

Ms Harsha Bhundia
Royal Borough of Kingston Upon Thames
Guildhall II
Kingston upon Thames
London
KT1 1EU

13th October 2021

Our Reference: 26902/A5/NP

Dear Harsha,

RE: CAMBRIDGE ROAD ESTATE – LETTER OF CLARIFICATION

We write on behalf of the Applicant, Cambridge Road (RBK) LLP, with respect to hybrid planning application reference 20/02942/FUL for the development on land at Cambridge Road Estate, Kingston, ('the Development'), submitted to the Royal Borough of Kingston upon Thames (RBKuT) in November 2020. This planning application is awaiting determination by RBKuT.

Background

Hybrid planning application reference 20/02942/FUL comprises demolition of existing buildings and construction of up to 2,170 new homes and up to 2,935 square metres (sqm) of non-residential floorspace that is to be used as flexible commercial, community and office workspace.

The Development falls within Category 10(b) of Schedule 2 of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended¹)* as an urban development project which includes more than 150 dwellings and a site area which is more than 5 hectares (ha) in size.

An ES was prepared in accordance with the EIA Regulations to accompany the planning application, which was submitted in November 2020. Amendments have subsequently been made to the affordable housing provision for the Development and in light of this change, this letter confirms that the conclusions of the submitted ES remain valid.

Summary of amendments

The amendments include the provision of an additional 74 affordable dwellings (intermediate dwellings) and a reduction of 74 private dwellings in the proposed housing mix for the Development. The overall housing provision for the Development remains up to 2,170 dwellings.

¹ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 SI No.571) (as amended in 2018 by SI No. 695 and in 2020 by SI No.505)

As result of the change to the affordable housing provision, minor amendments have been made to the traffic data provided by the project Transport Consultant (Markides Associates), which was used as part of the Air Quality assessment work undertaken for the ES (refer to Appendix 1).

Changes to prevailing baseline conditions and cumulative development

The ES was prepared in 2020. The assessment of effects considered a phased demolition and construction period. There have been no material changes to the baseline conditions since the submission of the ES in November 2020.

Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other existing and/or approved development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG, which echoes the requirements of the EIA Regulations:

"each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

Cumulative development was considered as part of the ES and the Applicant is not aware of any additional approved developments near to the Site that have been approved since the ES was submitted in November 2020, which could have the potential to result in likely significant effects on the environment in cumulation with the Development.

Validity of Likely Significant Effects

The scope of the November 2020 ES comprised the following topics:

- Population and Human Health;
- Air Quality;
- Biodiversity;
- Daylight, Sunlight and Overshadowing; and
- Wind Microclimate.

A detailed review of the above technical ES chapters included as part of the November 2020 ES has been undertaken. The role of the ES is to report on the likely significance of effects on the environment and the aim of the review has been to establish whether any likely significant effects not identified or identifiable at the time of the planning application's submission could now occur as a consequence of the amendment to the Development.

Population and Human Health: The change to the affordable housing provision for the Development has a bearing on the education yield calculations, used to inform the assessment of effects on primary and secondary education from the Development. The net additional education yield calculated in the November 2020 ES chapter was 119 primary school places and 39 secondary school places. As a result of the change in the affordable housing provision, the net additional yield is now 112 primary school places and 36 secondary school places from the Development (refer to Appendix 1).

The baseline assessment in the November 2020 ES chapter identified a significant surplus of primary school places, so the revised mix does not change the assessment of effect presented in the original chapter (negligible for primary education). The baseline assessment identified a deficit of secondary school places in the local area but the demand

for secondary school places, results in only a minor adverse effect. The revised yield calculation (36 secondary school places) does not change this effect. The change to the affordable provision does not therefore change any of the effects or conclusions of the Population and Human Health Chapter submitted as part of the November 2020 ES.

The Health Impact Assessment, submitted as Appendix 6.1 of the November 2020 ES, set out that the provision of affordable homes as part of the Development would have a positive health effect (under key health theme Housing quality and design). This will continue to be the case given the revised increase in affordable housing provision.

Air Quality: From the revised traffic data provided by Markides Associates, there are some minor redistributions of the Development traffic on the local road network (refer to Appendix 2). From review of the revised traffic data, there would be no significant change to the number of Development traffic movements on the major affected road links considered within the air quality assessment for the November 2020 ES (+16 on Cambridge Road North). Additional changes have taken place on road links where adjacent roads, which are not subject to changes to Development traffic numbers, are experiencing higher Development traffic movements. However, the impacts at receptor locations on these roads are predicted to be not significant and as such, it can be considered that air quality impacts associated with the amendments to the distribution will not exceed or significantly alter those previously predicted. Subsequently, it is considered that the conclusions of the air quality assessment for the November 2020 ES will remain the same.

The nature of the amendments have no bearing on the conclusions of the **Biodiversity** chapter prepared as part of the November 2020 ES. As the amendment to the Development does not involve any massing changes, the conclusions of the assessment in relation to **daylight, sunlight and overshadowing** and **Wind Microclimate** would also still apply.

ES Appendices updates

It should be noted that in addition to Appendix 6.1 (Health Impact Assessment), the following Appendices of the November 2020 ES have also been updated as a result of the minor amendments:

- Appendix 2.7: Transport Assessment; and
- Appendix 3.2: Energy Statement.

The changes to the above appendices have no bearing on the conclusions of the November 2020 ES.

Conclusion

Likely significant effects relating to the Development have been considered in relation to proposed amendment to the Development. No likely significant effects, that were not identified or identifiable at the time of the preparation of the November 2020 ES have been identified.

As also set out within this letter, there have been no material changes to the baseline environment and no additional cumulative development have been identified.

It is therefore considered that the conclusions of the November 2020 ES submitted as part of the hybrid planning application (reference 20/02942/FUL) remain valid and that the information provided comprises non-substantive clarification. However, given that this information relates to the submitted ES it should be published for consultation in accordance with the EIA Regulations.

Yours sincerely,



NEIL PURVIS

Associate Environmental Planner

ENCs.

Appendix 1: Pupil Yield Calculations

Appendix 2: Updated Traffic data

APPENDIX 1

PUPIL YIELD CALCULATIONS

Estimated Pupil Take-up from Application for Permission to Develop Land

	Total units	Type of property by number of bedrooms								Child yield by school phase				Pupil take-up ¹		
		Houses				Flats				Nur	Pri	Sec	Total	Pri	Sec	
		1	2	3	4	1	2	3	4							
[1] Private ownership		Houses				Flats				9%	59%	30%	98%	86%	70%	
				14		528	497	190		Nur	Pri	Sec	Total	Pri	Sec	
	1,229									42.1	279.0	139.4	470.0	239.9	97.6	
	-									-	-	-	-	0.0	0.0	
	-									-	-	-	-	0.0	0.0	
	-									-	-	-	-	0.0	0.0	
	-									-	-	-	-	0.0	0.0	
[1] Total: Private ownership		1,229	0	0	14	0	528	497	190	0	42.1	279.0	139.4	470.0	239.9	97.6
														Pri	Sec	
[2] Social housing		Houses				Flats				Child yield by school phase				100%	100%	
				15	33	348	411	117	17	Nur	Pri	Sec	Total	Pri	Sec	
	941									429.8	316.8	189.4	936.0	104.5	62.5	
	-									-	-	-	-	0.0	0.0	
	-									-	-	-	-	0.0	0.0	
	-									-	-	-	-	0.0	0.0	
	-									-	-	-	-	0.0	0.0	
[2] Total: Social housing		941	0	0	15	33	348	411	117	17	429.8	316.8	189.4	936.0	104.5	62.5
														Pri	Sec	

Note:
¹ Pupil take-up for social housing is reduced by 67% to account for pupils anticipated to be registered already at local schools.

Primary	344
Secondary	160

Yield from 832 units	232	Net additional yield	112
	124		36

APPENDIX 2

UPDATED TRAFFIC DATA

		2018 Base		2039 Future Base + Com Dev		2039 Future Base + Com Dev + Dev		Net change with Dev	
ATC	Link	AADT (2-way)	HGV%	AADT (2-way)	HGV%	AADT (2-way)	HGV%	AADT (2-way)	% AADT Change
1	London Rd W	22226	11%	25373	11%	25648	11%	275	1%
2	London Rd E	18535	7%	21160	7%	21393	7%	233	1%
3	Cambridge Rd N	16364	8%	18681	8%	19189	8%	508	3%
4	Fairfield South	6969	9%	8062	9%	8188	9%	126	2%
5	Hawks Rd	14117	7%	16222	7%	16348	7%	126	1%
6	Villiers Rd	12011	8%	13712	8%	13815	8%	104	1%
7	Cambridge Rd	19423	9%	22174	9%	22538	9%	364	2%
8	Gloucester Rd	6668	10%	7613	10%	7743	10%	130	2%
9	Cambridge Rd S	16065	11%	18446	11%	18867	11%	421	2%
10	Washington Rd	1148	11%	1310	11%	1504	11%	194	15%
11	St Peters Rd	351	4%	507	4%	507	4%	0	0%
12	Burritt Rd	910	7%	1039	7%	1197	7%	158	15%
13	Vincent Rd	471	7%	538	7%	579	7%	41	8%
14	Cambridge Grove	119	19%	135	19%	135	19%	0	0%
15	Willingham Way	498	13%	568	13%	568	13%	0	0%