseline	All receptors have been assessed and the scope of the baseline assessment is appropriate. There are no clear omissions.
Methodology	The methodologies used to set the baseline and quantify the impacts are appropriate and as per industry guidelines and best practice.
Assessment	The methodology appears to be robust in terms of how the ecological assessment has been undertaken.
Residual impacts	Residual impacts have been appropriately considered and addressed.
Overall conclusions / general comment	There is no question as to whether the correct procedures and approaches have been followed, including the project's positive responses to feedback and consultation, with the likes of the London Wildlife Trust. However, further detail (beyond the BNG and ES reporting) is required to provide absolute confidence that the design and the mitigation measures proposed (both at construction and during operation) will deliver the predicted positive outcomes for ecology and biodiversity in the longer-term. This includes a more robust assessment of the change in context and use of the site for habitat condition and species use, including the change in intensity of use. It is considered likely that the volume of tree loss remains the most impactful element of the proposed development and this may well have been understated to date, given the potential value of the trees to be lost (i.e. the value that those trees could attain in the medium-term were they not to be lost). Additional work is recommended to consider this and revisit any part of the proposed development that could reduce these impacts further.

## **5.2 Biodiversity net gain assessment and metric calculation**

- 5.2.1 The biodiversity net gain assessment comprises two parts. The first is the evaluation of the baseline value of the existing site and the second is the predicted valuation of the future built site. The robustness of the assessment is therefore dependent on both those conditions being accurately captured, with a focus on ensuring that the baseline value is not being under-estimated and that the future value is, conversely, not being overstated.

### **Baseline biodiversity value**

- 5.2.2 A number of objections relate to a perceived under-estimation of the current baseline ecological value of the site, specifically the golf course area. However, many of these objections relate to the under-recording of species on the site, rather than questioning the valuation of habitats, where biodiversity net gain assessments only consider habitats (as a proxy for overall biodiversity value). Species are dealt with via the EIA (and ecological impact assessment) process and so are not relevant here.
- 5.2.3 Where there have been specific questions raised by consultees about whether habitat value has been accurately captured, these have predominantly focused on the existing and potential value of the grassland communities present on the golf course site. However, the 'Save Wimbledon Park' rebuttal does additionally propose that the majority of the golf course area should in fact have been classified as a remnant ancient Parkland, which would constitute irreplaceable habitat and mean that any claims of net gain would be invalid. Given that the London Wildlife Trust have themselves independently evaluated the baseline and have not suggested such a condition, it is difficult to see how this could be substantiated by the objectors further. Ultimately, the evaluation of the site's condition and value is a matter of professional judgement, and differing opinions are both possible and likely.
- 5.2.4 Ecological impact assessment requires the consideration of potential (in addition to current) value. It is the case that if the golf course were left unmanaged, its ecological value is likely to increase over time (up until a point where management would start to benefit the structural diversity of the

habitat once again). However, although the applicant's biodiversity net gain assessment necessarily captures a point in time early in the process of the golf course having been set aside, there are areas of longer, unmanaged grassland (around the retained veteran trees, for example) that have been left to become 'wilder' and those do not appear to demonstrate a significantly greater level of diversity than the shorter historic green and fairway grassland areas. It is therefore reasonable to assume that a history of intensive management (including applications of fertilisers and herbicides) is likely to significantly limit the potential of the existing grassland, at least in the near (short to medium) term. In this way, it does not seem to be the case that the existing (grassland habitat) baseline has been undervalued in either biodiversity net gain or ecological impact assessment contexts.

- 5.2.5 The future potential value of the trees being lost is less easy to account for, but it is clear that the applicant has made every effort to apply the mitigation hierarchy (as is required by the good practice principles of biodiversity net gain) and reduce/minimise impacts to trees as far as possible within the confines of the project ambitions. Avoidance has focused on the oldest and largest tree specimens, including the translocation of trees that have been assessed as being likely to survive that process. The only real way of being less impactful to trees would be to reduce the scale of the project and/or to further limit the potential re-establishment of the historic landscape (driven by heritage interests). There remains a question as to whether the balance that has been struck between heritage gains and ecological losses is the right one, though it has been suggested that Historic England as another key stakeholder would ideally have sought further tree clearance. Nevertheless, it is considered likely that in focusing on the avoidance of the most important specimens, the potential biodiversity value of the Category B and C trees to be lost (particularly where this relates to native tree species that confer significant benefits to native fauna species) has been under-estimated. A 35-year-old native broadleaved tree in any condition is still a semi-mature tree; replacing this with a 5-year-old standard will involve a 30-year time lag until it reaches a similar condition and value<sup>7</sup>.
- 5.2.6 The baseline condition assessment for the aquatic habitats on site appears to be robust, although the detail of this has not been reviewed by aquatic expert/specialist at this time. One element that was noted from the site visit was the area of dense scrub and willow habitat that is proposed for removal, in order re-establish this historical area of open water and the views beyond. This is another example of an intervention that has a clear heritage benefit but is in conflict with ecological aspirations, whereby, ideally, at least part of this resource would be retained.

### **Future biodiversity value**

- 5.2.7 There is evidence that the assessors have erred on side of caution in determining both existing (as described above) and future values. Where committed management is likely to achieve fairly good condition habitats, these have been classified as being of moderate future value, precisely to account for any risk or uncertainty in their delivery, over and above that which is already accounted for in the metric. At the same time, there are examples of elements of the proposals that fully require and justify that caution, such as the proposed car parking on part of the created acidic grassland during tournament time. Whilst this is unlikely to significantly limit the viability of the habitat creation, it certainly does not benefit the grassland condition.
- 5.2.8 Objections around future values have referenced the reliability of predictions that high distinctiveness acid grassland communities can be created on the golf course site. The proposed approach to grassland creation (and management) and the soil testing carried out to date should provide enough surety that even if a comprehensively acidic grassland community were not to be achieved, another grassland of equal distinctiveness and condition could be created. The resultant potential variation would not have a significant impact on future biodiversity value.
- 5.2.9 It is important to recognise that, in addition to this review of the assessment, the London Wildlife Trust have themselves evaluated the net gain assessment work and concurred with its conclusions

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<sup>7</sup> It is noted that time lag is accounted for within the biodiversity net gain metric (tie to target condition), but this is reliant on professional judgment in the context of Ecological Impact Assessment.



in full. Their specific comments also recognise that the assessment has been amended over time to take on views presented to the assessors by the Wildlife Trust, which has resulted in the assessment being more precautionary than was originally the case.

### **5.3 Ecological mitigation strategy**

- 5.3.1 The ecological mitigation strategy sets out the measures taken within the final design that have avoided, reduced and compensated for predicted ecological impacts. It is very positive that the strategy has documented the early design advice provided by the applicant's consultant team and acknowledged those measures that have not been taken forward, in addition to the majority that have, within the final design proposals. Some of those measures that have not been taken forward to date perhaps provide opportunities for further enhancement, should they be needed in the future. Section 3.9 references several ornamental ponds to be created. Whilst remaining ornamental, it should be possible to further increase their potential biodiversity value by including a range of native aquatic plant species, alongside non-native ornamental plants. If this is already the plan (as is suggested by Section 3.11 onwards), it may be that this point should be clarified and/or referenced in any future planning condition requiring details of ecological enhancements.
- 5.3.2 The success or otherwise of some of the specific measures cited for different species or species groups, such as the bat structure for Daubenton's bats proposed for the lake island, will be dependent on receiving the right specialist advice in the development of the detailed design and installation of those features, as well as on avoiding the risk of any later value engineering that may seek to downgrade the type, number or complexity (the stated ambition) of these features. It is therefore essential that the planning conditions are as prescriptive as possible in the requirements for those features if that detail will not be made available until the next stage of the project, post-planning. If all the proposed mitigation measures are designed with the best possible biodiversity outcomes in mind and are installed under the full supervision of suitably experienced ecologists, there is no reason to doubt that they should be able to support the outcomes predicted.

### **5.4 Ecological impact assessment (Chapter 12 of the Wimbledon Park ES)**

- 5.4.1 Valuation of the individual species and species groups within the assessment (termed 'ecological importance of the site') appears to be broadly appropriate and logical.
- 5.4.2 It could be argued that, given that a survey is always (even where repeat visits are involved) a snapshot in time and an under-representation of the actual level and diversity of presence on the site overall, one or two of these groups where the valuation was assessed as being close to a higher level of value should have been classified at that higher level, with a degree of precaution therefore applied. This would have perhaps aligned better with the approach taken for the biodiversity net gain assessment which was deliberately conservative and precautionary.
- 5.4.3 This could apply to one or more of breeding birds, bats and invertebrates, whereby there are very likely to be several bird species not observed during surveys (that might use the site transitionally during periods of migration, for example), there are very likely to be other bat roosts (and potentially more cryptic bat species) present not yet detected, and there are equally very likely to be considerable number of invertebrates species overlooked by a sampling approach (even one involving multiple survey visits). Nevertheless, even if these upgrades to value were acknowledged, it may not have changed the overall higher level assessment outcomes nor required much in the way of additional mitigation beyond that already being proposed.
- 5.4.4 On balance, there appears to be limited ecological impact assessment of the likely (or at least possible) loss of species from areas of the site that will in the future be contextually very different from the current site environment. Whilst the lake and the mature trees will remain and large swathes of grassland will be enhanced, the remainder of the site will be transformed from an open golf course environment into a more cluttered environment that includes a far higher ratio of built structures than is currently the case. Although replacing intensively managed areas of the golf course with large numbers of highly maintained grass courts may not result in much change in ecological value, it does create a very different form to the environment.

- 5.4.5 In the case of bats, it has been acknowledged that reduced levels of lighting<sup>8</sup> and enhancements to these retained habitats will allow for (and indeed improve conditions for) continued bat activity into the future within the EIA, but there is little or no discussion of whether the whole of the bat population currently present will continue to use the whole of the operational site, as it does now. For example, it may be that urban-adapted bat species such as pipistrelles will continue to use the spaces between the complex of new grass courts and other structures, but it must be less likely or certain that other species more used to extensive semi-natural habitat areas, such as *Nyctalus* and *Myotis* species will continue to use this new environment as they would a golf course, even where the key features (primarily the veteran trees) have been retained. What is perhaps more likely to occur is a partial displacement of some of these species (or some of the individuals within a population of those species) away from the newly developed area and into the enhanced surrounds. Whether or not that then has a consequent impact to the future viability of populations of those species does not appear to have been sufficiently considered or assessed.
- 5.4.6 Similarly, the implications of change in use of the site (for habitat condition and/or species use) do not seem to have been adequately addressed by the assessment. The prior golf course use involved low to moderate levels of people and vehicle disturbance, during daylight hours, for most if not all of the year. The future tennis and parkland use of the site looks to be quite different from this, particularly during championship times where there will be short, intense periods of very high levels of disturbance, potentially over longer hours (including after dark). The main caveat to this is that much of this temporary disturbance already occurs across the golf course area during the championships, so the distinction is slightly blurred.

## 5.5 Recommendations

- 5.5.1 As part of the next detailed design stage for the proposed tree removal, relocation and planting, it is possible that impacts to trees could be further reduced by revisiting the detail of those proposed to be felled for arboricultural reasons (shape, form, health, condition, and/or position in landscape). This will aid the project in ensuring only those trees that absolutely have to go are removed while imperfect specimens that are likely to develop higher biodiversity value in future are retained. Furthermore, whilst there is a cost associated with the translocation of tree specimens otherwise to be lost, and a robust exercise has already been carried out to identify those most likely to survive the process, further consideration could be given to more marginal specimens still be relocated, to demonstrate all efforts are being made, comprehensively, to reduce this impact.
- 5.5.2 Proposed replanting of trees should give a little more weight to native/naturalised species of greater age and biodiversity value (currently a range of native and non-native proposed, some of which will be of limited or lesser biodiversity value). Replacing lost 35-year-old trees with 5-year-old standards is unlikely to be adequate to deal with broader biodiversity loss (not only of the tree but of its ability to support fauna species). Both this and the previous point would go some way to addressing the concerns of the Woodland Trust.
- 5.5.3 Information that may have been developed but that is not yet available for review or within the public domain, such as the finalised CEMP, is extremely important to fully understand the likely magnitude and/or control of what are likely to be the most impactful activities overall, including desilting the lake, and (construction and operational) lighting etc. It is understood this will only be available post-planning via planning conditions requirements, at the next stage of the detailed design.
- 5.5.4 Similarly, further detail is needed around the longer-term protection of the retained (particularly ancient and veteran) trees within the context of the new development and specifically the operational use of the site. Absolute clarity needs to be provided that the health and condition of the trees is not under threat during intense periods of activity and visitor pressure on the site, including through indirect effects such as soil compaction.

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<sup>8</sup> Reduced levels of lighting are reported, but no further details of lighting strategy or specifications are available at this time. The achievement of improved lighting conditions, compared to the baseline, is fundamental in the achievement of the assessment outcomes predicted for nocturnal and/or light sensitive species.

## 6. Technical review of socio-economics

- 6.1.1 This review has been undertaken by [REDACTED] (Associate, BA (Hons), MSc, MRTPI) and [REDACTED] (Associate Director, BA (Hons), MPhil, CIPFA, RTPI) of the economic, social and community benefits assessment. The review is set out within Table 6.

**Table 6 Review of the Economic, Social and Community Benefits Report**

Economic, Social and Community Benefits Report - review commentary	
Baseline	<p>The Economic, Social and Community Benefits Final Report (2021) and accompanying Addendum Report (2024) provide a detailed baseline commentary, covering the economic contribution made by the AELTC and The Championships at the local, regional and national scales. This includes analysis of the scale and spatial distribution of the economic impact associated with The Championships and is informed by research undertaken by Sheffield Hallam University's Sport Industry Research Centre. The role of the AELTC in providing existing social and community benefits is also provided.</p> <p>The reports consider a range of stakeholders/ receptors including:</p> <ul style="list-style-type: none"> <li>• Staff (year-round and events)</li> <li>• Spectators</li> <li>• Players</li> <li>• Court officials</li> <li>• Suppliers</li> <li>• Media</li> <li>• AELTC</li> </ul> <p>It is noted that the Wimbledon Park Golf Course has been out of use for over 18 months and therefore socio-economic impacts associated with the loss of the course are not considered within the reports.</p> <p>The reports are grounded in a review of relevant policy at the regional (London) and local scales.</p>
Methodology	<p>The methodology followed appears to be reasonable, including a combination of both quantitative and qualitative assessment and drawing on varying geographical scales as appropriate including; local (LBM, LBW), regional (Greater London) and national (UK).</p> <p>The reports broadly cover the below sub-topics, which are considered to provide a comprehensive basis for the assessment of economic, social and community benefits associated with the proposals:</p> <ul style="list-style-type: none"> <li>• Economic impact/ activity</li> <li>• Employment and training</li> <li>• Social and community importance</li> <li>• Knock on impacts</li> </ul>
Assessment	<p><u>Economic impact/ activity</u></p> <p>The economic impact projections for The Championships in 2028 (with the proposals) include both direct and indirect/induced impacts and are considered to be reasonable for a project of this scale.</p> <p><u>Employment and training</u></p> <p>The breakdown of existing jobs and estimated uplift in construction and operational (year-round and events) jobs is provided. The figures provided seem reasonable for a project of this scale. It is noted that the Qualifying Event is to be moved from its current</p>

## Economic, Social and Community Benefits Report - review commentary

	<p>location at the Bank of England Sports Centre in Roehampton and therefore it is assumed that the displacement of these jobs has been factored into the calculations at the UK level; however, this should be clarified in the reports. It would also be beneficial to develop a clear ‘before’ and ‘after’ employment estimate of (a) the current total and site split between AELTC and Roehampton, (b) the estimated total on the consolidated and expanded site campus proposed.</p> <p><u>Social and community importance</u></p> <p>The reports provide a qualitative commentary around the range of training opportunities, initiatives and programmes which will be made possible as a result of increased funds through ticket sales. Furthermore, the reports highlight the community benefits including a significant increase in accessible public open space, improved public realm surrounding the lake and new flexible spaces for the wider community to use for a range of activities. Enhanced opportunities for spectators and players are also highlighted. The reports provide a compelling case for a range of benefits.</p> <p><u>Knock-on impacts</u></p> <p>Beyond the direct social and community impacts, the reports also provide a qualitative review of the potential for knock on impacts including the inspirational effects of the events (i.e. promoting physical health and wellbeing), social and community pride, promoting attendance at live sporting events and increased attendance at other venues (i.e. at local pubs and outdoor screens). As above the reports provide a compelling case for a range of benefits.</p>
Residual impacts	As noted above, the displacement of employment at the current qualifying site at Roehampton should be clarified further in the report.
Overall conclusions / general comment	Overall, the reports are considered to provide a reasonable assessment of socio-economic benefits associated with the proposals at the local, London and national scales. The reports demonstrate how the bringing together of these two prestigious events into a single location can maximise benefits during the events, but also year-round.