

Memorandum

To Kingston Council Date 30 November 2021
From [REDACTED] Job no 046355
Copied to Harsha Bhundia, [REDACTED]
Subject CRE Energy Statement Review and suggested wording

1.1 Introduction

This note summarises a review of the heat network strategy within the Energy Statement for the Cambridge Road Estate development and makes suggestions of possible Section 106 conditions to be included.

1.2 Review of Energy Statement (dated Oct 2020)

- Carbon offset fund (page 5)
 - is currently calculated based on £60/tCO₂e, it is understood that Kingston have raised this to £95/tCO₂e. Kingston therefore may be able to increase the ask of this which would make a substantial difference to their payment (from ~£1.4m to ~£2.3m)
 - our understanding is that this is calculated predicated on connecting to the Kingston DHN. If the heat network is not built, then the amount of offsetting required will be larger as the on-site network will not be as low carbon. RBK may want to consider some sort of clause to secure the difference in this number should the heat network not be realised. This approach was used by LB Haringey for the Tottenham Hale development promoted by a JV between Haringey and Argent Related
 - See next comment
- Table 11 (page 27) states the assumption that the water source heat pump from the Kingston District Heat Network (KDHN) will generate 99% of the on-site heat.
 - The strategy is that the heat pump will provide closer to 85% (although earlier phases may achieve a higher fraction as the development builds out). This is likely over inflating carbon savings achieved from connecting to the network and hence undervaluing the Carbon Offset contribution.
 - This is still a significant saving versus the on-site Air-source Heat Pump (ASHP) counterfactual which is estimated to provide only 67% of heat for the development with a lower efficiency (260% vs 350%)
- The Energy Statement recognises that the energy centre will house gas boilers capable of delivering the required heat for the entire CRE development.
 - Previous communications with Countryside and Hodkinson (29/07/21) have indicated that is proposed these are adopted by the DHN operator. A duty/assist substation is suggested within the Energy Centre to connect to the low carbon supply from Hogsmill – this will provide hydraulic separation between the CRE on-site network (lower temperature) and the primary Hogsmill network (higher temperature). It is expected that the boilers will be able to feed onto the primary side of the KDHN.

- Point 6.14 states that *"The mean time solution is currently expected to utilise the proposed gas boilers until a connection to the RBKUT DEN is presented or confirmed as not possible."*
 - We would recommend that a timeframe is agreed by which point the alternative low carbon on-site solution (ASHP) should be provided in-lieu of the KDHN developing any further. A suggestion on the timeframe is included in the next section.
- A route for the KDHN heat network through the site is shown to be safeguarded in Figure 10 (p32).
 - It is currently proposed that the KDHN trunk main is installed through the site in 2024 as a single phase. There will be a single point of connection into the CRE secondary network at the onsite Energy Centre (Block E). A DN250 route should be secured through the site. This was flagged as a risk in a call with the CRE design team in Sept 21 - the project is waiting from confirmation from on the best network route for the KDHN pipework and timelines to get through the site to the hospital. There would be cost benefit if the developer were made to install the network as part of their infra works and then cap it off – this would reduce costs and disruption than having to dig up at a later stage.
- Figures 8 (p30) and Figure 11 (p33) in the Energy Statement illustrate the energy centre options depending on the final energy centre solution. The following highlighted screenshot of Figure 11 illustrates the additional space that will be required in the alternative on-site solution (mostly taken up by thermal storage).
 - This space could potentially be used to accommodate additional peak heating plant on the KDHN. It would be recommended to request that sufficient fluing space is provided for further boiler capacity should the heat network need it.

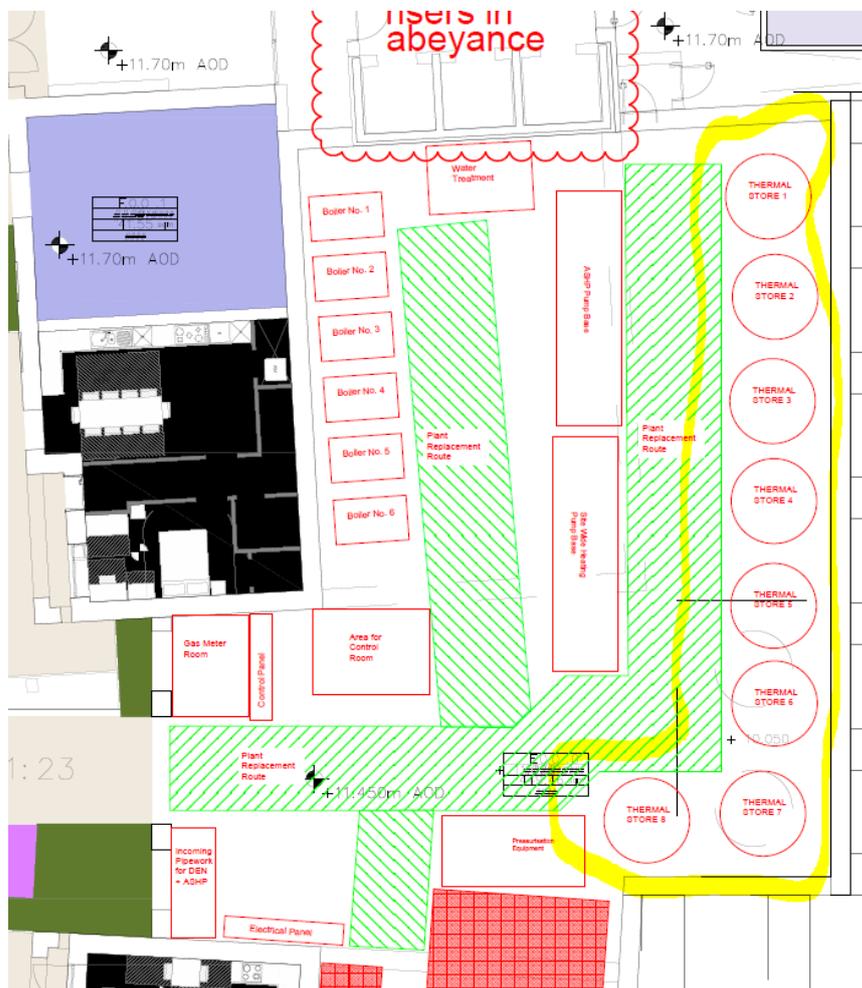


Figure 11 from the CRE Energy Statement - highlighted area for thermal stores which will not be required if connecting to DHN and this space may be able to accommodate additional plant

1.3 Possible Section 106 obligations

Proposed principles to be considered for the Section 106 obligations below. These will be subject to more detailed development and legal wording if adopted:

DHN connection notice

- The council will submit a DHN Connection Notice to the Developer informing the Developer that it intends to connect the development to the DHN network. The key components of the DHN Connection Notice include providing a credible business plan, reviewing the supply agreements and connection agreements. The council may submit a partial connection notice if it just wishes to connect the DHN to part of the development.

On receipt of the DHN Connection Notice. The Developer will undertake a Feasibility Study, which is a review of the connection notice to establish the feasibility and financial viability of connecting the development to the DHN. The Council then approves the feasibility study.

The Supply Agreement and Building Connection Agreements will be finalised through the DHN Connection Notice and Feasibility Study exercise.

Alternative low carbon provisions

- If no DHN Connection Notice is issued and a connection to the KDHN cannot be realised within 5 years of construction of the on-site Energy Centre building, a low carbon on-site alternative shall be installed no later than year 5. This should be equal to or improved from the alternative scenario presented within the Energy Statement. Evidence shall be provided to the Council to verify and approve the proposed alternative.

DHN Connection Payments

- A DHN Connection Payment will be paid by the Developer to the Council (or Heat Network Operator) towards the cost of providing, installing, commissioning and adopting any new infrastructure or plant or equipment required to enable the DEN to connect to the Development. The Connection Payment will be derived based on the offset costs of the Developer delivering the low-carbon counterfactual on-site. This shall include but not limited to:
 - Air Source heat pumps and connecting infrastructure to the energy centre
 - Electrical upgrades to accommodate the heat pumps

Carbon Offset Fund contribution

- The Developer shall pay a Carbon Offset Fund contribution, in line with Planning Requirements. This will use a carbon dioxide offset price of £95 (per tonne of carbon dioxide per year for a period of 30 years). If a connection to the KDHN cannot be realised, the final contribution will be recalculated by assessing any additional shortfall in the Development's energy performance against the methodology in the 2020 GLA Energy Statement Guidance.

Design

- The Developer shall ensure that the network is installed on-site to the latest CIBSE 'CP1 Heat networks: Code of Practice for the UK' to ensure that the network is adoptable by another operator. This will include the entire network from the energy centre through to the tertiary networks (it is anticipated however that the network will be adopted up to and including the HIUs in each flat). An adoption process for the secondary heat network and associated equipment will be agreed during project development.

As there is a hydraulic separation proposed between the primary KDHN network and the on-site CRE network, the operating temperature of CRE onsite network should be minimised in accordance with CP1 2020. Best endeavours should be made to minimise losses.

The Developer shall submit designs to the Council at RIBA Stages 3 and 4 in such a timely way to enable the Council to review and comment on the Contractors design information to ensure it complies with the relevant DHN Specifications and agreed departures. Once a heat network operator is engaged, the Developer shall work with the Operator to ensure that future phases are designed to their adoptable standards.

- If the on-site Energy Centre is constructed prior to the delivery of the heat network, the Developer shall be responsible for installing capped-off heat network pipework to a manhole at a suitable connection point outside of the energy centre building (in order to prevent future cost and disruption resulting from works with completed finishes). The diameter and specification and interim maintenance regime of this pipework shall be agreed with the Council (or Heat Network Operator) in advance of installation.
- The Developer shall install a heat network pipework route through the site to Cambridge Gardens and Kingston Hospital. A DN250 (internal diameter, Series 2 flow and return pipework to comply with BS EN 13941) route should be secured through the site. Where possible the installation of this pipework will be aligned with the CRE construction programme.
- The on-site Energy Centre will include peaking Gas boilers. The Developer shall ensure that these can be easily adapted to provide heat to the primary KDHN network.
 - The alternative low carbon on-site solution requires safeguarding for a larger energy centre (to accommodate heat pumps and thermal storage). The Developer shall ensure that this space can be adapted to accommodate additional boiler capacity including provision for additional space for flues within the energy centre risers. The Developer will not be expected to install the additional plant.
- The Developer shall provide sufficient space and infrastructure within the Energy Centre building to enable the DHN to connect to the Development in accordance with the DHN Specification. Engagement shall be carried out with the Council at the time of the design to ensure provisions are adequate. Provisions should include but not limited to the following:
 - Heat exchangers , meters and associated controls within the Plant Room ;
 - The connection to Agreed Connection Points, and any internal pipework required, in order to supply heat from the DHN to the Development;
 - Alteration to the existing building pipework in order to facilitate the connection;
 - Builder's work associated with the above; and
 - Any other works required in order to ensure that heat is supplied to the primary heat exchanger or, in the event that a supply is provided directly to each individual Dwelling, any works required to supply heat to the metering point (including , if required by the DEN operator, pumps and water quality treatment).

The Council / KDHN operator shall be responsible for carrying out the Agreed Connection Works and for procuring the connection of the development to the DEN including any internal pipework.



Development Management <development.management@kingston.gov.uk>

RE: Kingston Council - Planning Application consultation on 20/02942/FUL

1 message

KSLPlanning <KSLPLANNING@environment-agency.gov.uk>

7 December 2020 at 10:36

To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>

Dear sir/madam

Thank you for consulting us on the above application.

We have no comments to make on this planning application as it falls outside our remit as a statutory planning consultee.

Please refer to the attached 'When to consult the Environment Agency' document for guidance on when to consult us.

Non planning consents

Although we have no comments on this planning application, the applicant may be required to apply for other consents directly from us. The term 'consent' covers consents, permissions or licenses for different activities (such as water abstraction or discharging to a stream), and we have a regulatory role in issuing and monitoring them.

The applicant should contact 03708 506 506 or consult our website (<https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit>) to establish whether a consent will be required.If you feel we should assess this planning application in more detail due to local issues/opportunities please email KSLPLANNING@environment-agency.gov.uk

██████████
Planning Advisor, Kent and South London Team
Environment Agency | 2 Marsham Street, Westminster, London, SW1P 4DF
kslplanning@environment-agency.gov.uk

Creating a better place
for people and wildlife



From: development.management@kingston.gov.uk [mailto:development.management@kingston.gov.uk]**Sent:** 03 December 2020 12:56**To:** KSLPlanning <KSLPLANNING@environment-agency.gov.uk>**Subject:** Kingston Council - Planning Application consultation on 20/02942/FUL

Dear Sirs,

Please read the important information attached from Kingston Council.

Regards

Planning Support

Royal Borough of Kingston

This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

 **1a. External Consultation Checklist v3.3_Aug 17.pdf**
240K



Development Management <development.management@kingston.gov.uk>

20/02942/FUL

1 message

16 December 2020 at 16:57

To: Development Management <development.management@kingston.gov.uk>

Hello,

Find below comments in respect of land contamination for the above application.

I have looked at the contaminated land phase 1 report accompanying this application and recommend further risk assessment to be carried out in line with the reports conclusions. As you noted, this application bears some similarities with the previous report submitted under 19/02747/PAO2R. The following comments should be considered in this application:

Land Contamination

The above application is accompanied with a phase 1 contaminated land assessment prepared by Create Consulting Limited ref; CB/CS/P20-2124Rev 1, dated October 2019. The preliminary conception model uses on site historical information to assess potential risk to future site users and construction works. The report agrees the presence of made ground and pollutants of concern. The possibility of limited landscape to the gardens on ground floor areas presents major exposure pathways to potential pollutants, including asbestos containing materials. We recommend additional risk assessment to ensure that full ground profile is ascertained, although the report recommended limited ground investigation works.

Accordingly, we recommend the following contaminated land condition to be imposed.

CONDITION: 1

No development shall commence until a site investigation scheme based on the desk study together with assessment of risks posed by any contamination is carried out in accordance with British Standard BS10175: Investigation of Potentially Contaminated Sites - Code of Practice and the Environment Agency's Model Procedures for the Management of Land Contamination (CLR 11) (or equivalent British Standard and Model Procedures if replaced), has been submitted to and approved in writing by the Local Planning Authority. Should remediation be required, no development shall commence until a report specifying the measures to be taken, including the timescale, to remediate the site to render it suitable for use shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To comply with Policy DM11 of Sutton's Site Development Policies DPD and Policy 34 of the Draft Local Plan.

CONDITION: 2

Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason: Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

CONDITION: 3

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation

strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

Kind Regards

[REDACTED]
Environmental Protection Officer - Pollution Control
Enforcement
Kingston and Sutton Shared Environment Service
London Borough of Sutton | [24 Denmark Road](#) | [Carshalton](#) | Surrey | SM5 2JG
Direct Line: [REDACTED]

Date: 16 December 2020
Our ref: 336210
Your ref: 20/02942/FUL



Ms H. Bhundia
Royal Borough Of Kingston
Guildhall 2
Kingston-Upon-Thames
Surrey
KT1 1EU

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

harsha.bhundia@kingston.gov.uk

Dear Ms Bhundia,

Planning consultation: Hybrid Planning Application for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works. Detailed permission is sought for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission (with appearance and landscaping reserved) is sought for the remainder of the development (The Proposed Development).

Location: Cambridge Road Estate Cambridge Road, Kingston Upon Thames, KT1 3JJ

Thank you for your consultation on the above, dated and received by Natural England on 03 December 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

European sites

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

Sites of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

Green Infrastructure

The proposed development is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. Natural England would encourage the incorporation of GI into this development.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,


Consultations Team

Annex - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

Local authorities have responsibilities for the conservation of SSSIs under s28G of the Wildlife & Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states that development likely to have an adverse effect on SSSIs should not normally be permitted. Natural England's SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.

Protected Species

Natural England has produced standing advice¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. The list of priority habitats and species can be found here². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Protected landscapes

For developments within or within the setting of a National Park or Area of Outstanding Natural Beauty (AONB), we advise you to apply national and local policies, together with local landscape expertise and

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

information to determine the proposal. The National Planning Policy Framework (NPPF) (paragraph 172) provides the highest status of protection for the landscape and scenic beauty of National Parks and AONBs. It also sets out a 'major developments test' to determine whether major developments should be exceptionally be permitted within the designated landscape. We advise you to consult the relevant AONB Partnership or Conservation Board or relevant National Park landscape or other advisor who will have local knowledge and information to assist in the determination of the proposal. The statutory management plan and any local landscape character assessments may also provide valuable information.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Heritage Coasts are protected under paragraph 173 of the NPPF. Development should be consistent the special character of Heritage Coasts and the importance of its conservation.

Landscape

Paragraph 170 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access.

Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.

Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).



Development Management <development.management@kingston.gov.uk>

3rd Party Planning Application - 20/02942/FUL - Hybrid Full

1 message

BCTAdmin@thameswater.co.uk <BCTAdmin@thameswater.co.uk>
To: development.management@rbk.kingston.gov.uk

18 December 2020 at 14:52

Kingston upon Thames
Development Control
Guildhall 2
Kingston upon Thames
Surrey
KT1 1EU

Our DTS Ref: 67803
Your Ref: 20/02942/FUL - Hybrid Full

18 December 2020

Dear Sir/Madam

Re: Cambridge Road Estate, Cambridge Road, KINGSTON UPON THAMES, -, KT1 3JJ

Waste Comments

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - "The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check

that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

Thames Water would advise that with regards to surface water sewerage infrastructure. Provided that the existing flow regime can be verified to confirm that the proposed flows are a reduction, then we would not have any concern regarding the proposed development. If the existing flow regime cannot be verified or in the case of green field sites, then in accordance with the Building Act 2000 clause H3.3. Positive connection to a public surface water will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. The disposal hierarchy being :- 1st Soakaways; 2nd Watercourses; 3rd Sewer.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

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Development Management <development.management@kingston.gov.uk>

3rd Party Planning Application - 20/02942/FUL - Hybrid Outline

1 message

BCTAdmin@thameswater.co.uk <BCTAdmin@thameswater.co.uk>

18 December 2020 at 14:52

To: development.management@rbk.kingston.gov.uk

Kingston upon Thames
Development Control
Guildhall 2
Kingston upon Thames
Surrey
KT1 1EU

Our DTS Ref: 62918
Your Ref: 20/02942/FUL - Hybrid Outline

18 December 2020

Dear Sir/Madam

Re: Cambridge Road Estate, Cambridge Road, KINGSTON UPON THAMES, -, KT1 3JJ

Waste Comments

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Supplementary Comments

Thames Water would advise that with regards to surface water sewerage infrastructure. Provided that the existing flow regime can be verified to confirm that the proposed flows are a reduction, then we would not have any concern regarding the proposed development. If the existing flow regime cannot be verified or in the case of green field sites, then in accordance with the Building Act 2000 clause H3.3. Positive connection to a public surface water will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. The disposal hierarchy being :- 1st Soakaways; 2nd Watercourses; 3rd Sewer.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

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Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

From: [REDACTED] (Regional Director, South East)
Operations Directorate
South East Region
Highways England
PlanningSE@highwaysengland.co.uk

To: Royal Borough of Kingston Upon Thames (FAO Case Officer: Harsha Bhundia)
development.management@kingston.gov.uk

CC: SpatialPlanning@highwaysengland.co.uk

Council's Reference: 20/02942/FUL

Location: Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

Proposal: Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works: Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with appearance and landscaping reserved) is sought for the remainder of the development. This application is accompanied by an Environmental Statement.

Highways England Reference: 89935

Referring to the planning application referenced above received 01 December 2020 in the vicinity of the A3 that form part of the Strategic Road Network, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection*

**on the basis that we are satisfied that the proposal will not materially affect the safety, reliability and/or operation of the Strategic Road Network (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109) in this location and its vicinity.*

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~

~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~

~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B (covering new access to the SRN) is not relevant to this application.¹

HIGHWAYS ENGLAND (“we”) have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This represents Highways England’s formal recommendation (prepared by the Area 5 Spatial Planning Team) and is made available to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority disagree with any recommendation made under b), c) or d) above, the application must not be determined before they have:

- i) informed Highways England; and
- ii) consulted the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk.

Signature: 	Date: 18 December 2020
Name: 	Position: Spatial Planning Manager

¹ Where relevant, further information will be provided within Annex A.

PlanningSE@highwaysengland.co.uk

Highways England: Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ

Sutton & Kingston Shared Environment Service
MEMO

To: Planning
From: Pollution Control Team

Your Ref: 20/02942/FUL
Our Ref: 041141

Date: 21st December 2020

CAMBRIDGE ROAD ESTATE, CAMBRIDGE ROAD, KINGSTON UPON THAMES

Thank you for consulting the Pollution Control Team on the above application.

I make the following comments and have no objections to the proposed development subject to the following conditions being included.

NOISE

1. The site and building works required to implement the development shall be only carried out between the hours of 08.00 and 18.00 Mondays to Fridays and between 08.00 and 13.00 on Saturdays and not at all on Bank Holidays and Sundays
2. Before any piling takes place a piling method statement shall be submitted to and approved in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved piling method.

Informative

The piling method statement should detail the type of piling to be undertaken, why this method has been selected, measures to be taken to minimise noise and vibration and a plan showing where the piles are to be installed. There are a number of different piling methods suitable for different circumstances. Guidance is contained in BS5228 Noise control on Construction and Open sites - Part 4: Code of Practice for noise and vibration control applicable to piling operations. The contractor is required to take the best practicable means to minimise noise and vibration and the Council positively encourages the use of hydraulic, auger and diaphragm wall piling methods. Where complaints of noise and vibration are received it is expected that the contractor will undertake noise and vibration monitoring, with data reported back to the Environmental Health Service.

3. A scheme of noise insulation/reduction shall be submitted to ensure that the noise level of 35 dBL_{Aeq,16 hour} in living rooms and bedrooms during the daytime (0700 to 2300 hours) and 30 dBL_{Aeq,8 hour} and 45 dBL_{Amax} during the night time (measured with F time-weighting and between 2300 and 0700

hours) in bedrooms in accordance with BS8233:2014 shall not be exceeded. Where these levels cannot be met with windows open appropriate acoustic ventilation should be provided so that the room can be sufficiently ventilated. The acoustic performance of any passive vent, variable speed mechanical air supply unit or whole house ventilation must be sufficient to ensure that the noise level standards given above are not compromised.

AIR QUALITY

I have read Chapter 7 of the Environmental Statement, which pertains to air quality. The methodology and findings are acceptable. Based on the submitted information, I recommend that the following conditions be added:

4. Emissions from Boilers:

Prior to above ground works, details of the boilers hereby approved shall be submitted to and approved in writing by the local planning authority. The boilers shall have dry NO_x emissions not exceeding 40 mg/kWh. The boilers shall be installed and retained for the lifetime of the development in accordance with the approved details unless the prior written approval of the authority is given.

Reason: To comply with the London Plan's SPG on Sustainable Design and Construction and Policy 7.14 of the London Plan in relation to air quality.

5. Construction-phase dust monitoring:

Prior to the commencement of works at the site, a written scheme of continuous dust monitoring must be submitted to and approved in writing by the local authority. This scheme must be compliant with the GLA Control of Dust and Emissions during Construction and Demolition SPG, and must include threshold levels at which mitigating action must be taken by the contractor.

Reason: To protect the health and amenity of the area. To comply with the GLA Control of Dust and Emissions during Construction and Demolition SPG.

LAND CONTAMINATION

I have looked at the contaminated land phase 1 report accompanying this application and recommend further risk assessment to be carried out in line with the report's conclusions. As you noted, this application bears some similarities with the previous report submitted under 19/02747/PAO2R. The following comments should be considered in this application:

The above application is accompanied with a phase 1 contaminated land assessment prepared by Create Consulting Limited ref; CB/CS/P20- 2124Rev 1, dated October 2019. The preliminary conception model uses on site historical

information to assess potential risk to future site users and construction works. The report agrees the presence of made ground and pollutants of concern. The possibility of limited landscape to the gardens on ground floor areas presents major exposure pathways to potential pollutants, including asbestos containing materials. We recommend additional risk assessment to ensure that full ground profile is ascertained, although the report recommended limited ground investigation works.

Accordingly, we recommend the following contaminated land condition to be imposed.

6. No development shall commence until a site investigation scheme based on the desk study together with assessment of risks posed by any contamination is carried out in accordance with British Standard BS10175: Investigation of Potentially Contaminated Sites - Code of Practice and the Environment Agency's Model Procedures for the Management of Land Contamination (CLR 11) (or equivalent British Standard and Model Procedures if replaced), has been submitted to and approved in writing by the Local Planning Authority. Should remediation be required, no development shall commence until a report specifying the measures to be taken, including the timescale, to remediate the site to render it suitable for use shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To comply with Policy DM11 of Sutton's Site Development Policies DPD and Policy 34 of the Draft Local Plan.

7. Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason: Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

8. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the

developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

Best regards,


Environmental Protection Officer
Regulatory Services



Planning Officer: Karen Coles

Royal London Borough of Kingston upon Thames

PC [REDACTED]
Design Out Crime Officer - SW
Teddington Police Station,
Park Lane,
London,
TW11 0AB

Landline: 0208 247 5834

Telephone: 07831 159278

Email:
[REDACTED]

Your ref: 20/2942/FUL

Our ref: SW3871

Dear Karen,

Re: Royal Borough of Kingston Planning Applications Reference: 20/2942/FUL
Location: Cambridge Road Estate, Cambridge Road, Kingston upon Thames, KT1 3JJ.

Thank you for your request for comment on a recently submitted planning application for the proposed redevelopment of the Cambridge Road Estate.

I will be commenting on the following submission;

Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floor space (Use Class E), 1,395sqm of flexible retail/commercial floor space (Use Class E/Sui Generis), 1,250sqm community floor space (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works:

Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floor space (Use Class F2), 290sqm of flexible office floor space (Use Class E), 395sqm of flexible retail/commercial floor space (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works.

Outline permission for 1718 residential units (Use class C3), 1000 sq. of flexible retail/commercial floor space (Use Class E/Sui Generis) (with appearance and landscaping reserved) is sought for the remainder of the development.

This is a large and complex re generation project which involves the relocation of a densely populated estate with some long term residents and private owners. The project is projected to last 10 to 15 years before final completion and will be completed in 5 phases.

This application focuses on the regeneration as whole but primarily on Phase 1 and 2 which encompasses 3 residential blocs, commercial space and community space. These are in Blocks B, C and E.

I anticipate further planning applications with the detailed for the other phases to follow and welcome further partnership working.

I will be commenting on the design and layout of the proposed development in relation to crime using the principles of Crime Prevention through Environmental Design (CPTED) supported by the Secured by Design (SBD) guidance.

I have met with the design team prior to this submission on 2 occasions when the design and intended use of the buildings and spaces were discussed. They have extensively involved the current residents and interested parties throughout the design and concept stage and have taken into consideration their concerns, needs and desires and public consultation has been thorough.

I have also liaised with the Dedicated Ward Officer (DWO) on the Safer Neighbourhood Team (SNT) that covers that area and have a sound understanding of the complex needs and crime profiles within the Cambridge Estate.

Crime Statistics

For the year ending June 2020 the crime rate in Kingston upon Thames averaged 68.51 recorded crimes per 1,000 persons compared to the Metropolitan Police Service as a whole averaging at 94.78 crimes per 1,000 persons. This proposed development is in the Norbiton Ward.

The Cambridge Road Estate is a high density residential area with limited green open space and well known unfortunately for its high comparative crime rates and deprivation. It is an aging 1970s estate comprising of houses and flats with small convenience shops within it. There is high density of persons and mixed use buildings as well as vacant premises means crime rates are higher in this immediate area than other areas within the Ward.

The top three recorded crimes from January 2020 to December 2020 in the Norbiton Ward are listed below.

Crime type	Total	Percentage
Anti-Social Behaviour (ASB)	564	39.7%
Violence + Sexual Offences (V+S)	328	23.9%
Vehicle Crime	117	8.5%

I looked into the specific crime statistics within Phase 1 and 2 of the proposed development which I discussed with the applicant. I have looked at the figures in the winter and summer to try to reflect the change in crime patterns over a year. The figures for June 2020 are below.

Phase	Crime type	Total crimes
1 – Block C + MUGA	None	0
2 – Block B + E	V+S – 4, Drugs – 2, ASB – 2.	8

The figures for December 2020 are below.

Phase	Crime type	Total crimes
1 – Block C + MUGA	ASB – 4, V+S – 2.	6
2 – Block B + E	None	0

Data correct at the time of writing January 2021. Source www.police.uk

This report intends to identify any crime and security concerns and will propose recommendations on how to mitigate these risks from various crime types.

The open accessibility of new footpaths and opens spaces means that they can be difficult environments to secure. However, the vulnerability of people and property to crime can be mitigated if the appropriate and measures are incorporated.

General Comments:

1 – Public realm

- 1.1 Shrubs should be selected to have a mature growth height no higher than 1 metre, and trees should have no foliage, epicormic growth or lower branches below 2.4 metres thereby allowing a 1.4 metre clear field of vision.
- 1.2 The design of the planters within the landscape plan should not allow for impromptu seating.
- 1.3 Seating spaces should be carefully considered and located in the appropriate locations such as closer to where facilities are or where there will be natural surveillance. The design of the seating should be considered to discourage anti-social behaviour or prolonged loitering.
- 1.4 Any benches should be designed to include centrally positioned arm rest dividers to assist those with mobility issues.
- 1.5 Communal play-areas for the under 5s and the 5 to 11 years must be designed with due regard for natural surveillance, and have adequate resources for its satisfactory future management. Consideration should also be given to enabling the play area to be closed off during hours of darkness to dissuade inappropriate use. The location of the play area adjacent to the existing college could also cause problems with youths using the play equipment and deterring genuine use. Clear signage and rule setting must be used. This space should be designed so it can be secured at night. One entry/exit point to enable guardian/parental control. A fence height of 1200mm can discourage casual entry and maintain a secure space.**
- 1.6 Public space cycle parking should be in an area with good natural surveillance with parking systems that provide good anchor points for the pedal cycles. These should also be well illuminated. These should be within 50m of sight from 'active' rooms of dwellings. Compliant secure cycle parking must meet a minimum certified security standard of LPS1175 Issue 7.2:2014 SR1 or Sold Secure or STS 502.
- 1.7 Motorcycle or moped parking should be provided. Ground anchors or robust metal support stands are recommended and must meet either Sold Secure Gold or STS 503 security standards.
- 1.8 Recessed doors onto public spaces should be avoided. This is to mitigate loitering and 'smokers corners'.
- 1.9 Vehicular and pedestrian routes should be designed to ensure that they are visually open, direct, and well used.
- 1.10 Shared surface arrangements should be designed for those with visual impairment.
- 1.11 Any alternating brick design work should be removed. This can be used as a climbing aid.
- 1.12 Vehicle entrance gate must be fob access controlled and have a minimum height of 1.8m.

1.13 I recommend Fire Key Guard boxes are installed at all drop key points. This is to limit illegitimate use. Drop keys are readily available and have been known to be used in order to commit ASB in communal areas out of public view.

2 – Bin stores

2.1 The refuse store doors should be single leaf, third party tested and certified to a minimum security standard of PAS 24:2016. They should also be self-closing and locking with a push to exit button and PIR lighting. This would also discourage illegitimate use. The doors should be key fob access only. Not key or key pad operated as the methods are unreliable as they are often left unlocked for ease or the key code is readily distributed or compromised by a wearing down of the buttons.

3 – Landscaping

3.1 **Defensive planting** should be considered around the residential boundaries. This would mitigate intrusion and concealment of weapons and drugs.

3.2 Planting should not impeded natural surveillance. Shrubs should have a mature growth height of no more than 1m and trees should have no foliage, epicormic growth or lower branches below 1m.

3.3 Fencing to the rear of private spaces should be a minimum height of 1.8m.

3.4 I note there appears to be an undefined external space behind the block. The entrance gate should be access controlled and to be brought forward to remove the recess. I recommend defensive planting along the fence line to deter persons from scaling.

4 - Cycle Stores

4.1 These should have resident only fob access control entry but thumb turn exit to prevent accidental lock-ins. They should have good lighting and CCTV coverage capable of identifying anyone in the store area. The correct security door standard required for this is a minimum of LPS1175 and be outward opening with thumb turn exit on a self-closer locking system with key fob only access.

4.2 The cycle stand must facilitate the locking of both wheels and the crossbar. The minimum SBD security requirements are:

- Galvanised steel bar construction (minimum thickness 3mm) filled with concrete
- Minimum foundation depth of 300mm with welded 'anchor bar'

There should also be clear signage to instruct users how to uses the stands correctly.

Security compliance can be demonstrated by products certified to one of the following minimum security standards;

- LPS 1175 Issue 7.2:2014 SR1
- LPS 1175 Issue 8:2018 SR1 (A1)
- Sold Secure
- STS 502

4.3 Residential pedal cycle stores should relate to each internal core, thereby limiting unauthorised access.

4.4 There should only be one door to access the cycle store. This would limit vulnerability. The door should be outward opening.

Cycle theft is a high crime driver and is prevalent around Kingston. Cycle security also forms parts of Kingston's local planning policies. It is also to be noted that door sets providing access from the

storage facility into communal parts of the building are required to meet Part B, Part M, and Part Q of Building Regulations.

5 – Residential Block

5.1 Residential communal space should be clearly defined and access controlled to prevent unrestricted public access. There should be no linkage between public, communal and private areas.

5.2 All communal entrance doors sets should be video access controlled and be LPS 1175 SR1 3rd party certified.

5.3 I recommend where possible the use of single leaf doors as double doors require double the security furniture. However, as long as the double door set used is a fit for purpose communal door set that will be acceptable. Communal door sets should be tested with the appropriate communal door locking mechanism and not adapted residential patio doors with an additional electronic lock attached.

5.4 Equality Act 2010 requires lower front call plates for access control.

5.5 Individual flat front door sets should meet the PAS 24:2016 or equivalent standards. These must also meet the relevant fire ratings and a dual certificated door set is preferred.

5.6 There are numerous fire escape doors. These should be alarmed to sound if the door is used. This will alert any persons to possible danger but also alert residents to any misuse and increase detection of perpetrators. It is advised that CCTV is installed at fire escapes, especially in vulnerable areas.

5.7 The layout of the units should allow the active rooms towards the front of the units to allow greater surveillance of the public garden area and the children's play park.

6 - Access control

6.1 Access control is key to preventing uninvited persons causing anti-social behaviour or nuisance to residents. This can assist with the management of the development and allow access to residents to specific designated areas only.

Security considerations for this are (but not limited to);

- Live audio/visual communication between visitor and resident
- Capture and record colour images and for them to be stored for a minimum of 30 days. This information must be available to police within 3 days of request. If this is unavailable within the entry system then there should be CCTV installed dedicated to this purpose.
- All visitor and resident activity to be stored for a minimum of 30 days and the information to be made available to police within 3 days.
- The system must comply with GDPR.

6.2 Any trades buttons must be disconnected. This is strongly recommended as we still consistently see these buttons taken advantage of and illegitimate access gained causing significant issues in developments within Kingston.

6.3 The fobs should always be encrypted to reduce the risk of them being copied by a third party.

6.5 All easily accessible windows and door sets (including patio doors) must be a minimum third party certified security standard of PAS 24:2016.

6.6 Compartmentalisation access control. The Secure By Design New Homes Guide 2019 advises that any development of 25 residential units or more should be compartmentalised to limit permeability within a block. It is understood that this will not be implemented within the individual blocks. It was explained that during consultation residents were strongly against it as they felt it would reduce

community cohesion and isolate neighbours. This is not advisable as historically and issue within the Cambridge Estate has been that it has been too permeable. However, I do understand the reasoning in this instance why this advice will not be adhered to. What I will recommend is that the access control system installed will have the capability to be extended so that compartmentalisation can be installed if required.

I have been reassured that in Block C and E where there is shared private communal space with several cores that there will be access control so residents can only access their core, unless in the case of fire.

8 – CCTV

The CCTV system is to be designed and installed by be a contractor and a certificate confirming that the CCTV installation is compliant with BS 7958:2015 CCTV management and operation and meets the requirements of GDPR. The contractor will also be required to issue an NSI or SSAIB certificate of compliance.

8.1 There is no mention of CCTV as part of this design. External CCTV should be considered around vulnerable areas such as bin stores and cycle stores and shared amenity spaces.

8.2 Any soft landscaping and lighting fixtures should not be in conflict with the CCTV cameras field of view.

8.3 All CCTV systems should have a simple Operational Requirement (OR) detailed to ensure that the equipment fitted meets that standard, without an OR it is hard to assess a system as being effective or proportionate as its targeted purpose has not been defined. The OR will also set out a minimum performance specification for the system.

8.4 The system should be capable of generating evidential quality images day or night 24/7.

8.5 CCTV systems should operate in accordance with the best practice guidelines of the Surveillance and Data Protection Commissioners and the Human Rights Act.

8.6 Internal cameras should be installed to provide coverage of entrances, cycle storage and shared amenity areas.

9 - Lighting

9.1 Bollard lights, illuminated benches, architectural and tree up lighting are not considered as good lighting sources for SBD purposes. However, if bollard lighting is used, it is recommended that they comply with BS5489. Further advice can be given with on-going consultation.

9.2 SBD asks for 'white light' as this aids good CCTV colour rendition and gives a feeling of security to residents and visitors. Good coverage avoiding pockets of shadow is best as it provides less opportunity for someone to conceal themselves from view from CCTV or passers-by.

9.3 The public space lighting should also meet the current council requirements.

9.4 Lighting across the entire development should be to the required British Standards, avoiding the various forms of light pollution (vertical and horizontal glare). It should be as sustainable as possible with good uniformity.

9.5 Lighting can contribute to discouraging crime and vandalism making people feel secure and so encourage increase pedestrian activity. Both the carriageway and the footway should be illuminated, with shadows avoided.

9.6 The private external lighting must be at levels recommended by BS 5489-1:2013 where possible.

Appropriate and useable lighting is integral to the wellbeing and safety of legitimate users of all the spaces. Lighting is one of the most important tools used in the prevention and detection of crime. A lighting scheme that has been correctly designed and installed by appropriately qualified persons is essential in the functionality of this development. This care and attention must also be applied to all communal areas within the development too.

24hr lighting to all communal parts of the blocks of flats will be required. It is acceptable if this is dimmed during hours of low occupancy to save energy.

10 – Underground Car Park

10.1 An access control system must be applied to all vehicular and pedestrian entrances.

10.2 Inward opening automatic gates or roller grills must be located at the building line or at the tops of ramps. They must be capable of being operated remotely.

10.3 Lighting must be at the levels recommended by BS 5489-1:2013 and a certificate of conformity to be provided to the DOCO issued by an independent 'competent' designer who is also a member of ILP, IEng or CEng.

10.4 Walls and ceilings must have light colour finishes to maximise the effectiveness of the lighting.

10.5 Any internal door, lift, which give access to residential floors must have an access control system. It is recommended that the lift is key fob controlled.

10.6 CCTV is to be considered in this area.

Block B

There are no specific design changes recommended at this stage.

Block C

Retail/commercial

There is currently no intended occupant to this space as it will be used as the showroom/sales suite during the regeneration of the estate.

Community space

This space will have a patio area within a square that overlooks residents' bike stores as well as access to the communal door. It is essential that there is clear demarcation between this space and the residents' space and the correct recommended security products are in place. Consideration to the occupiers for late night use of the space as it may cause noise disturbance to the residents.

Multi Use Games Area (MUGA)

This is not due to be constructed until there is sufficient occupancy of the regenerated estate. I have not been given a predicted time frame at this stage. I recommend that consultation with this office is continued through its design as MUGAs have unfortunately been crime hotspots in the past from which we wish to mitigate.

Block E

The underground car park doesn't currently have any specific parking areas for motorbikes/mopeds. Ideally there will be space designated with security rated ground anchors installed.

There are x2 entrance/exits to the underground car park. This is not ideal. According to space and vehicle movement restrictions this is the only viable option. I have advised that once should be designated entrance only and one exit only. Good signage and roust enforcement is recommended. I recommend that roller grill is used to secure the carpark with a short open/close time to mitigate unauthorised access once a vehicle has passed through.

To conclude

This is overall a good design where security has been considered. This design could achieve a Secure By Design Silver Award if all the required security standards are met. I recommend that each Block has separate certification as each design is unique and there a several different design aspects which will impact its 'sign off'. I am satisfied at this stage that the designs while separate work well together. I look forward to working with the developer in the future.

Recommendation

Crime Prevention and community safety are material considerations. If Royal Borough of Kingston are to consider granting consent, I would seek that the following conditions details below be attached. This is to mitigate the impact and deliver a safer development in line with Kingston Core Strategy, London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

Suggested two part condition wording:-

- A. The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.

Reason: In order to achieve the principles and objectives of Secured by Design to improve community safety and crime prevention in accordance with Policy CS 14 of Kingston Core Strategy: Safer Communities, Policy DM 22 Design for Safety and Policy 7.3 Designing out Crime of the London Plan.

- B. Prior to occupation of each Block a Secured By Design final certificate shall be submitted to and approved by the Local Planning Authority.

Reason: In order to achieve the principles and objectives of Secured by Design to improve community safety and crime prevention in accordance with Policy CS 14 of Kingston Core Strategy: Safer Communities, Policy DM 22 Design for Safety and Policy 7.3 Designing out Crime of the London Plan.

The appropriate Secured by Design (SBD) requirements can be found in the design guides on the SBD web site (www.SecuredbyDesign.com)

If you require clarification or wish to discuss any aspect of the report, please do not hesitate to contact me.

Yours sincerely,



[Redacted]

[Redacted]

DOCO

South West Area, Metropolitan Police Service

p: [Redacted]

a: Teddington Police Station, 18 Park Road, Teddington, London, TW11 0AB

w: www.met.police.uk e: joanna.s.reeve@met.police.uk



The Primary Objective of an Efficient Police Force is the Prevention of Crime. This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to. All material in this report is subject to copyright. Unless it is specifically stated that particular material is available for general use then it should not be copied or re-used without the explicit permission of the Metropolitan Police Service or of other copyright holders where material is used under licence.

GREATER LONDON AUTHORITY

Good Growth

Harsha Bhundia
Borough of Kingston upon Thames
By Email

Our ref: 2020/6860/S1
Your ref: 20/02942/FUL
Date: 1 March 2021

Dear Harsha Bhundia

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**Cambridge Road Estate
Kingston Upon Thames
KT1 3JJ**

Local Planning Authority reference: 20/02942/FUL

I refer to the copy of the above planning application, which was received from you on 16 December 2020. On 1 March 2021 Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference 2020/6860/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan and the Publication London Plan for the reasons set out in paragraph 142 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the

application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Caitlin Ellis, [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

Head of Development Management

cc

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Cambridge Road Estate
in the Royal Borough of Kingston Upon Thames
planning application ref: 20/02942/FUL

Strategic planning application stage 1 referral

Town and Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.

The proposal

The outline scheme comprises the demolition of all existing buildings and the comprehensive redevelopment of the Cambridge Road Estate to deliver a mixed-use development comprising the erection of residential buildings within 15 plots ranging from 3 to 13 storeys in height providing 2,170 residential dwellings, office, flexible retail/ commercial and community floorspaces, publicly accessible open space and access, servicing and landscaping.

The detailed scheme (Phase 1) comprises the erection of blocks between 4 and 13 stories in height within Plots B, C and E comprising 452 residential units, community, office and flexible retail/ commercial floorspaces, publicly accessible open space and access, servicing, parking, landscaping including tree removal, refuse/ recycling and bicycle storage and energy centre.

The applicant

The applicant is **Cambridge Road (RBK) Regeneration LLP** (a joint venture partnership between Countryside Properties (UK) Ltd and the Royal Borough of Kingston), and the architect is **Patel Taylor**.

Strategic issues

Principle of estate regeneration: The proposals would re-provide all existing social rent units and secure an increase in like-for-like affordable housing floorspace, generally according with the Mayor's key principles for estate regeneration schemes (paragraphs 25-43).

Land use principle: The principle of the estate regeneration and uplift to deliver additional housing is supported (paragraphs 46-58).

Affordable housing: Discounting the proposed re-provision of existing social rented homes and noting that the shared equity units are not a formally recognised affordable housing product, the provision of affordable housing represents 0.4% of the uplift of residential accommodation, by habitable rooms. Overall, this equates to 36% affordable housing by habitable room. The viability information is being scrutinised to ensure the maximum quantum of affordable housing. Early, mid and late stage viability review mechanisms, and affordability levels should be secured (paragraphs 59-69).

Design and heritage: The layout and massing principles underpinning the master plan are rational and are broadly supported. Kingston's Strategic Development Brief identifies the site as having potential for tall buildings, and GLA Officers are satisfied the criteria in Policy D9 are addressed in the application. Suitable conditions should secure inclusive design requirements. Clarifications are required in respect of the submitted heritage statement (paragraphs 73-98).

Transport: The proposed changes to the eastbound and westbound Cambridge Grove bus stops and shelters are currently not acceptable and further work is required to agree the proposed changes. Suitable conditions and obligations should secure commitments in relation to car parking and cycle parking. A Travel Plan to be secured, enforced, monitored and reviewed as part of the S106 agreement, and Delivery and Servicing Plan and Construction Logistics Plan should be secured by condition (paragraph 128-138).

Other strategic issues relating to **equalities, fire safety, energy, air quality, sustainable drainage, water efficiency, green infrastructure and urban greening** and **the circular economy** also require resolution.

Recommendation

That Kingston Upon Thames Council be advised that the application does not yet fully comply with the London Plan and the Mayor's Publication London Plan, for the reasons set out in paragraph 142 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 16 December 2020, the Mayor of London received documents from Kingston Upon Thames Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town and Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Publication London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."
- Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."
- Category 1C(1c) - "Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London".
- Category 3A(1a) – "Development which is likely to result in the loss of more than 200 houses, flats, or houses and flats (irrespective of whether the development would entail also the provision of new houses or flats);

3 Once Kingston Upon Thames Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website, www.london.gov.uk.

Site description

6 The site is 8.86 hectares in size and is located approximately 850 metres east of Kingston Town Centre. The site is bound by the A2043 Cambridge Road to the east, Kingston Cemetery and Crematorium to the south, Bonner Hill Road to the west and Hawks Road to the north.

7 The existing estate is comprised of 832 residential units within four 15-storey blocks, low-rise blocks ranging from 2-storey houses to 5-storey maisonettes, and flat blocks with elevated walkways and bridges to access upper levels. The site is predominantly under Council freehold, except for some parcels within the site boundary under various private ownerships. The current housing mix (by unit size, typology and tenure) is detailed in the following tables 1-3: as follows:

Table 1: Existing unit mix, by unit size

	1-bed	2-bed	3-bed	4-bed	5 bed	Total
Units	270	316	241	4	1	832
Percentage	32%	38%	29%	>1%		100%

Table 2: Existing unit mix, by unit typology

	Flats	Maisonettes	Houses	Bungalows	Duplex	Total
Units	421	158	147	5	101	832
Percentage	51%	19%	18%	>1%	12%	100%

Table 3: Existing unit mix, by unit tenure

	Social rent	Leasehold	Freehold	832
Units	675	90	67	832
Percentage	81%	11%	8%	100

8 The existing site also comprises approximately 1,948 sq.m. of non-residential floorspace, which comprises the Bull and Bush Hotel, Piper Community Hall, Tadlow House (Housing Management), CRERA Office, CREST Office and the Surbiton Rifle Club.

9 The site is approximately 1.2 kilometres from the A307 Wheatfield Way, which forms part of the Strategic Road Network (SRN). The nearest train stations are Norbiton station, located north east of the application site, Kingston station located north west of the site and Berrylands station to the south. There are 10 bus routes within walking distance. The site has a Public Transport Access Level (PTAL) of 1b, on a scale of 0 to 6b where 6b is the most accessible.

Details of the proposal

10 The outline proposal comprises the demolition of all existing buildings and the comprehensive redevelopment of the Cambridge Road Estate to deliver a mixed use development comprising the erection of residential buildings within 15 plots ranging from 3 to 13 storeys in height providing 2,170 residential dwellings, 290sq.m. of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/ commercial floorspace (Use Class E/ Sui Generis) , 1,250sq.m. community floorspace (Use Class F2), publicly accessible open space and associated access, servicing, landscaping and works.

11 Figure 1, below, shows the proposed layout of the masterplan scheme.



Figure 1: Proposed masterplan layout.

12 The application has been submitted as a hybrid application, comprising outline and detailed components. Figure 2, below, shows the proposed layout of the detailed and the outline components of the scheme.

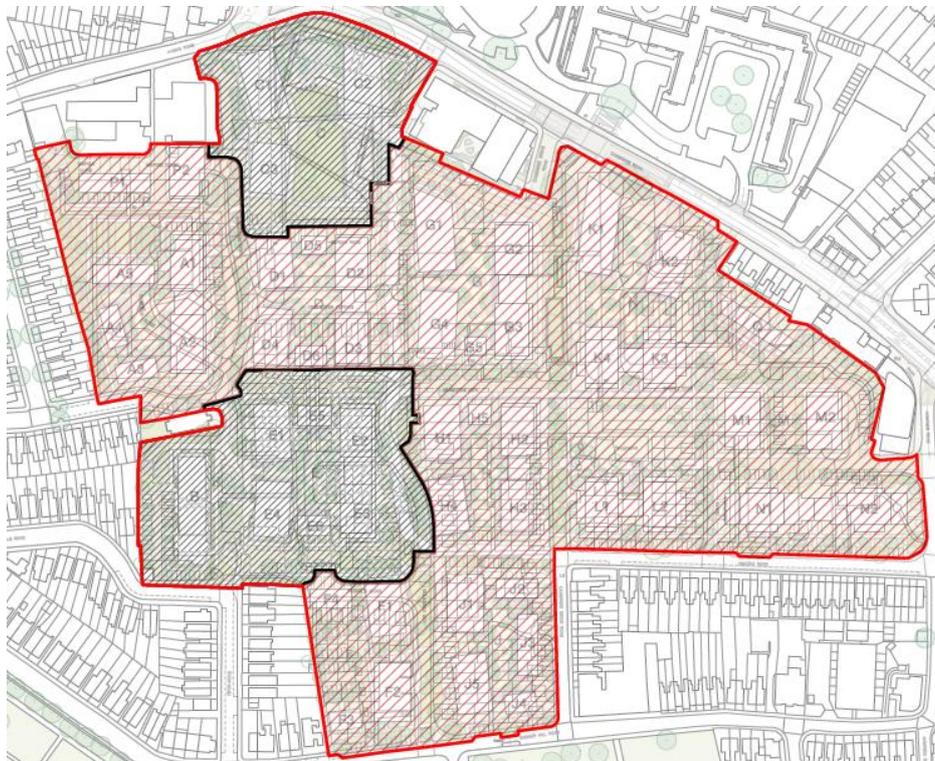


Figure 2: Detailed component of the scheme shown in black, and outline component of the scheme is shown in red.

13 Detailed planning permission is sought for Phase 1 of the scheme for erection of blocks between 4 and 13 stories in height within Plots B, C and E comprising 452 residential units, 1,250sq.m. community floorspace, 290sq.m. of flexible office floorspace, 395sq.m. of flexible retail/ commercial floorspace, publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/ recycling and bicycle storage, energy centre and works.

14 Outline permission is sought for the remainder of the development with appearance and landscaping reserved.

15 The overall breakdown of the housing for the detailed proposals is set out in Table 4, below:

Table 4 – Housing proposals

	Unit size	Social rent	Shared equity	Private	Total
Phase 1 (Detailed)	1 Bed Flat	54	11	102	167
	2 Bed Flat	43	5	137	185
	3 Bed Flat	36	12	31	79
	3 Bed Maisonette	4	2	2	8
	3 Bed House	0	0	0	0
	4 Bed Flat	2	0	0	2
	4 Bed Maisonette	4	0	0	4
	4 Bed House	4	0	0	4
	5 Bed House	2	0	0	2
	6 Bed Maisonette	1	0	0	1
	SUB-TOTAL	150	30	272	452
Outline Phases – Indicative	1 Bed Flat	244	9	456	709
	2 Bed Flat	287	32	404	723
	3 Bed Flat	41	0	127	168
	3 Bed Maisonette	2	20	30	52
	3 Bed House	6	9	14	29
	4 Bed Flat	1	0	0	1
	4 Bed Maisonette	9	0	0	9
	4 Bed House	27	0	0	27
	5 Bed House	0	0	0	0
	3 Bed Maisonette	0	0	0	0
	SUB-TOTAL	617	70	1,031	1,718
Overall Totals					
TOTAL	Social	767	100	1,303	Overall
					2,170

Case history

16 There is no strategic planning history relevant to the site however there is history associated with recent pre-application discussions had between the applicant and officers from the Local Planning Authority, Transport for London (TfL) and the Greater London Authority. Specifically, a design review panel meeting was held at the Cambridge Road Estate on 21 August 2019 which was attended by the GLA case officer. A pre-application meeting was also held on the 17 September 2019 that covered a wide range of strategic planning issues with respect to estate regeneration principles, non-residential land uses, housing and affordable housing, urban design, inclusive access, sustainable development and transport. A pre-application meeting with an energy topic-specific focus was additionally held at City Hall on 19 September 2019.

17 GLA Officers also held a follow-up pre-application meeting with the applicant and the Council on 16 April 2020 over Microsoft Teams which focused on urban design and estate regeneration principles. A written pre-application advice note was issued on the 19 June 2020 which concluded that the proposed estate regeneration scheme, which seeks the like-for-like re-provision and uplift of affordable housing, is supported in strategic planning terms, however, the future planning application will need to address the matters raised with respect to the estate regeneration principles set out in the Mayor's Good Practice Guide, affordable housing, urban design, inclusive access, environment and transport, to ensure accordance with the London Plan and the Mayor's Publication London Plan.

18 GLA Officers also held a follow-up pre-application meeting with the applicant and the Council on 28 July 2020 over Microsoft Teams which focused on viability, energy and urban design.

Strategic planning issues and relevant policies and guidance

19 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Kingston's Core Strategy (April 2012) and the London Plan 2016 (Consolidated with alterations since 2011).

20 The following are relevant material considerations:

- The National Planning Policy Framework (February 2019) and National Planning Practice Guidance;
- The London Plan Publication Version (December 2020);
- The Mayor's Affordable Housing and Viability SPG;
- The Mayor's Good Practice Guidance to Estate Regeneration (2018); and
- Cambridge Road Estate Strategic Development Brief (July 2017).

21 The Report of the Examination in Public of the draft London Plan was published in October 2019, and the Intend to Publish London Plan version (December 2019) was subsequently submitted to the Secretary of State. On 13 March and 10 December 2020, the Secretary of State issued the Mayor with directions under Section 337 of the Greater London Authority Act 1999.

22 On 21 December 2020 the Mayor submitted to the Secretary of State his Publication London Plan with amendments designed to address these directions. This is the most up to date version of the Mayor's London Plan and should be taken into account as a material consideration on the basis described in the NPPF.

23 On 29 January 2021, the Secretary of State confirmed that he had no further matters to raise and that the Publication London Plan (December 2020) conformed with the previous Directions. The Secretary of State ordered the London Plan to be published. The Mayor will now move to publish his London Plan.

24 The relevant issues and corresponding policies are, as follows:

- Estate regeneration London Plan; the Mayor's Publication London Plan; the Mayor's Good Practice Guide to Estate Regeneration (2018);
- Equalities London Plan; Mayor's Publication London Plan; Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG.
- Housing and affordable housing London Plan; Mayor's Publication London Plan; Affordable Housing and Viability SPG; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- Urban design and heritage London Plan; Mayor's Publication London Plan; Shaping Neighbourhoods: Character and Context SPG;
- Strategic views London Plan; Mayor's Publication London Plan; London View Management Framework SPG.
- Inclusive design London Plan; Mayor's Publication London Plan; Accessible London: Achieving an Inclusive Environment SPG;
- Sustainable development London Plan; Mayor's Publication London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;
- Air quality London Plan; Mayor's Publication London Plan; Control of dust and emissions during construction SPG.
- Transport London Plan; Mayor's Publication London Plan; Mayor's Transport Strategy.

Principle of estate regeneration

25 As the development proposes the demolition of existing affordable housing, the proposal is subject to strategic policies and planning guidance relating to the replacement of existing housing and estate regeneration, which are set out within London Plan Policy 3.14, Policy H8 of the Mayor's Publication London Plan. Further guidance is also provided in the Mayor's Affordable Housing and Viability SPG and the Mayor's Good Practice Guide to Estate Regeneration (GPGER).

26 London Plan Policy 3.14 states that the loss of existing housing, including affordable housing, should be resisted unless it is replaced at existing and higher

densities with at least equivalent floorspace. Policy H8 of the Mayor's Publication London Plan seeks to resist the demolition of affordable housing unless it is replaced by an equivalent amount of affordable housing floorspace. The policy also seeks that replacement affordable housing is integrated into the development to ensure mixed and inclusive communities.

27 As set out in the Mayor's Publication London Plan, all estate regeneration schemes should take into account and reflect the following key principles set out in the GPGER which apply to all estate regeneration schemes in London:

- like for like replacement of existing affordable housing floorspace;
- an increase in affordable housing;
- full rights of return for any social housing tenants;
- fair deal for leaseholders/freeholders; and
- full and transparent consultation and involvement.

28 There are 832 existing residential units located within the site. The tenure and typology of these units is detailed in the Table 5, below:

Table 5 – Existing housing

	HAB ROOMS	SQM	SOCIAL RENT HOMES			LEASEHOLD HOMES			FREEHOLD HOMES			TOTAL HOMES
			No	Hab	Sqm	No	Hab	Sqm	No	Hab	Sqm	
1 BEDROOM 2 PERSON FLAT	2	48	255	510	12240	10	20	480	0	0	0	265
2 BEDROOM 4 PERSON FLAT	4	62	145	580	8990	10	40	620	0	0	0	155
2 BEDROOM 4 PERSON MAISONETTE	4	75	89	356	6675	18	72	1350	1	4	75	108
3 BEDROOM 5 PERSON FLAT	5	105.3	1	5	105.3	0	0	0	0	0	0	1
3 BEDROOM 5 PERSON MAISONETTE	5	86	34	170	2924	15	75	1290	0	0	0	49
3 BEDROOM 6 PERSON MAISONETTE	5	109.6	1	5	109.6	0	0	0	0	0	0	1
3 BEDROOM 5 PERSON DUPLEX	5	86	68	340	5848	33	165	2838	0	0	0	101
1 BEDROOM 2 PERSON BUNGALOW	3	50	5	15	250	0	0	0	0	0	0	5
2 BEDROOM 4 PERSON HOUSES	4	80	36	144	2880	4	16	320	13	52	1040	53
3 BEDROOM 5 PERSON HOUSES	5	86	30	150	2580	0	0	0	52	260	4472	82
3 BEDROOM 6 PERSON HOUSES	5	112.9	7	35	790.3	0	0	0	0	0	0	7
4 BEDROOM 6 PERSON HOUSES	6	106	0	0	0	0	0	0	1	6	106	1
4 BEDROOM 7 PERSON HOUSES	6	131.5	3	18	394.5	0	0	0	0	0	0	3
5 BEDROOM 9 PERSON HOUSES	7	139.8	1	7	139.8	0	0	0	0	0	0	1
TOTAL			675	2,335	4,3926.5	90	388	6,898	67	322	5,693	832

Like-for-like replacement

29 As set out above, the loss of existing affordable housing should be resisted unless it is replaced by an equivalent amount of affordable housing floorspace (with no overall net loss). Policy H8 of the Mayor's Publication London Plan confirms that replacement affordable housing must be provided at social rent levels, where it is being provided to facilitate a right of return for existing social rent tenants. The requirement for like-for-like replacement affordable housing floorspace applies to the 675 social rent units located on the existing site.

30 The applicant has provided details of the existing affordable housing floorspace on site to enable assessment in terms of required re-provision. This assessment is set out below in Tables 6 - 8 and demonstrates that there would be a net increase in terms of rented accommodation by all metrics, with an increase in social rented floorspace, which is the key criteria applied by Policy 3.14 and H8. The

quality of the accommodation proposed would also be enhanced. Further discussion on the affordable housing offer is set out in subsequent sections of this report.

Table 6 – Existing affordable housing

	Units	Habitable rooms	Floorspace (GIA)
Social Rent	675	2,335	43,927 sq.m.

Table 7 – Proposed affordable housing

	Units	Habitable rooms	Floorspace (GIA)
Social Rent	767 units	2,350	67,240 sq.m.

Table 8 – Net change in affordable housing by tenure

	Units	Habitable rooms	Floorspace (GIA)
Social Rent	+92	+15	+23,313 sq.m.

Right to return

31 The GPGER seeks to ensure that social tenants have a full right to return to a property on the regenerated estate of a suitable size, taking into account levels of overcrowding or under-occupancy within each household, and at the same or similar rent level, with the same security of tenure.

32 The application states social tenants and resident homeowners will have the right to one of the new homes on the Cambridge Road Estate. This is strongly supported by GLA Officers.

33 The planning statement sets out that the demolition of the existing buildings and site preparation will be carried out on a phase-by-phase basis as the decant allows, in order to ensure that existing residents can be located into new blocks seamlessly as far as possible and that this reflects the Applicant’s “one move” intention for existing residents ensuring that inconvenience and potential upheaval is minimal. The rehousing statement goes onto clarify that data from the Council indicates a total of 1,642 residents in 710 households will require rehousing as a result of the regeneration process, and that this will take place in 5 phases over a period of 10-15 years. As above, social tenants and resident homeowners will have the right to one of the new homes on the Cambridge Road Estate and social tenants will also have the option to move to a Council property elsewhere in the borough of Kingston if this is their preference. The application sets out that the number of households who will need re-housing varies by phase, and that while most residents will be able to move straight into their new properties and should only need to move once, the application also recognised that some households in phase 1 who wish to remain on Cambridge Road Estate will need to move into temporary accommodation while their new home is built, and that the Council will provide this for social tenants and for resident homeowners who wish to purchase one of the new homes.

34 The application sets out that 149 of the existing units within the estate are currently being occupied by households in need of temporary accommodation to support the Council wider housing obligations and ensure that the area remains

occupied, and that residents who have been placed in temporary accommodation on Cambridge Road Estate will be offered alternative accommodation when vacant possession of their home is required.

Fair deal for leaseholders

35 The Mayor's GPGER sets out the principle that leaseholders affected by estate regeneration are treated fairly and fully compensated, in accordance with statutory duties.

36 As detailed in Table 3 of this report, above, GLA Officers understand that there are 90 leaseholders and 67 freeholders who will be impacted by the proposed development. The application states that all resident Leaseholders/Freeholders will have an opportunity to purchase a new property within the redevelopment. Specifically, the Council is offering resident homeowners the opportunity to purchase a new property on the regenerated estate on a shared equity basis if required. The phasing plan means that all the secure tenants and resident homeowners (with the exception of phase 1) that wish to, should be able to move once into a new home either on one of the rehousing sites within the wider Kingston area or within the new affordable homes constructed.

Full and transparent consultation

37 The Mayor's Publication London Plan and GPGER sets out the Mayor's aspirations for full and transparent consultation and meaningful ongoing involvement with estate residents throughout the regeneration process to ensure resident support.

38 From 18 July 2018, the Mayor requires any landlord seeking GLA funding for estate regeneration projects which involve the demolition of existing affordable or leasehold homes to demonstrate that they have secured resident support for their proposals through a ballot, subject to certain specified exemptions and transitional arrangements.

39 In this instance, GLA Officers understand that Housing Zone Grant and Building Council Homes Grant has been obtained to be used in funding the scheme. A residents' ballot held in March 2020 resulted in 86 percent attendance (from 820 eligible voters) and 73 percent support for the proposal.

40 GLA officers consider that the engagement approach followed (as set out in application, including the Statement of Community Involvement) accords with the key principles set out in the GPGER. While considerations around ballots and funding conditions are not planning issues, the Mayor encourages landlords to use ballots as widely as possible in line with his Good Practice Guide.

Consideration of alternative options

41 Policy H8 states that before considering demolition of existing estates, alternative options should first be considered and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts.

42 GLA Officers understand that many of the existing residential buildings at the estate are poor in terms building quality and energy efficiency, ventilation, noise transfer, and present several design and legibility challenges. Additionally, it has been presented that it was advised that it would be uneconomic to refurbish to a satisfactory standard and that the estate in its current form presents challenges in terms of access and permeability. As such, the premise of the resident-led development is supported in principle.

Conclusion – estate regeneration

43 Overall, the proposed development would ensure a net increase in existing affordable housing floorspace and would accord with the requirements and key principles for estate regeneration as set out in London Plan Policy 3.14, Policy H8 of the Mayor's Publication London Plan and the associated guidance in the Mayor's Affordable Housing and Viability SPG and the Mayor's GPGER.

Equalities

44 London Plan Policy 3.1 and Policy GG1 of the Mayor's Publication London Plan highlight the diverse nature of London's population and underscore the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities. More generally, the 2010 Equality Act places a duty on public bodies, including the GLA, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

45 An equalities statement (EQIA) has been submitted with the application. The EQIA identifies the site as within an area exhibiting high levels of deprivation, as well as low levels of public health which is affecting the quality of life of the existing residents and states that without intervention, the quality of life of the current residents and the associated current issues will continue to deteriorate. The EQIA concludes that there are no negative impacts associated with the Development in terms of equalities, and that the EQIA has not identified any potential for discrimination or adverse impact, and also all opportunities to promote equality are being taken forward. While the submitted EQIA assessment provides a useful overview of the proposals and planning benefits, and a generalised assessment of equalities, it is not clear how the conclusion has been reached that the proposal will have no negative impact on protected groups, as the potential impacts on each protected group has not been outlined. This should be clarified in a revised assessment. Given the proposed redevelopment of the residential estate and other social infrastructure, including the demolition of homes and requirement to move homes, as well the proposed 10-15 year decant, demolition and construction period, which may have a disproportionate impact on, inter alia, elderly people, young people and those with disabilities, consideration should be given to

whether any specific mitigation should be secured as part of any permission to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

Land use principle

Housing

46 London Plan Policy 3.3, in seeking to increase the supply of housing in London, sets borough housing targets and in Table 3.1 puts the minimum annual monitoring target for the Borough of Kingston Upon Thames at 6,434 additional homes between 2015 and 2025. The Mayor’s Publication London Plan sets a ten-year target of 9,640 for the period 2019/2020 to 2028/2029. This proposed scheme would deliver 2,170 new residential units (an uplift of 1,338 residential units – 1,146 market, 92 social rent units and 100 shared equity units) which would contribute positively to the above housing targets. Accordingly, the principle of residential development on the site is supported. Affordable housing is discussed in further detail in the subsequent section of this report.

47 As detailed above, there is existing affordable housing on the site, which the applicant has detailed will be reprovided in accordance with Policy H8(A) and H8(D) of the Mayor’s Publication London Plan.

Non-residential land uses

48 The site is located within Kingston Opportunity Area. This Opportunity Area, as designated within the Mayor’s Publication London Plan, has an indicative employment capacity for 5,000 new jobs. Spatially, both London Plan Policy 2.15 and the Mayor’s Publication London Plan Policy SD6 adopt a town-centre first approach, which recognises that town centres, should be the foci for commercial development beyond the CAZ, and Policy SD7 of the Mayor’s Publication London Plan discourages out-of-centre development of main town centre uses. The application site sits outside of the Kingston Town Centre.

49 The site as existing includes a variety of non-residential land uses, as detailed in Table 9, below:

Table 9: Existing non-residential uses

Use	Floorspace (GIA)
Bull and Bush Hotel	824sqm
Piper Community Hall	390sqm
Tadlow House (Housing Management)	654sqm
CRERA Office	42sqm
CREST Office	38sqm
Surbiton Rifle Club	Unknown.
Total	1,948sqm

50 The proposals include up to 2,935 sq.m. of non-residential floorspace including 290 sq.m. of office floorspace (Use Class E), 1,395 sqm retail/commercial floorspace (Use Class E/Sui Generis); and 1,250 sqm community floorspace (Use Class F2). Of this, the detailed phase of the development will deliver 1,250sq.m. community floorspace (Use Class F2), 290sq.m. of flexible office floorspace (Use Class E), 395sqm of flexible retail/ commercial floorspace (Use Class E/ Sui Generis). The remainder of the space will be delivered in outline phases. The planning statement states that it is envisaged that the non-residential floorspace is located primarily within Block C, G and K at ground floor level facing onto Cambridge Road or concentrated around the Madingley Gardens open space.

51 GLA Officers understand that the Bull and Bush closed as an operational public house in 2009, when it begun sole operations as a hotel. GLA Officers raise no strategic concern in respect of the loss of the existing hotel however in line with Policy HC7 of the Mayor's Publication London Plan, it should be confirmed the public house is not of heritage, cultural, economic or social value.

Retail and office land uses

52 Given the relatively small scale of the retail and office land uses proposed, and noting the re-provision of existing office floor space, GLA Officers consider that the proposed commercial uses are compatible with the nearby existing and proposed residential uses, as well as compatible with the nearby town centre, and also provide for services, facilities and employment opportunities on the site for the development's existing and new residents. GLA officers support the provision of a genuine mix of non-residential land uses to support the development, including community, retail and office land uses. In line with London Plan Policy 4.9 and Policy E9 of the Intend to Publish London Plan, GLA Officers would further support a commitment to the provision of shops for small or independent retailers and a proportion of affordable retail space to strengthen and promote the retail offer.

Community and sporting land uses

53 London Plan Policy 3.16 and Policy S1 of the Mayor's Publication London Plan guide assessment in respect of the loss of any community facility, as well the provision of new community facilities within the redevelopment of the estate.

54 London Plan Policy 3.19 states that proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted and Policy S5 of the Mayor's Publication London Plan identifies that existing sports and recreational land facilities should be retained unless an assessment shows the land or facilities are surplus to requirements at the local and sub-regional level, or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. Policy S4 of the Mayor's Intend to Publish London Plan states that development proposals for schemes that are likely to be used by children and young

people should not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

55 While the proposals result in the loss of the existing Piper Hall, the proposals include the re-provision of community land use, through the provision of 1,250sq.m of community floorspace within the detailed (first) phase. The application details that a temporary facility on or adjacent to the Estate will be provided for the period between demolition of Piper Hall and the completion of the new community centre to allow service providers the opportunity to continue to operate with minimum disruption. This proposal is strongly supported by GLA Officers in accordance with the Mayor's GPGER principles and should be secured within a S106 agreement.

56 Clarification is required in relation to the loss of the Surbiton Rifle Club in order to understand the nature of the existing facilities located within the estate (firstly to understand if these are sporting facilities, or another type of facility), if there is an identified need for re-provision and whether there is an opportunity for them to be relocated within the application site, or elsewhere within the Borough.

57 While the proposals result in the loss of an existing basketball court, a Multi Use Games court (MUGA) is proposed within Madingley Gardens, as part of Phase 2 of the redevelopment once the existing Madingley Tower is demolished. Confirmation of the size of the existing and proposed facilities should be provided.

58 Appropriate conditions in relation to the phasing and continued provision of any existing community facilities should be secured through any approval. The Council should also secure the maintenance and management strategies for the proposed community and sporting facilities within a S106 agreement, with full details (including access and costs to residents, local community groups and charities (as identified as users of the existing Piper Hall facility) which should not be prohibitive) secured within these strategies.

Housing

Affordable housing

59 London Plan Policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing in all schemes. London Plan Policies 3.11 and 3.12, Policy H4 of the Mayor's Publication London Plan, as well as the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing in all new developments.

60 The Mayor's Affordable Housing and Viability SPG and Policy H8 of the Mayor's Publication London Plan set out that all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.

61 A Financial Viability Appraisal (FVA) has been submitted as part of the application, which is currently being scrutinised by the Council and GLA officers to ensure the scheme provides the maximum viable amount of affordable housing. In accordance with the Mayor's Affordable Housing and Viability SPG, the Council is

required to publish the financial viability assessment (including any reviews) to ensure transparency of information.

Viability review mechanisms

62 As with all schemes which follow the ‘Viability Tested Route’, it will be expected that the Section 106 agreement will contain both early implementation and late stage viability reviews, in accordance with Policy H6 of the Mayor’s Publication London Plan. Given the size and long-term phasing of the scheme, mid-term review mechanisms are also required to be secured. Early, mid and late-stage review mechanisms should ensure that any additional affordable housing is provided on-site where sufficient surplus profit is generated, in line with the Mayor’s Affordable Housing and Viability SPG.

Tenure

63 Policy H6 of the Mayor’s Publication London Plan and the Mayor’s Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the borough as low cost rented homes or intermediate based on identified need. There is a presumption that the 40% to be decided by the borough will focus on low cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. In this case, locally, Kingston Core Strategy seek the maximum provision of affordable housing, with a strategic target of 50%, subject to viability testing with a 70:30 split in favour of social/affordable rented housing.

64 Table 10, below, details the housing proposals by unit, habitable room and floorspace, and also demonstrates uplift between the existing estate and proposed development.

Table 10: Housing proposals by unit, habitable room and floorspace (sq.m.)

Tenure		Units	Habitable Rooms	Sqm (GIA)
Social Rent	Existing	675	2,335	43,927
	Proposed	767	2,350	67,240
	Uplift	92	+15	23,313
Shared Equity	Existing	0	0	0
	Proposed	100	365	10,551
	Uplift	100	+365	10,551
Private (incl. existing leaseholders)	Existing	157	710	12,591
	Proposed	1303	3,762	108,420
	Uplift	1146	+3,052	95,829
TOTAL	Existing	832	3,045	56,518
	Proposed	2170	6,477	186,211
	Uplift	1338	+3,432	+129,693

65 The scheme proposes 2,170 residential units of which (including re-provision) 36% is proposed as affordable housing, by habitable room (35% by unit). As the shared equity units are not a formally recognised affordable housing product, the proposals represent 100% social rented accommodation. Noting that 675 social rented homes

(2,335 habitable rooms, 43,927 sq.m. of floorspace) must be reprovided in accordance with Policy H8 of the Mayor's Publication London Plan, the provision of affordable housing represents 0.4% of the uplift of residential accommodation by habitable room (7% by unit, 18% by floorspace).

66 As set out above, as the proposed shared equity units are not a formally recognised affordable housing product, the scheme proposes 100% social rented accommodation. While this does not comply with the tenure expectations set out in Policy H6 of the Mayor's Publication London Plan nor the Council's Local Plan tenure mix requirements, the scheme sees the total re-provision of the existing social rent housing. As such, the proposed tenure mix may be acceptable subject to the verification of the viability and affordable housing position and subject to confirmation from the Council that the proposed tenure split meets identified need.

Housing affordability

67 The Mayor is committed to the delivery of genuinely affordable housing and Policy H6 of the Mayor's Publication London Plan, the Mayor's Affordable Housing and Viability SPG and the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products.

68 All affordable housing must be robustly secured in perpetuity, within a Section 106 agreement. A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the Affordable Housing and Viability SPG.

Phasing

69 The detailed element of the scheme (namely, Plots B, C and E) will be delivered within Phase 1, and this comprises the delivery of 150 social rented homes, (comprising 40% affordable homes) and 30 shared equity units. The future reserved matters application will not be referred to the Mayor of London and the phased delivery of the scheme has implications in respect the assessment of a number of elements of the development and compliance with the London Plan and the Mayor's Publication London Plan, including affordable housing. The delivery of affordable housing should be secured throughout the delivery of the development.

Housing mix

70 London Plan Policies 3.8 and 3.11, as well as Policy H10 of the Mayor's Publication London Plan, encourage a choice of housing based on local needs with regard given to robust local evidence of need, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types at different price points across London.

71 The scheme proposes 2,170 residential units with a range of typologies, as detailed in the Table 5, above. The housing mix comprises a range of unit sizes including 1-beds, 2-beds, 3-beds, 4-beds, 5-beds and a 6-bed unit, in a range of typologies including flats, maisonettes and houses which is supported in principle.

72 The planning statement sets out that the unit mix will be reviewed on a phase by phase basis to take account of decant needs/local housing needs, market

changes, demographic changes and other variables such as unforeseen demand and conversely, lack of demand for specific unit type, and that there will be ongoing opportunities to engage with residents in the future and respond to changes as reserved matters applications will enable for each phase come forward. Subject to the Council confirming the proposed mix meets local need of the Borough as well as meeting the needs of existing residents returning to the site, GLA officers are supportive of the housing mix from a strategic perspective. The housing mix should be secured via suitable conditions and/or obligations.

Urban design

73 The design principles in chapter seven of the London Plan and chapter 3 of the Mayor's Publication London Plan expect all developments to achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality.

74 London Plan Policy 3.4 and Policy D3 of the Mayor's Publication London Plan seek to optimise the potential of sites. As per Policy D3 of the Mayor's Publication London Plan, a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth.

75 The proposals have been developed through engagement with residents and the scheme has been presented at three independent design review panel sessions, as well as to GLA and Kingston upon Thames planning officers.

76 The overall layout and massing principles underpinning the master plan are rational and are broadly supported. The design team have considered how the proposed block layout will align and connect with the surrounding street pattern to create legible pedestrian and cycle routes across the site, which is supported.

77 The distribution of proposed public realm and variety of open spaces contributes to the legibility of the masterplan, forming a welcome sequence of character areas. The majority of the masterplan is defined by perimeter blocks, providing good definition between public and private realm.

78 The proposal meets the definition of a tall building as set out Policy D9 of the Publication London Plan, which also makes clear that tall buildings should only be developed in locations identified in local plans as being suitable for such buildings. The Cambridge Road Estate Strategic Development Brief (July 2017) ("The Brief") contains a map which identifies areas within Cambridge Estate that are areas sensitive to height and areas with potential for height. The Brief goes on to state that "*the principle of taller buildings in this area may be supported, particularly if part of a new centre for the Estate, even if the existing tall buildings are demolished. All redevelopment must be subject to good urban design principles, density assessments, daylight and sunlight studies, Right of Light implications and wind impact studies. Tall buildings should incorporate green or brown roofs where possible*".

79 While GLA Officers recognise that the map within The Brief only specifically recognises the part of the site closest to Cambridge Road as having potential for tall buildings, GLA Officers note that the supporting text to this map states that "*while the building heights diagram highlights that the area to the north as most appropriate for*

height, given the buffer of Cambridge Road, designs should not only position height here”.

80 On the basis of the above, GLA Officers note that the application site is identified as potentially suitable for tall buildings by the Council, in accordance with part B of Policy D9. All tall buildings are also subject to the criteria set out in Part C of Policy D9, i.e. high standards of architecture and urban design.

81 On the basis of the information submitted within the Design and Access Statements, the detailed analysis shown within the Town and Visual Impact Assessment, and the quality of the proposal as shown within the detailed component of the scheme and within the design code, and noting the design-led process that the applicant has undertaken in the development of the scheme, GLA Officers consider that the proposed tall buildings are capable of meeting the design and impact criteria set out in Policy D9. To help with way-finding and to achieve a varied townscape, a varied sequence of building heights along the length of the main ‘avenue’ is supported. The Council should ensure that all the criteria set out in Publication London Plan Policy D9 have been achieved, including through scrutiny of the daylight, sunlight and wind chapters included within the environmental statement in order to ensure satisfactory levels of daylight, sunlight and wind are provided to all residential units, private and communal amenity spaces, as well as public spaces

82 The orientation of the site gives potential to deliver high residential quality, with predominantly east-west aspects. While there are still a relatively high number of single aspect units proposed within the scheme, the indicative floorplans provided in the design code and DAS indicate that the units would be of a high quality with good access to daylight and sunlight, and on balance the proportion of single aspect units is accepted. A minimum provision of dual aspect units in the outline proposal should be secured as part of any permission.

83 The use of simple architecture and colour tones is supported. The success of the architectural approach will be dependent on the use of the highest quality materials. As such, the materials and detailing should be secured by condition.

84 Generally, the design code contains sufficient information to secure design quality post-planning. The detailed phases of the scheme should be used as a benchmark of design quality for the outline element.

85 The application sets out that future phasing will consider the use of temporary landscapes to hide construction hoarding as and when required, and that public spaces within the phase will be built in progression with the completion of each building rather than all the landscape spaces left at the end of each parcel. This is supported by GLA and should be suitably secured by the Council.

Townscape

86 The scheme does not impact upon strategic views protected within the London View Management Framework (LVMF) by Policies 7.11 of the London Plan and HC3 of the Mayor’s Publication London Plan. The Council should assess the impact of the scheme upon local views, as protected by Policy HC3 of The Mayor’s Publication London Plan.

Residential quality

87 London Plan Policy 3.5 and Policy D6 of the Mayor's Publication London Plan promote quality in new housing provision, with further guidance provided by the Housing SPG.

88 The planning statement states that all units have been designed to meet or exceed the housing design standards within the Mayor of London's Draft Good Quality Homes for All Londoners SPG (October 2020).

Play space

89 London Plan Policy 3.6 and Policy S4 of the Mayor's Publication London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child.

90 The application sets out that the proposal generates an estimated yield of 978 children requiring 9.774 sq.m. of play space to achieve policy requirements. The application sets out that an indicative proposed play space provision across the masterplan as set in Table 11:

Table 11: Play space provision across the proposed masterplan

Phase	1	2	3	4	5	Total
Block	B, C, E	A, D, P	G,K	H,M,Q	F,J,L,N	All Blocks
Sq.m.	2,289	1,626	2,333	1,450	2,078	9776

91 Phase 1 includes 2,289sqm of play space. GLA Officers support the provision of play space for Phase 1 in accordance with the Shaping Neighbourhoods: Play and Informal Recreation SPG. The Council should secure the early implantation of this play space within the phase. The provision of play space within the subsequent phases should also be secured early in delivery programme of each phase.

92 Policy S4 of the Mayor's Publication London Plan requires that proposals are not segregated by tenure. The proposed play space is provided within a variety of spaces including a MUGA, and within residents' courtyard. The proposed on-site MUGA appears to be available for use by all residents regardless of tenure. This must be confirmed and secured within any planning permission. Noting there may be some segregation in the play spaces proposed within the residents' courtyards through the restriction of access to residents of each respective block, the Council should ensure that all play spaces provided at podium levels are "tenure blind" in terms of both quantum of play space and quality of playable features.

93 The MUGA is also proposed to be used for uses beyond play space (for example, the application sets out it may be used to provide a level hard surface close to the community centre which can host stalls for community fair, local craft or bric-a-brac sales, weekend farmer's market etc), a suitable management plan should be secured to ensure suitable management and access is provided, and to ensure that residents have free-of-charge access to this facility, and alternative arrangements for play if necessary.

94 The provision of on-site high quality, safe, playable features for children, as well as safety measures and shaded spaces, should be secured by the Council via condition or S106 obligation. There should also be clear separation of any car parking and road networks from play spaces to avoid user conflicts within this space, with suitable safety features secured via condition.

Fire safety

95 In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the Mayor's Publication London Plan seeks to ensure that development proposals achieve the highest standards of fire safety.

96 A fire strategy report produced by H+H Fire, a third-party organisation, that relates to Phase 1 (Buildings B, C and E) has been submitted with the planning application. The fire statement should be amended to confirm that the author is suitably qualified and evidence of competency of the author of the Fire Statement should be detailed in a clearly identified section at the beginning of the Fire Statement. In accordance with Policy D12(B6) the statement should also be amended to address how potential future modifications to the building will take into account and not comprise the base build fire safety and protection measures. Furthermore, a handover process for the passing of all relevant fire safety information contained within the fire strategy to future building owners should be planned and outlined within the Fire Statement.

97 The local planning authority should secure policy compliance with the amended fire statement through the imposition of a condition attached to the grant of planning permission. The report is titled "initial assessment report", and the report further states that "*The strategy should be seen as a live document that may evolve during further discussions within the design team and with the approving authorities*". It should be therefore be noted that if there are any changes to the scheme which require subsequent Section 96a or Section 73 applications following the grant of any planning permission, an amended Fire Statement should also be submitted which incorporates the proposed scheme amendments so that the content of the Fire Statement always remains consistent with the latest scheme proposals.

98 The application is a hybrid application, with many phases proposed in outline form only. As such, the application should also be accompanied by an outline fire statement which demonstrates commitment to the highest standards of fire safety and addresses Policy D12(B1-6) of the Mayor's Publication London Plan in suitable sections. These required details include construction methods and materials, means of escape for all building users, fire safety features which reduce the risk to life, access for fire service personnel and equipment, access within the site for fire appliances and how potential future modifications to the building will take into account and not comprise the base build fire safety and protection measures. Any associated outline planning permission should also include a condition which requires the submission of a detailed Fire Statement as part of any subsequent reserved matters application. Furthermore, in accordance with Policy D5(b) of the Mayor's Publication London Plan, the outline fire strategy should confirm that at a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building; this should also be secured.

Heritage

99 London Plan Policy 7.8. and Policy HC1 of the Mayor's Publication London Plan state that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

100 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

101 Whilst the site does not contain any designated heritage assets nor is the site located within a conservation area, there are statutorily listed buildings and structures and conservation areas in proximity to the site.

102 The planning application has been supported by an archaeology and heritage assessment. The submitted Townscape (TVIA) also includes reference to a number of designated heritage assets. The archaeology and heritage assessment states: *"the majority of the nationally and locally listed buildings in the study area are at a considerable distance from the PDA on the edge of the town centre along London Road, and along the other main approach roads. The significance of these assets derives from the historic and architectural value of the fabric and any group value. They have no historic or functional connection to the site and are physically and visually separated from it, so the site does not currently form part of the setting of any of these assets"*.

103 The report goes on to conclude that the likely effects (within the detailed proposed) to be neutral and no harm will arise to locally or nationally designated heritage assets. However, noting that the conclusion of the report is made in respect of the detailed proposals, it is unclear whether the impact of the outline proposals have been suitably assessed. As such, clarification in this respect is therefore required and an overall heritage assessment which considers the outline component is required. In the absence of evidence to demonstrate the impact on these designated heritage assets, GLA Officers are unable to arrive at a conclusive position in respect of heritage impact arising from the outline proposals and consider that a heritage impact assessment that arises at a conclusion in respect of both the detailed and outline schemes should be provided with this application.

104 In respect of the grade II listed mortuary chapels located to the south of the site, it is also noted that the submitted heritage statement states that *"while there*

would be significant visual change it is considered that the potential change to the setting of these designated heritage assets (grade II listed buildings) will at worst result in a neutral effect when considered in combination with the improvements in the design of the proposed development". The submitted townscape assessment whilst assessing impact of the proposals on a number of views also demonstrates impact on some nearby heritage assets. On the basis of View #19, GLA Officers consider that some harm will arise to the setting on the Grade II listed Mortuary Chapels, as the proposed development will extend beyond the roofline of the listed building, and will result in an impact on the setting of the chapel's spire. It is unclear from the view provided if this harm will arise from the detailed or the outline scheme; this clarification should be provided.

105 Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservations Areas) Act 1990, and NPPF requirements in relation to listed buildings, structures and conservation areas, GLA Officers consider that on the basis of the submission that harm will arise to the setting of the designated Mortuary Chapel however GLA officers are unable to formally conclude the overall level of harm that will arise to other nearby designated heritage assets through the delivery of the proposed outline scheme, and require a revised heritage impact assessment that concludes in respect of the wider master planned proposals. The revised heritage impact assessment should also be provided to enable officers to assess the proposal against the London Plan Policy 7.8. and Policy HC1 of the Mayor's Publication London Plan.

106 It is noted that the above-mentioned archaeology and heritage assessment includes a number of recommendations in respect impact on archaeology. This should be considered by the Council.

Inclusive design

107 London Plan Policy 7.2 and Policy D5 of the Mayor's Publication London Plan require that all new development achieves the highest standard of accessible and inclusive design and can be used safely, easily and with dignity by all. London Plan Policy 3.8 'Housing Choice' and Policy D7 of the Mayor's Publication London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

108 The application sets out that 10% of all dwellings across the masterplan will meet with M4(3) standards, and all other dwellings will meet with M4(2) standards, and that across the masterplan, a mix of lateral dwelling types and sizes (bed spaces) will be configured as M4(3), reflecting 10% by tenure. This is supported by GLA Officers as it provides older and disabled people similar choices to non-disabled people. The Council should secure the policy compliant quantum of accessible dwellings by condition as well as the provision of these wheelchair units across a variety of typologies, tenures and locations across the masterplan and within individual buildings.

109 For the first phase, the application states that the LPA's Housing Needs Assessment has determined specific resident requirements for wheelchair

accessibility which has influenced the specific provision in plots B,C and E. Specifically, the proposals set out that an increased number of Social Rent M4(3) homes were included at the ground floor to respond to resident needs and feedback during consultation. The locations of M4(3) wheelchair user homes have been distributed across various levels and settings including ground floor and podium, providing choice for residents which is supported by GLA Officers. The DAS sets out that potential locations for mobility scooter storage and charging accessed from the shared lobbies have been considered for future consultation to address needs of less able residents not qualifying for a M4(3) home; this should be secured by the Council.

110 As further detailed in the Fire Safety section of this report, a minimum of at least one lift per core (or more subject to capacity assessments) must be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building, in accordance with Policy D5 of the Mayor's Publication London Plan; this should be secured by the Council.

Environment

Energy

111 The energy strategy is supported and condition wording has been suggested for the proposed connection to the emerging Royal Borough of Kingston Upon Thames District Energy Network (RBKUT DEN). To ensure compliance with policies of the London Plan and the Mayor's Publication London Plan, further supporting detailed is required in respect of a number of elements of the energy strategy. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.

Air quality

112 The development is broadly compliant with policies set out in the London Plan and the Mayor's Publication London Plan, although further technical clarifications are required as set out in detailed comments circulated to the Council which should be addressed in entirety.

113 The comments recommend a number of conditions to secure compliance with the London Plan and the Mayor's Publication London Plan, and the Construction and Demolition SPG. These conditions include securing compliance with the Non-Road Mobile Machinery (NRMM) Low Emission Zone for London, compliance with measures to control emissions during construction and demolition and the submission of an air quality neutral assessment and air quality assessment with each detailed planning application and the energy plant. Furthermore, the energy plant installed as part of the site-wide heat network should conform to the emissions parameters used in the dispersion modelling and this should be secured.

Flood risk

114 The site is in Flood Zone 1 and is greater than 1 hectare in area. A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA adequately assesses the risk of flooding from tidal/fluvial, pluvial, sewer, groundwater, and artificial sources, which are considered

to be low. The proposed site levels should be designed in such a way as not to increase the risk of overland surface water flows off site, and this should be secured by an appropriately worded condition. The approach to flood risk management for the proposed development generally complies with London Plan Policy 5.12 and Policy SI.12 of the Mayor's Publication London Plan.

Sustainable drainage

115 The surface water drainage strategy for the proposed development does not comply with Policy SI.13 of the Mayor's Publication London Plan and London Plan Policy 5.13, as the drainage strategy is not sufficiently developed and does not give appropriate regard to the inclusion of sustainable, green, and above ground SuDS strategy. Further information is required in respect of a number of elements of the drainage strategy. Detailed technical comments in respect of sustainable drainage have been circulated to the Council under a separate cover to be addressed in their entirety.

Water efficiency

116 The sustainability statement proposes that the proposed dwellings will have a maximum indoor water consumption of 105 l/person/day, in line with the optional standard in Part G of the Building Regulations, and compliant with policy 5.15 of the London Plan (and Policy SI.5 of the Mayor's Publication London Plan. Water efficiency calculations have been provided.

117 The BREEAM pre-assessment targets zero Wat 01 credits. The new Publication London Plan policy SI.5 requires that a minimum BREEAM rating of 'Excellent' is achieved for Wat 01, which requires at least a 12.5% improvement over baseline performance standard for non-residential water consumption.

118 The sustainability statement states that a leak detection system and a water meter will be installed, in line with Policy SI.5 of the Mayor's Publication London Plan.

119 The proposed development does not meet the requirements of London Plan Policy 5.15 and Policy SI.5 of the Mayor's Publication London Plan as a BREEAM rating of 'Excellent' should be achieved for Wat 01 relating to non-residential water consumption.

Biodiversity

120 The site is adjacent to Kingston Cemetery which is a Site of Importance for Nature Conservation (Local), which joins with the Hogsmill Valley Sewage Works and Hogsmill River SINIC (Borough Grade 1). The site is therefore located in an important location within the local green infrastructure network and affords the opportunity to extend the green corridor further north. To that end, the specification of vegetation, both at ground and roof level, should complement the composition and needs of the adjacent ecological assets.

121 The Ecological Assessment states that a Construction Environment Management Plan should be produced to detail mitigation relating to construction

phase impacts upon Kingston Cemetery SINC, however no specific mitigation appears to have been included. This should be clarified prior to Stage 2.

122 Phase 1 of the proposed development has been calculated to deliver a 77.77% biodiversity net gain, as set out in the Biodiversity Net Gain Assessment. The masterplan was found to deliver 96.26% net gain. This is strongly supported in accordance with Policy 7.19 of the London Plan and Policy G6 of the Mayor's Publication London Plan, and should be brought to fruition as the subsequent phases are considered at detailed design.

Green infrastructure and urban greening

123 The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan which is strongly supported and should be brought to fruition.

124 The Urban Greening Factor (UGF) of the proposed development is calculated as 0.4, which meets the target set by Policy G5 of the Mayor's Publication London Plan. Given the size of the site, the proposed development represents an opportunity for further greening and the UGF policy target should there be seen as a minimum standard. The delivery of green infrastructure on site should be maximised with the ambition of creating an exemplar scheme. Possible improvements could include diversifying the proposed amenity lawns to include wildflower meadow edges; considering the integration of opportunities for community food growing; further increasing the tree coverage across the scheme; and seeking to replace 'biodiverse roofs' with 'intensive green roofs'.

125 Given that this is a hybrid application, delivery of the UGF at reserved matters should be secured by condition for subsequent phases of the proposed development to secure compliance with Policies 2.18, 5.10 and 5.11 of the London Plan and Policies G1 and G5 of the Mayor's Publication London Plan.

Trees

126 The Arboricultural Assessment considers the effect of Phase 1 of the proposed development. There are 10 trees proposed for removal, none of which are Grade A trees. The number of new trees proposed outweighs the number of trees lost. The schemes accord with Policy 7.21 of the London Plan and Policy G7 of the Mayor's Publication London Plan.

Circular economy

127 The proposal has considered circular economy principles, as required by Policy SI 7 of the Mayor's Publication London Plan. Detailed technical comments in respect of circular economy have been circulated to the Council under a separate cover to be addressed in their entirety.

Transport

128 The applicant should consider the Streetspace for London plan, which sets out how to create more space on streets for walking, cycling and social distancing as the lockdown is lifted. This may be important before, during and after construction and as it is a changing situation, should be consulted regularly.

Healthy Streets and Vision Zero

129 The proposed development will see an increase in pedestrian and cycling trips to/from the site and the local area and provides opportunities to reduce car dominance and promote sustainable and active travel due to its car-lite nature. The development also includes on-site public realm improvements and active frontages. The Go Cycle scheme is proposing a fully segregated cycle route along the A2043 between Kingston Town Centre and New Malden.

130 The proposals include a new crossing, with a raised table outside Plots K1 and K2 and Cambridge Gardens. The raised table is proposed to be constructed with different materials in order to enhance the public realm and assist in reducing vehicle speeds. It also improves the healthy streets indicator 'easy to cross' and should be secured through S106 agreement.

Trip Generation

131 The trip generation assessment is acceptable.

Car Parking

132 The development is proposing a car lite scheme with a parking ratio of 0.4 spaces per dwelling, providing a total of 868 spaces which accords with the Mayor's Publication London Plan. The applicant is proposing to provide 3% of all spaces as blue badge (BB) parking bays, in line with standards set out in the Mayor's Publication London Plan. Car parking will be provided through a mix of on-street, parking courts, podium parking and basement parking. In accordance with the Mayor's Publication London Plan, 20% of all spaces will be active Electric Vehicle Charging Points (EVCP), and 80% of all spaces will have passive EVCP. In addition, residents will not be eligible for parking permits for the surrounding Controlled Parking Zones (CPZs) or for any future CPZs which should be secured through the S106 agreement. Car club membership will be secured for 3 years for all new residents.

Cycle parking

133 A total of 3914 long-stay and 112 short-stay cycle parking spaces are proposed which is in line with Policy T5 of the Mayor's Publication London Plan.

134 Cycle parking should be located in secure, sheltered and accessible locations, and should meet design standards set out in Chapter 8 of the London Cycle Design Standards (LCDS).

135 For the commercial units, the provision of lockers, changing rooms and shower facilities will help promote and encourage cycling.

Bus infrastructure

136 In order to accommodate a new vehicular access to the site, the applicant is proposing changes to bus stop locations. The proposed changes are not supported in its current form. Further discussions and engagement are required to identify an acceptable solution. Any costs associated with changes to bus infrastructure are required to be fully funded by the applicant.

137 A Travel Plan should be secured, enforced, monitored and reviewed by the applicant as part of the S106 agreement.

138 A Delivery and Servicing Plan and Construction Logistics Plan should be secured by condition and discharged in consultation with TfL.

Local planning authority's position

139 GLA Officers understand that Kingston Council planning officers have engaged in pre-application discussions with the applicant and are undertaking an assessment of the submitted planning application, including the financial viability appraisal.

Legal considerations

140 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

141 There are no financial considerations at this stage.

Conclusion

142 London Plan and the Mayor's Publication London Plan policies on estate regeneration, equalities, housing, affordable housing, urban design, play space, fire safety, heritage, townscape, inclusive design, energy, air quality, flood risk, sustainable drainage, water efficiency, biodiversity, green infrastructure and urban greening, circular economy and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan and the Mayor's Publication London Plan:

- **Principle of estate regeneration:** The proposals would re-provide all existing social rent units and secure an increase in like-for-like affordable housing floorspace, generally according with the Mayor's key principles for estate regeneration schemes.

- **Land use principle:** The principle of the estate regeneration and uplift to deliver additional housing is supported.
- **Affordable housing:** Discounting the proposed re-provision of existing social rented homes, and noting that the shared equity units are not a formally recognised affordable housing product, the provision of affordable housing represents 0.4% of the uplift of residential accommodation, by habitable rooms. Overall, this equates to 363.5% affordable housing by habitable room. The viability information is being scrutinised to ensure the maximum quantum of affordable housing. Early, mid and late stage viability review mechanisms, and affordability levels should be secured.
- **Design and heritage:** The layout and massing principles underpinning the master plan are rational and are broadly supported. Kingston's Strategic Development Brief identifies the site as having potential for tall buildings, and GLA Officers are satisfied the criteria in Policy D9 are addressed in the application. Suitable conditions should secure inclusive design requirements. Clarifications are required in respect of the submitted heritage statement.
- **Fire safety:** The submitted fire strategy should be amended to address all the requirements of Policy D12 and D5 of the Mayor's Publication London Plan. An outline fire statement should also be submitted for the phases 2-5 of the scheme. Suitable conditions should be imposed to secure compliance with the fire statements.
- **Energy:** The energy strategy is supported and condition wording is suggested for the proposed connection to the emerging RBKUT DEN. Further supporting detailed is required in respect of a number of elements of the energy strategy. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.
- **Air quality:** Further clarifications are required in respect of the air quality assessment. Detailed technical comments in respect of air quality have been circulated to the Council under a separate cover to be addressed in their entirety. A number of conditions are also recommended.
- **Sustainable drainage and water efficiency:** The drainage strategy is not sufficiently developed and does not give appropriate regard to the inclusion of sustainable, green, and above ground SuDS measures. Detailed technical comments in respect of sustainable drainage have been circulated to the Council under a separate cover to be addressed in their entirety. The proposed development does not meet the requirements of London Plan policy 5.15 as a BREEAM rating of 'Excellent' should be achieved for Wat 01 relating to non-residential water consumption.
- **Green infrastructure and urban greening:** Given the size of the site, the proposed development represents an opportunity for further greening, particularly in complementing the adjacent SINC. The UGF policy target should therefore be seen as a 'minimum' and the applicant is encouraged to seek to deliver an exemplar greening scheme. Given that this is a hybrid application, delivery of the UGF at reserved matters should be secured by condition for subsequent phases of the proposed development.

- **Circular economy:** Detailed technical comments in respect of the circulated economy have been circulated to the Council under a separate cover to be addressed in their entirety.
- **Transport:** The proposed changes to the eastbound and westbound Cambridge Grove bus stops and shelters are currently not acceptable and further work is required to agree the proposed changes. Suitable conditions and obligations should secure commitments in relation to car parking and cycle parking. A Travel Plan to be secured, enforced, monitored and reviewed as part of the S106 agreement, and Delivery and Servicing Plan and Construction Logistics Plan should be secured by condition.

for further information, contact GLA Planning Unit (Development Management):

[Redacted contact information]



Development Management <development.management@kingston.gov.uk>

Fwd: Cambridge Road Estate - GLA comments - Energy (GLA Ref: 6860)

1 message

Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

8 March 2021 at 19:18

To: Development Management <development.management@kingston.gov.uk>

Please can you add to the DMS against file ref 20/02942/FUL and entitle 'GLA post-stage 1 energy comments' please mark sensitive

Kind regards

Harsha

Miss Harsha Bhundia**Principal Planner (Acting)**

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

KT1 1EU

T: 020 8547 4697

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----- Forwarded message -----

From: [REDACTED]

Date: Fri, 5 Mar 2021 at 10:33

Subject: RE: Cambridge Road Estate - GLA comments - Energy (GLA Ref: 6860)

To: Greg Pitt [REDACTED] Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Hi Harsha and [REDACTED]

Please find post stage 1 energy comments, attached, to be addressed.

Key outstanding strategic matters outstanding include:

- Further detail required on quality assurance for energy costs.
- Further information required on overheating.
- Agreement is required on the proposed condition to connect to the RBKUT network.
- Further detail required on the PV potential.
- Further commitment to Be Seen energy monitoring required.

Kind Regards,

[REDACTED]

Senior Strategic Planner, Development Management, Planning

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

Mob: 0 [REDACTED]

www.london.gov.uk/what-we-do/planning

[Register here](#) to be notified of planning policy consultation or sign up for GLA Planning News. Follow us on Twitter [@LDN_planning](#)

From: [REDACTED]
Sent: 17 February 2021 11:48
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Cc: [REDACTED]
Subject: RE: GLA comments (air quality, energy and CES)

Hi Harsha,

Please find attached our response to the comments on the energy strategy received from the GLA.

Regards

[REDACTED]



Associate

DDI: [REDACTED]

M: [REDACTED]

W: www.bartonwillmore.co.uk

**BARTON
WILLMORE**

7 Soho Square, London, W1D 3QB

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From: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Sent: 19 January 2021 15:17

To: [REDACTED]

Subject: GLA comments (air quality, energy and CES)

Hi [REDACTED]

We are still awaiting a Stage 1 response from the GLA, however, attached are some technical comments with requests for additional information, in advance of the formal Stage 1 response.

Kind regards

Harsha

Miss Harsha Bhundia BA (Hons) MA MRTPI

Principal Planner (Acting)

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

KT1 1EU

T: [REDACTED]

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20206860 Cambridge Road Estate Pre-stage 2 GLA Consultation - Energy Memo 2020_V2.xlsx
201K



Historic England

Ms Harsha Bhundia

Direct Dial: 020 7973 3712

Royal Borough of Kingston Upon Thames

Guildhall 2

Our ref: P01412590

High Street

Kingston upon Thames

KT1 1EU

1 April 2021

Dear Ms Bhundia

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CAMBRIDGE ROAD ESTATE CAMBRIDGE ROAD KINGSTON UPON THAMES
KT1 3JJ
Application No. 20/02942/FUL**

Thank you for your letter of 29 March 2021 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone [REDACTED]
HistoricEngland.org.uk





Historic England


Business Officer

E-mail: steve.hurst@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
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Historic England

Ms Harsha Bhundia
Royal Borough of Kingston upon
Thames
Guildhall 2
High Street
Kingston upon Thames
KT1 1EU

Your Ref: 20/02942/FUL
Our Ref: CLO33314
np
Contact: Louise Davies
Direct Dial: 0207 973 3740
Email: louise.davies@HistoricEngland.org.uk

13 April 2021

Dear Ms Bhundia

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2019**

Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works:

Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works.

Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with appearance and landscaping reserved) is sought for the remainder of the development.

Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3000

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This application is accompanied by an Environmental Statement.

Recommend No Archaeological Requirement

Thank you for your consultation dated 29 March 2021.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The submitted archaeological Desk-Based Assessment (Terence O'Rourke, October 2020) is very useful in assessing the archaeological potential of the site. I am in agreement that the site has low potential for survival of significant archaeological remains, and any remains present will have been impacted by the construction of the 19th century terraced housing and the 1970s estate. The site is located outside of the revised boundaries of the Archaeological Priority Areas in Kingston, which are soon to be published.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

[Redacted signature]

[Redacted name]

Archaeology Advisor

Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3000

www.historicengland.org.uk

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Greater London Archaeological Advisory Service
London and South East Region

Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3000

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Development Management <development.management@kingston.gov.uk>

Cambridge Road Estate, Kingston KT1 (20/02942/FUL)

1 message

7 May 2021 at 13:03

To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>

Cc: [REDACTED]

FAO Harsha Bhundia

Thank you for the opportunity to comment on the above planning application. We note that the proposed development is a hybrid application for mixed use development with detailed permission sought for phase 1, including 452 residential units and outline permission for the remainder of the development, including up to 1,718 residential units. The Cambridge Road Estate includes 832 existing residential properties.

There is no dedicated healthcare floorspace proposed as part of the scheme, although up to 1,395 m2 of flexible retail and commercial floorspace within Use Class E is proposed. A new community centre of 1,250 m2 is also proposed.

The proposed development will have an impact on healthcare services and infrastructure. An Environmental Statement (November 2020) and a Health Impact Assessment (November 2020) have been submitted with the application. These documents consider that the development will have an impact on 21 main and branch GP practices within 3km of the site. This is a large area that includes most of the GP practices in the borough and a GP practice in Richmond. A more realistic and commonly used distance which reflects GP patient catchments is 1 mile or 1.6km from a site.

The Environment Statement (ES) asserts that six of the GP practices have surplus capacity as measured against the standard of 1 FTE GP per 1,800 patients. Five of these practices are over 1 mile from the site. The ES concludes, at paragraph 6.130, that the development is likely to have a negligible effect on primary healthcare as capacity within existing infrastructure has been established, and no mitigation is required.

We consider that the impact of introducing an additional 3,300 residents into the local area is not negligible and that there is insufficient primary healthcare capacity to accommodate this demand.

The closest practices within 1 mile of the site include the three practices that make up Kingston Primary Care Network - Fairhill Medical Practice, Kingston Health Centre and St Albans Medical Centre. The network of practices are providing a wider range of services, using a multi-disciplinary workforce. This is likely to place additional pressure on workforce and estate capacity. As such, the GP per patient ratio should be treated with caution.

Nevertheless, the ratio for the Kingston PCN is 1 FTE GP per 2,735 patients using the latest published data from NHS Digital. This indicates that there is no surplus capacity to accommodate the additional demand. In particular, the development is likely to place additional pressure on Fairhill Medical Practice as, according to NHS Digital data, 45% of the residents currently living on the Cambridge Road Estate are registered with the practice. Also, the size of the GP premises in the PCN falls below a target of 60m2 per 1000 patients.

Therefore, we consider that the adverse impact of the development requires mitigation in the form of a s106 planning obligation.

Policy CS13 of Kingston's Core Strategy (2012) identifies Kingston/Norbiton as an area where additional primary care provision is needed. The Planning Obligations Supplementary Planning Document (Feb 2017) supports the use of financial contributions to mitigate the impact of the development on community infrastructure, including healthcare (paragraph 1.11) where a site-specific need for additional or enhanced facilities is demonstrated (paragraph 3.51). The use of the HUDU Planning Contributions Model to calculate s106 healthcare contributions is supported by the adopted London Plan (March 2021) (see paragraph 11.1.37).

Para 3.13 of the Environmental Statement (ES) notes that of the 832 residential properties on the estate, 782 are currently occupied and 50 units are unoccupied. Therefore, we have assumed a net increase of 1,388 homes (2,170 minus 782 homes). According to the ES this would generate a population increase of 3,345, based on an average household size of 2.41.

Using the housing mix information provided in Tables 3.1-3.3 of the ES, the HUDU model calculates a primary healthcare floorspace requirement of 225 m2. Whilst there is a preference for a new on site facility, a new facility should be of a sufficient size to accommodate a relocated GP practice who will be able to expand to meet the additional demand generated by the development.

The application includes 1,395m2 of flexible retail and commercial floorspace within Use Class E. The use class includes the provision of medical or health services (Class E(e)). It is proposed that a on site health facility is secured, preferably in phase 2 of the development and it is estimated that approximately 1,000 m2 is required.

We suggest that the s106 legal agreement secures an onsite health facility with a mechanism to trigger an in-lieu financial contribution should the facility not be provided or required in the future.

We suggest that prior to the submission of the first reserved matters application for phases 2-5 that a healthcare delivery plan is submitted and agreed with the Council and the CCG identifying the requirement for a new facility or the timing of a financial payment. The plan could set out the details of the space required, including size, location, timing, design and specification and costs. It could also identify the trigger mechanism for the financial payment either as a lump sum or payments. The HUDU model calculates an in-lieu s106 contribution of £951,460. The HUDU Model could recalculate the contribution once the final housing mix is known. As an alternative to on site provision, the s106 financial contribution would be allocated towards enhancing existing primary care infrastructure and providing additional capacity in the area.

Best Wishes



Senior Primary Care Locality and Engagement Manager (Kingston and Richmond)

NHS South West London CCGs (Kingston and Richmond)



T

A 2nd floor, Thames House, 180 High Street, Teddington TW11 8HU

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Development Management <development.management@kingston.gov.uk>

Fwd: Proposed redevelopment of the Cambridge Road Estate - 20/02942/FUL

1 message

Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

8 June 2021 at 15:57

To: Development Management <development.management@kingston.gov.uk>

Please can you add these comments to the DMS

Kind regards

Harsha

Miss Harsha Bhundia

Principal Planner (Acting)

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

KT1 1EU

T: 020 8547 4697

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From: [REDACTED]

Date: Mon, 7 Jun 2021 at 17:36

Subject: Fwd: Proposed redevelopment of the Cambridge Road Estate - 20/02942/FUL

To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

See below.

Toby

Toby Feltham

Lead Planning Officer (Strategic Major Developments/ Planning Delivery)

The Royal Borough of Kingston upon Thames

Guildhall 2, High Street,

Kingston Upon Thames,

KT1 1EU

Mobile: 07702630847 (If I don't answer, instead of leaving a voicemail, please send me an email if possible)

Toby.Feltham@Kingston.gov.uk

www.kingston.gov.uk

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https://www.kingston.gov.uk/info/200155/planning_applications_and_permissions/263/find_a_planning_application_or_appeal

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----- Forwarded message -----

From: [REDACTED]
 Date: Thu, 27 May 2021 at 16:59
 Subject: Proposed redevelopment of the Cambridge Road Estate - 20/02942/FUL
 To: Toby Feltham <toby.feltham@kingston.gov.uk>

Hi Toby,

I'm writing to state my views about the educational impact which the above application might have if it is approved.

Using the GLA population yield calculator, the likely net additional pupil yield will be 362 primary and 76 secondary (11-16) aged children, distributed across year-groups.

However, that yield takes no account of a 'dampener' for a certain, unquantifiable number of children whose families would move into the new accommodation on the estate from other local properties and therefore wouldn't require a new school place, so the real net numbers are likely to be smaller. The phasing of the development over a significantly long period will also mitigate the impact on local school provision.

Local school places for those additional children would principally be found through a combination of the following:

Primary

- The current spare places at King's Oak Primary School, the closest school to the estate; and
- A new two-form-entry primary free school on the former Kingstons House site in Coombe Road, Norbiton, expected to be built by the end of 2022 and opened at a point in time which will align with the completion and occupation of the first phases of the proposed redevelopment of the estate.

Secondary

- A proposed six-form-entry 11-16 Church of England secondary school on part of the Kingsmeadow site, to open in September 2024 or 2025, subject to: approval of the Diocese of Southwark's statutory proposal for the establishment of the school; formal disposal by the Council of the site and allocation of some capital funding for the purpose of establishing the school; and approval of a planning application for its buildings and landscaping.

However, whilst there is certainty regarding this primary school provision, there are risks in relation to the proposed secondary school because it is currently only a proposal. So, if the proposed school were not approved and therefore didn't open, the Council would be at high risk of not being able to meet its statutory duty to provide places for the additional children from new families on the estate whose parents/carers would require places for them.

Best wishes,

[REDACTED]

[REDACTED]

Associate Director, School Place Planning
Achieving for Children - providing children's services for Kingston and Richmond
Phone: 020 8547 6246 / 07951 506867
Email: [REDACTED]
First floor (east), Guildhall 2, High Street, Kingston upon Thames, KT1 1EU



[Website](#) | [Twitter](#) | [Facebook](#)

Achieving for Children is a Community Interest Company registered in England and Wales |
Company number: 08878185 | Registered address: [42 York Street, Twickenham, TW1 3BW](#).



Planning Officer: Karen Coles

Royal London Borough of Kingston upon Thames

██████████ **914TP**
Design Out Crime Officer - SW
Teddington Police Station,
Park Lane,
London,
TW11 0AB

Landline: 0208 247 5834

Telephone: 07831 159278

Email:
██

Your ref: 20/2942/FUL

Our ref: SW3871

Dear Karen,

Re: Royal Borough of Kingston Planning Applications Reference: 20/2942/FUL
Location: Cambridge Road Estate, Cambridge Road, Kingston upon Thames, KT1 3JJ.

Thank you for your request for comment on a recently submitted planning application for the proposed redevelopment of the Cambridge Road Estate.

I will be commenting on the following submission;

Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floor space (Use Class E), 1,395sqm of flexible retail/commercial floor space (Use Class E/Sui Generis), 1,250sqm community floor space (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works:

Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floor space (Use Class F2), 290sqm of flexible office floor space (Use Class E), 395sqm of flexible retail/commercial floor space (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works.

Outline permission for 1718 residential units (Use class C3), 1000 sq. of flexible retail/commercial floor space (Use Class E/Sui Generis) (with appearance and landscaping reserved) is sought for the remainder of the development.

This is a large and complex re generation project which involves the relocation of a densely populated estate with some long term residents and private owners. The project is projected to last 10 to 15 years before final completion and will be completed in 5 phases.

This application focuses on the regeneration as whole but primarily on Phase 1 and 2 which encompasses 3 residential blocs, commercial space and community space. These are in Blocks B, C and E.

I anticipate further planning applications with the detailed for the other phases to follow and welcome further partnership working.

I will be commenting on the design and layout of the proposed development in relation to crime using the principles of Crime Prevention through Environmental Design (CPTED) supported by the Secured by Design (SBD) guidance.

I have met with the design team prior to this submission on 2 occasions when the design and intended use of the buildings and spaces were discussed. They have extensively involved the current residents and interested parties throughout the design and concept stage and have taken into consideration their concerns, needs and desires and public consultation has been thorough.

I have also liaised with the Dedicated Ward Officer (DWO) on the Safer Neighbourhood Team (SNT) that covers that area and have a sound understanding of the complex needs and crime profiles within the Cambridge Estate.

Crime Statistics

For the year ending June 2020 the crime rate in Kingston upon Thames averaged 68.51 recorded crimes per 1,000 persons compared to the Metropolitan Police Service as a whole averaging at 94.78 crimes per 1,000 persons. This proposed development is in the Norbiton Ward.

The Cambridge Road Estate is a high density residential area with limited green open space and well known unfortunately for its high comparative crime rates and deprivation. It is an aging 1970s estate comprising of houses and flats with small convenience shops within it. There is high density of persons and mixed use buildings as well as vacant premises means crime rates are higher in this immediate area than other areas within the Ward.

The top three recorded crimes from January 2020 to December 2020 in the Norbiton Ward are listed below.

Crime type	Total	Percentage
Anti-Social Behaviour (ASB)	564	39.7%
Violence + Sexual Offences (V+S)	328	23.9%
Vehicle Crime	117	8.5%

I looked into the specific crime statistics within Phase 1 and 2 of the proposed development which I discussed with the applicant. I have looked at the figures in the winter and summer to try to reflect the change in crime patterns over a year. The figures for June 2020 are below.

Phase	Crime type	Total crimes
1 – Block C + MUGA	None	0
2 – Block B + E	V+S – 4, Drugs – 2, ASB – 2.	8

The figures for December 2020 are below.

Phase	Crime type	Total crimes
1 – Block C + MUGA	ASB – 4, V+S – 2.	6
2 – Block B + E	None	0

Data correct at the time of writing January 2021. Source www.police.uk

This report intends to identify any crime and security concerns and will propose recommendations on how to mitigate these risks from various crime types.

The open accessibility of new footpaths and opens spaces means that they can be difficult environments to secure. However, the vulnerability of people and property to crime can be mitigated if the appropriate and measures are incorporated.

General Comments:

1 – Public realm

- 1.1 Shrubs should be selected to have a mature growth height no higher than 1 metre, and trees should have no foliage, epicormic growth or lower branches below 2.4 metres thereby allowing a 1.4 metre clear field of vision.
- 1.2 The design of the planters within the landscape plan should not allow for impromptu seating.
- 1.3 Seating spaces should be carefully considered and located in the appropriate locations such as closer to where facilities are or where there will be natural surveillance. The design of the seating should be considered to discourage anti-social behaviour or prolonged loitering.
- 1.4 Any benches should be designed to include centrally positioned arm rest dividers to assist those with mobility issues.
- 1.5 Communal play-areas for the under 5s and the 5 to 11 years must be designed with due regard for natural surveillance, and have adequate resources for its satisfactory future management. Consideration should also be given to enabling the play area to be closed off during hours of darkness to dissuade inappropriate use. The location of the play area adjacent to the existing college could also cause problems with youths using the play equipment and deterring genuine use. Clear signage and rule setting must be used. This space should be designed so it can be secured at night. One entry/exit point to enable guardian/parental control. A fence height of 1200mm can discourage casual entry and maintain a secure space.**
- 1.6 Public space cycle parking should be in an area with good natural surveillance with parking systems that provide good anchor points for the pedal cycles. These should also be well illuminated. These should be within 50m of sight from 'active' rooms of dwellings. Compliant secure cycle parking must meet a minimum certified security standard of LPS1175 Issue 7.2:2014 SR1 or Sold Secure or STS 502.
- 1.7 Motorcycle or moped parking should be provided. Ground anchors or robust metal support stands are recommended and must meet either Sold Secure Gold or STS 503 security standards.
- 1.8 Recessed doors onto public spaces should be avoided. This is to mitigate loitering and 'smokers corners'.
- 1.9 Vehicular and pedestrian routes should be designed to ensure that they are visually open, direct, and well used.
- 1.10 Shared surface arrangements should be designed for those with visual impairment.
- 1.11 Any alternating brick design work should be removed. This can be used as a climbing aid.
- 1.12 Vehicle entrance gate must be fob access controlled and have a minimum height of 1.8m.

1.13 I recommend Fire Key Guard boxes are installed at all drop key points. This is to limit illegitimate use. Drop keys are readily available and have been known to be used in order to commit ASB in communal areas out of public view.

2 – Bin stores

2.1 The refuse store doors should be single leaf, third party tested and certified to a minimum security standard of PAS 24:2016. They should also be self-closing and locking with a push to exit button and PIR lighting. This would also discourage illegitimate use. The doors should be key fob access only. Not key or key pad operated as the methods are unreliable as they are often left unlocked for ease or the key code is readily distributed or compromised by a wearing down of the buttons.

3 – Landscaping

3.1 **Defensive planting** should be considered around the residential boundaries. This would mitigate intrusion and concealment of weapons and drugs.

3.2 Planting should not impeded natural surveillance. Shrubs should have a mature growth height of no more than 1m and trees should have no foliage, epicormic growth or lower branches below 1m.

3.3 Fencing to the rear of private spaces should be a minimum height of 1.8m.

3.4 I note there appears to be an undefined external space behind the block. The entrance gate should be access controlled and to be brought forward to remove the recess. I recommend defensive planting along the fence line to deter persons from scaling.

4 - Cycle Stores

4.1 These should have resident only fob access control entry but thumb turn exit to prevent accidental lock-ins. They should have good lighting and CCTV coverage capable of identifying anyone in the store area. The correct security door standard required for this is a minimum of LPS1175 and be outward opening with thumb turn exit on a self-closer locking system with key fob only access.

4.2 The cycle stand must facilitate the locking of both wheels and the crossbar. The minimum SBD security requirements are:

- Galvanised steel bar construction (minimum thickness 3mm) filled with concrete
- Minimum foundation depth of 300mm with welded 'anchor bar'

There should also be clear signage to instruct users how to uses the stands correctly.

Security compliance can be demonstrated by products certified to one of the following minimum security standards;

- LPS 1175 Issue 7.2:2014 SR1
- LPS 1175 Issue 8:2018 SR1 (A1)
- Sold Secure
- STS 502

4.3 Residential pedal cycle stores should relate to each internal core, thereby limiting unauthorised access.

4.4 There should only be one door to access the cycle store. This would limit vulnerability. The door should be outward opening.

Cycle theft is a high crime driver and is prevalent around Kingston. Cycle security also forms parts of Kingston's local planning policies. It is also to be noted that door sets providing access from the

storage facility into communal parts of the building are required to meet Part B, Part M, and Part Q of Building Regulations.

5 – Residential Block

5.1 Residential communal space should be clearly defined and access controlled to prevent unrestricted public access. There should be no linkage between public, communal and private areas.

5.2 All communal entrance doors sets should be video access controlled and be LPS 1175 SR1 3rd party certified.

5.3 I recommend where possible the use of single leaf doors as double doors require double the security furniture. However, as long as the double door set used is a fit for purpose communal door set that will be acceptable. Communal door sets should be tested with the appropriate communal door locking mechanism and not adapted residential patio doors with an additional electronic lock attached.

5.4 Equality Act 2010 requires lower front call plates for access control.

5.5 Individual flat front door sets should meet the PAS 24:2016 or equivalent standards. These must also meet the relevant fire ratings and a dual certificated door set is preferred.

5.6 There are numerous fire escape doors. These should be alarmed to sound if the door is used. This will alert any persons to possible danger but also alert residents to any misuse and increase detection of perpetrators. It is advised that CCTV is installed at fire escapes, especially in vulnerable areas.

5.7 The layout of the units should allow the active rooms towards the front of the units to allow greater surveillance of the public garden area and the children's play park.

6 - Access control

6.1 Access control is key to preventing uninvited persons causing anti-social behaviour or nuisance to residents. This can assist with the management of the development and allow access to residents to specific designated areas only.

Security considerations for this are (but not limited to);

- Live audio/visual communication between visitor and resident
- Capture and record colour images and for them to be stored for a minimum of 30 days. This information must be available to police within 3 days of request. If this is unavailable with in the entry system then there should be CCTV installed dedicated to this purpose.
- All visitor and resident activity to be stored for a minimum of 30 days and the information to be made available to police within 3 days.
- The system must comply with GDPR.

6.2 Any trades buttons must be disconnected. This is strongly recommended as we still consistently see these buttons taken advantage of and illegitimate access gained causing significant issues in developments within Kingston.

6.3 The fobs should always be encrypted to reduce the risk of them being copied by a third party.

6.5 All easily accessible windows and door sets (including patio doors) must be a minimum third party certified security standard of PAS 24:2016.

6.6 Compartmentalisation access control. The Secure By Design New Homes Guide 2019 advises that any development of 25 residential units or more should be compartmentalised to limit permeability within a block. It is understood that this will not be implemented within the individual blocks. It was explained that during consultation residents were strongly against it as they felt it would reduce

community cohesion and isolate neighbours. This is not advisable as historically and issue within the Cambridge Estate has been that it has been too permeable. However, I do understand the reasoning in this instance why this advice will not be adhered to. What I will recommend is that the access control system installed will have the capability to be extended so that compartmentalisation can be installed if required.

I have been reassured that in Block C and E where there is shared private communal space with several cores that there will be access control so residents can only access their core, unless in the case of fire.

8 – CCTV

The CCTV system is to be designed and installed by a contractor and a certificate confirming that the CCTV installation is compliant with BS 7958:2015 CCTV management and operation and meets the requirements of GDPR. The contractor will also be required to issue an NSI or SSAIB certificate of compliance.

8.1 There is no mention of CCTV as part of this design. External CCTV should be considered around vulnerable areas such as bin stores and cycle stores and shared amenity spaces.

8.2 Any soft landscaping and lighting fixtures should not be in conflict with the CCTV cameras field of view.

8.3 All CCTV systems should have a simple Operational Requirement (OR) detailed to ensure that the equipment fitted meets that standard, without an OR it is hard to assess a system as being effective or proportionate as its targeted purpose has not been defined. The OR will also set out a minimum performance specification for the system.

8.4 The system should be capable of generating evidential quality images day or night 24/7.

8.5 CCTV systems should operate in accordance with the best practice guidelines of the Surveillance and Data Protection Commissioners and the Human Rights Act.

8.6 Internal cameras should be installed to provide coverage of entrances, cycle storage and shared amenity areas.

9 - Lighting

9.1 Bollard lights, illuminated benches, architectural and tree up lighting are not considered as good lighting sources for SBD purposes. However, if bollard lighting is used, it is recommended that they comply with BS5489. Further advice can be given with on-going consultation.

9.2 SBD asks for 'white light' as this aids good CCTV colour rendition and gives a feeling of security to residents and visitors. Good coverage avoiding pockets of shadow is best as it provides less opportunity for someone to conceal themselves from view from CCTV or passers-by.

9.3 The public space lighting should also meet the current council requirements.

9.4 Lighting across the entire development should be to the required British Standards, avoiding the various forms of light pollution (vertical and horizontal glare). It should be as sustainable as possible with good uniformity.

9.5 Lighting can contribute to discouraging crime and vandalism making people feel secure and so encourage increase pedestrian activity. Both the carriageway and the footway should be illuminated, with shadows avoided.

9.6 The private external lighting must be at levels recommended by BS 5489-1:2013 where possible.

Appropriate and useable lighting is integral to the wellbeing and safety of legitimate users of all the spaces. Lighting is one of the most important tools used in the prevention and detection of crime. A lighting scheme that has been correctly designed and installed by appropriately qualified persons is essential in the functionality of this development. This care and attention must also be applied to all communal areas within the development too.

24hr lighting to all communal parts of the blocks of flats will be required. It is acceptable if this is dimmed during hours of low occupancy to save energy.

10 – Underground Car Park

10.1 An access control system must be applied to all vehicular and pedestrian entrances.

10.2 Inward opening automatic gates or roller grills must be located at the building line or at the tops of ramps. They must be capable of being operated remotely.

10.3 Lighting must be at the levels recommended by BS 5489-1:2013 and a certificate of conformity to be provided to the DOCO issued by an independent 'competent' designer who is also a member of ILP, IEng or CEng.

10.4 Walls and ceilings must have light colour finishes to maximise the effectiveness of the lighting.

10.5 Any internal door, lift, which give access to residential floors must have an access control system. It is recommended that the lift is key fob controlled.

10.6 CCTV is to be considered in this area.

Block B

There are no specific design changes recommended at this stage.

Block C

Retail/commercial

There is currently no intended occupant to this space as it will be used as the showroom/sales suite during the regeneration of the estate.

Community space

This space will have a patio area within a square that overlooks residents' bike stores as well as access to the communal door. It is essential that there is clear demarcation between this space and the residents' space and the correct recommended security products are in place. Consideration to the occupiers for late night use of the space as it may cause noise disturbance to the residents.

Multi Use Games Area (MUGA)

This is not due to be constructed until there is sufficient occupancy of the regenerated estate. I have not been given a predicted time frame at this stage. I recommend that consultation with this office is continued through its design as MUGAs have unfortunately been crime hotspots in the past from which we wish to mitigate.

Block E

The underground car park doesn't currently have any specific parking areas for motorbikes/mopeds. Ideally there will be space designated with security rated ground anchors installed.

There are x2 entrance/exits to the underground car park. This is not ideal. According to space and vehicle movement restrictions this is the only viable option. I have advised that once should be designated entrance only and one exit only. Good signage and roust enforcement is recommended. I recommend that roller grill is used to secure the carpark with a short open/close time to mitigate unauthorised access once a vehicle has passed through.

To conclude

This is overall a good design where security has been considered. This design could achieve a Secure By Design Silver Award if all the required security standards are met. I recommend that each Block has separate certification as each design is unique and there a several different design aspects which will impact its 'sign off'. I am satisfied at this stage that the designs while separate work well together. I look forward to working with the developer in the future.

Recommendation

Crime Prevention and community safety are material considerations. If Royal Borough of Kingston are to consider granting consent, I would seek that the following conditions details below be attached. This is to mitigate the impact and deliver a safer development in line with Kingston Core Strategy, London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

Suggested two part condition wording:-

- A. The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.

Reason: In order to achieve the principles and objectives of Secured by Design to improve community safety and crime prevention in accordance with Policy CS 14 of Kingston Core Strategy: Safer Communities, Policy DM 22 Design for Safety and Policy 7.3 Designing out Crime of the London Plan.

- B. Prior to occupation of each Block a Secured By Design final certificate shall be submitted to and approved by the Local Planning Authority.

Reason: In order to achieve the principles and objectives of Secured by Design to improve community safety and crime prevention in accordance with Policy CS 14 of Kingston Core Strategy: Safer Communities, Policy DM 22 Design for Safety and Policy 7.3 Designing out Crime of the London Plan.

The appropriate Secured by Design (SBD) requirements can be found in the design guides on the SBD web site (www.SecuredbyDesign.com)

If you require clarification or wish to discuss any aspect of the report, please do not hesitate to contact me.

Yours sincerely,



[Redacted]

[Redacted]

DOCO

South West Area, Metropolitan Police Service

[Redacted]

a: Teddington Police Station, 18 Park Road, Teddington, London, TW11 0AB

w: www.met.police.uk e [Redacted]



The Primary Objective of an Efficient Police Force is the Prevention of Crime. This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to. All material in this report is subject to copyright. Unless it is specifically stated that particular material is available for general use then it should not be copied or re-used without the explicit permission of the Metropolitan Police Service or of other copyright holders where material is used under licence.

Royal Borough Of Kingston Upon Thames
Royal Borough Of Kingston
Guildhall 2
Kingston-Upon-Thames
Surrey
KT1 1EU

Letter Printed 30 June 2021

FOR RECOMMENDATION DATED
30 June 2021

The Town and Country Planning Act 1990, (as amended)
Consultation – No Objection with Provisos

Application: 21/1732/CON
Your ref:
Our ref: DC/JAG/21/1732/CON/CON
Applicant: Royal Borough Of Kingston Upon Thames
Agent:

LOCATION

Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

for

PROPOSAL

Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works, including stopping up of all public highway including Wimpole Close, Eureka Road, St. Peters Road, Burritt Road, Stapleford Close, Willingham Way, Chesterton Terrace, Excelsior Close, Washington Road and Franklin Close, footpaths, parking courts and other areas of highway. Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with scale, layout, appearance, and landscaping reserved) is sought for the remainder of the development (parameter plans are included).

I refer to your consultation regarding the above mentioned proposal.

My Council's observations are as follows:

That the Royal Borough Of Kingston Upon Thames be advised that the London Borough of Richmond upon Thames raise no objection but would make the following provisos:

U0104127 No objection subject to provisos

The London Borough of Richmond upon Thames, in the event that the application is approved, raises no objections in principle subject to further consideration of the matters below.

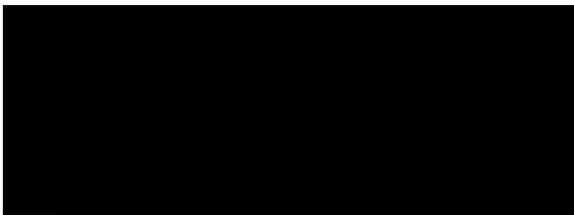
Impact on Bus Services

When it is fully built out, the whole development will result in a net increase of 141 two-way bus trips in the AM weekday peak hour and 121 two-way bus trips in the PM weekday peak hour. The detailed phase alone will result in a net increase of 29 two-way bus trips in the AM weekday peak hour and 31 two-way bus trips in the PM weekday peak hour. Concern is raised to the approach the applicant has taken in their calculations (just taking the number of trips and dividing by the number of services available within a radius of 640m of the site at the AM and PM weekday peak hours). This fails to consider that some destinations might be more popular for commuters and school children/students than others and fails to take account of existing bus loadings. It is strongly advised that the applicant liaises with TfL's City Planning team to enable TfL to assess the true impact of the development on existing bus services and routes and assess whether mitigation is needed that meets the CIL Regulation 122 tests.

Impact on surface rail services

The whole development will result in a net increase of 230 two-way rail trips in the AM weekday peak hour and 266 two-way rail trips in the PM weekday peak hour. As above, the applicant has just taken the total number of trips and divided them by the total number of services per hour. This takes no account of the fact that, as shown in trip to work distribution from Kingston MSOA 005 to the City of London, for example, already accommodates 180 person rail trips in the Am weekday peak hour, 45 passengers per service from Norbiton which is on the Waterloo - Shepperton/Richmond branch line. Although most trains are 10 carriages long, the applicant's analysis does not consider the impact relative to existing loadings. However, it is acknowledged that it is unlikely that any more carriages can be added per train because of existing platform lengths, or that additional services could be provided because of the availability of rolling stock.

Yours faithfully,




Head of Development Management



Network Rail Consultation Response

To:	Harsha Bhundia - Kingston upon Thames
Date:	05/08/2021
Application reference:	20/02942/FUL
Location:	Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ
Position:	Holding Objection

Dear Harsha,

Thank you for consulting Network Rail (NR) on the above planning application. Following an internal consultation which included train operating company South Western Railway, Network Rail would like to make the following comments.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, NR is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. Consequently, any third-party proposal that impacts NR's ability to deliver a safe operational railway is a concern.

In the case of this proposal, our interest is the potential impact of additional passengers at Norbiton and Kingston Railway Stations.

Station improvements

As a public funded company, Network Rail has responsibilities to spend public funds efficiently which consequently means we do not have the funds available to mitigate the impact of third-party development on railway stations. Where a significant amount of rail trips are to be generated by a third-party development, Network Rail request that the development provides a contribution to mitigate the addition usage, ensuring that the station can continue to operate effectively and provide a good standard for rail passengers.

Table 6.7 (Proposed Mode Share and Trip Generation) within the applicant's Transport Assessment identifies that journeys by train will be the joint highest mode of transport (28 %). Table 6.8 (Net

Change in Trips (+/-) indicates that there will be a significant net increase in train trips, 197 and 228 trips in the AM and PM Peaks respectively, and a daily net increase of 2,008.

Whilst the applicant suggests that the rail trips will be distributed across several stations within the vicinity of the site, it is Network Rail's view that the vast majority will be generated at Norbiton Station as it is the closest station and located within London Travel Zone 5, consequently the more desirable option for those travelling to central London.

The additional train trips generated by this development may result in increased congestion at Norbiton and Kingston stations consequently impacting Network Rail's ability to deliver a safe, efficient operational railway. As a result, there may be a need for congestion relief through the implementation of additional gate line or step free access which would also improve station circulation.

Network Rail are keen to meet with the applicant and council to gain a better understanding of the impact of the proposal and identify suitable mitigation measures.

First & Last Mile

We would encourage the applicant to consider the impact, not only on the railway itself, but also on the first and last mile element of passengers' journeys. This factors in access to and from the railway, as well as how other transport modes are integrated and how well communities are connected.

Developing access to the railway using first and last mile principles has several benefits including:

- Aligning with local and national policy to reduce carbon emissions and meet net-zero targets, by encouraging more active modes of transport such as walking and cycling
- Providing a seamless journey experience where various modes of transport are integrated, including bus and rail services
- Providing an accessible and inclusive offering of transport modes to both local residents and visitors
- Improving connections between communities which may not be as well-served by public transport

While infrastructure and transport services may be identified as areas for improvement, there may be other, smaller scale enhancements that can be made such as better provision of information or

additional cycle racks. Network Rail would welcome further discussions with the developers to gain a better understanding of how we can work together to improve access to the railway and integrate first and last mile thinking into the scheme plans, taking into account the various component parts of passengers' journeys and wider plans for the local area.

I trust the above clearly sets out Network Rail's position on the planning application. Should you require any more information from Network Rail, please do not hesitate to contact me.

Kind regards,

[REDACTED]

Town Planning Technician | Property (Southern)

Network Rail

1 Eversholt St | London | NW1 2DN

M [REDACTED]

E [REDACTED]

www.networkrail.co.uk/property

**Sport England Acknowledgement: 20/02942/FUL Cambridge Road Estate Cambridge Road , KINGSTON UPON THAMES, KT1 3JD (SE ref: PA/21/L/KUT/59382)**

1 message

planning.south@sportengland.org <planning.south@sportengland.org>
To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>

9 August 2021 at 15:53

Dear Harsha Bhundia,

App Ref: 20/02942/FUL**Site: Cambridge Road Estate Cambridge Road , KINGSTON UPON THAMES, KT1 3JD**

Proposal: Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works, including stopping up of all public highway including Somerset Road, Wimpole Close, Eureka Road, St. Peters Road, Burrirt Road, Stapleford Close, Willingham Way, Chesterton Terrace, Excelsior Close, Washington Road, Somerset Road and Franklin Close, various footpaths, parking courts and other areas of highway. Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with scale, layout, appearance, and landscaping reserved) is sought for the remainder of the development (parameter plans are included). This application is accompanied by an Environmental Statement.

Thank you for consulting Sport England on the above application. I can confirm that the consultation has been received and was accepted on 09/08/2021.

In accordance with Paragraph 011 of NPPG (Article 22 of the Development Management Procedure (England) Order 2015), Sport England will respond to this consultation within 21 days of the date of acceptance.

However, if insufficient information is received in order to allow us to make a substantive response to the consultation, Sport England will contact you to request further information. The 21 day deadline will not commence until receipt of the additional information.

As a public body, Sport England is subject to the terms of the Freedom of Information Act 2000, which gives members of the public the right to access the information we hold. In the event of a request being received, we will be obliged to release information relating to the application and our response unless an exemption in the Act applies. You should therefore inform us if you believe any elements of your submission to be confidential or commercially sensitive so that we can take your concerns into account.

If you would like any further information or advice please contact the undersigned at the address below

Yours sincerely,

Planning Administration Team

E: planning.south@sportengland.org

PLEASE NOTE, Sport England offices are now CLOSED. We currently have no access for the foreseeable future due to Covid 19.

Please send any planning applications/strategic consultations & planning general enquiries via email only to:

[Planning.south@sportengland.org](mailto:planning.south@sportengland.org)

We will endeavor to respond within our usual timescales.

We thank you for your patience.



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Network Rail Consultation Response

To:	Harsha Bhundia - Kingston upon Thames
Date:	05/08/2021
Application reference:	20/02942/FUL
Location:	Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ
Position:	Holding Objection

Dear Harsha,

Thank you for consulting Network Rail (NR) on the above planning application. Following an internal consultation which included train operating company South Western Railway, Network Rail would like to make the following comments.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, NR is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. Consequently, any third-party proposal that impacts NR's ability to deliver a safe operational railway is a concern.

In the case of this proposal, our interest is the potential impact of additional passengers at Norbiton and Kingston Railway Stations.

Station improvements

As a public funded company, Network Rail has responsibilities to spend public funds efficiently which consequently means we do not have the funds available to mitigate the impact of third-party development on railway stations. Where a significant amount of rail trips are to be generated by a third-party development, Network Rail request that the development provides a contribution to mitigate the addition usage, ensuring that the station can continue to operate effectively and provide a good standard for rail passengers.

Table 6.7 (Proposed Mode Share and Trip Generation) within the applicant's Transport Assessment identifies that journeys by train will be the joint highest mode of transport (28 %). Table 6.8 (Net

Change in Trips (+/-) indicates that there will be a significant net increase in train trips, 197 and 228 trips in the AM and PM Peaks respectively, and a daily net increase of 2,008.

Whilst the applicant suggests that the rail trips will be distributed across several stations within the vicinity of the site, it is Network Rail's view that the vast majority will be generated at Norbiton Station as it is the closest station and located within London Travel Zone 5, consequently the more desirable option for those travelling to central London.

The additional train trips generated by this development may result in increased congestion at Norbiton and Kingston stations consequently impacting Network Rail's ability to deliver a safe, efficient operational railway. As a result, there may be a need for congestion relief through the implementation of additional gate line or step free access which would also improve station circulation.

Network Rail are keen to meet with the applicant and council to gain a better understanding of the impact of the proposal and identify suitable mitigation measures.

First & Last Mile

We would encourage the applicant to consider the impact, not only on the railway itself, but also on the first and last mile element of passengers' journeys. This factors in access to and from the railway, as well as how other transport modes are integrated and how well communities are connected.

Developing access to the railway using first and last mile principles has several benefits including:

- Aligning with local and national policy to reduce carbon emissions and meet net-zero targets, by encouraging more active modes of transport such as walking and cycling
- Providing a seamless journey experience where various modes of transport are integrated, including bus and rail services
- Providing an accessible and inclusive offering of transport modes to both local residents and visitors
- Improving connections between communities which may not be as well-served by public transport

While infrastructure and transport services may be identified as areas for improvement, there may be other, smaller scale enhancements that can be made such as better provision of information or

additional cycle racks. Network Rail would welcome further discussions with the developers to gain a better understanding of how we can work together to improve access to the railway and integrate first and last mile thinking into the scheme plans, taking into account the various component parts of passengers' journeys and wider plans for the local area.

I trust the above clearly sets out Network Rail's position on the planning application. Should you require any more information from Network Rail, please do not hesitate to contact me.

Kind regards,

[REDACTED]

Town Planning Technician | Property (Southern)

Network Rail

1 Eversholt St | London | NW1 2DN

[REDACTED]

[REDACTED]

www.networkrail.co.uk/property



Development Management <development.management@kingston.gov.uk>

App Ref: 20/02942/FUL - Cambridge Road estate - Sport England Ref: PA/21/L/KUT/59382

1 message

[REDACTED]@sportengland.org> 27 August 2021 at 11:42
To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>

Dear Harsha

Thank you for consulting Sport England on the above application. Sport England provides the following comments for your consideration.

The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore Sport England has considered this a non-statutory consultation.

It is understood that is a Community Infrastructure Levy (CIL) charging authority and as such, the proposed development is required to provide CIL contribution in accordance with the Councils adopted CIL Charging Schedule.

It is acknowledged that there is no requirement to identify where those CIL monies will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct those monies to deliver new and improved facilities for sport.

I note that the applicant has made some provision for sport on site. This includes a community centre with space for indoor sports, a scramble wall and bouldering feature, a MUGA and an outdoor gym/adventure play. This is welcomed, in addition to CIL monies.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:

<http://www.sportengland.org/activedesign>

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

Thank you once again for consulting Sport England. We would be grateful if you would advise us of the outcome of the application by forwarding a copy of the decision notice.

Yours sincerely,

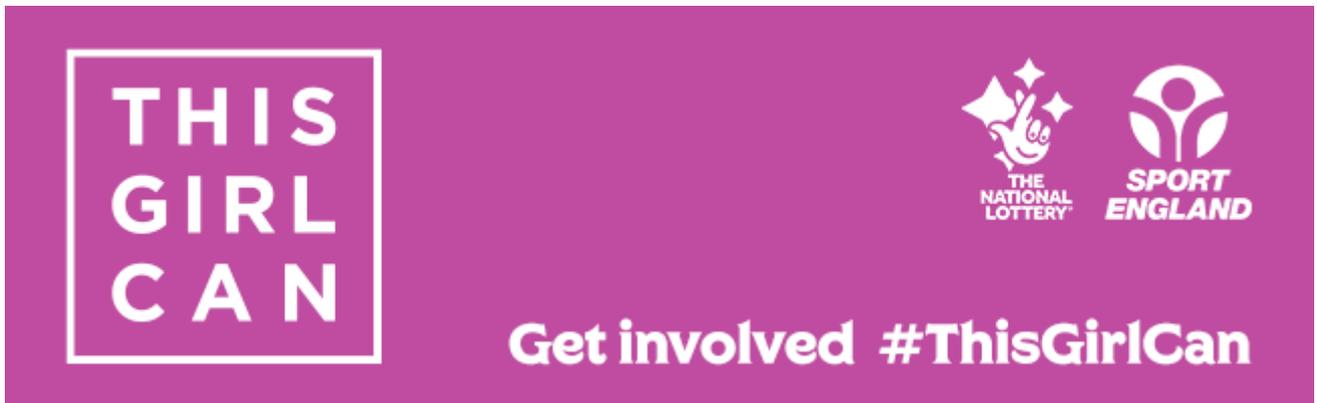
[REDACTED]
Planning Manager

[REDACTED]

[REDACTED]

F:

[REDACTED]



Level 1 21 Bloomsbury Street WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](mailto:Gaile.Walters@sportengland.org)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org

**Sport England Acknowledgement: 20/02942/FUL Cambridge Road Estate Cambridge Road , KINGSTON UPON THAMES, KT1 3JD (SE ref: PA/21/L/KUT/59382)**

1 message

planning.south@sportengland.org <planning.south@sportengland.org>
To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>

29 October 2021 at 11:20

Dear Harsha Bhundia,

App Ref: 20/02942/FUL**Site: Cambridge Road Estate Cambridge Road , KINGSTON UPON THAMES, KT1 3JD**

Proposal: Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works, including stopping up of all public highway including Somerset Road, Wimpole Close, Eureka Road, St. Peters Road, Burritt Road, Stapleford Close, Willingham Way, Chesterton Terrace, Excelsior Close, Washington Road, Somerset Road and Franklin Close, various footpaths, parking courts and other areas of highway. Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with scale, layout, appearance, and landscaping reserved) is sought for the remainder of the development (parameter plans are included). This application is accompanied by an Environmental Statement.

Thank you for consulting Sport England on the above application. I can confirm the additional information has been received and Sport England will aim to respond in 14 days.

As a public body, Sport England is subject to the terms of the Freedom of Information Act 2000, which gives members of the public the right to access the information we hold. In the event of a request being received, we will be obliged to release information relating to the application and our response unless an exemption in the Act applies. You should therefore inform us if you believe any elements of your submission to be confidential or commercially sensitive so that we can take your concerns into account.

If you would like any further information or advice please contact the undersigned at the address below

Yours sincerely,

Planning Administration Team**E: planning.south@sportengland.org**

PLEASE NOTE, Sport England offices are now CLOSED. We currently have no access for the foreseeable future due to Covid 19.

Please send any planning applications/strategic consultations & planning general enquiries via email only to:

[Planning.south@sportengland.org](mailto:planning.south@sportengland.org)

We will endeavor to respond within our usual timescales.

We thank you for your patience.



Join the conversation #thisgirlcan





Historic England

Ms Harsha Bhundia

Direct Dial: 020 7973 3712

Royal Borough of Kingston Upon Thames

Guildhall 2

Our ref: P01412590

High Street

Kingston upon Thames

KT1 1EU

1 November 2021

Dear Ms Bhundia

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CAMBRIDGE ROAD ESTATE CAMBRIDGE ROAD KINGSTON UPON THAMES
KT1 3JJ
Application No. 20/02942/FUL**

Thank you for your letter of 28 October 2021 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Historic England

[REDACTED]
Business Officer

E-mail: [REDACTED]@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Harsha Bhundia
Royal Borough of Kingston upon Thames
Development Control & Enforcement
Guildhall 2 High Street
Kingston upon Thames
Surrey
KT1 1EU

Our ref: SL/2021/121540/01-L01
Your ref: 20/02942/FUL
Date: 2 November 2021

Dear Harsha,

Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (use class C3), 290sqm of flexible office floorspace (use class E), 1,395sqm of flexible retail/commercial floorspace (use class E/sui generis), 1,250sqm community floorspace (use class F2), new publicly accessible open space and associated access, servicing, landscaping and works, including stopping up of all public highway including Somerset Road, Wimpole Close, Eureka Road, St. Peters Road, Burritt Road, Stapleford Close, Willingham Way, Chesterton Terrace, Excelsior Close, Washington Road, Somerset Road And Franklin Close, various footpaths, parking courts and other areas of highway.

Detailed permission for Phase 1 for erection of 452 residential units (use class c3), 1,250sqm community floorspace (use class F2), 290sqm of flexible office floorspace (use class e), 395sqm of flexible retail/commercial floorspace (use class E/sui generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (use class C3), 1000 sqm of flexible retail/commercial floorspace (use class e/sui generis) (with scale, layout, appearance, and landscaping reserved) is sought for the remainder of the development (parameter plans are included).

This application is accompanied by an Environmental Statement.

Cambridge Road Estate, Cambridge Road, Kingston Upon Thames, KT1 3JJ

Thank you for consulting us on the above application on 28 October 2021.

We are statutory consultees for applications which include an Environmental Impact Assessment (EIA). However, having reviewed the submitted plans, there are no environmental constraints that fall within our planning remit at this site and we would therefore have no comments to make on this application.

Non planning consents

Although we have no comments on this planning application, the applicant may be required to apply for other consents directly from us. The term 'consent' covers consents, permissions or licenses for different activities (such as water abstraction or

discharging to a stream), and we have a regulatory role in issuing and monitoring them.

The applicant should contact 03708 506 506 or consult our website to establish whether a consent will be required. <https://www.gov.uk/environmental-permit-check-if-you-need-one>

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated

Should you have any queries regarding this response, please contact me.

Yours sincerely,

██████████
Sustainable Places Planning Advisor

Direct dia ██████████
E-mail kslplanning@environment-agency.gov.uk



Development Management <development.management@kingston.gov.uk>

National Highways Response 20/02942/FUL Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

1 message

██████████ highwaysengland.co.uk> 4 November 2021 at 10:16
To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>
Cc: Spatial Planning <SpatialPlanning@highwaysengland.co.uk>, "transportplanning@dft.gov.uk" <transportplanning@dft.gov.uk>

For attention of: Harsha Bhundia

Site: Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

Consultation: Amended application 20/02942/FUL to include provision of 74 affordable dwellings with a corresponding reduction of 74 private dwellings (a net 0 change in overall numbers proposed)

Your Reference: 20/02942/FUL

National Highways' Reference: #15228

Thank you for your email dated 28 October 2021 on the above planning application.

National Highways (formerly Highways England) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of this proposed development, we are interested in the potential impact that the development might have upon the SRN, in particular the A3. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of development.

We responded to 20/02942/FUL on 18 December 2020 with no objection (attached for reference).

We are aware that some documents on the planning portal which have been prepared in support of this development have been updated as a result of the recent application to amend

20/02942/FUL to increase the percentage of affordable housing. We have reviewed the updated documents and are satisfied that the increase of affordable housing by 3.1% would not alter our previous response. We continue to have no objection to the proposals and are satisfied that the proposals will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF, particularly paragraph 111), in this location and its vicinity.

Our formal response (NHPR) was included in our original response from December 2020. We will not be reissuing the NHPR as our comments on the application have not changed.

Kind regards,

Pia Tiley, Assistant Spatial Planner working on behalf of National Highways

Spatial Planning Team, South East Region Operations Directorate

National Highways | Bridge House | [1 Walnut Tree Close](#) | [Guildford](#) | [GU1 4LZ](#)

Web: <http://www.highwaysengland.co.uk>

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Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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----- Forwarded message -----

From: [REDACTED]
To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>
Cc: Planning SE <planningse@highwaysengland.co.uk>
Bcc:
Date: Fri, 18 Dec 2020 16:29:20 +0000
Subject: Highways England Response for: #12031, 20/02942/FUL Cambridge Road Estate Cambridge Road Kingston Upon Thames

For attention of: Harsha Bhundia

Site: Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

Proposal: Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works: Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new

publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with appearance and landscaping reserved) is sought for the remainder of the development. This application is accompanied by an Environmental Statement

Your Reference: 20/02942/FUL

Highways England's Reference: 89935, #12031

Dear Harsha Bhundia,

Thank you for consulting Highways England regarding the application for the above proposal on 01 December 2020 and requesting a response by 25 December 2020.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly the A3.

Highways England has had the opportunity to review the application for both the first phase (452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis)) and for the outline application for a further 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis).

Highways England notes that the proposed development is expected to provide an overall betterment to the area and a decrease in vehicular trips associated with the site through its proposal of no-parking for residents, in combination with a controlled parking zone, removal of on-street free parking in the area, easily accessible public transport facilities and access to car clubs. The site itself is approximately 5 miles away from the A3 SRN. While the numbers indicated in the supporting Transport Assessment indicate that there is likely to be 154 AM and 170 PM peak hour trips (net change), this is across all modes of transport and of which vehicle associated trips equate to 13 AM and 16 PM trips (car, motorcycle and car driver) net increases (Table 6.19). Given this, Highways England does not consider that there would be a significant impact upon the SRN arising as a result of the proposed development.

Accordingly, Highways England has no objection to this planning application as we are satisfied the development will generate minimal additional traffic on the SRN in peak hours. We therefore consider that the development will not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT 02/13 Para 8-11 and MHCLG NPPF 2019 Para 108-11), in this location and its vicinity.

Please find our formal HEPR response attached.

Should you or the applicant have any queries regarding our response, please do not hesitate to contact us at PlanningSE@highwaysengland.co.uk.

Kind Regards,

Samantha Morgan (Sent of behalf of Janice Burgess Area 5 Spatial Planner)

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: <https://highwaysengland.co.uk>

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Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |

<https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

2 attachments



18122020_HEPR_No Objection_CambridgeRd_Kingston.pdf

200K



**Highways England Response for: #12031, 20/02942/FUL Cambridge Road Estate Cambridge Road
Kingston Upon Thames.eml**

296K



Development Management <development.management@kingston.gov.uk>

FW: App Ref: 20/02942/FUL - Cambridge Road estate - Sport England Ref: PA/21/L/KUT/59382

1 message

[Redacted]@sportengland.org 3 November 2021 at 17:31
To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>

Dear Harsha,

Thank you for reconsulting Sport England on the above application. Having reviewed the revised documents, it does not appear that the situation has changed with regard to sport and the facilities being provided on site (please do let me know if that is not the case) and therefore I have no further comments.

Kind regards,

[Redacted]
Planning Manager

[Redacted]

[Redacted]

F:

E: [Redacted]@sportengland.org



THIS GIRL CAN

THE NATIONAL LOTTERY | SPORT ENGLAND

Get involved #ThisGirlCan



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

From: [REDACTED]
Sent: 27 August 2021 11:42
To: development.management@kingston.gov.uk
Subject: App Ref: 20/02942/FUL - Cambridge Road estate - Sport England Ref: PA/21/L/KUT/59382

Dear Harsha

Thank you for consulting Sport England on the above application. Sport England provides the following comments for your consideration.

The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore Sport England has considered this a non-statutory consultation.

It is understood that is a Community Infrastructure Levy (CIL) charging authority and as such, the proposed development is required to provide CIL contribution in accordance with the Councils adopted CIL Charging Schedule.

It is acknowledged that there is no requirement to identify where those CIL monies will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct those monies to deliver new and improved facilities for sport.

I note that the applicant has made some provision for sport on site. This includes a community centre with space for indoor sports, a scramble wall and bouldering feature, a MUGA and an outdoor gym/adventure play. This is welcomed, in addition to CIL monies.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:

<http://www.sportengland.org/activedesign>

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

Thank you once again for consulting Sport England. We would be grateful if you would advise us of the outcome of the application by forwarding a copy of the decision notice.

Yours sincerely,

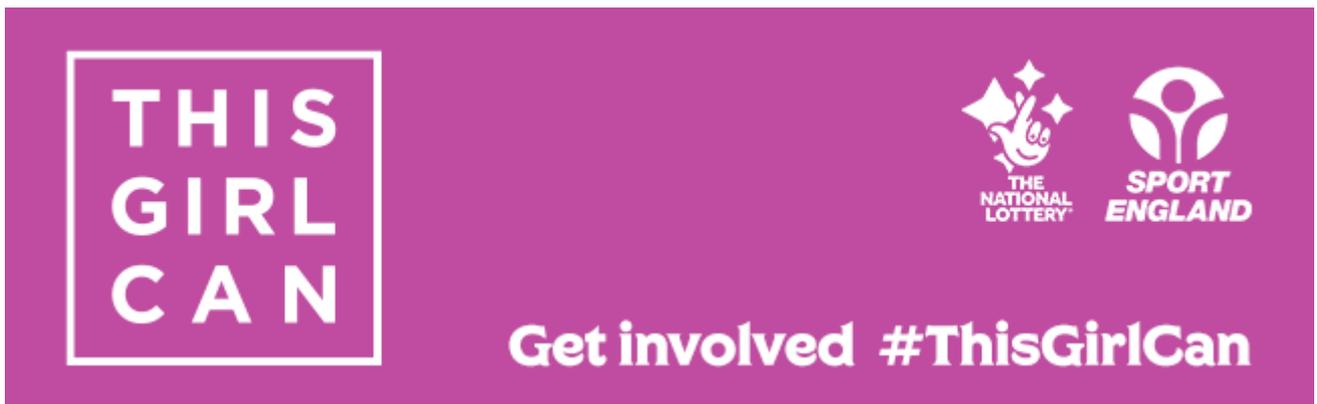
[Redacted]
Planning Manager

[Redacted]

[Redacted]

F:

E: [Redacted]@sportengland.org



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Development Management <development.management@kingston.gov.uk>

FAO Harsha Bhundia - Network Rail Consultation Response: Network Rail Consultation Response: 20/02942/FUL - Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

1 message

[REDACTED]@networkrail.co.uk 11 November 2021 at 10:05
To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>
Cc: Town Planning Southern <TownPlanningSouthern@networkrail.co.uk>, Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

OFFICIAL

Dear Harsha,

Network Rail Consultation Response: 20/02942/FUL - Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

Thank you for consulting Network Rail on the above planning application.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland and Wales. As statutory undertaker, NR is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway.

Following a review of the planning application, I can confirm that Network Rail have no objection to the proposed amendments.

We would like to take this opportunity to update our position regarding the station improvements at Kingston Station first raised within our consultation response dated 11/11/2021. Both Network Rail and South Western Railway remain unclear as to the potential impact this development has in isolation on Kingston Railway Station. Consequently we are unable to make a request for a s.106 contribution that will meet the statutory tests for planning obligations set out in regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended). We will therefore not be seeking any contribution from this development towards station improvements.

However, whilst we are not seeking any contributions from this development, there is concern that the cumulative impact of strong development growth within Kingston Railway Station catchment is likely to drive increased capacity requirements at the station in the future. Network Rail and South Western Railway are therefore keen to explore with Kingston Borough Council potential options at the station as well as funding to ensure that sufficient capacity is provided in the medium and long term to mitigate the cumulative impact of new developments.

I trust the above clearly sets out Network Rail's position on the proposal, should you require any additional information, please do not hesitate to contact me.

Kind regards,



[Redacted]

Town Planning Technician

Network Rail Property (Southern)

Office Address: 1 Puddle Dock, London, EC4V 3DS

Email: [Redacted]@networkrail.co.uk

Mobile: [Redacted]

Website: www.networkrail.co.uk

Please note I am on study leave on Wednesdays.

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Development Management <development.management@kingston.gov.uk>

Consultation Response - 20/02942/FUL - Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

1 message

[REDACTED]@naturalengland.org.uk 16 November 2021 at 17:43
To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>

For the attention of Ms Harsha Bhundia

Please find Natural England's response in relation to the above mentioned consultation below.

Dear Ms Bhundia,

Our ref: 372914

Your ref: 20/02942/FUL

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 16 December 2020 (Our ref: 336210).

The advice provided in our previous response applies equally to this amendment.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours sincerely,

[REDACTED]
Operations Delivery

Consultations Team
Natural England

County Hall

Spetchley Road

Worcester

WR5 2NP

Tel

mail to: consultations@naturalengland.org.uk

www.gov.uk/natural-england



Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

-----Original Message-----

From: development.management@kingston.gov.uk <development.management@kingston.gov.uk>

Sent: 28 October 2021 15:28

To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Subject: Kingston Council - Planning Application consultation on 20/02942/FUL

Dear Sirs,

Please read the important information attached from Kingston Council.

Regards

Planning Support

Royal Borough of Kingston

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98K



Indira Perera <indira.perera@kingston.gov.uk>

Fwd: FAO Harsha Bhundia - Network Rail Consultation Response: Network Rail Consultation Response: 20/02942/FUL - Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

1 message

Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
To: Indira Perera <indira.perera@kingston.gov.uk>

Wed, Nov 17, 2021 at 9:41 AM

Indira,

Please can you place this second email from Network rail on the DMS that confirms that south western railway no longer object so that there is a record?

Kind regards

Harsha

Miss Harsha Bhundia**Principal Planning Officer (Acting)**

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

KT1 1EU

T: 020 8547 4697

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----- Forwarded message -----

From: [REDACTED] <[REDACTED]@networkrail.co.uk>

Date: Tue, 16 Nov 2021 at 14:55

Subject: RE: FAO Harsha Bhundia - Network Rail Consultation Response: Network Rail Consultation Response: 20/02942/FUL - Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Cc: Town Planning Southern <TownPlanningSouthern@networkrail.co.uk>

OFFICIAL

Dear Harsha,

Yes I can confirm that South Western Railway no longer object.

Kind regards,



[Redacted]

Town Planning Technician

Network Rail Property (Southern)

Office Address: 1 Puddle Dock, London, EC4V 3DS

[Redacted] networkrail.co.uk

Mobile [Redacted]

Website: www.networkrail.co.uk

Please note I am on study leave on Wednesdays.

From: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Sent: 16 November 2021 14:52

To: [Redacted] <[\[Redacted\]@networkrail.co.uk](mailto:[Redacted]@networkrail.co.uk)>

Cc: Town Planning Southern <TownPlanningSouthern@networkrail.co.uk>

Subject: Re: FAO Harsha Bhundia - Network Rail Consultation Response: Network Rail Consultation Response: 20/02942/FUL - Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

Dear Nick,

Many thanks for your comments. Can I take it that there is no objection from South Western Railway also?

Kind regards

Harsha

Miss Harsha Bhundia

Principal Planning Officer (Acting)

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

KT1 1EU

T: 020 8547 4697

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Website: www.kingston.gov.uk

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On Thu, 11 Nov 2021 at 10:05, [REDACTED] networkrail.co.uk> wrote:

OFFICIAL

Dear Harsha,

Network Rail Consultation Response: 20/02942/FUL - Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

Thank you for consulting Network Rail on the above planning application.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland and Wales. As statutory undertaker, NR is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway.

Following a review of the planning application, I can confirm that Network Rail have no objection to the proposed amendments.

We would like to take this opportunity to update our position regarding the station improvements at Kingston Station first raised within our consultation response dated 11/11/2021. Both Network Rail and South Western Railway remain unclear as to the potential impact this development has in isolation on Kingston Railway Station. Consequently we are unable to make a request for a s.106 contribution that will meet the statutory tests for planning obligations set out in regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended). We will therefore not be seeking any contribution from this development towards station improvements.

However, whilst we are not seeking any contributions from this development, there is concern that the cumulative impact of strong development growth within Kingston Railway Station catchment is likely to drive increased capacity requirements at the station in the future. Network Rail and South Western Railway are therefore keen to explore with Kingston Borough Council potential options at the station as well as funding to ensure that sufficient capacity is provided in the medium and long term to mitigate the cumulative impact of new developments.

I trust the above clearly sets out Network Rail's position on the proposal, should you require any additional information, please do not hesitate to contact me.

Kind regards,



[Redacted]

Town Planning Technician

Network Rail Property (Southern)

Office Address: 1 Puddle Dock, London, EC4V 3DS

Email: [Redacted]@networkrail.co.uk

Mobile: [Redacted]

Website: www.networkrail.co.uk

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Development Management <development.management@kingston.gov.uk>

**Highways England Response for: #12031, 20/02942/FUL Cambridge Road Estate
Cambridge Road Kingston Upon Thames**

1 message

[REDACTED] highwaysengland.co.uk> 18 December 2020 at 16:29
To: "development.management@kingston.gov.uk" <development.management@kingston.gov.uk>
Cc: Planning SE <planningse@highwaysengland.co.uk>

For attention of: Harsha Bhundia**Site:** Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

Proposal: Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works: Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with appearance and landscaping reserved) is sought for the remainder of the development. This application is accompanied by an Environmental Statement

Your Reference: 20/02942/FUL**Highways England's Reference:** 89935, #12031

Dear Harsha Bhundia,

Thank you for consulting Highways England regarding the application for the above proposal on 01 December 2020 and requesting a response by 25 December 2020.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly the A3.

Highways England has had the opportunity to review the application for both the first phase (452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis)) and for the outline application for a further 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis).

Highways England notes that the proposed development is expected to provide an overall betterment to the area and a decrease in vehicular trips associated with the site through its

proposal of no-parking for residents, in combination with a controlled parking zone, removal of on-street free parking in the area, easily accessible public transport facilities and access to car clubs. The site itself is approximately 5 miles away from the A3 SRN. While the numbers indicated in the supporting Transport Assessment indicate that there is likely to be 154 AM and 170 PM peak hour trips (net change), this is across all modes of transport and of which vehicle associated trips equate to 13 AM and 16 PM trips (car, motorcycle and car driver) net increases (Table 6.19). Given this, Highways England does not consider that there would be a significant impact upon the SRN arising as a result of the proposed development.

Accordingly, Highways England has no objection to this planning application as we are satisfied the development will generate minimal additional traffic on the SRN in peak hours. We therefore consider that the development will not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT 02/13 Para 8-11 and MHCLG NPPF 2019 Para 108-11), in this location and its vicinity.

Please find our formal HEPR response attached.

Should you or the applicant have any queries regarding our response, please do not hesitate to contact us at PlanningSE@highwaysengland.co.uk.

Kind Regards,

Samantha Morgan (Sent of behalf of Janice Burgess Area 5 Spatial Planner)
Highways England | Bridge House | [1 Walnut Tree Close](#) | [Guildford](#) | [Surrey](#) | [GU1 4LZ](#)
Web: <https://highwaysengland.co.uk>

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18122020_HEPR_No Objection_CambridgeRd_Kingston.pdf
200K



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

From: [REDACTED] (Regional Director, South East)
Operations Directorate
South East Region
Highways England
PlanningSE@highwaysengland.co.uk

To: Royal Borough of Kingston Upon Thames (FAO Case Officer: Harsha Bhundia)
development.management@kingston.gov.uk

CC: SpatialPlanning@highwaysengland.co.uk

Council's Reference: 20/02942/FUL

Location: Cambridge Road Estate Cambridge Road Kingston Upon Thames KT1 3JJ

Proposal: Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works: Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with appearance and landscaping reserved) is sought for the remainder of the development. This application is accompanied by an Environmental Statement.

Highways England Reference: 89935

Referring to the planning application referenced above received 01 December 2020 in the vicinity of the A3 that form part of the Strategic Road Network, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection*

**on the basis that we are satisfied that the proposal will not materially affect the safety, reliability and/or operation of the Strategic Road Network (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109) in this location and its vicinity.*

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~

~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~

~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B (covering new access to the SRN) is not relevant to this application.¹

HIGHWAYS ENGLAND (“we”) have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This represents Highways England’s formal recommendation (prepared by the Area 5 Spatial Planning Team) and is made available to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority disagree with any recommendation made under b), c) or d) above, the application must not be determined before they have:

- i) informed Highways England; and
- ii) consulted the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk.

Signature: (Date: 18 December 2020
Name: ██████████	Position: Spatial Planning Manager

¹ Where relevant, further information will be provided within Annex A.

PlanningSE@highwaysengland.co.uk

Highways England: Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ

Report for – Royal Borough of Kingston Upon Thames
Review of Energy Assessment
Interim Review Report
Final

Document Version Control

Version	Date	Author	Reviewed by	Reviewed and Approved by
1.0	08/02/2021	[REDACTED]	[REDACTED]	James Sanders

Report for: Royal Borough of Kingston Upon Thames

Main Contributors: **Michael Woodbridge – Environmental Economics Ltd**
Sophie Williams - Environmental Economics Ltd

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1.0 INTRODUCTION TO THE REVIEW

1.1 Introduction

- 1.1.1 The Temple Team have been commissioned by Royal Borough of Kingston Upon Thames (RBKT) to carry out an independent review of the Energy Statement submitted in support the planning application for the Cambridge Road development (planning application numbers 20/02942/FUL).
- 1.1.2 This report supports a review of the Energy Statement prepared by Hodkinson on behalf of Cambridge Road (Kingston) Ltd 'the Applicant'. It reviews the Energy Statement against national and local policies and comments on the scope, methodology and conclusions of the assessment.
- 1.1.3 This report raises clarifications on the Energy Statement. It is recommended that these are addressed prior to determination.

2.0 ENERGY STATEMENT REVIEW

2.1 Compliance with National and Local Planning Policies, GLA guidance and Validation Requirements.

National Planning Policy

2.1.1 National Planning Policy Framework:

The National Planning Policy Framework (NPPF) states that local plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise. Every local authority is required by the NPPF to produce a local plan for its whole area. Local plans must address the spatial implications of economic, social and environmental change and should set out the opportunities for development and provide clear policies on what will or will not be permitted.

The NPPF suggests that sustainable development should be targeted. Three main objectives are stated:

an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating

Local Planning Policy

2.1.2 Policies from Royal Borough of Kingston upon Thames Core Strategy:

Policy CS 1 - Climate Change Mitigation

The Council will:

a. direct new development, including housing, employment, services and leisure to previously developed sites in accessible locations such as Kingston Town Centre, Surbiton, Tolworth and New Malden to reduce greenhouse gas emissions and energy used by transport.

b. ensure that all development (including extensions, refurbishments and conversions) is designed and built to make the most efficient use of resources, reduce its lifecycle impact on the environment and contribute to climate change mitigation and adaptation by:

- *reducing CO2 emissions during construction and throughout the lifetime of the development;*
- *building to the highest sustainable design and construction standards;*
- *minimising water consumption;*
- *using sustainable materials;*
- *reducing levels of pollution; air, water, noise and light; and*
- *planning for increased flood risk.*

c. optimise opportunities for retrofitting existing buildings with energy efficiency measures and low and zero carbon energy technologies.

The Council aims to:

d. identify areas suitable for designation as low carbon zones; and

e. identify and take forward opportunities for large scale renewable and decentralised energy generation to deliver low CO2 emissions resulting from energy generation within the Borough.

2.1.3 Policy CS 2 - Climate Change Adaptation

The Council will:

a. adapt to the effects of current and predicted climatic changes by working with its partners to develop a Climate Change Adaptation Strategy which will identify priorities for the Borough and future work programmes;

b. work towards minimising the urban heat island effect and prioritise areas;

c. ensure that future development takes into consideration the following:

- *hotter summers and therefore increased cooling demands;*
- *warmer, wetter winters and increased flood risk;*
- *water shortages and drought;*
- *urban heat island effect; and*
- *subsidence.*

d. continue to work in partnership with the Environment Agency and other key stakeholders to address flooding from the River Thames and its tributaries and surface water flooding, as shown on Figure 16; and

e. promote local food growing by encouraging development proposals to include appropriate spaces for residents to grow their own food and the establishment of community gardens for community food growing.

2.1.4 **Policy DM 1 - Sustainable Design and Construction Standards**

The Council will require all new residential developments to achieve successively higher levels of the Code for Sustainable Homes Level category for energy/CO2 in accordance with the following timeline:

- *Up to 2016: Code for Sustainable Homes Level 4; and*
- *From 2016: Code for Sustainable Homes Level 6.*

Major developments should meet Code level 5 from 2013.

Residential developments are encouraged to meet the other Code for Sustainable Homes Level categories (water, materials, surface water run-off and waste) as well.

Where appropriate, other new build developments over 500m² including conversions, refurbishments, extensions and changes of use are encouraged to achieve higher levels of the appropriate BREEAM standard in accordance with the following timeline:

- *Until 2013: BREEAM 'Excellent'; and*
- *From 2013 onwards: BREEAM Outstanding.*

Buildings that are undergoing refurbishment or extension, but where the alterations are too small to be assessed under BREEAM are encouraged to comply with the policies for existing buildings set out in the Council's Sustainable Design and Construction SPD.

Where it is not possible to meet the standards, compelling reasons must demonstrate that achieving the sustainability standards outlined in policies DM1 to DM3 would not be technically feasible or economically viable, the Council will negotiate planning contributions with developers to fund other methods to offset the environmental impact of the development. Further guidance on the level of contributions expected will be outlined in the Council's Planning Obligations SPD, or Community Infrastructure Levy charge, in line with Policy IMP3.

New development should minimise air, noise and contaminated land impacts in line with industry best practice. Development proposals for contaminated land should include remediation measures.

Monitoring Emissions

The Council will promote good carbon management by monitoring CO2 emissions to ensure the development is operated within the CO2 emissions standards of the as-built specification and those outlined within the Council's Sustainable Design and Construction SPD. Measures to ensure these standards are maintained will be monitored by the Council.

2.1.5 Policy DM 2 - Low Carbon Development

Independent Renewable Energy Generation The Council will consider all applications for independent renewable energy installations favourably, subject to other Core Strategy policies.

The development of energy generating infrastructure will be fully encouraged by the Council providing that any opportunities for generating heat simultaneously with power are fully exploited.

District Heating Networks

The Council will seek to develop District Heating Networks in the following areas identified as being suitable for the establishment of a combined heat and power network as outlined in Figure 15:

- *The Hogsmill Valley Area;*
- *Kingston Town Centre; and*
- *Tolworth Regeneration Area.*

Where relevant, development proposals in these areas should undertake the following when a District Heating Network is:

Not in place – Major developments should undertake a detailed investigation into the feasibility of establishing a District Heating Network with the proposed development as an anchor heat load or contribute towards such feasibility work.

Planned – make all reasonable efforts to ensure the proposed development will be designed to connect to the planned District Heating Network without any major changes to the development. When the network is in place, the development should be connected, unless it can be demonstrated that there is insufficient heating demand for an efficient connection.

Present – connect to the District Heating Network and make all reasonable attempts to connect existing developments in the vicinity to the network, unless it can be demonstrated that connection of existing developments will not result in CO2 savings.

2.1.6 New London Plan (LP 2020)

Policy SI 2 Minimising greenhouse gas emissions

- A. *Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:*
1. *Be lean: use less energy and manage demand during operation;*
 2. *Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly;*
 3. *Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site;*

-
4. *Be seen: monitor, verify and report on energy performance.*
- B. *Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.*
- C. *A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:*
1. *Through a cash in lieu contribution to the borough's carbon offset fund, or*
 2. *Off-site provided that an alternative proposal is identified and delivery is certain.*
- D. *Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.*
- E. *Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment that are not covered by Building Regulations, i.e. unregulated emissions.*
- F. *Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.*
- 2.1.7 N.B. Compliance with London Plan policy is also subject to guidance within the GLA document –“ Energy Assessment Guidance (April 2020)”

Table 2.1 Summary of Response to Policies

Requirements of Planning Current Policy	Included in Energy Statement?
NPPF.	Yes – report has addressed local plan policy which is what NPPF directs to
CS 1 – “Reducing CO2 emissions during construction and throughout the lifetime of the development”.	Yes – carbon emissions have been reduced by following Energy Hierarchy. Post construction energy use monitoring has also been mentioned, and a whole life cycle carbon analysis has been completed
CS 2 - c. ensure that future development takes into consideration the following: hotter summers and therefore increased cooling demands.	Yes – CIBSE TM59 assessment have been completed
DM 1 - Major developments should meet Code level 5 from 2013.	No – code was formally withdrawn in 2015 so this no longer applies
DM 2 - Where appropriate, other new build developments over 500m ² including conversions, refurbishments, extensions and changes of use are encouraged to achieve higher levels of the appropriate BREEAM standard in accordance with the following timeline: •Until 2013: BREEAM ‘Excellent’ •From 2013 onwards: BREEAM Outstanding	No – a couple of BREEAM credits have been mentioned but no overall BREEAM level has been targeted. This has been raised as a clarification in the summary table below.
DM 2 - Planned – make all reasonable efforts to ensure the proposed development will be designed to connect to the planned District Heating Network without any major changes to the development.	Yes – the report has identified a planned network and is planning to connect to it
LP 2020 - Major development should be net zero-carbon.	No – domestic portion has an offset specified by the non-domestic does not
LP 2020 - Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.	Yes - energy hierarchy has been applied and carbon emissions are reduced in excess of requirements
LP 2020 - Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures.	Yes – target has been met at Be Lean stage for both aspects of development
LP 2020 - Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment that are not covered by Building Regulations, i.e. unregulated emissions.	Yes – unregulated energy demands have been calculated. There is a commitment to reducing them, but with no detail of how this will be approached
LP 2020 - Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.	Yes - a whole life cycle carbon analysis has been carried out and included in report

2.2 Commentary on the Scope and Methodology of the Assessment

2.2.1 The report addresses a development which is described as follows:

Hybrid Outline Planning Application for a mixed-use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290 m² of flexible office floorspace (Use Class E), 1,395 m² of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250 m² community floorspace (Use Class F2);

Detailed permission is sought for access, layout, scale, appearance and landscaping of Phase 1 for erection of 452 residential units (Use Class C3), 1,250 m² community floorspace (Use Class F2), 290 m² of flexible office floorspace (Use Class E), 395 m² of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works.

2.2.2 Representative SAP assessments have been carried out for the domestic units, with a total of 10 different units assessed. Shell and core SBEM assessments have been carried out for the non-domestic aspects.

2.2.3 The requisite energy hierarchy has been applied to both sets of calculations. This has been carried out in line with the proscribed process contained with London Plan and supplementary documents. SAP 10 figures have been used in line with latest guidance. Zero carbon via an offset payment has been achieved for the domestic units, but has not been achieved for the non-domestic, which would be required. **This has been included as a clarification in the summary table below.**

2.2.4 At Be Lean stage both domestic and non-domestic aspects surpass the 10% and 15% reduction target respectively. Mains gas heating has been correctly assumed as this stage. A high-level fabric specification has been assumed, alongside enhanced thermal bridging details and mechanical ventilation with heat recovery. It should be noted that these assumptions must be carried through to detailed design if the Be Lean targets are to be achieved.

2.2.5 The report identifies a planned heat network and has designed the majority of the development to connect to it, the exception being the small commercial units which will be offered connection but may choose to not do so. They have engaged with the relevant team designing this network and have acquired relevant data to be entered into the calculations. The site will be served by mains gas heat boilers until they are able to connect to the network. If connections turn out not to be possible, a heat pump alternative has been proposed. Designs for both these scenarios have been included.

2.2.6 A renewable feasibility comparison has been carried out. It concludes that PV can be provided to supplement the carbon reductions. Indicative PV layouts have been provided, but it is unclear if the provision has been maximised. **This is raised as a clarification in the summary table below.**

2.2.7 Be Seen energy monitoring has been alluded to, but policy details were not finalised when report was completed. However, it seems the development will be designed to be able to monitor and report energy use, and the reporting process as prescribed by the GLA could be followed. **This is raised as a clarification in the summary table below.** Suitable

legal wording would be required to ensure that this is followed through design and operation of the development.

- 2.2.8 An overheating assessment has also been included in the report. The domestic units have been assessed under CIBSE TM59 as required. Several weather files have been used in the assessment. The assessment achieves required performance with DSY1 weather scenario. However internal blinds are required to do so, alongside a high air change rate for the MVHR. The overheating mitigation strategy aligns with relevant acoustic and air quality concerns.
- 2.2.9 A whole life cycle carbon analysis has also been submitted, as requested by emerging LP 2020.

2.3 Commentary on the Conclusions of the Assessment

- 2.3.1 Overall the report is largely compliant with relevant planning policy. The energy hierarchy has been followed with appropriate measures introduced at each stage in order to minimise carbon emissions. To this end emissions have been reduced in excess of the requirements of London Plan.
- 2.3.2 Any clarifications required are dependent on the extent to which the emerging LP2020 is to be enforced.

Summary of Clarifications Required
<ol style="list-style-type: none">1. Is BREEAM Outstanding being targeted as per Policy DM 2?2. Will the non-domestic aspect achieve zero-carbon via an offset payment?3. Will PV provision be maximised on available roof space?4. Will the Be Seen carbon reporting process be adhered to?



Re: Residents Comments re CRE (20/02942/FUL)

[REDACTED]@kingston.gov.uk
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Cc: [REDACTED]@kingston.gov.uk

25 February 2021 at 12:27

Good afternoon Harsha,

As requested this email is to provide supplementary explanation to my earlier comments in order to address specific concerns relating to trees as summarised by Elliot. I address these concerns in order below (Elliot's comments in red):

"I have struggled to gain clarity of what will happen to both trees and hedgerows located in private gardens. Could we have some clarity of what the extent of tree and habitat loss there will be in these areas?"

The tree data relates specifically to trees on site, so this does not include other green areas or the grown contents of private garden spaces such as hedges and shrubs. This may be another level of data picked up by Elliot with their biodiversity experts following his concerns, but in relation to the tree data, this tells us only what trees are where on site, what their condition and value are, whether they conflict with elements of the proposals and subsequently whether they will be retained or removed and how those retained will be protected during the course of development.

Obviously the Council have to assess whatever information is submitted and unless there are some obvious and glaring discrepancies we would not have reason to doubt the data that they have employed independent specialists to compile and submit on their behalf. Earlier on in the process there were some questions surrounding the tree numbers not matching Council data of the site, but this was when the proposals were at an earlier stage of development and trees shown on conceptual plans were not truly indicative of what existed. At this point I raised the importance of the tree information being provided, as trees on site were a major constraint to the development and needed special consideration. The developers then submitted the information as requested and I have not had cause to mistrust what I see in the Arboricultural submissions whilst having spent some time studying them in depth in order to provide my consultation.

The Council are required to assess the loss of trees in the same way as they would any other site constraint and to balance the proposals against losses and retention of trees and any mitigation that may be sought for losses that cannot be avoided. Some members of the public might say that all trees should be retained, but it isn't that simple, a development of this size necessitates some site reconfiguration and has other restrictions and targets that must be met. All of these must be balanced in order to present a holistic scheme which attempts to provide the best possible solution to each constraint in tandem and not in isolation. Trees naturally form part of this assessment, but whilst I have consulted on a number of schemes which have been resistant to making any changes in order to retain trees, I have been pleasantly surprised with the response from these developers and their willingness to alter major elements of the scheme in order to retain important trees and to bring us to a position where the application in consideration has, on a major site, managed to show the retention of all 16 Category A trees, 81 out of 84 Category B trees (those 3 lost are in direct conflict with built elements that cannot be compromised), and 66 Category C trees with 37 to be removed. An additional 9 Category U trees which are not suitable for retention on health and safety grounds brings the total removals to 49 whilst the retentions make 163 trees most of which are of high amenity value to the site and which will have the greatest impact out of any retained element to the way the development feels following completion. Those 163 trees being retained and protected will then be supplemented with substantial landscape areas, extensive planting and the installation of 250 additional trees. As noted previously though, the tree numbers, sizes and species and their impact upon the site including potential for biodiversity will need to be sought via a detailed planting plan along with details of all other planting. Given the importance of this scheme I'm of the opinion that this should be sought in advance of going to committee rather than by condition.

"Points are raised with regard to the impact of the root protection areas of trees in a number of locations throughout the footprint of the development. In this instance can we also gain clarity on what potential impact there will be on the retained trees, to ensure that they are not detrimentally impacted as part of the proposal."

Responding to this, I recall discussions at an earlier stage where the developer talked about options to avoid damaging the RPA of retained trees. A number of options were discussed including partial cantilevering of building portions and the use of piling to avoid roots. In the end though their consultant Arborist advised them that the best route was to remain outside of the actual RPA* and instead ensure that new buildings were constructed within the footprint of existing foundations in order to avoid any entrance into the actual RPA. This approach is reflected in points 3.9 & 3.10 of the Arb Method Statement as seen below in green. I have also included 3.10 as it covers the provision of underground services.

**Actual RPA being the calculated RPA which has been adjusted to take into account existing obstructions to root growth such as the deep foundations of existing buildings as in this case.*

3.9. Construction within RPAs 3.9.1. With the exception of RPA's of T23, T32 all buildings are to be constructed outside the RPA's of retained trees. T23 and T32 have existing buildings shown within their RPA's and the proposed buildings are to be built within the footprint of existing. It is likely that the existing buildings would have likely restricted root growth, therefore the proposed will not have a negative effect on the trees.

3.10. Services It is fundamental to tree protection that infrastructure design is sensitively approached, as trenching close to trees may damage roots and affect tree health and stability. Details of services have not been provided at the time of writing. The Tree Protection Plan, showing the constraints posed by retained trees will be passed to the infrastructure engineers to inform their design, ensuring that all services avoid areas of potential conflict. As per BS5837:2012 Figure 1, once further details become available as part of the detailed/technical design for the site, the TPP and AMS will be revised to incorporate these details for services for inclusion in the Tender documentation.

Hopefully then this provides the additional clarity that you require and substantiates my position in support of the application.

Warm regards,



Tree & Landscape Officer for the ~

Royal Borough of Kingston upon Thames

Guildhall II,
High Street,
Kingston upon Thames,
KT1 1EU

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On Tue, Feb 9, 2021 at 4:12 PM Harsha Bhundia <harsha.bhundia@kingston.gov.uk> wrote:

Hi Ben,

Please see [redacted] comments below. I have seen your comments on trees, however, in light of a number of objection letters specifically raising the loss of so many trees, are you able to provide more commentary on this point and [redacted] qs below?

Kind regards

Harsha

Miss Harsha Bhundia BA (Hons) MA MRTPI

Principal Planner (Acting)

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

KT1 1EU

T: 020 8547 4697

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----- Forwarded message -----

From: [REDACTED] [kingston.gov.uk](mailto:[REDACTED]@kingston.gov.uk)>
Date: Tue, 9 Feb 2021 at 10:51
Subject: Residents Comments re CRE
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Hi Harsha,

Apologies for the delay in responding to you regarding the extensive comments provided by a resident for the Cambridge Road Estate redevelopment. I have just read through the comments which raise a number of points, many of which align with some of the points I detailed in my previous email - such as the efficacy bat survey, the feasibility of the SUDs scheme and the impact on the house sparrow population.

The comments also raise issues re the loss of trees in private gardens. Since re reviewing the associated documents I have struggled to gain clarity of what will happen to both trees and hedgerows located in private gardens. Could we have some clarity of what the extent of tree and habitat loss there will be in these areas?

Furthermore points are raised with regard to the impact of the root protection areas of trees in a number of locations throughout the footprint of the development. In this instance can we also gain clarity on what potential impact there will be on the retained trees, to ensure that they are not detrimentally impacted as part of the proposal.

Best wishes,

[REDACTED]

[REDACTED] MSc (Hons)

Biodiversity Officer
Corporate and Communities

The Royal Borough of Kingston upon Thames
Guildhall 2
High Street
Kingston upon Thames
KT1 1EU

Email: [REDACTED] [kingston.gov.uk](mailto:[REDACTED]@kingston.gov.uk)

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RE: CRE Biodiversity

Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
To: [REDACTED] bartonwillmore.co.uk>

13 April 2021 at 16:28

Hi [REDACTED]

I have had a meeting with [REDACTED] to discuss these comments and in our view, subject to conditions in relation to watching briefs, BNG, and habitat enhancements no objections are raised on biodiversity grounds. I will of course let you have sight of the conditions in due course when fully drafted.

bat bricks

Kind regards

Harsha

Miss Harsha Bhundia**Principal Planner (Acting)**

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

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T: 020 8547 4697

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On Wed, 31 Mar 2021 at 08:26, [REDACTED] bartonwillmore.co.uk> wrote:

Morning Harsha,

Please see our responses below in red.

Regards



Associate

[Redacted]

[Redacted]



W: www.bartonwillmore.co.uk

7 Soho Square, London, W1D 3QB

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From: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Sent: 19 March 2021 12:13
To: [Redacted] <[\[Redacted\]@bartonwillmore.co.uk](mailto:[Redacted]@bartonwillmore.co.uk)>
Subject: Re: CRE Biodiversity

Hi [Redacted]

Many thanks for the attached. Officers response below:

Comment 1:

I am pleased to see the commitment to integrate the habitat features for the target species identified with greater detail to be provided in the Ecological Management Plan which will include: wildflower planting, species rich grassland, a hectare of biodiverse/biosolar roofs, the installation of bird and bat boxes and the creation of stag beetle loggeries and hedgehog highways.

Just as a point of clarification, in terms of ecological function and longevity, I would also advocate the inclusion of bat and bird bricks to be incorporated with the design - please see my comments below referring to section '3,4,5 &

7'. Details of the location and design of the integrated bat and bird bricks can be secured via an appropriately worded planning condition regarding the Ecological Management Plan.

Thank you for providing the images of the biodiverse living roofs provided in the appendix of the application. These look to be valuable habitat features, (please see comment 13 for further points on this).

Comment 2:

Thank you for the comments regarding potential issues of increased levels of cat predation. I take the point that the proposed development has a 31 unit reduction in the units/homes that have direct access to the ground floor and cats which do not have direct access will be very restricted in their ability to get outside through self closing doors which will not be fitted with cat flaps. Therefore the intensity of cat predation could potentially be reduced.

As I am sure you appreciate, it is pertinent to treat speculation with some level of caution and though I deem the above statement to be logical, I think it would be wise to add some level of communication programme to further address this issue. Especially as the site is recognised for its strong population of House Sparrows which are known to be vulnerable species to cat predation, and that there are locally important populations of Slow Worm (see comment below) which are also a target prey species. Therefore would it be possible to issue new tenants with a welcome pack that includes guidance on responsible pet ownership (i.e encouraging bells / collar mounted devices) which could also raise awareness of the importance of the local area in terms of its wildlife value. *This requirement would be addressed within the Ecological Management Plan and details of the proposed communication can be enclosed within this document and subsequently reviewed / approved by the Local Planning Authority.*

With regard to the desk based study and local slow worm population which identified the closest record for slow worm was 1174m, please be aware that this is not a true reflection of the situation. Indeed, we have data demonstrating a locally important breeding population of slow worms in the kingsmeadow area. This is approximately 120 meters from the proposed western boundary on Vincent Road. We are also aware of slow worm records on Kingston Cemetery which borders the site. *The records of slow worm closer than 1174m were not held by GiGL (the relevant Biodiversity Record Office) at the time of the desk study in 2019 as it was not included in the species records. For this reason it could not be considered as it was unknown and we can only assess the information that we are provided and that is in the public domain. The presence of slow worms closer to the site is only an issue if the cat population was to increase, which it is predicted not to, based on the reasons provided in our previous response.*

Comments 3,4 5 & 7.

We recognise that the bird survey was conducted at a sub-optimal period, however the applicant acknowledges that the number of 25 individuals recorded at one time is not reflective of the house sparrow population supported by the site. I am pleased to see that it is acknowledged that the house sparrow population on site is in excess of 125 individuals and that the mitigation will reflect this.

As we discussed on the call there is strong research emerging with regard to the ability of swift bricks to provide beneficial roosting habitat for a range of species most notably house sparrows - therefore I would greatly encourage their inclusion with the built structures. A ratio of at least 1:1 nest bricks per dwelling is generally accepted now as good practice – a level of provision outlined in the award-winning Exeter City Council 'Residential Design Guide SPD' (2010). If we could incorporate a significant number of these across the footprint which could provide a real benefit to local bird species, in line with good practice this potentially could be 2,170 bricks incorporated within the full footprint. *We query how applicable the Exeter City Council SPD is to an urban regeneration project of this nature and scale. It is an SPD primarily written for volume housebuilding and low to mid rise flatted Blocks. The request for 2,170 bricks is therefore considered to be excessive and the reference of a 1:1 ratio is unlikely to be the ratio applied to a development of this size. The exact number will be decided when the EMP is produced. If 250 - 375 bricks across the scheme were included this would provide nesting opportunities for double/triple the existing potential population. In addition to this multiple bat boxes will be installed across the site.*

This is however a detailed design matter and details of the location and design of the bat and bird bricks can be secured via an appropriately worded planning condition.

Comment 6

Thank you for providing comments around the hedgerow planting, with 510m² to be secured in phase one and 2,900m² of hedgerow to have been established by the project's completion. In terms of the species, I would advise that native species are preferred and was pleased to see field maple, hawthorn, blackthorn and european hornbeam. I suggest these species are selected to bring wider biodiversity benefits. *This feedback is noted and the Council will be consulted on the final planting specification as part of a detailed landscape condition.*

Comment 8

I accept the conclusions drawn with regard to the potential roosting habitat in the undercroft area. No further action required.

Comment 9, 10, 11 & 12

It is good to see the data has been rectified, which previously included faulty data. This has resulted in the overall average pass rate increasing from 21 to 32 passes per night. Thank you for sharing the raw data, which shows in excess of 3,000 recordings throughout the survey period. As stated, the site is used for both commuting and foraging. Utilizing the framework provided by Wray et al ('Valuing Bats in Ecological Impact Assessment (2010) which was published in 'In Practice' December ed (The Bulletin for the Institute of Ecology and Environmental Management), it would suggest that the activity recorded would be of District / local importance. *The value of the site for foraging and commuting bats was valued at the local level within the ES chapter. The framework referred to above groups 'District, local or parish' as one group. The level above this is County, which the site is not of County value, and the level below is 'not important'. Therefore, we stand by the value level assigned within the ES and it appears to be broadly in line with what the Biodiversity Officer is concluding. The ES has also been subject to independent review and confirmed that the methodology employed is correct.*

I endorse the incorporation of habitat features on site to improve community, roosting and foraging opportunities. For this to be successful, lighting must conform with Bat Conservation Trust Guidance Note 08/18 and habitat to support the generation of invertebrates. I appreciate that greater detail on these measures will be provided within a development phase specific Ecological Management Plan. *Noted. To be secured via an appropriately worded planning condition.*

Comment 13

With regard to the biodiverse/biosolar roofs, can we confirm that these will not have public access and hard infrastructure such as additional satellite dishes will not compromise their ecological integrity over time. Can details regarding the soil depth also be provided? *There is no public access to the roofs. Soil depth details are typically provided at the detailed design stage and we suggest that this information is submitted pursuant to an appropriately worded planning condition in due course.*

Comment 14

Very pleased to see the wetland feature integrated within the SUDs scheme is indeed viable and the contradiction previously noted was a reporting error. This is a highly important ecological feature for the site, providing habitat for amphibians, freshwater invertebrates and drinking opportunities for a range of fauna. *Noted.*

Kind regards

Harsha

Miss Harsha Bhundia

Principal Planner (Acting)

Royal Borough of Kingston upon Thames

Guildhall II

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T: 020 8547 4697

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On Tue, 16 Mar 2021 at 17:08, [REDACTED] bartonwillmore.co.uk> wrote:

Hi Harsha,

Please see the attached response to the points raised.

Regards

[REDACTED]

Associate



[REDACTED]

7 Soho Square, London, W1D 3QB

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From: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Sent: 28 January 2021 15:14

To: [REDACTED] [bartonwillmore.co.uk](mailto:[REDACTED]@bartonwillmore.co.uk)>

Subject: CRE Biodiversity

Hi [REDACTED]

Please find below Biodiversity Officer's preliminary comments. The comments in red are mine and the blue coloured comments are his responses.

Documents Reviewed:

- Preliminary Ecological Appraisal Report
- Letter dated 16th October 2020
- Bird Survey Report
- Bat Report
- Bat activity heat map
- Biodiversity Net Gain Assessment
- The Master Plan Design Guidelines (Chapter 1)
- The Master Plan Design Guidelines (Chapter 6)
- Environmental Statement
- Flood Risk Assessment Part One

Preliminary Ecological Appraisal - November 2020

Key findings of the report include the close proximity to bordering Kingston Cemetery which is a Site of Importance for Nature Conservation, It should be noted that the independent SINC review conducted over the Summer of 2020 recommended that this site should be upgraded to Borough Level. I support the recommendation for a CEMP to identify and mitigate impacts this application may have on Cemetery, (5.1) to be secured by condition. Key species identified within the report include House sparrow (see my comments in the Bird Survey Report), Eurasian Hedgehog, Stag beetle and bat species, all of which need to be integrated into the landscaping strategy in line with all the recommendations made within the report. Reviewing the Master Plan design guidelines, there is a lack of clarity of how these species will be incorporated into the landscaping strategy. - [I request for greater detail demonstrating how the recommendations made within the PEA have be intergrated into the landscaping strategy.](#)

Caution should be given to the conclusion drawn in 5.5 of the report which states 'the local population will not increase significantly'. Here I would note that the application is for "up to 2,170 residential units" which is a sizable increase from the existing 832 residential units. This will likely exert greater pressure on the existing greenspaces and green infrastructure. I note in the Environmental Statement the RSPB document '*Are cats causing bird declines?*' is referenced, this suggests there is no direct evidence on how cats impact bird populations however, it is undeniable that they have a strong predatory impact. Indeed high levels of predation on house sparrow populations is noted within the referenced document. We should also be aware that increased cat numbers will also have a significant impact on small mammal and reptile populations, and we have one of the most important meta populations of slow worms in Kingston in close proximity to the development site. [Are we expecting more robust investigation into impact of cat populations on bird, mammal and reptile populations? Yes I would recommend this, with suggestions on how to mitigate this increased predation risk, I would include bats in the taxa at risk too.](#)

Cambridge Road Estate - Bird Survey Report November 2020

As stated in (3.7) of the report, this survey was conducted at a sub-optimal period, and the surveyors indicate there is high potential nesting on the site (4.4) in line with the PEARs findings (4.40). Caution should be taken with regard to the observation made in 4.5 of the report, which states "No other species were confirmed as breeding" as the surveyors previously identified this survey was conducted in a suboptimal period. [When is the best time to do the surveys? As stated in 3.7 of the report the optimal period between March and July, with visits spaced four weeks apart.](#)

The survey identified 17 species of bird on the site, of which five are on the RSPB Birds of Conservation Concern listed as declining.

The surveyors peak count of House Sparrows in one location at one time was recorded at 25, in what is described as a 'moderate numbers'. I am aware of records that House Sparrows have been recorded in numbers over 125 individuals making it one of Kingston most important colonies. There has been recorded breeding on site especially with reference to the significant house sparrow population, with Figure 4.1 demonstrating the importance of the hanging tiles as potential nesting features. We should recognise the House Sparrow numbers have declined by nearly 71% since 1977 in the UK and that it is classified as the UK Red List under birds of conservation concern. They are also a priority species under the UK post 2010 Biodiversity Framework and a London BAP Priority Species. [Suggested next steps? I recommend for the survey to be conducted in an optimal period, and demonstaration of how viable habitat \(roosting & foraging\) will be incorporated into the design to ensure the site can continue to sustain the imporant population of house sparrows.](#)

Particular note should be given to 5.1 which ensures that new nest boxes are installed prior to the commencement of any demolition. 5.2 states that Sparrow terraces should be installed across the development, however it is unclear from Chapter 6 in the master plan where such structures will be erected. I would advocate that these are installed in all viable locations across the site, inline with Objective 2.5 of the London House Sparrow HAP.

As identified in 5.3, the associated site clearance with this development will 'result in the loss of foraging habitat' and thus it is essential that this loss is mitigated for. Reviewing the Biodiversity Net Gain Assessment and Landscaping plan can I ask for clarity on the provision of hedgerow which provides vital foraging opportunities, and how this will be able to successfully establish with the levels of shading that will result from the high rise buildings. This site represents significant opportunities for hedgerow creation which can bring widespread benefits to the ecology and local community.

I do however endorse all the recommendations made within section 5 of the report. Particular note should also be given to recommendations 5.4 & 5.5 to integrate nesting opportunities for a range of other avian species including swifts. Again, reviewing the landscaping assessment it is unclear to what extent these recommendations have been integrated with the proposals. **Please provide a revised plan.**

Bat survey - November 2020

The bat survey method statement and preliminary roost appraisal identifies a significant number of potential roosting features as depicted in Fig 10. The emergence surveys however concluded that 'roosting bats were confirmed as likely being absent from the site' (Point 4.2). It must be noted that surveyors were unable to gain access to 'underground parking / storage areas' which were considered to be 'potential roosting features' (Point 2.16) and thus the conclusion must be taken with caution. **With relation to the underground parking storage area I recommend an appropriate emergence survey to investigate the potential roosting features identified within the report, in line with Bat Conservation Trust guidelines. These state that surveys of summer and maternity roosts should be conducted within the period May - August. When access is gained, if the ecologist deems it an appropriate structure to support a winter hibernating roost, the optimal time for this survey to be conducted is between December through to February.**

Foraging and community activity was observed of 4 species within the site. There are a number of constraints which must be taken into account with regard to methodology and results, including the technical failure of static monitor CRE4 which failed on two occasions. During April 2020 there were a number of nights which dropped below 10oc. If the static detectors were deployed during these periods they would be in breach of Bat Conservation Trust best practice guidelines which recommend only surveying in temperatures above 10oc (BCT guidelines point 2.6 page 20).

When reviewing the presented results regarding bat activity there is a difficulty in discerning the true levels of bat activity observed, which are potentially overlooked when only taking the mean level of activity into consideration. The graph in 4.14 of the document shows that approx 2000 passes were recorded in the summer season and graph depicted in 4.4 depicts large error bars indicating high levels of standard deviation from the static deployment of CRE2. The graph shows that this placement could have recorded within the region of 110 passes per evening.

To avoid misinterpretation of the results, can I request the raw data to ensure that the mean is a true representation of the levels of activity within the site. **Please can this be provided.** I am aware of local records that indicate the site has an important role in supporting foraging bats and due to the constraints associated with this investigation I urge significant caution with relation to the conclusion made within 8.106 of the Environmental statement which states there is 'very limited sustained foraging'.

I endorse all the recommendations made of mitigation and enhancement made within the bat report, however there is a lack of clarity on how such recommendations have been incorporated into the master plan, especially when considering how the appropriate habitat will be established to enable foraging opportunities.

BNG Assessment and SUDs scheme

I welcome the enactment of a biodiversity net gain assessment, however caution should be taken with regard to the reports conclusions. It is pleasing to see that the assessment predicted to secure a 70.77% increase in biodiversity following phase 1 of the development and 96.26% gain following the completion of the proposed master plan.

I would however like to highlight that surveyors refer to 0.42 hectares of amenity grassland being in poor condition for the phase one development. However, amenity grassland across the site supports a number of floral and fungal species that actively provide forage for local wildlife populations including polinators, bats and the significant colony of house sparrows. The new landscape strategy must ensure it can support these populations, which is not clearly demonstrated. Can I also query why in 4.2 of the assessment it is stated that the post development intensive green roof will be in a poor condition?

The Master Plan, Environment Statement and Biodiversity Net Gain assessment state that 1,255 sqm of rain gardens and SUDs channels will be integrated into the scheme. This would provide beneficial habitat to local wildlife populations. However when reviewing Part 1 of the Flood Risk Assessment and the SUD feasibility matrix detailed in point 6.11.7 it states that due to a number of factors including topography, clay substrate and limited public open space such an approach 'is not a viable strategy'. **Please nca th applicant clarify this point.**

Furthermore, in an earlier iteration of the proposal that was circulated the plan incorporated a number of 'Biodiverse Mini Parks'. Disappointingly I can not see these areas included in the current proposal. When reviewing the master plan landscaping plans, I welcome the reference of a 'focus on ecology' however it is difficult to discern how this translates to the landscaping strategy.

I was unable to locate an Urban Greening Factor associated with the proposal, to ensure that the development achieves the recommended target of 0.4, as stated in policy G5 of the draft new London Plan. **This covered in the Biodiversity Impact Assessment (they are estimating 0.414) Thank you this would meet the London Plan Recommended minimum target.**

Kind regards

Harsha

Miss Harsha Bhundia BA (Hons) MA MRTPI

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Report

2 July 2021



TEMPLE

LEADERS IN ENVIRONMENT,
PLANNING & SUSTAINABILITY.

Report for – The Royal Borough of Kingston-upon-Thames

Cambridge Road Estate Regeneration Equalities Impact Assessment

Independent Review by Temple



Document version control

Version	Date	Author	Reviewed by	Reviewed and approved by
01	18.06.2021	Prudence Wales		
02	30.06.2021	Prudence Wales		
03	02.07.2021	Prudence Wales		

Report for: **Harsha Bhundia**
The Royal Borough of Kingston-upon-Thames

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Contents

1.0	Introduction	1
2.0	Approach	2
3.0	Review of the planning application EqIA	3
4.0	Review of the revised EqIA	6
5.0	Review of the draft final EqIA	7
6.0	Conclusions	9

1.0 Introduction

- 1.1 Temple has prepared this report in response to a request for proposal from Harsha Bhundia at the Royal Borough of Kingston-upon-Thames (RBK).
- 1.2 RBK appointed Temple on 4 June 2021 to undertake an independent review of the Cambridge Road Estate regeneration equalities impact assessment (EqIA) in order to provide comfort that the planning application submission document provides a robust and thorough assessment of the scheme's anticipated effects on members of protected groups as defined by the Equality Act 2010.
- 1.3 **Mark Teasdale, Senior Director** at Temple led the review, supported by **Prudence Wales, Senior Consultant** at Temple. Mark is a socio-economics expert with over 30 years' experience delivering complex, development schemes, often subject to environmental impact assessment (EIA).
- 1.4 Mark has particular expertise in preparing equality impact assessments for estate regeneration schemes, having led the EqIA work for both the Winstanley and York Road scheme in Clapham and the Alton Estate regeneration scheme in Roehampton. Mark has also acted as an expert witness on equalities matters.

2.0 Approach

2.1 In order to complete the review, Temple undertook the work outlined below.

Document review

2.2 As well as reviewing the planning application EqIA in some detail, we considered the GLA's comments on the EqIA and the Applicant's response to those comments in their letter of 31 March 2021. The Cambridge Road Local Lettings Plan and associated EqIA were reviewed, alongside the Planning Statement and relevant RBK equality policies.

Indicative findings

2.3 We provided a track change version of the planning application EqIA on 8 June 2021 highlighting our indicative findings.

Consultation with the Applicant

2.4 We held workshop sessions with the Applicant team on 8 June 2021 and 11 June 2021 during which we discussed our comments on the planning application EqIA and a range of suggestions for strengthening the document.

Final reporting

2.5 This document forms the final report summarising the findings of our independent review of the Cambridge Road Estate regeneration EqIA.

3.0 Review of the planning application EqIA

- 3.1 Temple shares the GLA's concerns about the planning application EqIA, agreeing with the GLA that the assessment was far too generalised to provide a meaningful consideration of how the proposed development is likely to affect members of protected groups.
- 3.2 The main points from our review of the planning application EqIA are outlined below.

Baseline assessment

- 3.3 The planning application EqIA compared overall baseline conditions in Norbiton ward with those across RBK. Temple recommended using data that is tailored to the Cambridge Road Estate, drawing out the key protected characteristic groups and other vulnerable groups that will be affected on site and comparing that to the wider ward profile. This baseline data was available separately in the Cambridge Road Local Lettings Strategy.

Temporary and permanent effects

- 3.4 The planning application EqIA did not distinguish between the temporary and permanent effects of the scheme on protected characteristic groups and other vulnerable groups. Temple recommended that temporary (or construction) and permanent (or operational) effects be separated to demonstrate adequate consideration of the impact of a 10 to 15-year regeneration project, as well as end-use impacts.
- 3.5 We recommended that the Applicant consider the potential impacts on members of protected groups summarised below.

Temporary Impacts (Construction Phase)

Access to Social Infrastructure

1. Access to open space
2. Access to play space
3. Impact on community cohesion
4. Access through and to the site
5. Access to education infrastructure
6. Access to leisure facilities
7. Access to health infrastructure

Construction Disruption

- 8. Impact of construction noise
- 9. Air quality impacts of construction traffic
- 10. Access to the site
- 11. Temporary changes in daylight and sunlight
- 12. Feelings of safety and security during construction

Access to Employment Opportunities

- 13. Access to employment and skills development opportunities
- 14. Opportunities for employment on site

Housing

- 15. Disruption due to changes in housing arrangements
- 16. Health impacts – mental well-being and physical health

Permanent Impacts (Operational Phase)

Access to Social Infrastructure

- 17. Access to open space
- 18. Access to play space
- 19. Impact on community cohesion
- 20. Access through and to the site
- 21. Access to education Infrastructure
- 22. Access to health infrastructure

Opportunities for social interaction

- 23. Access to the site (including parking)
- 24. Impact on feelings of safety and security

Access to Employment Opportunities

- 25. Access to employment and skills development opportunities
- 26. Opportunities for employment on site

Housing

- 27. Access to affordable housing
- 28. Health impacts – mental well-being and physical health

Methodological approach

- 3.6 Temple recommended that the Applicant draw out potential impacts more clearly in the main body of the report, demonstrating how impacts relate to the mitigations suggested in Sections 3.1 and 3.2, as well as explaining how and why they might benefit protected characteristic groups.

Cumulative effects

- 3.7 The planning application EqIA lacked consideration of cumulative effects. Given the developments taking place near the site, it was recommended that discussion of this be included.

Related strategies and mitigations

- 3.8 The planning application EqIA lacked detail on existing strategies and work done throughout the scheme's development to make the regeneration more inclusive. We recommended that more detail was included on how a range of strategies had considered equalities, including the Cambridge Road Local Lettings Strategy, the Construction Management Plan and the Statement of Community Involvement.

4.0 Review of the revised EqIA

- 4.1 Following the workshop session on 8 June 2021, the Applicant prepared a revised version of the EqIA. The revised EqIA included a technical appendix providing a much more systematic assessment of the likely effects of the proposed development on members of protected groups.
- 4.2 We convened a further workshop with the Applicant on 11 June 2021 to discuss our comments on the revised EqIA. The main points from our review of the revised EqIA and accompanying technical appendix are outlined below.

Methodological approach

- 4.3 Further clarity was provided in the revised EqIA about what impacts were considered in the assessment through an additional appendix provided by Barton Wilmore on the Schedule of Impacts. We recommended that this be integrated into the main body of the report, so that all information on the consideration of protected characteristic groups and other vulnerable groups was provided in one place for the reader.

A joined-up approach

- 4.4 We stressed the need to ensure that all relevant strategies, policies and previous EqIAs carried out by the Applicant were referenced and explained clearly in this EqIA. This was to demonstrate the consistent consideration of equalities throughout the scheme's development.

Inclusion of mitigations

- 4.5 Where mitigations were mentioned, it was recommended to provide exact examples from the relevant strategies and ensure that they were related back to the specific protected characteristic groups that they will affect.

5.0 Review of the draft final EqIA

- 5.1 Temple conducted a third and final review after consideration of previous comments under Sections 3.0 and 4.0 of the draft final EqIA prepared by Barton Willmore on behalf of the Applicant.
- 5.2 We found that the draft final EqIA was significantly improved in terms of demonstrating the consideration of the impact of the proposed development on protected characteristic and other vulnerable groups compared to the planning application EqIA.
- 5.3 The final residual comments do not reflect significant deficiencies with the overall report. However, the resolution of the remaining comments would strengthen the individual sections of the EqIA to which they relate.

Figures in Table 14

- 5.4 The figures in Table 14 do not sum correctly. Nor do the percentage columns accurately reflect the main data. Currently, the figures in paragraph in 2.22 do not align with the figures in Table 14 and the subtotals in Table 14 do not seem to be correct.

Ensuring that Rehousing Strategy is linked to Kingston Council's Equalities Duty

- 5.5 Paragraph 3.18 should include an additional sentence linking the explanation of the Rehousing Strategy back to the equalities duty outlined in the policy section. Without this, it remains unclear to the reader how this paragraph is related to question 1.3.

Defining Scope

- 5.6 In the paragraph below Table 16 it would be useful to include the phrase "key relevant protected characteristics." This would make it clear that the other protected characteristics have been scoped out rather than simply omitted from this list.

Table 17 – Summary of Effects

- 5.7 The addition of the Table 17 is welcome and demonstrates the systematic consideration of equalities effects. However, it is unclear why some rows are not split into two columns. Consistency around this approach would strengthen this table.
- 5.8 In the row discussing temporary effects on the access to education infrastructure, it is recommended that 'potential' be added to the type of effect column, to demonstrate that this would not be expected for all families.

Summary of Actions

- 5.9 In paragraph 3.104 an additional sentence would be beneficial explaining that this section is a summary of the strategies and policies that include specific mitigations which address potential adverse effects, and that these can be found within the planning suite of documents.

6.0 Conclusions

6.1 Following three rounds of review, we can report that the draft final EqIA uploaded to the RBK planning portal is significantly improved when compared with the planning application EqIA. The following changes were noted as strengthening the EqIA:

Inclusion of Cambridge Road Baseline Conditions

6.2 Temple recommended including baseline data specific to the Cambridge Road Estate, to draw out the key characteristics of those directly affected by the regeneration compared to the rest of Norbiton ward and the borough. This has now been included, drawing on work undertaken as part of the Cambridge Road Lettings Policy and its associated EqIA.

Systematic Consideration of Schedule of Effects

6.3 It was recommended that the EqIA consider both temporary and operational potential effects on Protected Characteristic Groups and other vulnerable people using a schedule of effects approach that is often seen in major regeneration projects. This has now been included in Stage 3 Assessing Impact and Analysis and includes consideration of 16 potential temporary effects (or construction effects) and 12 potential permanent effects (or operational effects).

Clarity on Negative, Positive and Neutral Effects

6.4 Temple suggested providing more transparency on why and how effects have been considered to have negative, positive or neutral effects. This has been addressed during this report through the inclusion of an impact table. This demonstrates what type of effects have been considered and why they have been designated as such.

Inclusion of Key Mitigations and Embedded Measures

6.5 The planning application EqIA lacked detail on how potential negative effects were to be mitigated and what construction management and design processes had been embedded to guard against potential negative impacts on equalities. The draft final EqIA includes key mitigations seen in the Cambridge Local Lettings Policy and the Construction

Management Plan, as well as including details of embedded measures, such as being a 'Secure by Design' scheme.

Integration with Other Documents in the Planning Application Suite

- 6.6 Temple recommended during our review that the submitted EqIA would benefit from more explicit links with the previous work done throughout the application on equalities. This includes previous EqIAs undertaken, such as within the Cambridge Local Lettings Policy, the GLA Housing Zone Report (March 2017, Decant Policies (September 2017), Voluntary Ballot (March 2019) and Registered Providers Decant Policy (September 2019).
- 6.7 We also recommended reflecting the explicit measures taken in the Construction Management Plan and further details from the Statement of Community Involvement. These have now been included in the draft final EqIA.

Cambridge Road Estate
in the Royal Borough of Kingston Upon Thames
planning application ref: 20/02942/FUL

Strategic planning application stage 1 referral

Town and Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.

The proposal

The outline scheme comprises the demolition of all existing buildings and the comprehensive redevelopment of the Cambridge Road Estate to deliver a mixed-use development comprising the erection of residential buildings within 15 plots ranging from 3 to 13 storeys in height providing 2,170 residential dwellings, office, flexible retail/ commercial and community floorspaces, publicly accessible open space and access, servicing and landscaping.

The detailed scheme (Phase 1) comprises the erection of blocks between 4 and 13 stories in height within Plots B, C and E comprising 452 residential units, community, office and flexible retail/ commercial floorspaces, publicly accessible open space and access, servicing, parking, landscaping including tree removal, refuse/ recycling and bicycle storage and energy centre.

The applicant

The applicant is **Cambridge Road (RBK) Regeneration LLP** (a joint venture partnership between Countryside Properties (UK) Ltd and the Royal Borough of Kingston), and the architect is **Patel Taylor**.

Strategic issues

Principle of estate regeneration: The proposals would re-provide all existing social rent units and secure an increase in like-for-like affordable housing floorspace, generally according with the Mayor's key principles for estate regeneration schemes (paragraphs 25-43).

Land use principle: The principle of the estate regeneration and uplift to deliver additional housing is supported (paragraphs 46-58).

Affordable housing: Discounting the proposed re-provision of existing social rented homes and noting that the shared equity units are not a formally recognised affordable housing product, the provision of affordable housing represents 0.4% of the uplift of residential accommodation, by habitable rooms. Overall, this equates to 36% affordable housing by habitable room. The viability information is being scrutinised to ensure the maximum quantum of affordable housing. Early, mid and late stage viability review mechanisms, and affordability levels should be secured (paragraphs 59-69).

Design and heritage: The layout and massing principles underpinning the master plan are rational and are broadly supported. Kingston's Strategic Development Brief identifies the site as having potential for tall buildings, and GLA Officers are satisfied the criteria in Policy D9 are addressed in the application. Suitable conditions should secure inclusive design requirements. Clarifications are required in respect of the submitted heritage statement (paragraphs 73-98).

Transport: The proposed changes to the eastbound and westbound Cambridge Grove bus stops and shelters are currently not acceptable and further work is required to agree the proposed changes. Suitable conditions and obligations should secure commitments in relation to car parking and cycle parking. A Travel Plan to be secured, enforced, monitored and reviewed as part of the S106 agreement, and Delivery and Servicing Plan and Construction Logistics Plan should be secured by condition (paragraph 128-138).

Other strategic issues relating to **equalities, fire safety, energy, air quality, sustainable drainage, water efficiency, green infrastructure and urban greening** and **the circular economy** also require resolution.

Recommendation

That Kingston Upon Thames Council be advised that the application does not yet fully comply with the London Plan and the Mayor's Publication London Plan, for the reasons set out in paragraph 142 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 16 December 2020, the Mayor of London received documents from Kingston Upon Thames Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town and Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Publication London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."
- Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."
- Category 1C(1c) - "Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London".
- Category 3A(1a) – "Development which is likely to result in the loss of more than 200 houses, flats, or houses and flats (irrespective of whether the development would entail also the provision of new houses or flats);

3 Once Kingston Upon Thames Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website, www.london.gov.uk.

Site description

6 The site is 8.86 hectares in size and is located approximately 850 metres east of Kingston Town Centre. The site is bound by the A2043 Cambridge Road to the east, Kingston Cemetery and Crematorium to the south, Bonner Hill Road to the west and Hawks Road to the north.

7 The existing estate is comprised of 832 residential units within four 15-storey blocks, low-rise blocks ranging from 2-storey houses to 5-storey maisonettes, and flat blocks with elevated walkways and bridges to access upper levels. The site is predominantly under Council freehold, except for some parcels within the site boundary under various private ownerships. The current housing mix (by unit size, typology and tenure) is detailed in the following tables 1-3: as follows:

Table 1: Existing unit mix, by unit size

	1-bed	2-bed	3-bed	4-bed	5 bed	Total
Units	270	316	241	4	1	832
Percentage	32%	38%	29%	>1%		100%

Table 2: Existing unit mix, by unit typology

	Flats	Maisonettes	Houses	Bungalows	Duplex	Total
Units	421	158	147	5	101	832
Percentage	51%	19%	18%	>1%	12%	100%

Table 3: Existing unit mix, by unit tenure

	Social rent	Leasehold	Freehold	832
Units	675	90	67	832
Percentage	81%	11%	8%	100

8 The existing site also comprises approximately 1,948 sq.m. of non-residential floorspace, which comprises the Bull and Bush Hotel, Piper Community Hall, Tadlow House (Housing Management), CRERA Office, CREST Office and the Surbiton Rifle Club.

9 The site is approximately 1.2 kilometres from the A307 Wheatfield Way, which forms part of the Strategic Road Network (SRN). The nearest train stations are Norbiton station, located north east of the application site, Kingston station located north west of the site and Berrylands station to the south. There are 10 bus routes within walking distance. The site has a Public Transport Access Level (PTAL) of 1b, on a scale of 0 to 6b where 6b is the most accessible.

Details of the proposal

10 The outline proposal comprises the demolition of all existing buildings and the comprehensive redevelopment of the Cambridge Road Estate to deliver a mixed use development comprising the erection of residential buildings within 15 plots ranging from 3 to 13 storeys in height providing 2,170 residential dwellings, 290sq.m. of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/ commercial floorspace (Use Class E/ Sui Generis) , 1,250sq.m. community floorspace (Use Class F2), publicly accessible open space and associated access, servicing, landscaping and works.

11 Figure 1, below, shows the proposed layout of the masterplan scheme.



Figure 1: Proposed masterplan layout.

12 The application has been submitted as a hybrid application, comprising outline and detailed components. Figure 2, below, shows the proposed layout of the detailed and the outline components of the scheme.

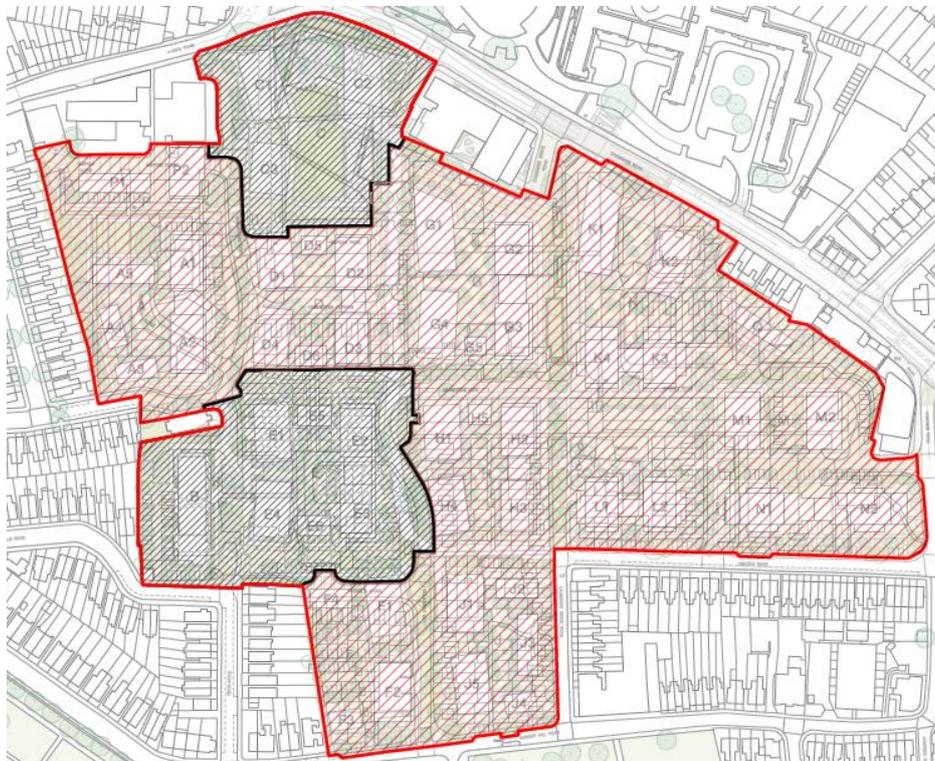


Figure 2: Detailed component of the scheme shown in black, and outline component of the scheme is shown in red.

13 Detailed planning permission is sought for Phase 1 of the scheme for erection of blocks between 4 and 13 stories in height within Plots B, C and E comprising 452 residential units, 1,250sq.m. community floorspace, 290sq.m. of flexible office floorspace, 395sq.m. of flexible retail/ commercial floorspace, publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/ recycling and bicycle storage, energy centre and works.

14 Outline permission is sought for the remainder of the development with appearance and landscaping reserved.

15 The overall breakdown of the housing for the detailed proposals is set out in Table 4, below:

Table 4 – Housing proposals

	Unit size	Social rent	Shared equity	Private	Total
Phase 1 (Detailed)	1 Bed Flat	54	11	102	167
	2 Bed Flat	43	5	137	185
	3 Bed Flat	36	12	31	79
	3 Bed Maisonette	4	2	2	8
	3 Bed House	0	0	0	0
	4 Bed Flat	2	0	0	2
	4 Bed Maisonette	4	0	0	4
	4 Bed House	4	0	0	4
	5 Bed House	2	0	0	2
	6 Bed Maisonette	1	0	0	1
	SUB-TOTAL	150	30	272	452
Outline Phases – Indicative	1 Bed Flat	244	9	456	709
	2 Bed Flat	287	32	404	723
	3 Bed Flat	41	0	127	168
	3 Bed Maisonette	2	20	30	52
	3 Bed House	6	9	14	29
	4 Bed Flat	1	0	0	1
	4 Bed Maisonette	9	0	0	9
	4 Bed House	27	0	0	27
	5 Bed House	0	0	0	0
	3 Bed Maisonette	0	0	0	0
	SUB-TOTAL	617	70	1,031	1,718
Overall Totals					
TOTAL		Social	Shared	Private	Overall
		767	100	1,303	2,170

Case history

16 There is no strategic planning history relevant to the site however there is history associated with recent pre-application discussions had between the applicant and officers from the Local Planning Authority, Transport for London (TfL) and the Greater London Authority. Specifically, a design review panel meeting was held at the Cambridge Road Estate on 21 August 2019 which was attended by the GLA case officer. A pre-application meeting was also held on the 17 September 2019 that covered a wide range of strategic planning issues with respect to estate regeneration principles, non-residential land uses, housing and affordable housing, urban design, inclusive access, sustainable development and transport. A pre-application meeting with an energy topic-specific focus was additionally held at City Hall on 19 September 2019.

17 GLA Officers also held a follow-up pre-application meeting with the applicant and the Council on 16 April 2020 over Microsoft Teams which focused on urban design and estate regeneration principles. A written pre-application advice note was issued on the 19 June 2020 which concluded that the proposed estate regeneration scheme, which seeks the like-for-like re-provision and uplift of affordable housing, is supported in strategic planning terms, however, the future planning application will need to address the matters raised with respect to the estate regeneration principles set out in the Mayor's Good Practice Guide, affordable housing, urban design, inclusive access, environment and transport, to ensure accordance with the London Plan and the Mayor's Publication London Plan.

18 GLA Officers also held a follow-up pre-application meeting with the applicant and the Council on 28 July 2020 over Microsoft Teams which focused on viability, energy and urban design.

Strategic planning issues and relevant policies and guidance

19 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Kingston's Core Strategy (April 2012) and the London Plan 2016 (Consolidated with alterations since 2011).

20 The following are relevant material considerations:

- The National Planning Policy Framework (February 2019) and National Planning Practice Guidance;
- The London Plan Publication Version (December 2020);
- The Mayor's Affordable Housing and Viability SPG;
- The Mayor's Good Practice Guidance to Estate Regeneration (2018); and
- Cambridge Road Estate Strategic Development Brief (July 2017).

21 The Report of the Examination in Public of the draft London Plan was published in October 2019, and the Intend to Publish London Plan version (December 2019) was subsequently submitted to the Secretary of State. On 13 March and 10 December 2020, the Secretary of State issued the Mayor with directions under Section 337 of the Greater London Authority Act 1999.

22 On 21 December 2020 the Mayor submitted to the Secretary of State his Publication London Plan with amendments designed to address these directions. This is the most up to date version of the Mayor's London Plan and should be taken into account as a material consideration on the basis described in the NPPF.

23 On 29 January 2021, the Secretary of State confirmed that he had no further matters to raise and that the Publication London Plan (December 2020) conformed with the previous Directions. The Secretary of State ordered the London Plan to be published. The Mayor will now move to publish his London Plan.

24 The relevant issues and corresponding policies are, as follows:

- Estate regeneration London Plan; the Mayor's Publication London Plan; the Mayor's Good Practice Guide to Estate Regeneration (2018);
- Equalities London Plan; Mayor's Publication London Plan; Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG.
- Housing and affordable housing London Plan; Mayor's Publication London Plan; Affordable Housing and Viability SPG; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- Urban design and heritage London Plan; Mayor's Publication London Plan; Shaping Neighbourhoods: Character and Context SPG;
- Strategic views London Plan; Mayor's Publication London Plan; London View Management Framework SPG.
- Inclusive design London Plan; Mayor's Publication London Plan; Accessible London: Achieving an Inclusive Environment SPG;
- Sustainable development London Plan; Mayor's Publication London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;
- Air quality London Plan; Mayor's Publication London Plan; Control of dust and emissions during construction SPG.
- Transport London Plan; Mayor's Publication London Plan; Mayor's Transport Strategy.

Principle of estate regeneration

25 As the development proposes the demolition of existing affordable housing, the proposal is subject to strategic policies and planning guidance relating to the replacement of existing housing and estate regeneration, which are set out within London Plan Policy 3.14, Policy H8 of the Mayor's Publication London Plan. Further guidance is also provided in the Mayor's Affordable Housing and Viability SPG and the Mayor's Good Practice Guide to Estate Regeneration (GPGER).

26 London Plan Policy 3.14 states that the loss of existing housing, including affordable housing, should be resisted unless it is replaced at existing and higher

densities with at least equivalent floorspace. Policy H8 of the Mayor's Publication London Plan seeks to resist the demolition of affordable housing unless it is replaced by an equivalent amount of affordable housing floorspace. The policy also seeks that replacement affordable housing is integrated into the development to ensure mixed and inclusive communities.

27 As set out in the Mayor's Publication London Plan, all estate regeneration schemes should take into account and reflect the following key principles set out in the GPGER which apply to all estate regeneration schemes in London:

- like for like replacement of existing affordable housing floorspace;
- an increase in affordable housing;
- full rights of return for any social housing tenants;
- fair deal for leaseholders/freeholders; and
- full and transparent consultation and involvement.

28 There are 832 existing residential units located within the site. The tenure and typology of these units is detailed in the Table 5, below:

Table 5 – Existing housing

	HAB ROOMS	SQM	SOCIAL RENT HOMES			LEASEHOLD HOMES			FREEHOLD HOMES			TOTAL HOMES
			No	Hab	Sqm	No	Hab	Sqm	No	Hab	Sqm	
1 BEDROOM 2 PERSON FLAT	2	48	255	510	12240	10	20	480	0	0	0	265
2 BEDROOM 4 PERSON FLAT	4	62	145	580	8990	10	40	620	0	0	0	155
2 BEDROOM 4 PERSON MAISONETTE	4	75	89	356	6675	18	72	1350	1	4	75	108
3 BEDROOM 5 PERSON FLAT	5	105.3	1	5	105.3	0	0	0	0	0	0	1
3 BEDROOM 5 PERSON MAISONETTE	5	86	34	170	2924	15	75	1290	0	0	0	49
3 BEDROOM 6 PERSON MAISONETTE	5	109.6	1	5	109.6	0	0	0	0	0	0	1
3 BEDROOM 5 PERSON DUPLEX	5	86	68	340	5848	33	165	2838	0	0	0	101
1 BEDROOM 2 PERSON BUNGALOW	3	50	5	15	250	0	0	0	0	0	0	5
2 BEDROOM 4 PERSON HOUSES	4	80	36	144	2880	4	16	320	13	52	1040	53
3 BEDROOM 5 PERSON HOUSES	5	86	30	150	2580	0	0	0	52	260	4472	82
3 BEDROOM 6 PERSON HOUSES	5	112.9	7	35	790.3	0	0	0	0	0	0	7
4 BEDROOM 6 PERSON HOUSES	6	106	0	0	0	0	0	0	1	6	106	1
4 BEDROOM 7 PERSON HOUSES	6	131.5	3	18	394.5	0	0	0	0	0	0	3
5 BEDROOM 9 PERSON HOUSES	7	139.8	1	7	139.8	0	0	0	0	0	0	1
TOTAL			675	2,335	4,3926.5	90	388	6,898	67	322	5,693	832

Like-for-like replacement

29 As set out above, the loss of existing affordable housing should be resisted unless it is replaced by an equivalent amount of affordable housing floorspace (with no overall net loss). Policy H8 of the Mayor's Publication London Plan confirms that replacement affordable housing must be provided at social rent levels, where it is being provided to facilitate a right of return for existing social rent tenants. The requirement for like-for-like replacement affordable housing floorspace applies to the 675 social rent units located on the existing site.

30 The applicant has provided details of the existing affordable housing floorspace on site to enable assessment in terms of required re-provision. This assessment is set out below in Tables 6 - 8 and demonstrates that there would be a net increase in terms of rented accommodation by all metrics, with an increase in social rented floorspace, which is the key criteria applied by Policy 3.14 and H8. The

quality of the accommodation proposed would also be enhanced. Further discussion on the affordable housing offer is set out in subsequent sections of this report.

Table 6 – Existing affordable housing

	Units	Habitable rooms	Floorspace (GIA)
Social Rent	675	2,335	43,927 sq.m.

Table 7 – Proposed affordable housing

	Units	Habitable rooms	Floorspace (GIA)
Social Rent	767 units	2,350	67,240 sq.m.

Table 8 – Net change in affordable housing by tenure

	Units	Habitable rooms	Floorspace (GIA)
Social Rent	+92	+15	+23,313 sq.m.

Right to return

31 The GPGER seeks to ensure that social tenants have a full right to return to a property on the regenerated estate of a suitable size, taking into account levels of overcrowding or under-occupancy within each household, and at the same or similar rent level, with the same security of tenure.

32 The application states social tenants and resident homeowners will have the right to one of the new homes on the Cambridge Road Estate. This is strongly supported by GLA Officers.

33 The planning statement sets out that the demolition of the existing buildings and site preparation will be carried out on a phase-by-phase basis as the decant allows, in order to ensure that existing residents can be located into new blocks seamlessly as far as possible and that this reflects the Applicant’s “one move” intention for existing residents ensuring that inconvenience and potential upheaval is minimal. The rehousing statement goes onto clarify that data from the Council indicates a total of 1,642 residents in 710 households will require rehousing as a result of the regeneration process, and that this will take place in 5 phases over a period of 10-15 years. As above, social tenants and resident homeowners will have the right to one of the new homes on the Cambridge Road Estate and social tenants will also have the option to move to a Council property elsewhere in the borough of Kingston if this is their preference. The application sets out that the number of households who will need re-housing varies by phase, and that while most residents will be able to move straight into their new properties and should only need to move once, the application also recognised that some households in phase 1 who wish to remain on Cambridge Road Estate will need to move into temporary accommodation while their new home is built, and that the Council will provide this for social tenants and for resident homeowners who wish to purchase one of the new homes.

34 The application sets out that 149 of the existing units within the estate are currently being occupied by households in need of temporary accommodation to support the Council wider housing obligations and ensure that the area remains

occupied, and that residents who have been placed in temporary accommodation on Cambridge Road Estate will be offered alternative accommodation when vacant possession of their home is required.

Fair deal for leaseholders

35 The Mayor's GPGER sets out the principle that leaseholders affected by estate regeneration are treated fairly and fully compensated, in accordance with statutory duties.

36 As detailed in Table 3 of this report, above, GLA Officers understand that there are 90 leaseholders and 67 freeholders who will be impacted by the proposed development. The application states that all resident Leaseholders/Freeholders will have an opportunity to purchase a new property within the redevelopment. Specifically, the Council is offering resident homeowners the opportunity to purchase a new property on the regenerated estate on a shared equity basis if required. The phasing plan means that all the secure tenants and resident homeowners (with the exception of phase 1) that wish to, should be able to move once into a new home either on one of the rehousing sites within the wider Kingston area or within the new affordable homes constructed.

Full and transparent consultation

37 The Mayor's Publication London Plan and GPGER sets out the Mayor's aspirations for full and transparent consultation and meaningful ongoing involvement with estate residents throughout the regeneration process to ensure resident support.

38 From 18 July 2018, the Mayor requires any landlord seeking GLA funding for estate regeneration projects which involve the demolition of existing affordable or leasehold homes to demonstrate that they have secured resident support for their proposals through a ballot, subject to certain specified exemptions and transitional arrangements.

39 In this instance, GLA Officers understand that Housing Zone Grant and Building Council Homes Grant has been obtained to be used in funding the scheme. A residents' ballot held in March 2020 resulted in 86 percent attendance (from 820 eligible voters) and 73 percent support for the proposal.

40 GLA officers consider that the engagement approach followed (as set out in application, including the Statement of Community Involvement) accords with the key principles set out in the GPGER. While considerations around ballots and funding conditions are not planning issues, the Mayor encourages landlords to use ballots as widely as possible in line with his Good Practice Guide.

Consideration of alternative options

41 Policy H8 states that before considering demolition of existing estates, alternative options should first be considered and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts.

42 GLA Officers understand that many of the existing residential buildings at the estate are poor in terms building quality and energy efficiency, ventilation, noise transfer, and present several design and legibility challenges. Additionally, it has been presented that it was advised that it would be uneconomic to refurbish to a satisfactory standard and that the estate in its current form presents challenges in terms of access and permeability. As such, the premise of the resident-led development is supported in principle.

Conclusion – estate regeneration

43 Overall, the proposed development would ensure a net increase in existing affordable housing floorspace and would accord with the requirements and key principles for estate regeneration as set out in London Plan Policy 3.14, Policy H8 of the Mayor's Publication London Plan and the associated guidance in the Mayor's Affordable Housing and Viability SPG and the Mayor's GPGER.

Equalities

44 London Plan Policy 3.1 and Policy GG1 of the Mayor's Publication London Plan highlight the diverse nature of London's population and underscore the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities. More generally, the 2010 Equality Act places a duty on public bodies, including the GLA, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

45 An equalities statement (EQIA) has been submitted with the application. The EQIA identifies the site as within an area exhibiting high levels of deprivation, as well as low levels of public health which is affecting the quality of life of the existing residents and states that without intervention, the quality of life of the current residents and the associated current issues will continue to deteriorate. The EQIA concludes that there are no negative impacts associated with the Development in terms of equalities, and that the EQIA has not identified any potential for discrimination or adverse impact, and also all opportunities to promote equality are being taken forward. While the submitted EQIA assessment provides a useful overview of the proposals and planning benefits, and a generalised assessment of equalities, it is not clear how the conclusion has been reached that the proposal will have no negative impact on protected groups, as the potential impacts on each protected group has not been outlined. This should be clarified in a revised assessment. Given the proposed redevelopment of the residential estate and other social infrastructure, including the demolition of homes and requirement to move homes, as well the proposed 10-15 year decant, demolition and construction period, which may have a disproportionate impact on, inter alia, elderly people, young people and those with disabilities, consideration should be given to

whether any specific mitigation should be secured as part of any permission to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

Land use principle

Housing

46 London Plan Policy 3.3, in seeking to increase the supply of housing in London, sets borough housing targets and in Table 3.1 puts the minimum annual monitoring target for the Borough of Kingston Upon Thames at 6,434 additional homes between 2015 and 2025. The Mayor’s Publication London Plan sets a ten-year target of 9,640 for the period 2019/2020 to 2028/2029. This proposed scheme would deliver 2,170 new residential units (an uplift of 1,338 residential units – 1,146 market, 92 social rent units and 100 shared equity units) which would contribute positively to the above housing targets. Accordingly, the principle of residential development on the site is supported. Affordable housing is discussed in further detail in the subsequent section of this report.

47 As detailed above, there is existing affordable housing on the site, which the applicant has detailed will be reprovided in accordance with Policy H8(A) and H8(D) of the Mayor’s Publication London Plan.

Non-residential land uses

48 The site is located within Kingston Opportunity Area. This Opportunity Area, as designated within the Mayor’s Publication London Plan, has an indicative employment capacity for 5,000 new jobs. Spatially, both London Plan Policy 2.15 and the Mayor’s Publication London Plan Policy SD6 adopt a town-centre first approach, which recognises that town centres, should be the foci for commercial development beyond the CAZ, and Policy SD7 of the Mayor’s Publication London Plan discourages out-of-centre development of main town centre uses. The application site sits outside of the Kingston Town Centre.

49 The site as existing includes a variety of non-residential land uses, as detailed in Table 9, below:

Table 9: Existing non-residential uses

Use	Floorspace (GIA)
Bull and Bush Hotel	824sqm
Piper Community Hall	390sqm
Tadlow House (Housing Management)	654sqm
CRERA Office	42sqm
CREST Office	38sqm
Surbiton Rifle Club	Unknown.
Total	1,948sqm

50 The proposals include up to 2,935 sq.m. of non-residential floorspace including 290 sq.m. of office floorspace (Use Class E), 1,395 sqm retail/commercial floorspace (Use Class E/Sui Generis); and 1,250 sqm community floorspace (Use Class F2). Of this, the detailed phase of the development will deliver 1,250sq.m. community floorspace (Use Class F2), 290sq.m. of flexible office floorspace (Use Class E), 395sqm of flexible retail/ commercial floorspace (Use Class E/ Sui Generis). The remainder of the space will be delivered in outline phases. The planning statement states that it is envisaged that the non-residential floorspace is located primarily within Block C, G and K at ground floor level facing onto Cambridge Road or concentrated around the Madingley Gardens open space.

51 GLA Officers understand that the Bull and Bush closed as an operational public house in 2009, when it begun sole operations as a hotel. GLA Officers raise no strategic concern in respect of the loss of the existing hotel however in line with Policy HC7 of the Mayor's Publication London Plan, it should be confirmed the public house is not of heritage, cultural, economic or social value.

Retail and office land uses

52 Given the relatively small scale of the retail and office land uses proposed, and noting the re-provision of existing office floor space, GLA Officers consider that the proposed commercial uses are compatible with the nearby existing and proposed residential uses, as well as compatible with the nearby town centre, and also provide for services, facilities and employment opportunities on the site for the development's existing and new residents. GLA officers support the provision of a genuine mix of non-residential land uses to support the development, including community, retail and office land uses. In line with London Plan Policy 4.9 and Policy E9 of the Intend to Publish London Plan, GLA Officers would further support a commitment to the provision of shops for small or independent retailers and a proportion of affordable retail space to strengthen and promote the retail offer.

Community and sporting land uses

53 London Plan Policy 3.16 and Policy S1 of the Mayor's Publication London Plan guide assessment in respect of the loss of any community facility, as well the provision of new community facilities within the redevelopment of the estate.

54 London Plan Policy 3.19 states that proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted and Policy S5 of the Mayor's Publication London Plan identifies that existing sports and recreational land facilities should be retained unless an assessment shows the land or facilities are surplus to requirements at the local and sub-regional level, or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. Policy S4 of the Mayor's Intend to Publish London Plan states that development proposals for schemes that are likely to be used by children and young

people should not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

55 While the proposals result in the loss of the existing Piper Hall, the proposals include the re-provision of community land use, through the provision of 1,250sq.m of community floorspace within the detailed (first) phase. The application details that a temporary facility on or adjacent to the Estate will be provided for the period between demolition of Piper Hall and the completion of the new community centre to allow service providers the opportunity to continue to operate with minimum disruption. This proposal is strongly supported by GLA Officers in accordance with the Mayor's GPGER principles and should be secured within a S106 agreement.

56 Clarification is required in relation to the loss of the Surbiton Rifle Club in order to understand the nature of the existing facilities located within the estate (firstly to understand if these are sporting facilities, or another type of facility), if there is an identified need for re-provision and whether there is an opportunity for them to be relocated within the application site, or elsewhere within the Borough.

57 While the proposals result in the loss of an existing basketball court, a Multi Use Games court (MUGA) is proposed within Madingley Gardens, as part of Phase 2 of the redevelopment once the existing Madingley Tower is demolished. Confirmation of the size of the existing and proposed facilities should be provided.

58 Appropriate conditions in relation to the phasing and continued provision of any existing community facilities should be secured through any approval. The Council should also secure the maintenance and management strategies for the proposed community and sporting facilities within a S106 agreement, with full details (including access and costs to residents, local community groups and charities (as identified as users of the existing Piper Hall facility) which should not be prohibitive) secured within these strategies.

Housing

Affordable housing

59 London Plan Policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing in all schemes. London Plan Policies 3.11 and 3.12, Policy H4 of the Mayor's Publication London Plan, as well as the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing in all new developments.

60 The Mayor's Affordable Housing and Viability SPG and Policy H8 of the Mayor's Publication London Plan set out that all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.

61 A Financial Viability Appraisal (FVA) has been submitted as part of the application, which is currently being scrutinised by the Council and GLA officers to ensure the scheme provides the maximum viable amount of affordable housing. In accordance with the Mayor's Affordable Housing and Viability SPG, the Council is

required to publish the financial viability assessment (including any reviews) to ensure transparency of information.

Viability review mechanisms

62 As with all schemes which follow the ‘Viability Tested Route’, it will be expected that the Section 106 agreement will contain both early implementation and late stage viability reviews, in accordance with Policy H6 of the Mayor’s Publication London Plan. Given the size and long-term phasing of the scheme, mid-term review mechanisms are also required to be secured. Early, mid and late-stage review mechanisms should ensure that any additional affordable housing is provided on-site where sufficient surplus profit is generated, in line with the Mayor’s Affordable Housing and Viability SPG.

Tenure

63 Policy H6 of the Mayor’s Publication London Plan and the Mayor’s Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the borough as low cost rented homes or intermediate based on identified need. There is a presumption that the 40% to be decided by the borough will focus on low cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. In this case, locally, Kingston Core Strategy seek the maximum provision of affordable housing, with a strategic target of 50%, subject to viability testing with a 70:30 split in favour of social/affordable rented housing.

64 Table 10, below, details the housing proposals by unit, habitable room and floorspace, and also demonstrates uplift between the existing estate and proposed development.

Table 10: Housing proposals by unit, habitable room and floorspace (sq.m.)

Tenure		Units	Habitable Rooms	Sqm (GIA)
Social Rent	Existing	675	2,335	43,927
	Proposed	767	2,350	67,240
	Uplift	92	+15	23,313
Shared Equity	Existing	0	0	0
	Proposed	100	365	10,551
	Uplift	100	+365	10,551
Private (incl. existing leaseholders)	Existing	157	710	12,591
	Proposed	1303	3,762	108,420
	Uplift	1146	+3,052	95,829
TOTAL	Existing	832	3,045	56,518
	Proposed	2170	6,477	186,211
	Uplift	1338	+3,432	+129,693

65 The scheme proposes 2,170 residential units of which (including re-provision) 36% is proposed as affordable housing, by habitable room (35% by unit). As the shared equity units are not a formally recognised affordable housing product, the proposals represent 100% social rented accommodation. Noting that 675 social rented homes

(2,335 habitable rooms, 43,927 sq.m. of floorspace) must be reprovided in accordance with Policy H8 of the Mayor's Publication London Plan, the provision of affordable housing represents 0.4% of the uplift of residential accommodation by habitable room (7% by unit, 18% by floorspace).

66 As set out above, as the proposed shared equity units are not a formally recognised affordable housing product, the scheme proposes 100% social rented accommodation. While this does not comply with the tenure expectations set out in Policy H6 of the Mayor's Publication London Plan nor the Council's Local Plan tenure mix requirements, the scheme sees the total re-provision of the existing social rent housing. As such, the proposed tenure mix may be acceptable subject to the verification of the viability and affordable housing position and subject to confirmation from the Council that the proposed tenure split meets identified need.

Housing affordability

67 The Mayor is committed to the delivery of genuinely affordable housing and Policy H6 of the Mayor's Publication London Plan, the Mayor's Affordable Housing and Viability SPG and the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products.

68 All affordable housing must be robustly secured in perpetuity, within a Section 106 agreement. A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the Affordable Housing and Viability SPG.

Phasing

69 The detailed element of the scheme (namely, Plots B, C and E) will be delivered within Phase 1, and this comprises the delivery of 150 social rented homes, (comprising 40% affordable homes) and 30 shared equity units. The future reserved matters application will not be referred to the Mayor of London and the phased delivery of the scheme has implications in respect the assessment of a number of elements of the development and compliance with the London Plan and the Mayor's Publication London Plan, including affordable housing. The delivery of affordable housing should be secured throughout the delivery of the development.

Housing mix

70 London Plan Policies 3.8 and 3.11, as well as Policy H10 of the Mayor's Publication London Plan, encourage a choice of housing based on local needs with regard given to robust local evidence of need, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types at different price points across London.

71 The scheme proposes 2,170 residential units with a range of typologies, as detailed in the Table 5, above. The housing mix comprises a range of unit sizes including 1-beds, 2-beds, 3-beds, 4-beds, 5-beds and a 6-bed unit, in a range of typologies including flats, maisonettes and houses which is supported in principle.

72 The planning statement sets out that the unit mix will be reviewed on a phase by phase basis to take account of decant needs/local housing needs, market

changes, demographic changes and other variables such as unforeseen demand and conversely, lack of demand for specific unit type, and that there will be ongoing opportunities to engage with residents in the future and respond to changes as reserved matters applications will enable for each phase come forward. Subject to the Council confirming the proposed mix meets local need of the Borough as well as meeting the needs of existing residents returning to the site, GLA officers are supportive of the housing mix from a strategic perspective. The housing mix should be secured via suitable conditions and/or obligations.

Urban design

73 The design principles in chapter seven of the London Plan and chapter 3 of the Mayor's Publication London Plan expect all developments to achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality.

74 London Plan Policy 3.4 and Policy D3 of the Mayor's Publication London Plan seek to optimise the potential of sites. As per Policy D3 of the Mayor's Publication London Plan, a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth.

75 The proposals have been developed through engagement with residents and the scheme has been presented at three independent design review panel sessions, as well as to GLA and Kingston upon Thames planning officers.

76 The overall layout and massing principles underpinning the master plan are rational and are broadly supported. The design team have considered how the proposed block layout will align and connect with the surrounding street pattern to create legible pedestrian and cycle routes across the site, which is supported.

77 The distribution of proposed public realm and variety of open spaces contributes to the legibility of the masterplan, forming a welcome sequence of character areas. The majority of the masterplan is defined by perimeter blocks, providing good definition between public and private realm.

78 The proposal meets the definition of a tall building as set out Policy D9 of the Publication London Plan, which also makes clear that tall buildings should only be developed in locations identified in local plans as being suitable for such buildings. The Cambridge Road Estate Strategic Development Brief (July 2017) ("The Brief") contains a map which identifies areas within Cambridge Estate that are areas sensitive to height and areas with potential for height. The Brief goes on to state that "*the principle of taller buildings in this area may be supported, particularly if part of a new centre for the Estate, even if the existing tall buildings are demolished. All redevelopment must be subject to good urban design principles, density assessments, daylight and sunlight studies, Right of Light implications and wind impact studies. Tall buildings should incorporate green or brown roofs where possible*".

79 While GLA Officers recognise that the map within The Brief only specifically recognises the part of the site closest to Cambridge Road as having potential for tall buildings, GLA Officers note that the supporting text to this map states that "*while the building heights diagram highlights that the area to the north as most appropriate for*

height, given the buffer of Cambridge Road, designs should not only position height here”.

80 On the basis of the above, GLA Officers note that the application site is identified as potentially suitable for tall buildings by the Council, in accordance with part B of Policy D9. All tall buildings are also subject to the criteria set out in Part C of Policy D9, i.e. high standards of architecture and urban design.

81 On the basis of the information submitted within the Design and Access Statements, the detailed analysis shown within the Town and Visual Impact Assessment, and the quality of the proposal as shown within the detailed component of the scheme and within the design code, and noting the design-led process that the applicant has undertaken in the development of the scheme, GLA Officers consider that the proposed tall buildings are capable of meeting the design and impact criteria set out in Policy D9. To help with way-finding and to achieve a varied townscape, a varied sequence of building heights along the length of the main ‘avenue’ is supported. The Council should ensure that all the criteria set out in Publication London Plan Policy D9 have been achieved, including through scrutiny of the daylight, sunlight and wind chapters included within the environmental statement in order to ensure satisfactory levels of daylight, sunlight and wind are provided to all residential units, private and communal amenity spaces, as well as public spaces

82 The orientation of the site gives potential to deliver high residential quality, with predominantly east-west aspects. While there are still a relatively high number of single aspect units proposed within the scheme, the indicative floorplans provided in the design code and DAS indicate that the units would be of a high quality with good access to daylight and sunlight, and on balance the proportion of single aspect units is accepted. A minimum provision of dual aspect units in the outline proposal should be secured as part of any permission.

83 The use of simple architecture and colour tones is supported. The success of the architectural approach will be dependent on the use of the highest quality materials. As such, the materials and detailing should be secured by condition.

84 Generally, the design code contains sufficient information to secure design quality post-planning. The detailed phases of the scheme should be used as a benchmark of design quality for the outline element.

85 The application sets out that future phasing will consider the use of temporary landscapes to hide construction hoarding as and when required, and that public spaces within the phase will be built in progression with the completion of each building rather than all the landscape spaces left at the end of each parcel. This is supported by GLA and should be suitably secured by the Council.

Townscape

86 The scheme does not impact upon strategic views protected within the London View Management Framework (LVMF) by Policies 7.11 of the London Plan and HC3 of the Mayor’s Publication London Plan. The Council should assess the impact of the scheme upon local views, as protected by Policy HC3 of The Mayor’s Publication London Plan.

Residential quality

87 London Plan Policy 3.5 and Policy D6 of the Mayor's Publication London Plan promote quality in new housing provision, with further guidance provided by the Housing SPG.

88 The planning statement states that all units have been designed to meet or exceed the housing design standards within the Mayor of London's Draft Good Quality Homes for All Londoners SPG (October 2020).

Play space

89 London Plan Policy 3.6 and Policy S4 of the Mayor's Publication London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child.

90 The application sets out that the proposal generates an estimated yield of 978 children requiring 9.774 sq.m. of play space to achieve policy requirements. The application sets out that an indicative proposed play space provision across the masterplan as set in Table 11:

Table 11: Play space provision across the proposed masterplan

Phase	1	2	3	4	5	Total
Block	B, C, E	A, D, P	G,K	H,M,Q	F,J,L,N	All Blocks
Sq.m.	2,289	1,626	2,333	1,450	2,078	9776

91 Phase 1 includes 2,289sqm of play space. GLA Officers support the provision of play space for Phase 1 in accordance with the Shaping Neighbourhoods: Play and Informal Recreation SPG. The Council should secure the early implantation of this play space within the phase. The provision of play space within the subsequent phases should also be secured early in delivery programme of each phase.

92 Policy S4 of the Mayor's Publication London Plan requires that proposals are not segregated by tenure. The proposed play space is provided within a variety of spaces including a MUGA, and within residents' courtyard. The proposed on-site MUGA appears to be available for use by all residents regardless of tenure. This must be confirmed and secured within any planning permission. Noting there may be some segregation in the play spaces proposed within the residents' courtyards through the restriction of access to residents of each respective block, the Council should ensure that all play spaces provided at podium levels are "tenure blind" in terms of both quantum of play space and quality of playable features.

93 The MUGA is also proposed to be used for uses beyond play space (for example, the application sets out it may be used to provide a level hard surface close to the community centre which can host stalls for community fair, local craft or bric-a-brac sales, weekend farmer's market etc), a suitable management plan should be secured to ensure suitable management and access is provided, and to ensure that residents have free-of-charge access to this facility, and alternative arrangements for play if necessary.

94 The provision of on-site high quality, safe, playable features for children, as well as safety measures and shaded spaces, should be secured by the Council via condition or S106 obligation. There should also be clear separation of any car parking and road networks from play spaces to avoid user conflicts within this space, with suitable safety features secured via condition.

Fire safety

95 In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the Mayor's Publication London Plan seeks to ensure that development proposals achieve the highest standards of fire safety.

96 A fire strategy report produced by H+H Fire, a third-party organisation, that relates to Phase 1 (Buildings B, C and E) has been submitted with the planning application. The fire statement should be amended to confirm that the author is suitably qualified and evidence of competency of the author of the Fire Statement should be detailed in a clearly identified section at the beginning of the Fire Statement. In accordance with Policy D12(B6) the statement should also be amended to address how potential future modifications to the building will take into account and not comprise the base build fire safety and protection measures. Furthermore, a handover process for the passing of all relevant fire safety information contained within the fire strategy to future building owners should be planned and outlined within the Fire Statement.

97 The local planning authority should secure policy compliance with the amended fire statement through the imposition of a condition attached to the grant of planning permission. The report is titled "initial assessment report", and the report further states that "*The strategy should be seen as a live document that may evolve during further discussions within the design team and with the approving authorities*". It should be therefore be noted that if there are any changes to the scheme which require subsequent Section 96a or Section 73 applications following the grant of any planning permission, an amended Fire Statement should also be submitted which incorporates the proposed scheme amendments so that the content of the Fire Statement always remains consistent with the latest scheme proposals.

98 The application is a hybrid application, with many phases proposed in outline form only. As such, the application should also be accompanied by an outline fire statement which demonstrates commitment to the highest standards of fire safety and addresses Policy D12(B1-6) of the Mayor's Publication London Plan in suitable sections. These required details include construction methods and materials, means of escape for all building users, fire safety features which reduce the risk to life, access for fire service personnel and equipment, access within the site for fire appliances and how potential future modifications to the building will take into account and not comprise the base build fire safety and protection measures. Any associated outline planning permission should also include a condition which requires the submission of a detailed Fire Statement as part of any subsequent reserved matters application. Furthermore, in accordance with Policy D5(b) of the Mayor's Publication London Plan, the outline fire strategy should confirm that at a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building; this should also be secured.

Heritage

99 London Plan Policy 7.8. and Policy HC1 of the Mayor's Publication London Plan state that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

100 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

101 Whilst the site does not contain any designated heritage assets nor is the site located within a conservation area, there are statutorily listed buildings and structures and conservation areas in proximity to the site.

102 The planning application has been supported by an archaeology and heritage assessment. The submitted Townscape (TVIA) also includes reference to a number of designated heritage assets. The archaeology and heritage assessment states: *"the majority of the nationally and locally listed buildings in the study area are at a considerable distance from the PDA on the edge of the town centre along London Road, and along the other main approach roads. The significance of these assets derives from the historic and architectural value of the fabric and any group value. They have no historic or functional connection to the site and are physically and visually separated from it, so the site does not currently form part of the setting of any of these assets"*.

103 The report goes onto conclude that the likely effects (within the detailed proposed) to be neutral and no harm will arise to locally or nationally designated heritage assets. However, noting that the conclusion of the report is made in respect of the detailed proposals, it is unclear whether the impact of the outline proposals have been suitably assessed. As such, clarification in this respect is therefore required and an overall heritage assessment which considers the outline component is required. In the absence of evidence to demonstrate the impact on these designated heritage assets, GLA Officers are unable to arrive at a conclusive position in respect of heritage impact arising from the outline proposals and consider that a heritage impact assessment that arises at a conclusion in respect of both the detailed and outline schemes should be provided with this application.

104 In respect of the grade II listed mortuary chapels located to the south of the site, it is also noted that the submitted heritage statement states that *"while there*

would be significant visual change it is considered that the potential change to the setting of these designated heritage assets (grade II listed buildings) will at worst result in a neutral effect when considered in combination with the improvements in the design of the proposed development". The submitted townscape assessment whilst assessing impact of the proposals on a number of views also demonstrates impact on some nearby heritage assets. On the basis of View #19, GLA Officers consider that some harm will arise to the setting on the Grade II listed Mortuary Chapels, as the proposed development will extend beyond the roofline of the listed building, and will result in an impact on the setting of the chapel's spire. It is unclear from the view provided if this harm will arise from the detailed or the outline scheme; this clarification should be provided.

105 Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservations Areas) Act 1990, and NPPF requirements in relation to listed buildings, structures and conservation areas, GLA Officers consider that on the basis of the submission that harm will arise to the setting of the designated Mortuary Chapel however GLA officers are unable to formally conclude the overall level of harm that will arise to other nearby designated heritage assets through the delivery of the proposed outline scheme, and require a revised heritage impact assessment that concludes in respect of the wider master planned proposals. The revised heritage impact assessment should also be provided to enable officers to assess the proposal against the London Plan Policy 7.8. and Policy HC1 of the Mayor's Publication London Plan.

106 It is noted that the above-mentioned archaeology and heritage assessment includes a number of recommendations in respect impact on archaeology. This should be considered by the Council.

Inclusive design

107 London Plan Policy 7.2 and Policy D5 of the Mayor's Publication London Plan require that all new development achieves the highest standard of accessible and inclusive design and can be used safely, easily and with dignity by all. London Plan Policy 3.8 'Housing Choice' and Policy D7 of the Mayor's Publication London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

108 The application sets out that 10% of all dwellings across the masterplan will meet with M4(3) standards, and all other dwellings will meet with M4(2) standards, and that across the masterplan, a mix of lateral dwelling types and sizes (bed spaces) will be configured as M4(3), reflecting 10% by tenure. This is supported by GLA Officers as it provides older and disabled people similar choices to non-disabled people. The Council should secure the policy compliant quantum of accessible dwellings by condition as well as the provision of these wheelchair units across a variety of typologies, tenures and locations across the masterplan and within individual buildings.

109 For the first phase, the application states that the LPA's Housing Needs Assessment has determined specific resident requirements for wheelchair

accessibility which has influenced the specific provision in plots B,C and E. Specifically, the proposals set out that an increased number of Social Rent M4(3) homes were included at the ground floor to respond to resident needs and feedback during consultation. The locations of M4(3) wheelchair user homes have been distributed across various levels and settings including ground floor and podium, providing choice for residents which is supported by GLA Officers. The DAS sets out that potential locations for mobility scooter storage and charging accessed from the shared lobbies have been considered for future consultation to address needs of less able residents not qualifying for a M4(3) home; this should be secured by the Council.

110 As further detailed in the Fire Safety section of this report, a minimum of at least one lift per core (or more subject to capacity assessments) must be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building, in accordance with Policy D5 of the Mayor's Publication London Plan; this should be secured by the Council.

Environment

Energy

111 The energy strategy is supported and condition wording has been suggested for the proposed connection to the emerging Royal Borough of Kingston Upon Thames District Energy Network (RBKUT DEN). To ensure compliance with policies of the London Plan and the Mayor's Publication London Plan, further supporting detailed is required in respect of a number of elements of the energy strategy. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.

Air quality

112 The development is broadly compliant with policies set out in the London Plan and the Mayor's Publication London Plan, although further technical clarifications are required as set out in detailed comments circulated to the Council which should be addressed in entirety.

113 The comments recommend a number of conditions to secure compliance with the London Plan and the Mayor's Publication London Plan, and the Construction and Demolition SPG. These conditions include securing compliance with the Non-Road Mobile Machinery (NRMM) Low Emission Zone for London, compliance with measures to control emissions during construction and demolition and the submission of an air quality neutral assessment and air quality assessment with each detailed planning application and the energy plant. Furthermore, the energy plant installed as part of the site-wide heat network should conform to the emissions parameters used in the dispersion modelling and this should be secured.

Flood risk

114 The site is in Flood Zone 1 and is greater than 1 hectare in area. A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA adequately assesses the risk of flooding from tidal/fluvial, pluvial, sewer, groundwater, and artificial sources, which are considered

to be low. The proposed site levels should be designed in such a way as not to increase the risk of overland surface water flows off site, and this should be secured by an appropriately worded condition. The approach to flood risk management for the proposed development generally complies with London Plan Policy 5.12 and Policy SI.12 of the Mayor's Publication London Plan.

Sustainable drainage

115 The surface water drainage strategy for the proposed development does not comply with Policy SI.13 of the Mayor's Publication London Plan and London Plan Policy 5.13, as the drainage strategy is not sufficiently developed and does not give appropriate regard to the inclusion of sustainable, green, and above ground SuDS strategy. Further information is required in respect of a number of elements of the drainage strategy. Detailed technical comments in respect of sustainable drainage have been circulated to the Council under a separate cover to be addressed in their entirety.

Water efficiency

116 The sustainability statement proposes that the proposed dwellings will have a maximum indoor water consumption of 105 l/person/day, in line with the optional standard in Part G of the Building Regulations, and compliant with policy 5.15 of the London Plan (and Policy SI.5 of the Mayor's Publication London Plan. Water efficiency calculations have been provided.

117 The BREEAM pre-assessment targets zero Wat 01 credits. The new Publication London Plan policy SI.5 requires that a minimum BREEAM rating of 'Excellent' is achieved for Wat 01, which requires at least a 12.5% improvement over baseline performance standard for non-residential water consumption.

118 The sustainability statement states that a leak detection system and a water meter will be installed, in line with Policy SI.5 of the Mayor's Publication London Plan.

119 The proposed development does not meet the requirements of London Plan Policy 5.15 and Policy SI.5 of the Mayor's Publication London Plan as a BREEAM rating of 'Excellent' should be achieved for Wat 01 relating to non-residential water consumption.

Biodiversity

120 The site is adjacent to Kingston Cemetery which is a Site of Importance for Nature Conservation (Local), which joins with the Hogsmill Valley Sewage Works and Hogsmill River SINIC (Borough Grade 1). The site is therefore located in an important location within the local green infrastructure network and affords the opportunity to extend the green corridor further north. To that end, the specification of vegetation, both at ground and roof level, should complement the composition and needs of the adjacent ecological assets.

121 The Ecological Assessment states that a Construction Environment Management Plan should be produced to detail mitigation relating to construction

phase impacts upon Kingston Cemetery SINC, however no specific mitigation appears to have been included. This should be clarified prior to Stage 2.

122 Phase 1 of the proposed development has been calculated to deliver a 77.77% biodiversity net gain, as set out in the Biodiversity Net Gain Assessment. The masterplan was found to deliver 96.26% net gain. This is strongly supported in accordance with Policy 7.19 of the London Plan and Policy G6 of the Mayor's Publication London Plan, and should be brought to fruition as the subsequent phases are considered at detailed design.

Green infrastructure and urban greening

123 The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan which is strongly supported and should be brought to fruition.

124 The Urban Greening Factor (UGF) of the proposed development is calculated as 0.4, which meets the target set by Policy G5 of the Mayor's Publication London Plan. Given the size of the site, the proposed development represents an opportunity for further greening and the UGF policy target should there be seen as a minimum standard. The delivery of green infrastructure on site should be maximised with the ambition of creating an exemplar scheme. Possible improvements could include diversifying the proposed amenity lawns to include wildflower meadow edges; considering the integration of opportunities for community food growing; further increasing the tree coverage across the scheme; and seeking to replace 'biodiverse roofs' with 'intensive green roofs'.

125 Given that this is a hybrid application, delivery of the UGF at reserved matters should be secured by condition for subsequent phases of the proposed development to secure compliance with Policies 2.18, 5.10 and 5.11 of the London Plan and Policies G1 and G5 of the Mayor's Publication London Plan.

Trees

126 The Arboricultural Assessment considers the effect of Phase 1 of the proposed development. There are 10 trees proposed for removal, none of which are Grade A trees. The number of new trees proposed outweighs the number of trees lost. The schemes accord with Policy 7.21 of the London Plan and Policy G7 of the Mayor's Publication London Plan.

Circular economy

127 The proposal has considered circular economy principles, as required by Policy SI 7 of the Mayor's Publication London Plan. Detailed technical comments in respect of circular economy have been circulated to the Council under a separate cover to be addressed in their entirety.

Transport

128 The applicant should consider the Streetspace for London plan, which sets out how to create more space on streets for walking, cycling and social distancing as the lockdown is lifted. This may be important before, during and after construction and as it is a changing situation, should be consulted regularly.

Healthy Streets and Vision Zero

129 The proposed development will see an increase in pedestrian and cycling trips to/from the site and the local area and provides opportunities to reduce car dominance and promote sustainable and active travel due to its car-lite nature. The development also includes on-site public realm improvements and active frontages. The Go Cycle scheme is proposing a fully segregated cycle route along the A2043 between Kingston Town Centre and New Malden.

130 The proposals include a new crossing, with a raised table outside Plots K1 and K2 and Cambridge Gardens. The raised table is proposed to be constructed with different materials in order to enhance the public realm and assist in reducing vehicle speeds. It also improves the healthy streets indicator 'easy to cross' and should be secured through S106 agreement.

Trip Generation

131 The trip generation assessment is acceptable.

Car Parking

132 The development is proposing a car lite scheme with a parking ratio of 0.4 spaces per dwelling, providing a total of 868 spaces which accords with the Mayor's Publication London Plan. The applicant is proposing to provide 3% of all spaces as blue badge (BB) parking bays, in line with standards set out in the Mayor's Publication London Plan. Car parking will be provided through a mix of on-street, parking courts, podium parking and basement parking. In accordance with the Mayor's Publication London Plan, 20% of all spaces will be active Electric Vehicle Charging Points (EVCP), and 80% of all spaces will have passive EVCP. In addition, residents will not be eligible for parking permits for the surrounding Controlled Parking Zones (CPZs) or for any future CPZs which should be secured through the S106 agreement. Car club membership will be secured for 3 years for all new residents.

Cycle parking

133 A total of 3914 long-stay and 112 short-stay cycle parking spaces are proposed which is in line with Policy T5 of the Mayor's Publication London Plan.

134 Cycle parking should be located in secure, sheltered and accessible locations, and should meet design standards set out in Chapter 8 of the London Cycle Design Standards (LCDS).

135 For the commercial units, the provision of lockers, changing rooms and shower facilities will help promote and encourage cycling.

Bus infrastructure

136 In order to accommodate a new vehicular access to the site, the applicant is proposing changes to bus stop locations. The proposed changes are not supported in its current form. Further discussions and engagement are required to identify an acceptable solution. Any costs associated with changes to bus infrastructure are required to be fully funded by the applicant.

137 A Travel Plan should be secured, enforced, monitored and reviewed by the applicant as part of the S106 agreement.

138 A Delivery and Servicing Plan and Construction Logistics Plan should be secured by condition and discharged in consultation with TfL.

Local planning authority's position

139 GLA Officers understand that Kingston Council planning officers have engaged in pre-application discussions with the applicant and are undertaking an assessment of the submitted planning application, including the financial viability appraisal.

Legal considerations

140 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

141 There are no financial considerations at this stage.

Conclusion

142 London Plan and the Mayor's Publication London Plan policies on estate regeneration, equalities, housing, affordable housing, urban design, play space, fire safety, heritage, townscape, inclusive design, energy, air quality, flood risk, sustainable drainage, water efficiency, biodiversity, green infrastructure and urban greening, circular economy and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan and the Mayor's Publication London Plan:

- **Principle of estate regeneration:** The proposals would re-provide all existing social rent units and secure an increase in like-for-like affordable housing floorspace, generally according with the Mayor's key principles for estate regeneration schemes.

- **Land use principle:** The principle of the estate regeneration and uplift to deliver additional housing is supported.
- **Affordable housing:** Discounting the proposed re-provision of existing social rented homes, and noting that the shared equity units are not a formally recognised affordable housing product, the provision of affordable housing represents 0.4% of the uplift of residential accommodation, by habitable rooms. Overall, this equates to 363.5% affordable housing by habitable room. The viability information is being scrutinised to ensure the maximum quantum of affordable housing. Early, mid and late stage viability review mechanisms, and affordability levels should be secured.
- **Design and heritage:** The layout and massing principles underpinning the master plan are rational and are broadly supported. Kingston's Strategic Development Brief identifies the site as having potential for tall buildings, and GLA Officers are satisfied the criteria in Policy D9 are addressed in the application. Suitable conditions should secure inclusive design requirements. Clarifications are required in respect of the submitted heritage statement.
- **Fire safety:** The submitted fire strategy should be amended to address all the requirements of Policy D12 and D5 of the Mayor's Publication London Plan. An outline fire statement should also be submitted for the phases 2-5 of the scheme. Suitable conditions should be imposed to secure compliance with the fire statements.
- **Energy:** The energy strategy is supported and condition wording is suggested for the proposed connection to the emerging RBKUT DEN. Further supporting detailed is required in respect of a number of elements of the energy strategy. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.
- **Air quality:** Further clarifications are required in respect of the air quality assessment. Detailed technical comments in respect of air quality have been circulated to the Council under a separate cover to be addressed in their entirety. A number of conditions are also recommended.
- **Sustainable drainage and water efficiency:** The drainage strategy is not sufficiently developed and does not give appropriate regard to the inclusion of sustainable, green, and above ground SuDS measures. Detailed technical comments in respect of sustainable drainage have been circulated to the Council under a separate cover to be addressed in their entirety. The proposed development does not meet the requirements of London Plan policy 5.15 as a BREEAM rating of 'Excellent' should be achieved for Wat 01 relating to non-residential water consumption.
- **Green infrastructure and urban greening:** Given the size of the site, the proposed development represents an opportunity for further greening, particularly in complementing the adjacent SINC. The UGF policy target should therefore be seen as a 'minimum' and the applicant is encouraged to seek to deliver an exemplar greening scheme. Given that this is a hybrid application, delivery of the UGF at reserved matters should be secured by condition for subsequent phases of the proposed development.

- **Circular economy:** Detailed technical comments in respect of the circulated economy have been circulated to the Council under a separate cover to be addressed in their entirety.
- **Transport:** The proposed changes to the eastbound and westbound Cambridge Grove bus stops and shelters are currently not acceptable and further work is required to agree the proposed changes. Suitable conditions and obligations should secure commitments in relation to car parking and cycle parking. A Travel Plan to be secured, enforced, monitored and reviewed as part of the S106 agreement, and Delivery and Servicing Plan and Construction Logistics Plan should be secured by condition.

for further information, contact GLA Planning Unit (Development Management):

[Redacted contact information]



Development Management <development.management@kingston.gov.uk>

Fwd: Cambridge Road Estate - GLA comments -Air quality (GLA Ref: 6860)

Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

8 March 2021 at 10:31

To: Development Management <development.management@kingston.gov.uk>

Please can you add this email trail to the DMS - 20/02942/FUL

Kind regards

Harsha

Miss Harsha Bhundia**Principal Planner (Acting)**

Royal Borough of Kingston upon Thames

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----- Forwarded message -----

From: [REDACTED] <[REDACTED]@london.gov.uk>

Date: Fri, 5 Mar 2021 at 10:33

Subject: RE: Cambridge Road Estate - GLA comments -Air quality (GLA Ref: 6860)

To: [REDACTED] <[REDACTED]@bartonwillmore.co.uk>, Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Hi Harsha and [REDACTED]

Please see post stage 1 comments in respect to air quality, below:

Air quality

Ensafe's response (16th Feb 2021) to the clarifications requested in the Stage 1 air quality memo (dated 7th Jan 2021) are considered acceptable and there are no further outstanding items.

The conditions recommended in the Stage 1 memo remain applicable and should be recommended.

Kind Regards,

[REDACTED]

Senior Strategic Planner, Development Management, Planning

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

Mob: [REDACTED]

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From: [REDACTED] bartonwillmore.co.uk>
Sent: 16 February 2021 17:49
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Cc: [REDACTED] london.gov.uk>
Subject: RE: GLA comments (air quality, energy and CES)

Hi Harsha,

Please find attached our response to the air quality comments received from the GLA.

Regards

[REDACTED]

Associate



DDI: [REDACTED]



M: [REDACTED]

W: www.bartonwillmore.co.uk

7 Soho Square, London, W1D 3QB

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From: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Sent: 19 January 2021 15:17
To: [REDACTED] <[\[REDACTED\]@bartonwillmore.co.uk](mailto:[REDACTED]@bartonwillmore.co.uk)>
Subject: GLA comments (air quality, energy and CES)

H [REDACTED]

We are still awaiting a Stage 1 response from the GLA, however, attached are some technical comments with requests for additional information, in advance of the formal Stage 1 response.

Kind regards

Harsha

Miss Harsha Bhundia BA (Hons) MA MRTPI

Principal Planner (Acting)

Royal Borough of Kingston upon Thames

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Air Quality Memo: Stage 1 consultation

2020/6860/S1

7th January 2021

Cambridge Road Estate

London Borough of Kingston upon Thames

To (Case Officer):	██████████
From:	██████████
Applicant:	Cambridge Road (RBK) LLP
Air Quality Consultant:	Ensafe
Document Title:	Environmental Statement (Chapter 7)
Document Date:	November 2020

Proposal

Hybrid Planning Application for a mixed-use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works.

Detailed permission is sought for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works.

Outline permission (with appearance and landscaping reserved) is sought for the remainder of the development ("the Proposed Development").

Use	Floorspace/Number of units
Residential (C3)	2,170 dwellings
Commercial/Retail (E)	1,685 sqm
Community (F2)	1,250 sqm

Supporting documents also appraised.

Overview of Proposals

1. The air quality assessment has identified the whole site as a *high* risk site during the construction phase. As the proposed development is to be delivered in phases,

construction mitigation measures will need to be determined and applied relevant to each phase. This is to ensure compliance with London Plan Policy 7.14 (B) (b) and Publication London Plan SI 1 (D). Recommended conditions are outlined below.

2. In line with the GLA energy hierarchy, a site-wide heat network is planned to be developed, made up of gas boilers, prior to the completion of the RBKUT district energy network in advanced stages of design. The emissions from the gas-fired boiler network have the potential to impact on local air quality. The assessment has considered energy plant emissions alongside emissions from road traffic, and has concluded that the site is broadly suitable for residential use without additional mitigation. The development is therefore provisionally compliant with London Plan Policy 7.14 (B) and Publication London Plan Policy SI 1 (B). However, the building height of outline elements of the development may exceed the maximum assessed height of energy plant emissions. Where necessary, an air quality assessment will be required at detailed application stage to ensure amenity for future residents is protected. Recommended conditions are outlined below.
3. The impact of the proposed development on air quality at off-site locations has also been assessed. *Minor* adverse impacts are predicted at one receptor, and *moderate* adverse impacts are predicted at three receptors. These arise due to a combination of road traffic and energy plant emissions and all occur on Cambridge Rd, and close to its junction with the A308. On balance, considering the conservative methodology employed as part of the assessment, and the likely completion of the RBKUT district energy network in the future, these impacts are not considered significant. The outline development thus complies with London Plan Policy 7.14 (B) and Publication London Plan Policy SI 1 (B).
4. The proposed development has considered the Good Quality Homes for All Londoners and the Housing Design Quality and Standards Guidance (Ch.12 of the DAS). Air quality constraints were identified (adjacent to Cambridge Road), and have been considered in the design by minimising outlook at this road and ensuring dual aspect. The development has taken steps to deliver an 'air quality positive' development, in accordance with Publication London Plan Policy SI 1 (C).
5. The proposed development is 'air quality neutral' and thus complies with London Plan Policy 7.14 (B) (c) and Publication London Plan Policy SI 1 (B) (2a). However, minor clarifications are requested; detailed are provided in an Appendix to this memo.

Recommendations

The development is broadly compliant with London Plan policies, although further technical clarifications are required, which are listed in the Appendix to this memo.

The following conditions are recommended: AQN/energy plant emissions/standard.

1. The proposed development is considered 'air quality neutral' as presented in this hybrid application. A revised air quality neutral assessment should be submitted with each detailed planning application to ensure each phase/plot remains within the air quality neutral benchmarks (London Plan Policy 7.14 (B) (c) and Publication London Plan Policy SI 1 (B) (2a)).
2. An air quality assessment should be submitted with each detailed planning application to ensure that future occupants are not exposed to poor air quality arising from emissions from the site-wide heat network in Block E. This is because the submitted assessment has not assessed the impacts at heights above ground level for which outline permission is sought. (London Plan Policy 7.14 (B) and Publication London Plan Policy SI 1 (B)).
3. Details of the energy plant installed as part of the site-wide heat network should be approved by the local authority prior to occupation. These should conform to the emissions parameters used in the dispersion modelling as part of the air quality assessment; if they exceed these parameters, another air quality assessment will be required. (London Plan Policy 7.14 (B) and Publication London Plan Policy SI 1 (B)).
4. Compliance with the Non-Road Mobile Machinery (NRMM) Low Emission Zone for London (London Plan Policy 7.14 (B) (b) and Intend to Publish London Plan Policy SI 1 (D)).
5. Measures to control emissions during construction and demolition relevant to a *high* risk site should be written into an Air Quality and Dust Management Plan, or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. This should be undertaken for each phase of construction with each detailed planning application. (London Plan Policy 7.14 (B) (b) and Intend to Publish London Plan Policy SI 1 (D)).

No additional items are required to be secured by s106, beyond those necessary in line with the LPA's planning policies.

Appendix - Detailed Air Quality Assessment Review

1. Further information is requested regarding the verification of PM₁₀ undertaken using the KT5 automatic monitor. Table 7.10 in Appendix 7.1 is unclear, and the background concentration used at this monitor is not stated. The applicant must state the monitored concentration, the assumed background concentration at the site, the unadjusted modelled road-PM₁₀ concentration, and the adjustment applied to the modelled road-PM₁₀ concentration. The factor required to adjust the stated unadjusted conc. (2.51 µg/m³) to the stated adjusted conc. (12.22 µg/m³) would be much higher than the stated verification factor of **1.4787**.
2. Calculation of development building emissions for the AQN assessment, or the source of the data, should be shown.

Stage 1

The model	Response needed
1. Application details:	
1.1. Is the floor space/GIA (split by use class where applicable) correct/the same as stated on the application form?	There are discrepancies, but they do not affect the outcome of the assessment.
1.2. Is the layout of the development proposed the same as in the AQA (especially any buildings included in the model, but also amenity spaces, location of sensitive uses etc)?	Yes – outline
1.3. Are all new parking spaces, new roads and new bus stops etc included in the model?	N/A
1.4. Is the modelled stack location and height shown on the plans? (where a plant room is included)	Yes
1.5. Have other new emissions sources been identified (such as new industrial sources, vents and discharges, NRMM, vessels/boats etc)?	Yes
1.6. Have any new emissions sources or receptors been scoped out, and is this justified?	None
2. Baseline model:	
2.1. Has a suitable baseline year been chosen?	Yes - 2018
2.2. Are all relevant local roads included, and have appropriate traffic counts/fleet splits and profiles (where applicable) been used?	Yes – extent of road network is large

(Where traffic counts have been included in the transport assessment these should be checked against the AQA)	
2.3. Is queueing and congestion at local junctions appropriately modelled?	Yes
2.4. Is local geography properly taken into account (street canyons, raised or lowered roads)	Yes
2.5. Have local industrial sources been properly accounted for?	N/A
2.6. Have point sources from other local developments (e.g. CHP systems or DH/CH energy centres) been included?	No, but on-site plant modelled.
2.7. Have suitable monitoring sites for verification purposes been identified? Are any monitoring sites scoped out, and is this appropriate?	Yes
2.8. Has the verification procedure been carried out appropriately (including any fixes to the model)?	Minor clarifications required
3. Future baseline scenario:	
3.1. Have changes to the traffic emissions been sensibly applied?	Yes – conservative
3.2. Have emissions from committed developments within the model area been taken into account?	Traffic growth has been applied
3.3. Have committed changes to junctions and road layouts been taken into account?	Yes
3.4. Have any new street canyons or other significant changes to local geography been taken into account?	N/A
4. Future “With development” scenario:	
4.1. Do traffic changes match the transport assessment?	Worst case applied
4.2. Have emissions from energy systems been taken into account? And do they match the requirements of the energy strategy (including profiles where necessary)?	Yes – worst case energy strategy (boilers) assessed
4.3. Have changes proposed to junctions and road layouts as part of the development been taken into account?	Yes
4.4. Have any new street canyons or other significant changes to local geography as a result of the development been taken into account?	N/A
4.5. Has suitable evidence been included to justify emissions factors for non-transport sources (e.g. technical specs for CHP)?	Clarification required

5. Model outputs	
5.1. If energy and traffic emissions were modelled separately, have they been combined in a sensible way?	Yes
5.2. Has NOx to NO2 conversion been done appropriately?	Yes – NOx to NO2 calculator
5.3. Have suitable on and off-site receptors been explicitly modelled, and have the results for all receptors been detailed (including receptors at height, mechanical ventilation inlets and amenity spaces)?	Yes. On-site receptors at higher level will need to be taken account of in detailed applications for individual plots.
5.4. Has a map been provided to indicate the extent of impacts?	Yes – contour plots provided
5.5. Has an air quality neutral assessment been undertaken? And do the details match the rest of the modelling?	Yes – some discrepancies

Interpretation of results:	Response needed
6. General:	
6.1. Is the development Air Quality Neutral?	Yes – minor clarifications required
6.2. Have the impacts at the modelled receptors been categorised in line with IAQM guidance?	Yes
6.3. Has the extent of the impacts been discussed (i.e. not just the number of modelled receptors, but with reference to the isopleth maps as well)?	Yes – contour plots provided
6.4. Is the development considered acceptable in air quality terms by the developer?	Yes
6.5. Is this conclusion justified in the professional opinion of the reviewers?	Broadly – some clarifications requested
7. Mitigation measures (where provided)	
7.1. Are any proposed mitigation measures genuinely additional to the “with development” scenario, as modelled?	Construction only. None provided for operational development
7.2. Are proposed mitigation measures appropriate to the problem to be mitigated?	N/A
7.3. Has the impact of mitigation measures been estimated, and are they sufficient to address the identified problem?	N/A
7.4. Are offsetting payments proposed in lieu of mitigation?	No
7.5. Will the mitigation measures need to be secured by condition/s106?	No
7.6. Are design changes required to implement mitigation measures?	No
7.7. Is the development (post stated mitigation) acceptable in air quality terms?	N/A

Construction/demolition	Response needed
8. General:	
8.1. Have suitable human and ecological receptors been identified?	Yes
8.2. Has a screening assessment been carried out to see if a DRA is needed?	Yes
8.3. Has the DRA been undertaken by a suitably qualified person?	Yes
8.4. Has the DRA correctly assessed the Risk of Dust impacts for the demolition phase?	No – condition applied
8.5. Has the DRA correctly assessed the Risk of Dust impacts for the earthworks phase?	Yes
8.6. Has the DRA correctly assessed the Risk of Dust impacts for the construction phase?	Yes
8.7. Has the DRA correctly assessed the Risk of Dust impacts for trackout?	Yes
8.8. Has the DRA recommended suitable mitigation measures for the demolition phase?	Yes (?)
8.9. Has the DRA recommended suitable mitigation measures for the earthworks phase?	Yes
8.10. Has the DRA recommended suitable mitigation measures for the construction phase?	Yes
8.11. Has the DRA recommended suitable mitigation measures for trackout?	Yes
8.12. Has monitoring been suggested for the site?	No – to be established with AQDMPs for site

Recommendations	Response needed
9. Overall development:	
9.1. Are there technical issues with the assessment that mean that it cannot be decided if the development is acceptable?	Minor clarifications requested
9.2. Can the development as currently proposed be recommended for approval?	As above
9.3. Are there matters preventing approval that can be addressed with refinements to the development or mitigation measures (i.e. before stage II)	No
9.4. Are there matters preventing approval that cannot be dealt with within the current development?	No
10. Matters to be secured by condition on s106 agreement	
10.1. Any mitigation measures for the final development that need to be secured by condition or s106?	Conditions to be secured
10.2. Any mitigation measures for construction and demolition that need to be secured by condition or s106?	Yes
10.3. Any offsetting measures or payments that need to be secured by s106?	No
10.4. Any documents where conformity needs to be secured by the planning permission?	Yes – energy plant



Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

RE: Drainage comments 6 May 2021 - Cambridge Road Estate (GLA ref: 6860 / 0596)

To: [redacted]@london.gov.uk, [redacted]@bartonwillmore.co.uk, Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

28 May 2021 at 15:22

Good afternoon,

Please see further post stage 1 comments from the GLA Water Team:

In response to the latest stage 1 water comments, the Applicant has provided an email responding to the outstanding points (from Barton Willmore, dated 17/05/2021). The Applicant confirms that drainage via gravity is achievable for all parts of the site and that swales and rain gardens are proposed throughout. As stated in previous comments, the provision of rainwater harvesting, green roofs, swales, and rain gardens should be secured by an appropriately worded condition so that these SuDS features are included within the forthcoming reserved matters applications.

Kind Regards,

[redacted]
Senior Strategic Planner, Development Management, Planning

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

Mob: [redacted]

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From: [redacted]@bartonwillmore.co.uk
Sent: 17 May 2021 14:34
To: [redacted]@london.gov.uk; Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Subject: RE: Drainage comments 6 May 2021 - Cambridge Road Estate

Hi [redacted],

Please see the responses set out below in red:

In response to the previous stage 1 comments, the Applicant has provided an updated drainage strategy drawing and a plan showing exceedance flood flow routes. The drainage strategy plan now shows locations of attenuation tanks for the whole masterplan, which are 1.2m deep. Connection points from the tanks to the sewer system are not shown. Most of the tanks are proposed beneath landscaped areas/central gardens so there will need to be considerable build-up above the tanks to allow for landscaping and other uses. The Applicant should confirm that the feasibility of discharging surface water from the tanks to the drainage system by gravity has been tested and confirmed. *We have reviewed the proposed invert levels of the tanks and we can confirm that the surface water from all tanks in Phase 1A and B can discharge via gravity into the existing public sewer.*

The plan shows no SuDS within the masterplan phases, and only shows permeable paving for the detailed phases.

Please see section 8.22 in the submitted Design and Access Statement (see screen shot below).

Landscaping is a reserved matter for all parts of the development apart from Phase 1. Swales/rain gardens are to be delivered in later phases and detailed drawings will be submitted in support of those Reserved Matters Applications when they come forward.



Figure 76: Sustainable urban drainage systems keyplan.

- Rain garden
- Swales / planted areas
- Porous paving/planting
- Attenuation tanks

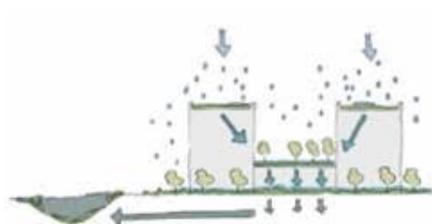
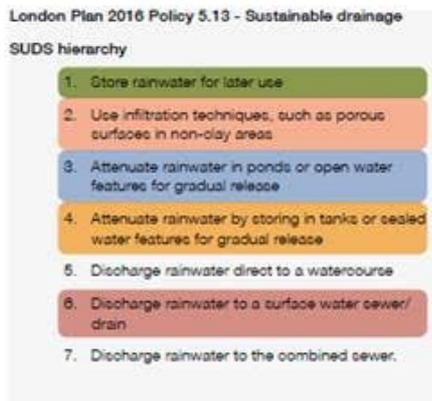


Figure 77: Typical sustainable urban drainage systems.

The provision of rainwater harvesting, green roofs, swales, and rain gardens as cited in the drainage report should be secured by condition to ensure they are incorporated within the scheme, as they are necessary to provide the required amenity, biodiversity, and water quality benefits.

The applicant is happy for this to be conditioned and details to be submitted pursuant to the relevant reserved matters application.

Regards

[Redacted signature]

Associate



[Redacted signature]

[Redacted signature]



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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 14 May 2021 17:15
To: [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Subject: RE: Drainage comments 6 May 2021 - Cambridge Road Estate

Hi [REDACTED] and Harsha,

Please see updated comments from the GLA Water Team, below:

Sustainable drainage

In response to the previous stage 1 comments, the Applicant has provided an updated drainage strategy drawing and a plan showing exceedance flood flow routes. The drainage strategy plan now shows locations of attenuation tanks for the whole masterplan, which are 1.2m deep. Connection points from the tanks to the sewer system are not shown. Most of the tanks are proposed beneath landscaped areas/central gardens so there will need to be considerable build-up above the tanks to allow for landscaping and other uses. The Applicant should confirm that the feasibility of discharging surface water from the tanks to the drainage system by gravity has been tested and confirmed. The plan shows no SuDS within the masterplan phases, and only shows permeable paving for the detailed phases. The provision of rainwater harvesting, green roofs, swales, and rain gardens as cited in the drainage report should be secured by condition to ensure they are incorporated within the scheme, as they are necessary to provide the required amenity, biodiversity, and water quality benefits.

Kind Regards,

[REDACTED]

Senior Strategic Planner, Development Management, Planning

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

Mob: [REDACTED]

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From: [REDACTED] <[REDACTED]@bartonwillmore.co.uk>
Sent: 11 May 2021 11:42
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: FW: Drainage comments 6 May 2021 - Cambridge Road Estate

Hi Harsha [REDACTED]

Please find attached our response to the LLFA and GLA comments along with the following drawings:

- Proposed exceedance routes; and
- Proposed drainage layout.

Hopefully this resolves the remaining points but if there is anything else to address then please let me know.

Regards

[REDACTED]

Associate



[REDACTED]

[REDACTED]

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From: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Sent: 06 May 2021 13:12
To: [REDACTED] <[REDACTED]@bartonwillmore.co.uk>
Subject: Drainage comments 6 May 2021

Dear [REDACTED]

Please find LLFA comments below in relation to the material submitted on 29 April:

Having reviewed the transferred documents, and considering the previous comments provided, I have the following comments to make from this review:

�. The applicant implies that rainwater which falls on soft landscaping will be used by the planting for self-irrigation. I would suggest this is not an example of infiltration techniques, more rainwater reuse.

�. The table presented on page 16 suggests that permeable, channels, swales and rain gardens will be implemented on site. The applicant should provide a drawing detailing the proposed locations for these features, to ensure they are implicated across the site in accordance with the drainage hierarchy.

�. The applicant should detail their justification for the proposed runoff rates in their FRA. It is encouraged that the applicant makes every effort to reduce the proposed runoff rate to as close to greenfield runoff rates as possible for all storm events up to the 1 in 100-year plus 40% climate change event.

�. The applicant is required to provide the greenfield runoff rate - using Quick Storage Estimate is not considered a suitable demonstration of volume requirements.

�. A maintenance plan has not been provided for any of the SuDS features proposed in the FRA.

Once these comments have been addressed, we will review further and revert back with any additional comments we may have.

Should you have any comments or questions, please do not hesitate to ask and we will be happy to help.

Kind regards

Harsha

Miss Harsha Bhundia

Principal Planner (Acting)

Royal Borough of Kingston upon Thames

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Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

RE: Cambridge Road Estate - GLA Stage 1 Response (fire strategy) (GLA ref: 6860)

[redacted]london.gov.uk> 22 November 2021 at 14:32
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>, Greg Pitt <Greg.Pitt@bartonwillmore.co.uk>

Hi Harsha,

Thanks – I have reviewed in my capacity as a strategic planning officer and have no further comments.

Kind Regards,

[redacted]

From: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Sent: 22 November 2021 14:25
To: [redacted]bartonwillmore.co.uk>
Cc: [redacted]london.gov.uk>
Subject: Re: Cambridge Road Estate - GLA Stage 1 Response (fire strategy) (GLA ref: 6860)

H [redacted]

Just to clarify, are you staying that following review of the fire statement the GLA raise no further comments or that the GLA are still to review?

Kind regards

Harsha

Miss Harsha Bhundia

Principal Planning Officer (Acting)

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

KT1 1EU

T: [redacted]

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On Mon, 22 Nov 2021 at 14: [redacted] bartonwillmore.co.uk> wrote:

Hi [redacted]

Thanks for the clarification [redacted]

Regards

[redacted]

Planning Director



[redacted]

[redacted]



W: www.bartonwillmore.co.uk

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[redacted] london.gov.uk>

Sent: 22 November 2021 14:19

To: [redacted] <[redacted]@bartonwillmore.co.uk>; Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Subject: RE: Cambridge Road Estate - GLA Stage 1 Response (fire strategy) (GLA ref: 6860)

Hi [redacted]

Thanks – no further comments at this stage.

Kind Regards,

[redacted]

From: Greg Pitt <Greg.Pitt@bartonwillmore.co.uk>
Sent: 22 November 2021 14:03
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>; Emily Leslie <Emily.Leslie@london.gov.uk>
Subject: RE: Cambridge Road Estate - GLA Stage 1 Response (fire strategy) (GLA ref: 6860)

Hi Emily,

Apologies for the chaser but is there any update/response on the amended fire strategy that we sent across?

Thanks

Greg Pitt

Planning Director



[redacted]

[redacted]

W: [redacted]



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From: [REDACTED]
Sent: 04 November 2021 14:22
To: [REDACTED] <[REDACTED]@kingston.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Cambridge Road Estate - GLA Stage 1 Response (fire strategy) (GLA ref: 6860)

Hi Harsha, [REDACTED]

Please find attached an updated Fire Statement for Phase 1 and a Gateway 1 submission.

I've provided a response to the points previously raised in red below.

- A revised fire strategy report produced by H+H Fire, a third-party organisation, that relates to Phase 1 (Buildings B, C and E) was submitted on 09/04/2021. A report has now been produced by Jensen Hughes and supersedes the previous version issued.
- At Stage 1, GLA Officers stated the fire statement should be amended to confirm that the author is suitably qualified and evidence of competency of the author of the Fire Statement should be detailed in a clearly identified section at the beginning of the Fire Statement. This has not been provided; the submitted statement should therefore be amended to demonstrate compliance with Policy D12. Please see section 1.6
- The revised fire statement is an initial assessment report and there are several elements of the fire strategy that still require confirmation in order to demonstrate compliance with Policy D12. These points include the building's construction: methods, products and materials used, including manufacturers' details, the ongoing maintenance and monitoring of these any fire suppression and smoke ventilation systems proposed, and information that demonstrates that any potential future modifications to the building will take into account and not compromise the base build fire safety / protection measure. Please see section 3. A planning condition can be used to ensure that a Fire Statement is submitted with future s.73 applications and reserved matters applications.
- Some elements of the fire strategy are also unclear: e.g. at paragraph 4.10.2 the statement recommends the use of Computer Fluid Dynamic to model a fire in the car park & a suitable ventilation system to show the efficiency of the system; compliance with this recommendation should be confirmed to demonstrate the highest standards of fire safety is proposed and e.g. at paragraph 4.8.5 the design team should input into the fire strategy to resolve this paragraph.
- A handover process for the passing of all relevant fire safety information contained within the fire strategy to future building owners should be planned and outlined within the Fire Statement. See section 9
- The Council should ensure that policy compliant commitments are secured via condition in order to accord with Policy D12(B1-6) of the Mayor's London Plan and to demonstrate that the highest standards of fire safety. Ideally the fire statement should be amended to address Policy D12(B1-6) under specific headings. We are completely happy for these requirements to be conditioned.
- The fire statement states that one lift per residential core will be a fire evacuation lift, suitable to be used to evacuate people who require level access from the building. Policy D5(B)(5) of the Mayor's London Plan is a requirement relates to all land uses where lifts are installed, not just residential land uses. The fire statement should be amended to confirm that as a minimum at least one lift per core (or more subject to capacity assessments) is a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. Please see section 4.7
- A Policy D5 Declaration of Compliance has been submitted which is supported in principle. As set out in the in draft Fire Guidance, a Declaration of Compliance is a statement written and signed by the author confirming that the technical content produced within the development application complies with all relevant legislation and London Plan fire safety policy requirements. The submitted Declaration of Compliance has

been signed by the applicant, not by the author of the fire statement, who (subject to addressing the above point) is the third party, suitably qualified assessor. A Declaration of Compliance should be submitted by author of the fire statement. Please see section 1.6

Regards

[Redacted]

Planning Director



DDI: [Redacted]

M: [Redacted]

W: www.bartonwillmore.co.uk



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From: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Sent: 03 June 2021 15:51

To: [Redacted] <[\[Redacted\]@bartonwillmore.co.uk](mailto:[Redacted]@bartonwillmore.co.uk)>

Subject: Fwd: Cambridge Road Estate - GLA Stage 1 Response (fire strategy) (GLA ref: 6860)

Dear [Redacted]

I recognise that you were not copied into the email below from the GLA. Please could you address the matters raised by [Redacted]?

Kind regards

[Redacted]

Miss Harsha Bhundia

Principal Planner (Acting)

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

KT1 1EU

T: [REDACTED]

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Date: Tue, 4 May 2021 at 14:23

Subject: RE: Cambridge Road Estate - GLA Stage 1 Response (fire strategy) (GLA ref: 6860)

To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Hi Harsha,

Please see Post Stage 1 comment on the revised fire statement, below:

Fire strategy

- A revised fire strategy report produced by H+H Fire, a third-party organisation, that relates to Phase 1 (Buildings B, C and E) was submitted on 09/04/2021.
- At Stage 1, GLA Officers stated the fire statement should be amended to confirm that the author is suitably qualified and evidence of competency of the author of the Fire Statement should be detailed in a

clearly identified section at the beginning of the Fire Statement. This has not been provided; the submitted statement should therefore be amended to demonstrate compliance with Policy D12.

- The revised fire statement is an initial assessment report and there are several elements of the fire strategy that still require confirmation in order to demonstrate compliance with Policy D12. These points include the building's construction: methods, products and materials used, including manufacturers' details, the ongoing maintenance and monitoring of these any fire suppression and smoke ventilation systems proposed, and information that demonstrates that any potential future modifications to the building will take into account and not compromise the base build fire safety / protection measure.
- Some elements of the fire strategy are also unclear: e.g. at paragraph 4.10.2 the statement recommends the use of Computer Fluid Dynamic to model a fire in the car park & a suitable ventilation system to show the efficiency of the system; compliance with this recommendation should be confirmed to demonstrate the highest standards of fire safety is proposed and e.g. at paragraph 4.8.5 the design team should input into the fire strategy to resolve this paragraph.
- A handover process for the passing of all relevant fire safety information contained within the fire strategy to future building owners should be planned and outlined within the Fire Statement.
- The Council should ensure that policy compliant commitments are secured via condition in order to accord with Policy D12(B1-6) of the Mayor's London Plan and to demonstrate that the highest standards of fire safety. Ideally the fire statement should be amended to address Policy D12(B1-6) under specific headings.
- The fire statement states that one lift per residential core will be a fire evacuation lift, suitable to be used to evacuate people who require level access from the building. Policy D5(B)(5) of the Mayor's London Plan is a requirement relates to all land uses where lifts are installed, not just residential land uses. The fire statement should be amended to confirm that as a minimum at least one lift per core (or more subject to capacity assessments) is a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- A Policy D5 Declaration of Compliance has been submitted which is supported in principle. As set out in the in draft Fire Guidance, a Declaration of Compliance is a statement written and signed by the author confirming that the technical content produced within the development application complies with all relevant legislation and London Plan fire safety policy requirements. The submitted Declaration of Compliance has been signed by the applicant, not by the author of the fire statement, who (subject to addressing the above point) is the third party, suitably qualified assessor. A Declaration of Compliance should be submitted by author of the fire statement.

Kind Regards,

[REDACTED]

Senior Strategic Planner, Development Management, Planning

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

Mob: [REDACTED]

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From: [REDACTED] <[REDACTED]@bartonwillmore.co.uk>
Sent: 09 April 2021 16:19
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Subject: RE: Cambridge Road Estate - GLA Stage 1 Response

Hi [REDACTED]

Further to issuing of our response last week, attached is the updated Fire Report and declaration of compliance.

I will shortly send you a file transfer from where the Updated Flood Risk and Drainage Strategy can be downloaded from.

If you have any questions or queries then please do not hesitate to contact me.

Regards

[REDACTED]

Associate



DDI: [REDACTED]

M: [REDACTED]

W: www.bartonwillmore.co.uk



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From: [REDACTED]
Sent: 01 April 2021 17:07
To: [REDACTED] kingston.gov.uk>
Cc: [REDACTED] @london.gov.uk>
Subject: Cambridge Road Estate - GLA Stage 1 Response

Hi Harsha,

Please find attached our response to the GLA Stage 1 Report.

The documents in green are attached and the others are to follow next week.

- Updated masterplan drawing (Ref: 503-PTA-MP-RF-DR-A-1201_S4-PL3)
- Updated Equalities Impact Assessment prepared by Barton Willmore LLP;
- Updated Fire Strategy Report;
- Updated Archaeology and Heritage Report prepared by Terence O'Rourke; and
- Updated Flood Risk and Drainage Strategy prepared by CTP Consulting Engineers.

Regards



Associate



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Response to financial viability information

GLA Case Number:	6860
Scheme Address:	Cambridge Road Estate
Applicant:	Cambridge Road (RBK) LLP
Local Planning Authority:	RB Kingston upon Thames
Date:	22 nd November 2021

1. Introduction

- 1.1 This document represents an Addendum to the Position of the Greater London Authority's Viability Team issued in February 2021. It considers the "Financial Viability Assessment – October 2021" ("Updated FVA") issued by U.L.L. Property ("ULL") which revised the applicant's viability position due to changes in certain inputs/assumptions and to reflect an updated affordable housing offer.

2. Updated Affordable Housing Offer

- 2.1 The revised affordable housing offer was described in a letter from Barton Willmore (Gregg Pitt) to the Royal Borough of Kingston upon Thames (Local Planning Authority) dated 20th October 2021.
- 2.2 The revised offer proposed an additional 74 Intermediate tenure affordable homes. It also amended the affordability criteria of 80 affordable homes that did not previously meet the London Plan 2021 criteria to qualify as genuinely affordable housing. Overall, the affordable housing has increased from 36.26% to 44%, based on the Mayor's affordability and eligibility criteria. The table below describes the former and revised offers in more detail:

Tenure	Former Offer		Revised Offer (October 2021)	
	Homes	% (by Habitable Room)	Homes	% (by Habitable Room)
Low Cost: Social Rent	767	36.26%	767	36.26%
Intermediate: Shared Equity/Shared Ownership - Non GLA Compliant	100	5.64%	20	1.12%
Intermediate: Shared Equity/Shared Ownership - GLA Compliant	N/A	N/A	80	4.52%
Additional Intermediate: Shared Equity/Shared Ownership - GLA Compliant	N/A	N/A	74	3.10%
Total (GLA Compliant)	767	36.26%	921	43.88%

- 2.3 Further inquiries were made by the GLA to confirm that the proposed affordable housing units met the requirements set out in the London Plan 2021. It was confirmed that:
- The Social Rented units will be affordable in perpetuity.
 - Shared ownership and shared equity owners will have the right to staircase their ownership and that staircasing receipts will be recycled to provide additional affordable housing in the Borough.
 - The Intermediate units will be affordable for households with the following maximum incomes (for the first three months of marketing):
 - 1 bed: £40,000
 - 2 bed: £50,000
 - 3 bed: £60,000
 - Annual housing costs, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, will be no greater than 40 per cent of net household income at the income caps assumed.
 - For sales of shared equity units after the initial sale, purchasers will need to meet the GLA's eligibility criteria and the price paid will meet GLA affordability criteria. These units will remain affordable in perpetuity because they will always be sold at the relevant discount to market value in line with these criteria (taking into account staircasing).
- 2.4 20 of the proposed shared equity units do not meet relevant criteria set out in the London Plan 2021. It is understood that this is because they are to be made available to re-house existing owners on site whose incomes may exceed those above, so the applicant cannot commit that they will meet the income cap and annual housing costs criteria.
- 2.5 Where units have not been subject to an offer within the first three months of marketing during which time they have been available for occupation, the relevant household income should not exceed £90,000.
- 2.6 Overall, this approach is acceptable taking into account the circumstances of this estate regeneration scheme, subject to review of the Section 106 Agreement.

3. Viability Assessment

- 3.1 The Updated FVA included a number of amended a number of inputs/assumptions (including the revised affordable housing offer) which reduced the viability deficit from £50,841,000 to £18,164,000.
- 3.2 The updated FVA and the "Review of Applicant's Financial Viability Assessment" prepared by Carter Jonas (dated March 2021) on behalf of the Local Planning Authority has

addressed some of the queries previously raised. This document focuses on areas of disagreement which are set out below:

Assumed Developer Return

- 3.3 The allowances for developer return in the updated FVA remain as originally submitted and are as follows:

Type of Development	Percentage of GDV
Market Tenure Housing	17.5%
Affordable Tenure Housing	6%
Commercial	15%

- 3.4 The rates adopted are considered to be excessive, for the following reasons:

- They are in excess of returns for a number of other Estate Regeneration schemes that have been assessed by the GLA. For example:
 - Profit assumptions at 10% on the value of market tenure housing and 3% on affordable housing were adopted in relation to the regeneration of the Gascoigne Estate, Barking and Dagenham.
 - LB Hackney's proposed assessment of viability at Marian Court assumed returns of 10% on cost for the market tenure housing and 3% on cost for affordable housing. Whilst neither this scheme nor the one above is a Joint Venture ("JV"), the returns assumed reflect the Local Authority ambition to optimise delivery of AH whilst allowing for market risk.
 - The developer return allowance in relation to the Waterloo and Queen's Estate which, is a JV between LB Havering and Wates, is 10.9% on cost.
- In relation to the 6% allowance for affordable housing, any affordable housing proposed to be allocated to rehouse existing residents on site should be applied at a lower profit rate, to reflect the lower risk of finding an occupier and RP owner/manager of these units. Other FVA's for Estate Regeneration schemes have adopted allowances of 4% on GDV for these units.
- In a grant funding proposal relating to the Ladderswood Estate regeneration at Enfield, the JV applicant based the funding assessment on 15% profit on value of the market tenure housing.

- 3.5 Taking this into account the GLA considers that the proposed level of return for market and affordable housing has not been justified in this case.

Benchmark Land Value

- 3.6 ULL have reduced the BLV for the scheme, from £53,492,000 to £31,766,000 in the Updated FVA. It is unusual for a BLV to be included in a Viability Assessment for an Estate Regeneration scheme alongside separate site acquisition and re-location costs of £80,463,182. FVAs for other estate regeneration schemes that the GLA has considered

typically include a nil value (see Clapham Park Estate, Acton Gardens, Grahame Park, Woodberry Down, Westthorpe Gardens and Mill Grove Estate, Fosters Estate, amongst others), for the following reasons:

- London Plan Policy H8 requires the re-provision of existing affordable housing and for additional affordable housing to be maximised. This should be taken into account when determining any landowner return which should be the minimum return necessary to enable delivery while fully complying with policy requirements.
 - Policy H8C of the London Plan requires authorities to consider all other options before demolition and so it should be assumed that there is an economic benefit in bringing forward redevelopment. It therefore follows that it is unlikely the existing blocks will have a significant EUV. If that was the case a refurbishment is likely to be a more appropriate route.
 - Many estates that are to be the subject of regeneration (and particularly older ones such as the Cambridge Estate) are subject to significant capital repair and refurbishment costs to ensure that existing properties meet required standards. These costs can amount to a significant liability which should be taken into account alongside any revenue in Existing Use Valuations, which can often result in a nil or negative value.
 - The regeneration of housing estates can require significant site acquisition costs including from leaseholders who have previously purchased properties from the landowner under right-to-buy, together with re-location costs. This affects the ability of the landowner to bring forward the site for redevelopment and the value of the site.
- 3.7 Taking these points into account and that sufficient information relating to ongoing refurbishment and maintenance costs has not been provided, the proposed BLV has not been justified in this case.

Finance Costs

- 3.8 The updated FVA maintains a position that finance costs of 5.5% are reasonable. Whilst this rate is lower than one typically applied to speculative schemes, this appears to be marginally high given the scheme is proposed to be delivered by a JV between a Local Authority and major housebuilder who are likely to be able to access finance at a lower rate.

Residual Appraisal Results and Analysis

- 3.9 The applicant's original position was that the scheme was in deficit by £50,841,000. A reduced deficit has subsequently been agreed with the LPA's advisor of £18,164,000, whilst the proportion of affordable housing has been increased, as set out above.
- 3.10 The GLA's previous comments noted that the applicant is required to demonstrate how the

scheme is deliverable, in accordance with paragraph 3.10 of the AH&VSPG which states that:

“Scheme delivery

3.10 Applicants should demonstrate that their proposal is deliverable and that their approach to viability is realistic. As such appraisals would normally be expected to indicate that the scheme does not generate a deficit, and that the target profit and benchmark land value can be achieved with the level of planning obligations provided. If an appraisal shows a deficit position the applicant should demonstrate how the scheme is deliverable.

- 3.11 The GLA note that reports to RBKUT’s Strategic Housing and Planning Committee and Finance and Contracts Committee, regarding governance arrangements for the development and JV with Countryside, do not reference the scheme being in financial deficit. Rather, they state that the ‘commercial offer scored highly both in terms of the level of return back to the council and the robustness used within their financial modelling, given the council confidence in their commercial offer’ and that the ‘regeneration proposal is affordable’.
- 3.12 It is widely acknowledged that the residual valuation approach is highly sensitive to input assumptions, particularly for sales values and build costs. Reliance purely on one valuation approach is not compliant with RICS guidance contained in ‘Valuation of development property (1st edition, October 2019)’. This states that where a residual method is used, it is similarly important to cross-check the outcome with comparable market bids and transactions where they exist, including the subject property.
- 3.13 Evidence of land market sales of residential led development sites has not been provided to sense check the applicant’s conclusions on residual land value. While transactions for estate sites may not be available, evidence for residential sites can provide a useful sense check. The GLA has taken into account transactional evidence which supports the position that some of the assumptions in the appraisal may be pessimistic and that the scheme is deliverable without generating a deficit.

Overall Conclusions

- 3.14 Taking into account the points raised above, the GLA consider that the scheme is deliverable with 44 per cent affordable housing that this would not result in a financial deficit. In view of the increased level of affordable housing and amendments to affordability criteria to meet London Plan requirements, together with the costs associated with land acquisition and delivery, it is considered that additional affordable housing cannot be provided at this stage.
- 3.15 The scheme should however be subject to early, mid and late viability reviews to determine whether additional affordable housing can be provided over the lifetime of the development. These should be based on the approach set out in the Mayor’s Affordable Housing and Viability SPG.

-
- 3.16 A draft S106 agreement should be provided incorporating the reviews and provisions to secure delivery of the affordable housing including the re-provided social rent units by floorspace, units, and habitable rooms and other criteria in line with the Mayor's guidance and standard clauses.



Development Management <development.management@kingston.gov.uk>

Fwd: 20/02942/FUL (Our Ref pgo-0589)

1 message

Indira Perera <indira.perera@kingston.gov.uk>

8 December 2021 at 11:52

To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

Cc: Development Management <Development.management@kingston.gov.uk>, Barry John Lomax <barry.lomax@kingston.gov.uk>

Hi Harsha

Please see email below for your info.

Kind regards
Indira

----- Forwarded message -----

From: [REDACTED]
Date: Wed, Dec 8, 2021 at 11:07 AM
Subject: 20/02942/FUL (Our Ref pgo-0589)
To: indira.perera@kingston.gov.uk <indira.perera@kingston.gov.uk>

Dear Indira,

Thank you for your email in relation to Planning Application 20/02942/FUL

Please Note – we became a statutory consultee on 1st August 2021. We cannot comment on planning applications from local planning authorities submitted prior to that date (unless a subsequent application, after 1st August 2021, is made under [section 73 of the Town and Country Planning Act 1990](#)). Therefore, as this application was validated 03/12/2020, on this occasion we will not be able to provide a response.

Please also note for future reference a fire statement should be provided by the developer as part of their planning application for relevant buildings. Further guidance on Fire safety and high-rise residential buildings (from 1 August 2021)

is available [here](#).

Please do not reply directly to the sender of this email but use the mailbox planninggatewayone@hse.gov.uk and our reference number (pgo-0589); this will ensure your query is promptly dealt with.

Thank you for your email, if you require further advice please do not hesitate to contact the planning gateway one team.

Kind Regards

[REDACTED]

**Operational Support,
Building Safety and Construction Division**

Health And Safety Executive, Redgrave Court, Merton Road, Bootle, Merseyside, Liverpool,
L20 7HS

☎️: ✉️: PlanningGatewayOne@hse.gov.uk

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Indira Perera
Business Support Officer- Planning & Transportation and Environment
Royal Borough of Kingston Upon Thames 2nd Floor, Guildhall 2
Kingston upon Thames,
KT1 1EU

FW: Drainage comments 6 May 2021 - Cambridge Road Estate

[REDACTED]@kingston.gov.uk
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

28 October 2021 at 15:40

Hi Harsha,

In response to your email and our recent re-consultation on this application, we would suggest imposing the following Condition on any decision notice recommended for the application:

Prior to commencement of groundworks (excluding site investigations and demolition), the applicant must submit a final detailed drainage design including drawings, supporting calculations and an updated Drainage Assessment Form to the Lead Local Flood Authority for review and approval, aligned with the Flood Risk Assessment produced by CTP Consulting Engineers (April 2021, report reference: A6424/KN/NG) and associated drawings. A detailed management plan confirming routine maintenance tasks for all drainage components must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.

Reason: To prevent the risk of flooding to and from the site in accordance with relevant policy requirements including but not limited to London Plan Policy SI 13, its associated Sustainable Design and Construction SPG, the Non-Statutory Technical Standards for Sustainable Drainage Systems and Kingston Council's Local Plan Policy DM4.

If you have any further comments or questions, please do not hesitate to contact me and I will be happy to help.

Kind regards,

Nick

[Quoted text hidden]

--

Nick Metcalfe
Flood Risk Officer

[REDACTED]
Please note I work for Kingston on Wednesday PM, Thursday, and Friday PM.

Highways and Transport
Kingston and Sutton Shared Environment Service
Royal Borough of Kingston upon Thames
3rd Floor, Guildhall 2, Kingston upon Thames KT1 1EU
[REDACTED]@kingston.gov.uk



----- Forwarded message -----

From: [REDACTED] <[REDACTED]@kingston.gov.uk>
Date: Wed, 14 Jul 2021 at 16:55
Subject: Re: Health Impact assessments for planning applications (Cambridge Road Estate) 11/03/21
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Cc: [REDACTED] <[REDACTED]@kingston.gov.uk>

Hi Harsha,

I had gone through most of it, but have now managed to finish reading through the EQIA.

In both the responses to my comments, and through the detail of the EQIA, I feel satisfied that consideration has been made of the relative deprivation of the CRE residents and that this is key to plans on this development, in terms of ensuring increased opportunities are available for residents to close the gap with other areas in the borough and to improve quality of life.

I appreciate the citing of the London Plan in the EQIA and in focusing on reducing health inequalities and improving life chances for this community. It is also good to see the impact of COVID being included, as we know this is an area which has been disproportionately impacted. The focus on community engagement is really positive and will help this development be 'owned' by the residents and that they feel part of it. This is essential in supporting residents to feel included and not socially isolated or disengaged from the redevelopment. The inclusion of community and green spaces is something that we support and appreciate the acknowledgement that this will benefit the quality of life of residents.

Many thanks,
[REDACTED]

On Wed, 14 Jul 2021 at 12:22, Harsha Bhundia <harsha.bhundia@kingston.gov.uk> wrote:

Hi [REDACTED]

I am sorry to chase as I can imagine how busy you are. Have you had an opportunity to review the attached?

Kind regards

Harsha

Miss Harsha Bhundia

Principal Planning Officer (Acting)

Royal Borough of Kingston upon Thames

Guildhall II

Kingston upon Thames

KT1 1EU

RECOMMENDATION

No Highways objection subject to conditions, Section 278 Highways agreement and Section 106 agreement.

OVERVIEW

The application covers both a detailed design for Phase One and an Outline design for the wider master plan area. Both are considered together in terms of each of the key aspects of relevance to highways – parking; access; servicing; sustainable travel; and construction.

Phase One is proposed to commence in June 2021, with construction completed by May 2025. Phase Two would overlap that, with an indicated commencement date of September 2023 and due for completion of construction in August 2027. Other phases overlap in a similar manner. It is therefore important that any subsequent planning applications for these later phases take into account the cumulative highway impacts of this multi-phase approach, in particular with regard to construction logistics and temporary parking and access arrangements.

THE APPLICATION SITE

The Cambridge Road Estate is situated approximately 1 km to the east of Kingston town centre, with residential uses to the north, east and west and Kingston Cemetery to the south. Cambridge Road defines the northern boundary of the site and Hawks Road runs west from the north-eastern extent of the site, linking to Kingston town centre. Hampden Road (together with Vincent Road and Cambridge Grove Gardens) provides an eastern access into the site, and the west of the site is accessible from Bonner Hill Road (together with Somerset Road, Rowlls Road/Piper Road).

The existing estate comprises 832 dwellings, constructed in the 1960s and 70s. 81% of these are council/social housing with the remainder 19% being leasehold or freehold properties.

APPLICATION DETAILS

Pre-Application

Pre-application discussions with both Royal Borough of Kingston (RBK) and Transport for London (TfL) were held previously and the following was agreed:

- 'Car-lite' development based on an overall 0.4 parking ratio with Controlled Parking Zone (CPZ) restrictions to promote sustainable travel;
- New residents should be excluded from participation in any existing or future external CPZ;
- Disabled Parking to be provided in accordance with 2021 London Plan standards;
- Internal highway network to be designed so as to discourage rat-running between A2043 Cambridge Road and Hawks Road;
- Junction of Hawks Road and Washington Road to be used for construction access only;
- Manual PTAL calculation accepted as reflection of improved pedestrian/cycle access;
- No local junction modelling required (TfL);
- A potential bus corridor through the site should be identified and safeguarded (TfL);
- An Active Travel Zone to include routes to Norbiton and Kingston railway stations, bus stops, schools, Kingston Town Centre, Kingston Hospital and parks should be identified;
- TA to focus on Masterplan with details covered under subsequent Reserved Matters Applications (RMAs).

Outline

The hybrid planning application is for a mixed-use development, including:

- demolition of existing buildings
- erection of up to:
 - 2,170 residential units
 - 290 sqm flexible office space
 - 1,395 sqm flexible retail/commercial space
 - 1,250 sqm community space
 - new publicly accessible open space and associated access, servicing and landscape works

The extent of the Outline (Masterplan) layout is illustrated on Drawing No. 503-PTA-MP-RF-DR-A-1201 P23).

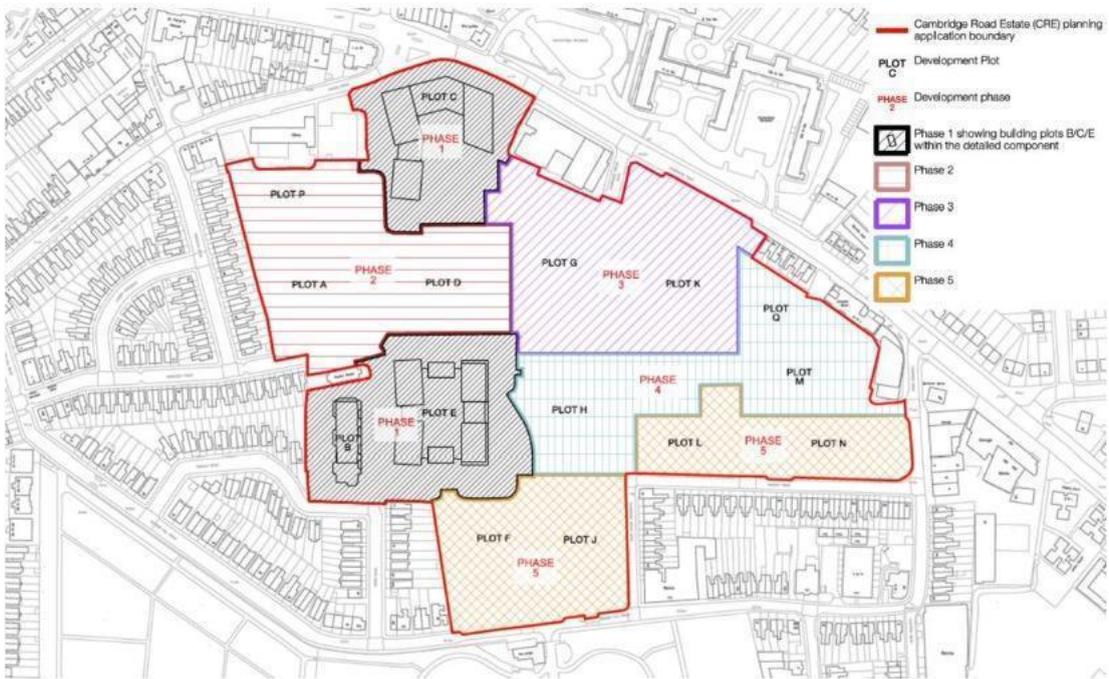
Image 1.1 Illustrative Masterplan



Source: Patel Taylor 503-PTA-MP-RF-DR-A-1201 P23

The site will be constructed in five phases, with the final phase (Phase 5) due to commence in April 2029 for completion on April 2033.

Image 4.1 Phasing Plan



Source: Extract from Patel Taylor Drawing 503-PTA-MP-XX-DR-A-5407 P03

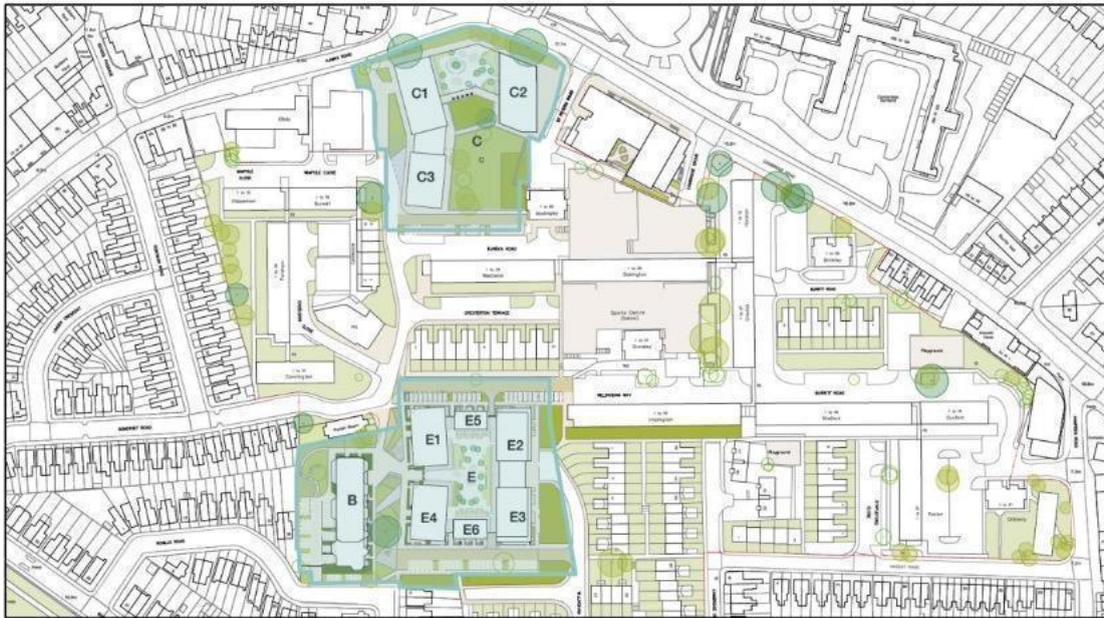
Phase One

Phase One comprises:

- 452 residential units
- 1,250 sqm community space
- 290 sqm flexible office space
- 395 sqm flexible retail/commercial space
- new publicly accessible open space and associated access, servicing and parking

The extent of the Phase One layout is illustrated on Drawing No. 503-PTA-MP-RF-DR-A-5101 P02).

Image 1.2 Phase 1 Site Plan



Source: Patel Taylor 503-PTA-MP-RF-DR-A-5101 P02

Phase One incorporates much of the non-residential development, which includes the Bull and Bush Hotel (Phase 2), Piper Community Hall, Tadlow House (Housing Management), CRERST Office and the Surbiton Rifle Club (Phase 3). Overall, however, the proposed development of Phase One would result in a net increase of 323 residential units and a net loss of 13 sqm non-residential floor area.

KEY DOCUMENTS

The applicant has submitted the following documents considered most relevant to Highways and a review of these forms the basis for our comments:

- Transport Scoping Note
- Transport Assessment
- Delivery and Servicing Plan
- Travel Plan
- Car Parking Management Plan
- Construction Logistics Plan

Unless otherwise indicated, drawings reproduced as part of these Highway comments are taken directly from the transport assessment.

TRIP GENERATION AND WIDER HIGHWAY CONSIDERATIONS

The proposed development has been designed to promote sustainable travel and is supported by a Travel Plan for Phase One. It is understood that this will be later expanded to incorporate future phases as they are put forward. This, together with the 0.4 parking ratio for the Masterplan site (i.e., 'car lite'), is indicated in the TA as supporting the argument that despite a significant increase in residential and commercial floorspace, the development should result in a reduction in vehicle trips on the highway network. Based on the evidence provided this argument would appear to be substantiated but will need to be secured through conditions and a Section 106 agreement to ensure in particular that the travel plan and parking management plans remain robust as the development progresses.

The Transport Assessment (TA) takes into account the strategic transport objectives of the Mayor's Transport Strategy, Healthy Streets and Vision Zero.

Existing and 'with development' trip generation has been estimated using the industry standard TRICS database using trip rates derived from mixed private/affordable housing. For the existing site, these trip rates are set out in Table 6.1 of the TA. The methodology and rates used are accepted.

Vehicular Trips (Outline)

Based on these rates it is estimated that the estate's existing 832 dwellings generate:

- 149 vehicular movements in the a.m. peak
- 126 in the p.m. peak
- 1505 daily trips (07:00 – 21:00).

As a further check, vehicle trips were also estimated based on automated traffic counter (ATC) data collected primarily on 16th July 2019 and 22 July 2019 from sites on:

- Somerset Road
- St Peter's Road
- Burritt Road
- Wilmington Way

These roads together serve 774 of the total 832 dwellings. Some sites had to be resurveyed on 9th September 2019 and 15th September 2019 due to malfunction or tampering of the ATC equipment.

In terms of trip distribution, Somerset Road recorded the highest proportion of daily trips (34%), followed by Burritt Road (26%), Willingham Way (15%), Vincent Road (14%) and St Peters Road (10%).

Overall, the site is presently estimated to generate daily:

- 220 vehicle trips in the a.m. peak

- 212 vehicle trips in the p.m. peak
- 3124 vehicle trips throughout the day (07:00 – 21:00)

These ATC-recorded trips were then profiled so as to reflect the daily TRICS trip profile. This suggests that a large proportion of trips occur outside of the main residential (journey to and from work) movements, reflecting retail and commuter parking by those external to the site.

Table 6.3 of the TA indicates that due to unrestricted parking over much of the site, an additional:

- 71 vehicle trips in the a.m. peak
- 86 vehicle trips in the p.m. peak
- 1619 vehicle trips throughout the day;

are made by non-residents.

In summary, whilst the existing 832 dwellings generate 1505 daily vehicular trips, a further 3124 vehicular trips are made by those entering the site to avail themselves of the free parking that is presently available.

The applicant suggests, reasonably, that the introduction of parking controls including a new sitewide Controlled Parking Zone (CPZ) as detailed in the Parking Management Plan, together with a replacement internal highway network that prevents rat-running should substantially reduce if not eliminate these externally generated vehicular trips.

For the proposed full development (Phases 1 - 5), based on TRICS surveys reflecting 60% private houses and 40% affordable flats, the following is estimated:

- 141 vehicle trips in the a.m. peak
- 128 vehicle trips in the pm. Peak
- 1137 vehicle trips throughout the day.

As set out in Table 6.9 of the Transport Assessment, the proposed development would result in a net reduction of 79 vehicle trips in the a.m. peak, 84 in the p.m. peak and 1988 trips throughout the day.

No modelling of the existing junction performance was undertaken, this having been agreed by TfL during pre-application discussions.

Vehicular Trips (Phase One)

This first phase comprises a significant proportion of the non-residential elements of the site. Because of this, as new residential units are occupied there will be encouragement towards internalised trips for those uses as may be required by future residents.

Existing Mode Share

The TA has estimated existing mode share on the basis of 2011 Census (Middle Super Output Area, Kingston upon Thames 005, which includes the site) data for journey-to-work. This suggests the following:

- 27% car driver
- 1% car passenger
- 14% bus
- 27% train/light rail
- 23% walk
- 6% cycle
- 1% motorcycle

Census data also indicates that car ownership of existing residents is between 0.4 and 0.5 per dwelling.

ACCESS AND ACCESSIBILITY - OUTLINE

The development will incorporate new east/west and north/south connections to the external highway network whilst being designed to prevent rat-running, in particular between Hawks Road and Cambridge Road.

Healthy Streets

The TA includes a review of the existing site against the Healthy Streets Indicators, as summarised in Table 3.5.

The northern part of the site is generally better connected to local services and public amenities, although movement within the site is to some extent inhibited by levels changes and lack of step-free pedestrian routes.

The proposed development has also been assessed using the Healthy Streets Indicators, as stipulated in Policy T2 of the 2021 London Plan. This focused on three corridors – Washington Road and New Central Road (north-south) and Vincent Road (east-west). New Central Road is a newly proposed road; the remaining two are existing. This shows an improvement when compared to the ‘existing’ indicator scores, particularly with regard to ‘people feel safe’, ‘things to see and do’, ‘pedestrians from all walks of life’ and ‘places to stop and rest’.

The TA incorporates an Active Travel Zone (ATZ) which shows the existing and proposed cycle routes from the site and a range of local amenities which could be reached based on a 20-minute cycle ride. Further details of these amenities (including bus stops and railway stations) are provided in Table 5.1 of the TA.

A Neighbourhood Active Travel Zone is also included to illustrate the anticipated key walking and cycle routes surrounding the site.

Pedestrian Access

The primary pedestrian routes into and across the site are shown on Drawing No. 503-PTA-MP-00-DR-A-1235 P01. These are arranged into a grid layout which permits easy movement along car-free routes in north-south and east-west directions, with regular interconnections. It would therefore be convenient for pedestrians to move between each of the development blocks and this is further facilitated by addressing the levels changes which currently exist across this site.

Image 4.2 Primary Pedestrian Routes



Source: Extract from Patel Taylor Drawing (503-PTA-MP-00-DR-A-1235 P01)

The TA included details of a Pedestrian Level of Comfort Assessment (PLCA) undertaken in accordance with TfL's Pedestrian Comfort Guidance 2019. Eight key proposed internal footways were assessed using projected a.m. peak hour pedestrian flows. These all scored highly, as A, A- or A+, reflecting the generous footway widths that are proposed (see Image 4.6 of the TA).

The development as a whole is expected to generate an additional 190 walking trips in the a.m. peak and 221 walking trips in the p.m. peak.

The internal footway network as proposed will provide convenient access to all parts of the site and to local amenities and public transport interchanges. This will be further improved by changes implemented to address existing levels differences, making the site largely step-free and accessible to all.

A new 10 metre wide pedestrian crossing is proposed on the A2043 Cambridge Road, providing access to the bus stops near Cambridge Gardens.

Image 4.10 Proposed Cambridge Road Crossing



Source: Extract form 503-PTA-MP-RF-DR-A-1201_S2-P24 P24

This is welcomed as a proposal as it would serve to enhance the public transport accessibility of the site but the exact location and design details will need to be agreed with RBK Highways through the S278 process. It will also be necessary to ensure that a raised table of this size does not conflict with the GoCycle proposals for the local area.

Cycle Access

The development as a whole is expected to generate an additional 50 cycling trips in the a.m. peak and 58 cycling trips in the p.m. peak.

The primary cycle routes are shown on Drawing No. 503-PTA-MP-00-DR-A-1231 P01. Again, these are arranged in a grid like fashion. A primary north-south and east-west cycle route, both largely on-street but with shorter off-street sections, are accompanied by additional secondary routes to facilitate door-to-door access within each of the development blocks. Externally, these routes provide access to the segregated cycleway on A2043 Cambridge Road, and to Hawks Road and Bonner Hill Road. Presently, however, the cycling environment on Hawks Road is poor due to pinch points created by the traffic islands. Given the substantial commitment towards improving cycle access through the Go Cycle scheme the applicant needs to demonstrate a similar commitment in supporting this objective. Funds should be allocated from within the S106 Agreement to secure further enhancements, which could include (1) the removal of the small wall on the boundary between the south footway and the property to increase space for cyclists and pedestrians; and (2) enhancement of the Hawks Road junction. Such improvement works would need to be agreed with RBK Highways but should be secured in principle in the S106 Agreement for the Outline application. The applicant's transport consultants, Markides Associates, have indicated in their technical note "Response to TfL and

RBK Highways” dated 31st March 2021 that these requirements should be acceptable in principle to the applicant but would require additional highway adoption to extend the cycleway width into what is currently private land.

Image 4.3 Primary Cycle Routes



Source: Extract from Patel Taylor Drawing (503-PTA-MP-00-DR-A-1231 P01

Public Transport Accessibility

The existing site has a PTAL ranging from 0 to 5. The area to the south is least accessible to public transport due to the reasons previously stated, i.e., relative lack of pedestrian permeability through the site to reach bus stops to the north on Cambridge Road. From those stops, however there is good onward bus connectivity with buses serving the town centre, Kingston Hospital and Tooting among other destinations, and with both Norbiton and Kingston railway stations within walking distance.

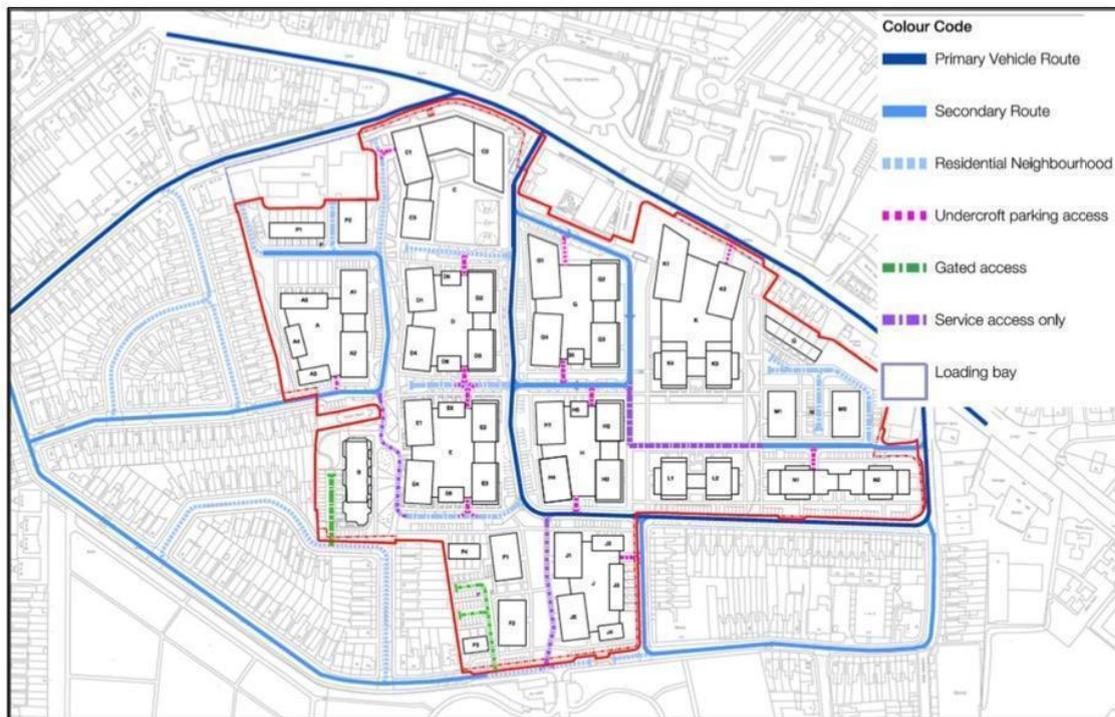
The nearest bus stops are located on Cambridge Road (Stops A and L), 550 metres from the centre of the site and approximately a 7-minute walk. There are additional bus stops on A308 London Road, 700 metres from the centre of the site and approximately an 8-minute walk. Table 3.2 of the TA lists all available services, their routes and frequencies.

Norbiton Station is the nearest railway station and is located approximately 900 metres north-east of the site (13-minute walk). Kingston Station is located approximately 1.4 kilometres to the north-west of the site (18-minute walk). Both stations are on the same line and have good connections to Central London (Waterloo) and to Richmond Clapham Junction and Wimbledon.

Vehicular Access

The existing vehicular access points into the site have been retained, in some cases in an amended form. Those which are retained include St Peters Road, Cambridge Grove Road (junction with Cambridge Road), Hampden Road, Burritt Road and Somerset Road. Existing accesses via Stapleford Close, Cambridge Road (north of its junction with Vincent Road) and Rowlls Road/Piper Road are to be closed. New points of vehicular access are proposed via Rowlls Road/Piper Road, Somerset Road, Bonner Hill Road and at a new T-junction with Vincent Road/Cambridge Grove Road. These vehicular access routes for the proposed development are illustrated on Drawing No. 503-PTA-MP-00-DR-A-1225 P03.

Image 4.4 Primary and Secondary Vehicular Access Routes



Source: Extract from Patel Taylor Drawing (503-PTA-MP-00-DR-A-1225 P03)

The TA confirms that the final junction design of St Peters Road and Hampden Road will be determined at the Reserved Matters Application (RMA) stage but this will likely be in line with the Go Cycle design, with St Peters Road being widened to 6.5m width to accommodate a potential bus route. Highways have some concern that intensifying vehicle movements close to the traffic signals is likely to be a safety issue which the applicant will need to address at that time, with further justification for the increased width including provision for a Road Safety Audit. Similarly, all new/amended/closed vehicular accesses beyond those forming part of the Phase One development will be dealt with as part of the RMA.

TfL have indicated that they have no immediate plans to introduce a new bus route through the site but asked that the potential to accommodate such a route in future be incorporated into the design. To achieve this as a future option it will be necessary for the applicant to take fully into account the on-street implications for parking and loading, and safe delivery vehicle access.

The applicant has indicated in the TA that it is intended to stop-up all the existing internal road and footway network within the estate, using the S247 procedures as needed.

Image 4.14 Extent of Public Highway to be Stopped Up



It is understood that the applicant proposes at a m to construct the primary roads to adoptable standards. It must be emphasised, however, that any estate roads that are to be part of a future internal Controlled Parking Zone (CPZ) will have to be adopted under a S38 Agreement prior to implementation. For this reason, and also to facilitate potentially future further bus penetration into the site, and to maintain proper access to the NHS facility (located north of Plot P and west of Plot C) RBK Highways would require that all primary and secondary routes should be adopted at a minimum.

Prior to being adopted the applicant must enforce parking restrictions on all primary and secondary roads on a private, permit-controlled basis to ensure that unregulated parking does not become established ahead of adoption and the introduction of the new CPZ. For this reason, no resident must be provided with an allocated space on-street since they would not be able to retain such a space once the CPZ regime becomes operational. The applicant should amend the CPMP accordingly and

include a detailed Parking Enforcement Plan to be reviewed and agreed by RBK Highways prior to first occupation.

For Phase 3 of the proposed development a new vehicular access off the A2043 Cambridge Road is proposed as shown in Image 4.9 below.

In response to concerns raised previously by Highways, the applicant has submitted a revised layout (Drawing No. 19157-MA-XX-XX-DR-C-01) which avoids the need to relocate the two existing bus stops, as was previously indicated. The bus stops have been adjusted to accommodate the wider crossing on Cambridge Road. The amended vehicular access includes appropriate visibility splays and tracking confirms vehicles can safely enter/exit the access. The vehicular access is proposed to be a vehicular crossover (dropped kerb access) and not a formal bellmouth junction as the intention is to retain the pedestrian and cycle priority along Cambridge Road.

Figure 3.1 K2 Vehicular Access and Cambridge Road Bus Stops



Source: Extract of Drawing: 19157-MA-XX-XX-DR-C-01

The applicant should be aware that the cost of removing or relocating all existing highway infrastructure, such as lamp columns and a permanent traffic counter, will need to be fully covered by them. There would appear to be a significant levels difference between the site and Cambridge Road along this section and this will need to be detailed in any forthcoming design work.

As suggested in the TA this will require detailed highway design checking and approval under a S278 Agreement, secured by the S106 legal agreement at a later Reserved Matters Application (RMA) stage.

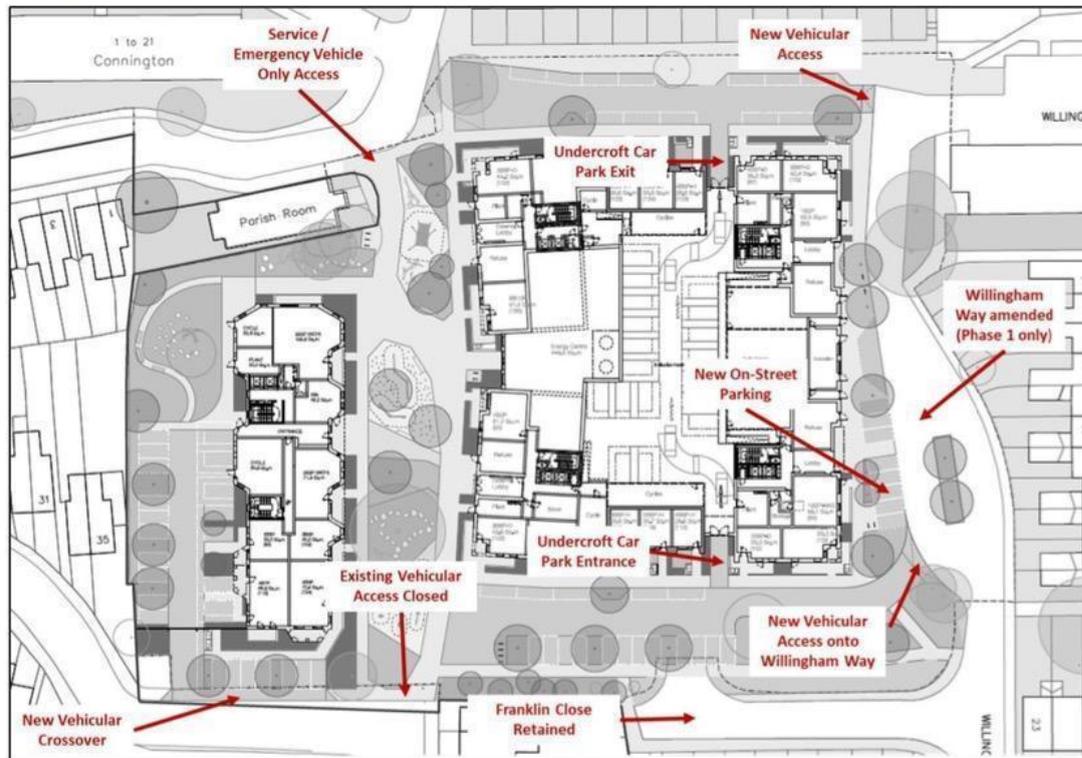
ACCESS AND ACCESSIBILITY – PHASE ONE

This phase consists of three blocks – Block B, Block C and Block E.

Block B will be served by a new vehicular access from Rowlls Road, with Block E being served from Willingham Way. Parking for both Blocks B and E will also be reached via these two vehicular accesses. For Block B the parking will be directly

from the road and for Block E the access from Willingham Road will facilitate on-street parking to the south of Block E and also the entrance to an undercroft car park.

Image 4.15 Block B and E Site Layout

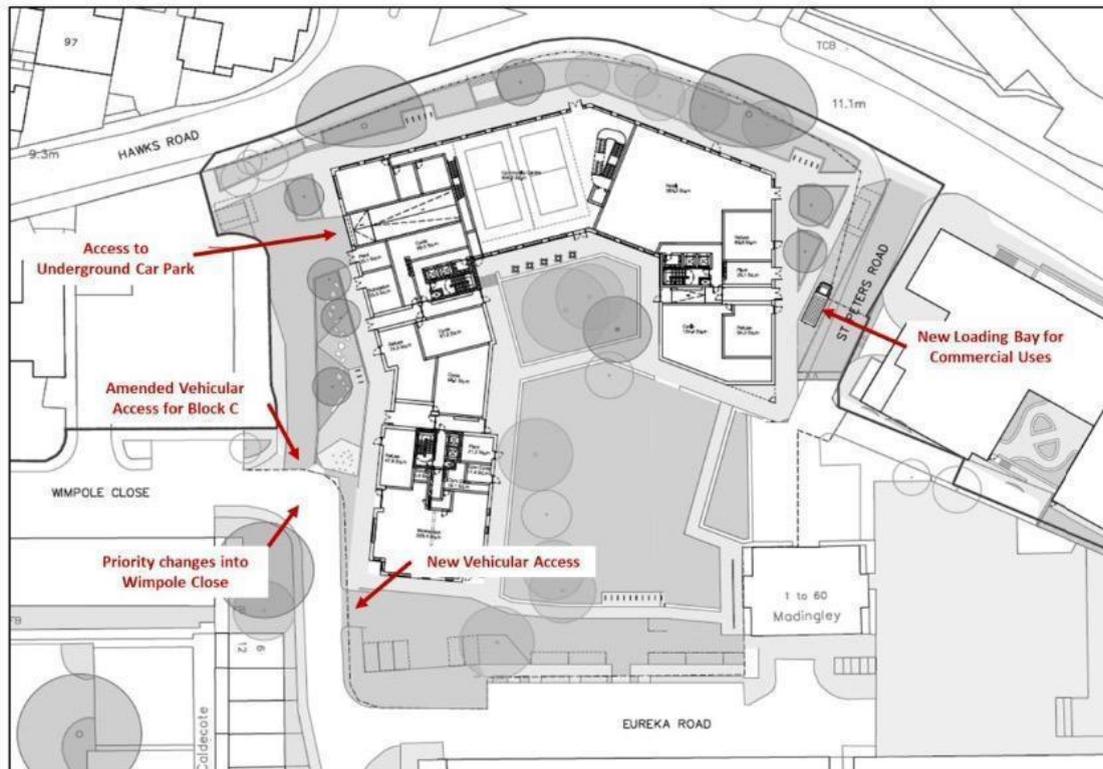


Source: Extract from Patel Taylor Drawing 503-PTA-PH1-00-DR-LA-4301 P01

According to the TA, on-street parking will be provided on the western side of Willingham Way, with the alignment of the road temporarily altered in order to retain access to both the residential properties to the east of Block E and the parking area between Graveley and Impington Court.

The existing vehicular access at the corner of Rowlls Road and Piper Road is to be closed off in order to facilitate the creation of a green walking and cycling route.

Image 4.16 Block C Site Layout



Source: Patel Taylor 503-PTA-PH1-00-DR-LA-4300 P01

Blocks B and E (Drawing No. 503-PTA-PH1-00-DR-LA-4300 P01, Superseded):

- Blocks B and E will incorporate new pedestrian infrastructure, linking them to the existing footways on Washington Road, Rowlls Road and Willingham Way.
- A new north-south pedestrian route between Washington Road and Rowlls Road is proposed.
- Vehicular access to Block B and associated parking will be via a new access off Rowlls Road.
- Block E will be accessed via Willingham Way.
- A new vehicular access off Willingham Way will serve on-street parking to the south of Block E and the entrance to the undercroft car park.
- The undercroft parking exits to the north of Block E which becomes a new street with on-street parking served from a new access onto Willingham Way.
- New on-street parking is included on the western side of Willingham Way (temporarily reconfigured until completion of Phase 5).
- Existing vehicular access at the corner of Rowlls Road and Piper Road is closed off to facilitate creation of a green walking/cycle route.

In response to comments from Highways regarding the Rowlls Way access, the applicant has been able to reduce the width of the new crossover access to the

south of Block B, thereby improving the pedestrian environment while still maintaining the 0.4 parking ratio. The revised layout is shown below:

Figure 3.2 Rowlls Road Vehicular Access



Source: Extract of Patel Taylor Drawing: 503-PTA-PH1-00-DR-LA-4301

In this design, the footway has effectively been widened to approx. 3m in width (reducing the width of the existing carriageway) to accommodate the crossover whilst still providing a 2m wide level footway for pedestrians. This access is expected to be only lightly used. As detailed in the Highways Technical Note from Markides Associates, the remaining width of Rowlls Road is 6.4m. The on-street parking on the south side of Rowlls Road is also retained leaving a 4.4m effective carriageway width, which is sufficient width for two cars to pass each other.

The turning head at the end of Franklin Close also appears to be curtailed by the parking court to the south of Block E. The applicant will need to demonstrate that sufficient turning space is retained on Franklin Close to avoid vehicles having to reverse onto Willingham Way.

Block C (Drawing No. 503-PTA-PH1-00-DR-LA-4300 P01):

- Block C will benefit from new pedestrian infrastructure linking the residential, retail, office and community uses to Washington Road, Hawks Road, Cambridge Road and St Peters Road.
- A new footway will link the new green space with Madingley, and Eureka Road.
- Northern end of Washington Road is amended to provide vehicular access to underground parking for Block C.
- Commercial loading will be facilitated by provision of a loading bay on the western side of St Peters Road.

As noted in the TA, these detailed highway design matters will need to be agreed as part of a S278 Agreement for Phase One and subsequent phases, as set out in the Section 106 Agreement, and will also be secured by condition.

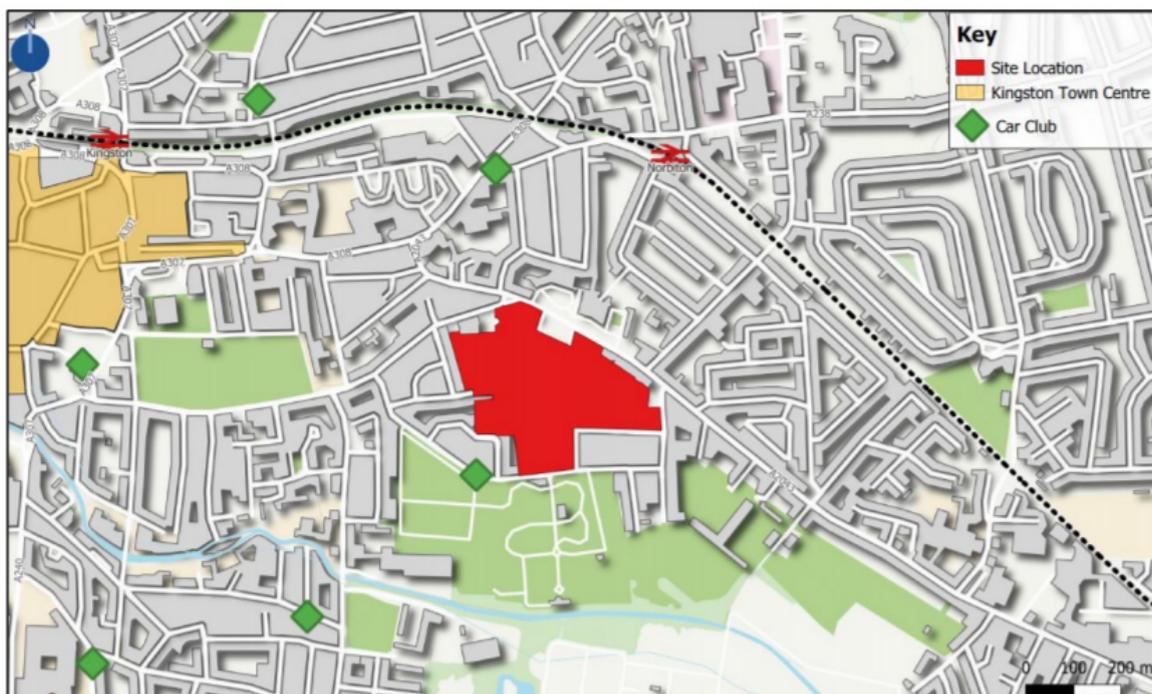
The TA includes vehicle tracking for a range of vehicle types to demonstrate the feasibility of access for Phase One. These have been reviewed and are considered to be adequate.

PARKING - EXISTING

The A2043 Cambridge Road has double-yellow-line restrictions, with bus lanes, on both carriageways. Hawks Road is also similarly restricted. A Controlled Parking Zone (CPZ – Zone N) surrounds the site and partially encroaches it at its southern extent. However, much of the internal road network is unrestricted and this leads to opportunistic parking by incoming vehicles not associated with the estate.

There are car clubs in existence nearby, the nearest of which is located on Bonner Hill Road, approximately 350 metres from the site centre, as illustrated in Figure 3.8 of the TA. The development will also be supported by additional car club spaces. The TA states that the applicant has been in contact with Zipcar who have confirmed that they are willing to provide 2 zip cars in Phase 1 (2021-2025). Further vehicles will be provided throughout the regeneration of the estate and this will be monitored and discussed with Zipcar as each phase is developed. In addition, the applicant is willing to fund a 3-year membership for each new home. Zipcar will also give each home £50+VAT of driving credit.

Figure 3.8 Location of Existing Car Clubs



Parking beat surveys undertaken on Wednesday 8th and Thursday 9th July 2020 using the established Lambeth Methodology covered both the Cambridge Road Estate and offsite (200 metres from boundary).

Cambridge Road Estate:

- Unrestricted parking (134 spaces) – 77% and 78% occupancy
- Private parking areas (304 spaces) – 88% and 87% occupancy
- Average occupancy of 56% and 57% across both days

Off-site:

- Unrestricted parking (28 spaces) – 79% occupancy
- Permit holder parking (412 spaces) – 60% and 80% occupancy
- Permit holder (daytime) (155 spaces) – 50% occupancy
- Average occupancy of 47% and 48% across both days

The parking beat surveys identified 741 spaces altogether but the TA notes that there are a further 194 spaces in garages and on driveways, giving a total of 935 spaces on the existing site – a ratio of 1.1 spaces per dwelling.

PARKING - OUTLINE

Car Parking

868 parking spaces are proposed for the 2,170 dwellings, representing an overall parking ratio of 0.4 spaces per dwelling. This level of parking was considered acceptable during pre-application discussions between the applicant and both RBK highways and TfL. It reflects a commitment towards sustainable travel and is based on anticipated levels of car ownership, improvements to public transport Accessibility (PTAL) and the implementation of our bus travel plan. This level of parking is also in line with draught London plan parking policy.

Car parking will be provided on-street, within surface parking bays and in basement car parks. Existing (rehoused) residents who own a vehicle will be offered one guaranteed parking space per household. The same provision will continue for new residents on a first-come-first-served basis, but these will not be allocated and will be permit-based. The submitted Car Parking Management Plan (CPMP) provides further broad details on management and enforcement. For both private and public parking, residents will be issued with a permit to park but they will not be allocated an identified parking space. In this way, the parking management will be consistent with the operation of other CPZ parking zones within the Royal Borough of Kingston.

It should be noted that a significant proportion of existing parking activity within the Cambridge Road Estate is undertaken by non-residents who drive to the site to take advantage of the currently free parking which is available. To address this point the applicant has committed to a new internal (site) CPZ. The design, implementation and timing of this CPZ will need to be agreed with RBK Highways and it is anticipated that the Section 106 Agreement will stipulate the required financial contribution that will be required for the CPZ consultation and implementation, and an appropriate threshold trigger at which point this process must be initiated. Provision may also be made in the Section 106 Agreement to secure a similar financial contribution towards the amendment or extension of adjoining external CPZs.

The detailed implementation and timing of a new internal CPZ will need to be agreed with RBK Highways and should be distinct from the existing Zone N which presently covers part of the Cambridge Road Estate. The roads within the estate should all fall

within the new CPZ and not form part of the wider Zone N CPZ. This is necessary so that residents of the estate do not have the ability to park on external CPZ roads and, conversely, residents of those neighbouring roads should be precluded from parking inside the Cambridge Road Estate. The applicant should note that a CPZ can only be implemented on the public highway and therefore any roads to be part of the CPZ will need to be adopted. The applicant will also need to ensure for all phases that there is no intervening private land between public parking and the public highway (including footways). It is now understood that all internal roads within the Cambridge Road Estate are to be adopted through Section 38 Highway agreement.

The CPMP confirms that 25 (20%) active and 101 (80%) passive electric vehicle charging points (EVCP) will be provided, in accordance with 2021 London Plan standards. Given that the site is being promoted as being highly sustainable, Highways would strongly recommend that the applicant increase the proportion of active EVCP beyond the 20% London Plan minimum levels.

The applicant has also confirmed in the CPMP that at least 3% disabled parking provision (with capacity to accommodate up to 10%) is agreed in line with 2021 London Plan standards. However, it is also noted that the number of Blue Badge holders in the Royal Borough of Kingston is only 2.3% of the total resident population. Transport for London has recently indicated that in these circumstances they would not expect a higher than 3% disabled parking allocation to be safeguarded.

It is noted from reviewing the Master Plan site layout drawings that many of the proposed parking courts are reached through extended frontages onto the public highway. This is an area of concern since it serves to emphasise and prioritize cars over pedestrians and is likely to be deemed unacceptable. However, it does not apply to Phase One and it is acknowledged that detailed parking layouts for future phasing will be the subject of separate forthcoming planning applications. The applicant must also ensure that, taking into account any future potential highway adoption, there are no situations where there is intervening private land between the public highway and any public off-street parking.

In their Highways Technical Note, Markides Associates have acknowledged that a revised full Car Parking Management Plan will need to be provided if planning approval is granted and this should be secured by condition.

Cycle Parking

The number of short-stay and long-stay cycle parking spaces is as set out in Table 4.4 of the Transport Assessment. These meet and, in the case of short-stay, exceed the minimum standards stipulated in the 2021 London Plan.

Table 4.4 Proposed Cycle Parking Provision

Land Use	Phase 1		Masterplan	
	Long Stay	Short Stay	Long Stay	Short Stay
Residential (C3)	821	14	3902	56
Office (B1)	4	1	4	1
Flexible Retail / Commercial	4	20	8	42
Community Use		13		13
Additional cycle parking spaces		10		
Total	829	58	3914	112

From Transport Assessment

We are aware that there are 9 Cyclehoop cycle hangars located within the Cambridge Road Estate. These are managed by RBK Housing and they should be relocated to other RBK estates with the assistance of Housing, in locations to be agreed with housing, and at the applicant's expense.

PARKING - PHASE ONE

Car Parking

The proposed vehicular parking for the three Phase One plots is shown in the following table:

PLOT	DWELLINGS	VEHICULAR PARKING SPACES	RATIO
B	44	18	0.4
C	202	40	0.2
E	206	68	0.3
Total	452	126	--

Car parking provision is in line with 2021 London Plan maximum standards, and also complies with the minimum provision standards for electric vehicle charging point (EVCP) and disabled parking.

Cycle Parking

Cycle parking for Phase One is indicated in Table 4.8 of the TA. It comprises 821 residential (C3), 4 office (B1) and 4 flexible retail commercial long-stay spaces and 14 residential (C3), 1 office (B1), 20 flexible retail/commercial, 13 community use and 10 general short-stay spaces. Total provision is 829 long-stay spaces and 48 short-stay spaces. These are provided as Sheffield stands, positioned at grade throughout the plots. These need to be secure i.e. not in the open & lockable if they are to count as secure, long term cycle storage. e.g. individual lockers. The applicant

is requested to utilise at least one of the existing Cyclehoop Hangars within the Phase One development.

The level of both short-stay and long-stay cycle parking is in line with 2021 London Plan minimum standards.

The layout of the proposed cycle parking for Phase One has been reviewed and is considered to be acceptable.

HIGHWAY SAFETY

The TA incorporates a 'Vision Zero' analysis of the local road network. This involves the analysis of TfL collision data for a 5-year period from 2014-2108. A collision map is included in the TA (Figure 5.3). No fatal crashes were identified, although there were clusters of serious collisions along Cambridge Road and at its junctions with Gloucester Road and Hampden Road, and also on the A328 at its junction with Norbiton Station and along the A307.

Some suggestions for highway improvement works at or near to these collision sites have been put forward by the applicant in the TA. These will need to be reviewed by the RBK Highways Design Team in conjunction with the Neighbourhood Engineer, and in some cases may require a Road Safety Audit. At this stage the location and nature of the proposed highway safety measures should not be considered as agreed and will require further review by RBK Highways in conjunction with the applicant.

SERVICING - OUTLINE

The applicant has submitted a Delivery and Servicing Plan (DSP) which sets out the servicing arrangements for both the residential and commercial uses. This DSP is in line with relevant policies (Draft London Plan, Policy T7; Sustainable Transport SPD, 2013) and takes account of the Transport for London Guidance on DSPs – "Making Freight Work For You".

For the Masterplan, the DSP estimates that there will be 10 LGV and 10 HGV daily trips (07:00 – 21:00) associated with the commercial uses, based on TRICS trip rates. None of these trips is expected to arise during the a.m. peak (08:00 – 09:00) and only 1 during the p.m. peak (17:00 – 18:00) hours. For the residential component, 118 daily LGV and 21 HGV trips are similarly estimated, of which 9 would arise in the a.m. peak and 22 in the p.m. peak.

SERVICING - PHASE ONE

For Phase One, the DSP estimates that there will be 6 LGV and 3 HGV daily trips (07:00 – 21:00) associated with the commercial uses, based on TRICS trip rates. None of these trips is expected to arise during the a.m. peak (08:00 – 09:00) or p.m. peak (17:00 – 18:00) hours. For the residential component, 24 daily LGV and 4 HGV

trips are similarly estimated, of which 2 would arise in the a.m. peak and 4 in the p.m. peak. These estimated trips will be checked against a baseline survey and at 3 months after residential occupancy reaches 75% or, if sooner, at 6 months after first occupation of the commercial space.

Emphasis is made within the DSP of the need to prevent disruption to pedestrians, cyclists and vehicles, both on and off site, and to prioritise off-street servicing where possible and to avoid missed deliveries.

Residential servicing will, however, be accommodated primarily on-street or within the parking courts. The latter have been designed to accommodate panel vans and 7.5t box vans with turning areas provided. Access will be via Somerset Road, Willingham Way and Rowlls Road.

The location of loading bays for Phase One have been outlined previous

CONSTRUCTION – OUTLINE

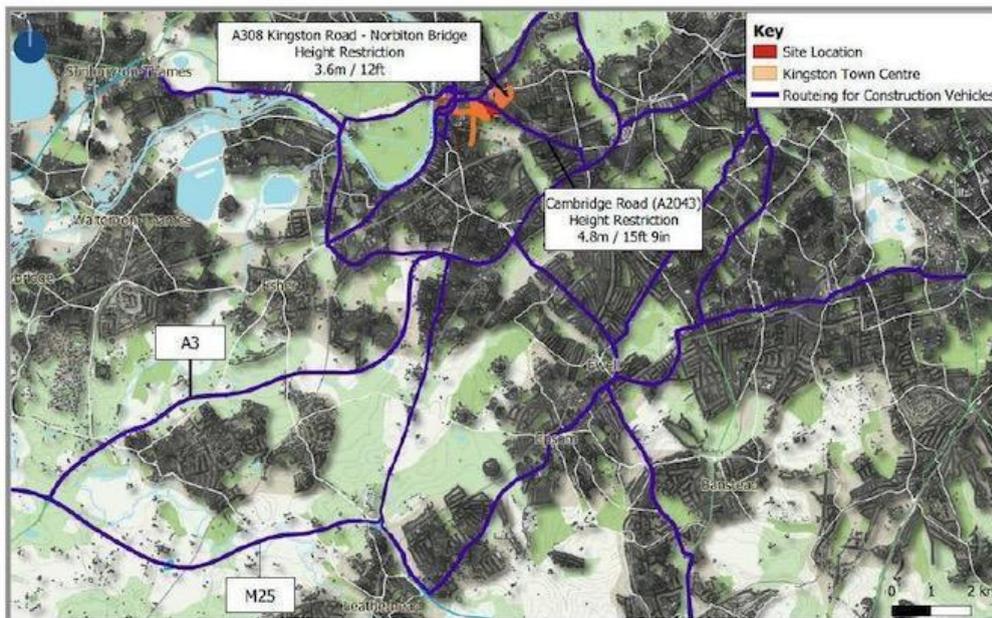
The applicant has submitted an Outline Construction and Logistics Plan (CLP), prepared in accordance with TfL Guidance, as part of the application together with a Construction Management Plan.

The TA notes that the details on construction vehicle movements has yet to be determined but the following approximations have been made:

- 630-1050 vehicles/month (4 weeks); 1260-2100 movements/month
- 165-275 vehicles/week; 330-550 movements/week
- 30-50 vehicles/day; 60-100 movements/day
- 4-6 vehicles/hour; 8-12 movements/hour

The proposed local construction traffic routing is illustrated in the following drawing, taken from the Outline CLP:

Figure 0-1 Construction Traffic Local Routing and Access Plan



This Outline CLP is compliant with both TFL Guidance and relevant RBK and London Plan policies.

It is noted that there is a commitment to promoting sustainable travel for construction workers and this is welcomed. It is also noted, however, that there is only very limited parking on-site for construction workers' vehicles (except disabled) and it must be stressed therefore that it is not permissible for such vehicles to park on any nearby residential road, in order to protect the amenity of local residents. In preparing the full CLP details should be provided as to how this will be safeguarded, e.g. through implementation of a Construction Travel Plan, provision of minibus shuttle service from Kingston/Norbiton Station and/or other secured off-street parking.

The Outline CLP commits to the following:

- Adherence to CLOCS and FORS standards for all construction vehicles.
- Use of banksman to manage deliveries/ material removal at all times.
- Appointment of a Community Liaison Manager to keep residents informed and deal promptly with any issues that may arise.
- Strict scheduling of vehicles to ensure that they can be accommodated on-site and do not wait up on the public highway.
- Timing of deliveries to off-peak periods wherever practicable.
- Segregation of pedestrian/cycle access from vehicular access.
- Implementing measures to minimise noise impact, to protect pedestrians through hoardings, and to ensure that wheel-washing is undertaken.

The Construction Method Statement indicates that site working hours will be as follows:

- 8 a.m. to 6 p.m. Monday – Friday
- 8 a.m. to 1 p.m. Saturday (where required)

- No work will be permitted on Sundays and Bank Holidays
- During school term times, deliveries will exclude 08:15 – 09:15 and 15:00 – 15:45 school peak hours

CONSTRUCTION – PHASE ONE

Phase One comprises three plots – B, C and E (see Drawing No. 503-PTA-MP-XX-DR-A-5407 P03).

Construction access for Phase One South is proposed to be from Hawks Road to the south of the Hawks Road/Cambridge Road junction on a left-in/right/out basis, as illustrated on the following swept path analysis drawing from the TA – see also Drawing No. 19157-MA-XX-XX-DR-C-0045 and incorporates a temporary crossover to Washington Road. Vehicles would then travel back along the same route to egress the site.

Image 7.1 Phase 1 Hawks Rd Access – Swept Path Analysis



The Neighbourhood Engineer has raised some concerns over the suitability of this proposed construction access route and at this stage officers object to this. Highways therefore request that a revised Construction Logistics Plan, including

amended access routes and accompanying junction modelling as to be later agreed, is secured by pre-commencement condition.

For Phase One North the proposed construction access is via A2043 Cambridge Road/St Peters Road as shown in the drawing below, taken from the Construction Method Statement, and again egress would follow this same route in reverse.

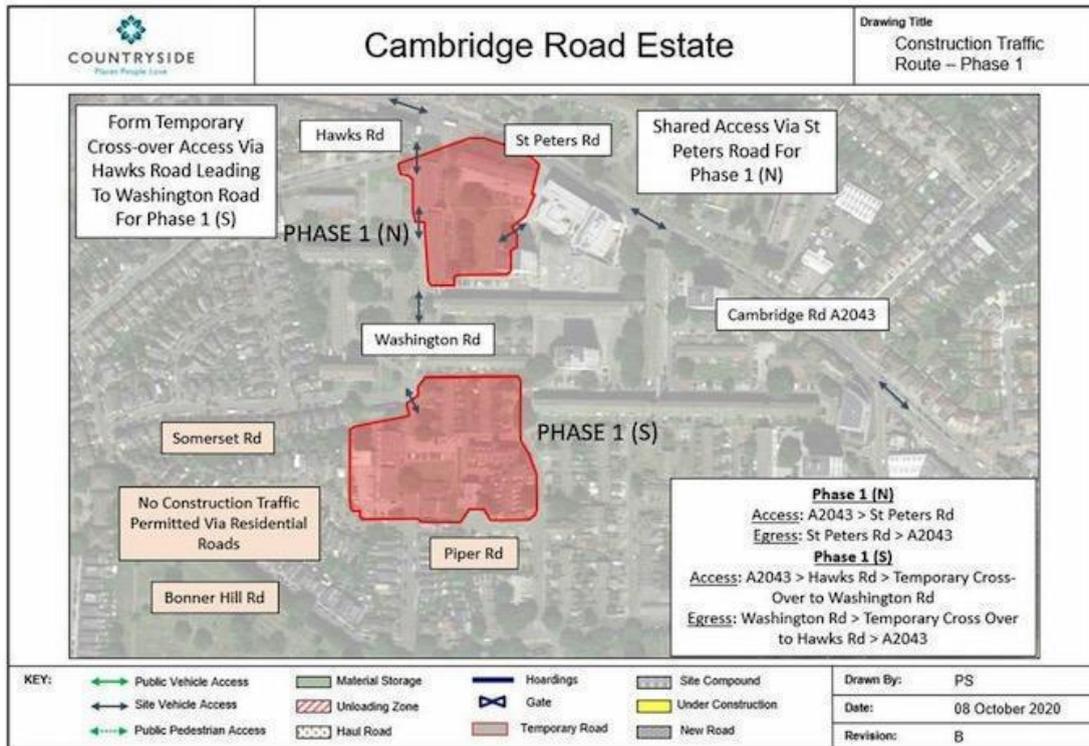


Figure 7 – Phase 1 Construction Traffic Access Route

HIGHWAYS WORKS CONSIDERATIONS

Detailed on-site highways works will necessitate discussions between the applicant and/or their contractors and RBK Highways as part of the design and technical approval process but at this stage we would advise that notwithstanding the lack of a Kingston Highway Design Guide the Council will expect that minimum acceptable standards in relation to key design criteria, for example minimum footway widths, spacing of lighting columns and gully placement are met and these will be advised to the contractor by RBK Highways subsequent to any planning approval. This is necessary to ensure that pedestrian, cycle and vehicular safety is safeguarded and that all site roads and footways are constructed to adoptable standards. The applicant should note that all costs associated with the highways works, including but not limited to diversion of services, relocation of highway infrastructure (e.g. gullies, street lighting) will need to be undertaken at their own expense.

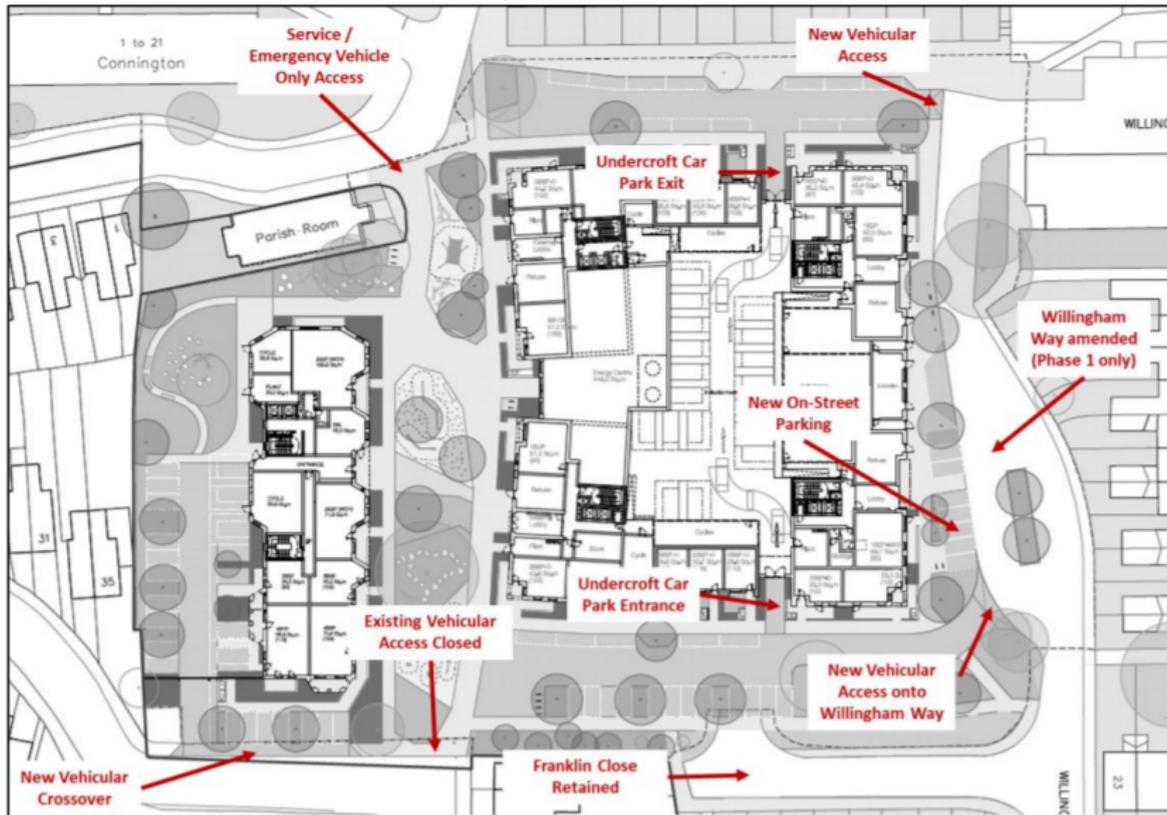
In addition to the s38 Agreement for adoption of the internal road and footway network, there will need to be s278 Agreements put in place for all works on the

public highway. The applicant has stated in their TA (para. 4.2.13) that “It should be noted that, with the exception of Phase 1 any new/amended vehicular access or closure of existing accesses will be a matter for the RMA”.

The Phase One (Blocks B, E and C)Highways works that will need to be incorporated into a s278 Agreement involve the following, as set out in the TA:

Block B and E:

Image 4.15 Block B and E Site Layout



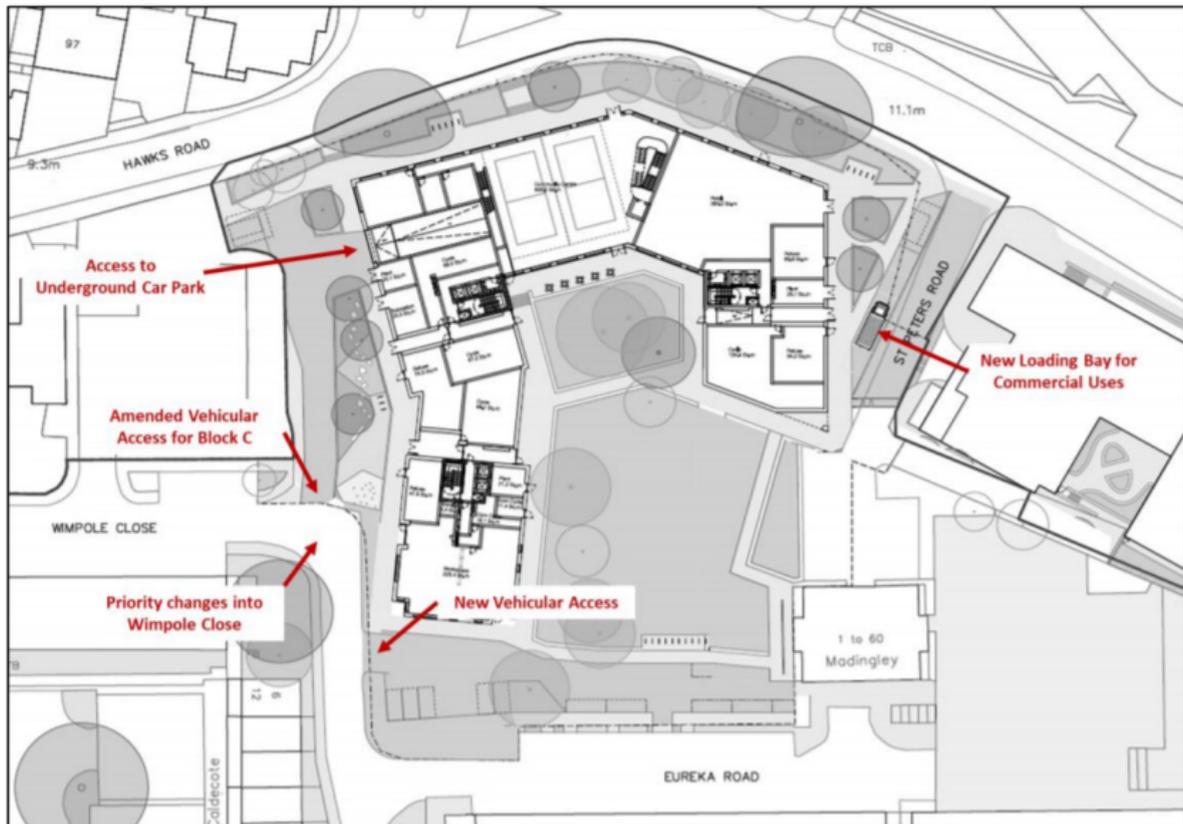
Source: Extract from Patel Taylor Drawing 503-PTA-PH1-00-DR-LA-4301 P01

- Vehicular access to Block B will be served from Rowlls Road, via a new access and parking directly from the road.
- Block E will be served from Willingham Way. A new vehicular access is proposed from Willingham Way which will serve on-street parking to the south of Block E and the entrance to the undercroft car park.
- The undercroft parking exits to the north of Block E which becomes a new street with on-street parking served from a new access onto Willingham Way.
- New on-street parking is provided on the western side of Willingham Way, with the alignment of Willingham Way temporarily altered (under Phase 1 before the masterplan is completed in Phases 4 and 5) in order to retain access to the residential properties to the east of Block E and to retain access to the parking area between Graveley and Impington Court.
- The existing vehicular access at the corner of Rowlls Road and Piper Road is closed off to allow the creation of a green walking /cycling route.

With respect to the above, the TA states that “It is expected that the proposed vehicular accesses within the detailed element will be agreed through conditions with the detail design and construction agreed as part of a highway licence application or S278 agreement”.

Block C:

Image 4.16 Block C Site Layout



Source: Patel Taylor 503-PTA-PH1-00-DR-LA-4300 P01

- The northern end of Washington Road is amended to provide vehicular access to an underground car park which will serve Block C. The turning head will be amended in line with the masterplan vision. Loading for the commercial uses will occur from St Peters Road with a loading bay provided on the western side of the road
- Access to Wimpole Close and the Health Centre is retained under the Phase 1 proposals, with the priority changing as Washington Road bends westwards into Wimple Close, with a priority junction for the section of Washington Road which will serve the Block C.
- A new vehicular access is created to serve a parking area to the south of Block C.

Whilst the costs associated with these works is yet to be determined, Highways anticipate based on the applicant’s submitted Transport Assessment that the following (see TA, Table 4.2) will be subject to a Section 278 Highways Agreement, in relation to any new, amended or closed vehicular accesses:

Vehicular Access Locations	Retained / Amended	New	Closed
St Peters Road	✓		
Cambridge Grove Road (jct with Cambridge Road)	✓		
Hampden Road	✓		
Burritt Road	✓		
Stapleford Close			✓
Cambridge Grove Road (to the north of its junction with Vincent Road)			✓
Willingham Way			
Rowlls Road / Piper Road		✓	✓
Somerset Road	✓	✓	
Bonner Hill Road		✓	
Creation of new T-Junction with Vincent Rd / Cambridge Grove Road		✓	

Any other minor works to the surrounding highway will also be subject to a s278 Highways Agreement.

CONCLUSIONS

For Phase One the proposed development is considered acceptable in highways terms as it passes the test in Paragraph 111 of the National Planning Policy framework of not being expected to result in “an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”, although some further discussions with the applicant will be required to agree the suitability of the Hawks Road construction access.

The Outline for the wider site master plan is also accepted, on the understanding that detailed highway design matters will be subject to separate consideration through subsequent RMAs for the remaining phases and as part of the S278/S38 highways procedure. It must be acknowledged however that traffic movements on the local network are subject to unanticipated changes over the longer timescales due to travel behaviour change more generally and likely changes in policy at the local and national levels. Therefore, for each subsequent phase beyond Phase One the applicant should be required to (a) submit a supplementary transport assessment, with updated trip generation, distribution and mode share forecasts. These may also need to include additional traffic surveys and junction modelling (individually and/or linked) as to be agreed by RBK Highways at the time of later planning applications being submitted; (b) submit a Road Safety Audit for any new or amended junctions that are impacted by occupation of that phase.

SUGGESTED CONDITIONS

Car Parking Management Plan (full, revised)
Travel Plan (full - subject to monitoring)
Construction Logistics Plan (revised)
Delivery and Servicing Plan (full, revised)

Legal Agreements: Highways works (s278); highway adoption (s38); stopping up (s247) and s106 to (a) require s38/s78 (b) to car-cap residents from parking within existing/external CPZ (c) to secure travel plan monitoring fee, and (d) Go Cycle cycle widening along Cambridge Road and improvements to Hawks Road junction, (e) to secure funding for 2 car club spaces for P1, with later expansion for subsequent phases, three years' free membership for new residents and £50 + VAT driving credit for each home.

The amount to be secured through the initial s106 agreement as a contribution to the CPZ is estimated at £40,000 with subsequent contributions for later phases to be secured in separate s106 agreements as part of the later reserved matters applications.

Response from the Placemaking Team

Date of Response: [06/12/2021]

Case Officer: Harsha Bhundia

Planning Reference: 20/02942/FUL

Site Address: Cambridge Road Estate, London Borough of Kingston upon Thames, KT1 3HW

Proposal: Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works: Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with Scale, Layout, Appearance and Landscaping reserved) is sought for the remainder of the development. This application is accompanied by an Environmental Statement.

Target Determination Date: TBC

Thank you for consulting the Placemaking Team on the above application.

Placemaking Summary

Design Code / Design Guidelines Comments

The applicant's submission comprises a hybrid application which consists of:

- an outline master-plan for "access" only, which is:
 - defined by design guidelines / design code
 - demonstrated through an indicative master-plan
- detailed design / full application for Phase 1 only

Whilst an indicative master-plan has been produced by the applicant to demonstrate the design code / guidelines principles, CRE is a large redevelopment site which is phased to be completed over a period of around 15 years. Given the submitted master-plan may require changes and amendments over that period of time and the outline application for the master-plan includes only "access", whilst "scale", "layout", "landscaping" and "appearance" are all reserved matters at this stage, it is important that the outline permission and the associated design guidelines / code allow a good balance between defining elements and priorities while also allowing flexibility and adaptability over time. Flexibility and adaptability is particularly pertinent in relation to:

- carparking and vehicular access requirements / arrangements

- wider context and potential wider regeneration, especially if CRE redevelopment is consented
- areas of technology where innovation is highly likely over time (communications, servicing, sustainability and green tech, street furniture, architecture and landscaping design, detailed design elements, materials, cladding to name only a few)
- meanwhile uses programme while the development is progressing for some of the surrounding existing areas, potential events and ways to stay actively engaged with the community and collect emerging feedback throughout the process

Whilst the submitted outline is for “access” only, the applicant has submitted extensive design guidance for the master-plan which includes elements of site layout, massing, height, new character / identity creation, public realm and landscaping, architecture, articulation and materiality.

Some of the key positives in the submitted design code / design guidelines include:

- clear outline of built form typologies to guide future phases
- clear outline of key site-wide routes / links / streets and visibility lines
- introduction and definition of a principal new green space for the estate and smaller outdoor spaces within each development plot
- clear outline of street character / character areas, which includes architecture, materiality and landscaping, to guide future phases
- clear outline of maximum plot envelope parameters (*page 17*) and minimum separation distances between buildings
- developed design examples to inform min. street widths and the variety of elements these need to include to achieve a vibrant, varied and well-designed public realm and character whilst also accommodating servicing and traffic requirements
- clear outline of utmost height parameters
- clear outline of street hierarchy
- clear outline of public, communal and private environments
- clear outline of “foreground buildings” and “primary facades” and their relationship with surrounding public realm, context and the new character areas
- principles outlining breaking down and architectural articulation of massing
- clear outline of materiality and colour palettes principles to inform coherence and consistency of the character areas being defined in the development
- examples of “moments” palette which contribute and inform the overall character and the pedestrian experience as well as encourage play, art and enjoyment
- clear outline of continuous greening and trees which aid biodiversity, sensory richness and placemaking
- examples of podium garden layout and principles to guide quality of communal amenity
- clear outline of principles for details including street furniture, surfacing, carparking principles, landscaping and tree species, play space, architectural articulation of massing, elevations, fenestration, balconies and bay windows, entrances, screens and gates, front garden treatment, materials and principles, refuse, signage, rooftop principles, architectural details and embellishment

Some of the key considerations going forward, once the detailed design development of the future phases commences, include:

- review of consistency and coherence of desire lines, access and movement patterns as per the outlined principles
- review of proposed height in relation to the indicative master-plan and the design guidelines / code maximum parameter. Important to note that the indicative master-plan does not match the utmost height being suggested in the submitted design guidelines / code, and that difference will need to be considered and reconciled through the detailed planning application for each phase
- review of cumulative effects, particularly in relation to:
 - sunlight / sun hours into key public spaces
 - sunlight for surrounding blocks
 - wind
 - acoustic / noise (which should include materiality and location of building services)
 - outlook, privacy and overlooking
 - servicing, back-of-house and traffic requirements
 - glare and light pollution
- review the consistency, coherence and character of the proposed appearance (architecture, landscaping, detailing and materiality) as per outlined principles
- review of the proposed materiality and colour
- the submitted indicative master-plan demonstrates good levels of sunlight penetration, and accords with the BRE guidelines of at least 2 hours in at least 50% of the outdoor open space on March 21st, for all of the new proposed public spaces, which includes Cambridge Grove Gardens, Madingley Square, Fordham Gardens, and all of the key (north-south) streets in the development. Furthermore, the proposal also achieves satisfactory sunlight penetration into all of the communal courtyards and back-of-house amenity with the exception of Plot G where the internal courtyard is overshadowed and does not achieve the BRE guidelines. Nevertheless, it is considered that Plot G is workable and can be amended to move some of the mass and height as well as amend the layout of the building to allow more sunlight to penetrate the raised courtyard. This re-working of Plot G which could occur at detailed design stages when it is submitted as a full application, should also give further consideration in terms of impact on the newly redeveloped property to the north. All in all, the proposal makes excellent efforts to maximise sunlight penetration while also optimising the site capacity

Other than that, given the above considerations are reviewed at detailed design for each phase in a holistic manner and to a reasonable degree, the proposed guidelines / code is considered to be of high quality and broadly ensures a development which at its completion can be a healthy, inclusive, vibrant, and sustainable place to live. The proposed design guidelines / code is supported by the Placemaking Team.

(Indicative) Masterplan Comments

Cambridge Road Estate is in the 20% of most deprived neighbourhoods in England and is the most deprived neighbourhood in Kingston. The estate, which was built in the late 1960s and early 1970s, follows modernist master-planning principles which result in the lack of well-defined streets and a confusing site layout, unnecessary level changes and physical barriers, poor legibility and way-finding, associated anti-social behaviour (ASB) and high crime rates, largely ineffective and poorly maintained landscaping, with some areas

excessively hard-landscaped and car-dominated, and an outdated and austere urban fabric and architecture.

The proposed development, which comprises an outline masterplan and a detailed Phase 1, facilitates comprehensive and holistic redevelopment of the estate following good practice urban design principles and master-planning. These include:

- a street-based approach with clearly defined public and private environments largely utilising the urban perimeter block form
- facilitating wider links and desire lines, encouraging active sustainable travel through a clear public transport and cycling provisions strategy
- considerate and sympathetic distribution of height and mass across the master-plan which responds to its low-rise fine-grain surroundings through change in scale and typology at its site boundary edges
- considerately addressing and mending surrounding urban blocks and site boundary edges by utilising terraces, linear, villa / mansion block typologies and scaling down in those locations
- introducing a slight angle / crank to the arrangement of the building blocks creates a more varied, less relentless and oppressive rhythm of blocks and streets and allows expanded street landscaping and greening in those locations
- optimising housing provision and housing quality by distributing height and density on the north-south axis, resulting in maximising east-west aspect and access to sunlight
- further breaking down of the blocks aids in largely maximising dual aspect, minimising the number of single aspect dwellings
- utilising the urban perimeter block and raised courtyards typology to provide additional communal amenity per block whilst wrapping around inactive back-of-house ancillary spaces. The additional communal amenity areas further facilitate greening, play, relaxation, privacy and enjoyment
- encourages much improved in comparison to the original estate active frontages and natural surveillance which should have considerable positive effects on designing out ASB and crime in the area
- incorporates a variety of uses across the site which include commercial, workspace, community and residential and utilises a variety of residential typologies which facilitate choice and variety of dwelling sizes and tenure
- well-balanced and effective car-parking, vehicular access and servicing strategy which minimises the impacts of the car, reduces the amount of space lost to roads and parking, and optimises the provision of urban greening, well-designed, attractive and varied public realm, safe and inclusive landscaping and amenity
- providing a strategy and Phase 1 of development which encourages high quality architecture, attention to detail, visual coherence for the area, promotes sensory richness and variety
- providing a clear and reasonable phasing strategy which incorporates some of the new publicly accessible outdoor green spaces in the masterplan as well as communal facilities as part of Phase 1 of the development
- incorporates shared energy facilities in Phase 1 of the development, and a series of sustainable strategies which include:
 - BREEAM “Excellent”
 - 35% reduction in CO2, relying on connecting to an existing Heat District Network, utilising energy efficiency measures (“Beyond Best Practice” construction score) and use PV panels

- embracing principles of “Circular Economy”
- embracing use of SUDs, urban greening, biodiversity and ecology
- embracing inclusive access
- designing to reduce overheating of the new buildings
- designing to avoid noise and acoustic nuisances
- optimising water use efficiency
- promoting sustainable transport
- addressing recycling and waste management in a well integrated, discreet and considered manner
- using locally sourced, responsible supplier, low environmental impact materials where possible

The submitted proposal is accompanied by a comprehensive TVIA report. Some of the key comments in regards to the submitted report and associated views are:

- CRE is located in a valley between Coombe and Surbiton hills with a difference of approximately 30 metres in elevation, which helps the proposed height and massing in the longer distance views to blend in with the rest of the urban landscape
- whilst the report outlines a good amount and variety of medium and long distance views which represent the visual impacts from the scheme comprehensively and in good amount of detail, it is slightly less useful for short-distance views which the provided information in the rest of the submitted information is more useful (namely, the DAS Volume 2, DAS Addendum and the Design Code / Design Guidelines doc)
- it is important to note that the submitted TVIA study does not demonstrate the effects from the “heights parameter” which forms part of the accompanying Design Guidelines / Design Code (“access” only, with “layout”, “scale”, “landscape” and “appearance” being reserved matters). It is our expectation that similar TVIA analysis would be provided for all future phases to demonstrate the relevant reserved matters aspects
- at **long distance** the proposed development has been designed to have minimal townscape effect on its surroundings, being indiscernible in almost all of the Very Highly Important Views (VHIVs outlined in the Kingston Views Study) and where discernible being heavily obscured by existing trees, generally sitting below the line of the trees’ canopies and broadly blending in with the existing urban landscape
- whilst the report does not outline all of the VHIVs, a VUCity model has been provided through the preapplication process which allowed a more thorough analysis of the proposed form, which also included views from Hampton Court, additional views from Richmond Park, views from Richmond Hill and other
- out of the long distance views, **View 12**, View East from Fairfield Park, is probably the one with the greatest long distance townscape impact. However, given the nature of the proposed development and the fact that it aims to articulate a new place south of Norbiton station, and the fact that the proposed height is commensurate and obscured to a degree by the existing trees, the impact on the open space is considered to be minimal and justifiable through the public benefit and the quality of the proposed master-plan
- at **medium distance**, the townscape impact from the development becomes more discernible and more perceivable especially in the predominant context of streets of low rise, fine grain terraces and semi-detached dwellings. Nevertheless, whilst the visual impact increases the surrounding areas’ character is considered less important than the VHIVs and more amenable to accommodating change as such, particularly given the proposal aims to create a new neighbourhood, a new place of the size of

master-plan that it is (National Design Guide, para 59). Some of the most impacted medium-distance views include: **view 11** (view south-east from A2043), **view 13** (view east from Fairfield south), **view 14** (view east from Somerset Road), **view 15** (view east from Rowlls Road), **view 16** (view north from Piper Road), **view 19** (view north from Kingston cemetery - war memorial), **view 20** (view north-east from Kings cemetery - west). Some of the medium distance views are already alleviated through some of the visual breaking down of the massing of the proposal, but could be further broken down visually and their effects minimised via high quality architecture and visual variety / character that the appearance of the future phases may display / articulate

- at **short distance / immediate views**, the submitted information demonstrates a well-articulated 'base', the proposed buildings broadly positively meet the ground, broadly facilitate a positive relationship with the street, activation, utilises materiality and architecture which pay attention to detail and acknowledges the human scale. Furthermore, the proposed landscaping also contributes to the character of the new streets, how pleasing those environments will end up being and helps the proposed built form blend better with its immediate surroundings

The proposed indicative master-plan is considered to positively reinforce the spatial hierarchy of the wider context, acknowledging the site's connectivity and its importance in the context of Norbiton as a new, exciting, large regeneration project and a well-designed future place to live in and enjoy. The serendipitous south-north orientation of the tall elements in the scheme and the gradual rising to the north helps in terms of way-finding and legibility by orienting the key streets to lead to Norbiton station. Way-finding is further reinforced via a series of details and choice of materials at the pedestrian / experiential scale.

The proposed master-plan is considered a significant improvement to the existing condition of the estate, articulates a positive, well-considered and sympathetic to its context vision which promotes healthy living and wellbeing, sustainability, high quality, inclusive, safe and well-designed public realm and urban greening, well-designed architecture which pays attention to detail and encourages coherence, a holistic approach to creation of a new character / identity for the area and sense of community. The proposed indicative master-plan is supported by the Placemaking Team.

Phase 1

Phase 1 of the development, submitted as a detailed application, includes plots B, C and E of the master-plan and the associated public realm for those plots (Madingley Gardens, portion of Washington Avenue and Madingley Avenue, Westwick Street, Piper Way, Chesterton Street, Franklin Street and a portion of the frontage onto Cambridge Road).

Plot C

Plot C comprises an urban block which is defined by three tower and villa blocks (buildings C1, C2 and C3) located to the north and east, joined by a 2-storey linear base, as well as an outdoor Multi-Use Games Area (MUGA), Madingley Gardens, to the south-east. Buildings C1 (13 storey tower block) and C2 (12 storey tower block) to the north, and C3 (10 storey villa block) to the south. Ground floor comprises Community Centre (G+1), workspace, retail, residential core entrances, ancillary spaces (refuse, cycle, plant & substation) and associated public realm and landscaping. Upper floors comprise residential dwellings, communal

outdoor podium deck amenity spaces. Includes basement floor which comprises carparking & water tank provisions. Rooftop green roofs and roof plant.

- community facilities, retail, workspace and Madingley Gardens outdoor are strongly supported and it is positive that these are being brought forward as part of Phase 1 of the master-plan. The location of the proposed active uses at ground is supported as it activates key streets, focal points and important corners of the proposed building
- it is seen as a positive that the proposal has been set some distance away from Cambridge Road, thus curtailing some of the noise and air pollution impacts on the development
- the number and location of cores is supported. It is seen as a positive that the cores utilise a walk-through corridor to either side of the building
- the amount of public-facing ancillary spaces is somewhat excessive and may result in a rather inanimate elevation at places. It may have been more appropriate to locate some of these facilities below ground and utilise some more of the ground floor for other active uses
- it is seen as a positive that the proposal utilises roof areas for further communal amenity and greening
- it is seen as a positive that the proposal maximises dual aspect and a more broken down massing, allowing visual relief, varied outlook and sunlight penetration
- the proposed height for Plot C is supported and is considered to be justified via its ground floor uses as well as its role as one of the key gateways into the wider redevelopment
- Plot C incorporates good amount of well-located outdoor amenity on the surrounding streets as well as at Madingley Gardens space and communal spaces at L01 and L02
- the proposed architecture is simple yet varied, broadly well-articulated, promoting good levels of sensory richness and visual interest. The proposed fenestration is broadly supported and the use of balconies to aid in creating slenderness and aiding visual variety and rhythm is seen as a positive design move

Despite some of its minor weaknesses, Plot C provides a good balance of of broadly attractive architecture, high quality accommodation and outdoor spaces and facilities, and is broadly supported by the Placemaking Team.

Plot E

Plot E comprises an urban perimeter block which is defined by four tower, villa blocks (buildings E1, E2, E3 and E4) and two terraces (E5 & E6), joined by a single storey podium deck base. Buildings E1 and E2 (two 12 storey tower blocks) and E5 (4 storey terraces) to the north, and E3 (11 storey villa block), E4 (8 storey villa block) and E6 (4 storey terraces) to the south. Ground floor comprises residential dwellings, residential core entrances, Combined Heat & Power (CHP), carparking and ancillary spaces (refuse, cycle, plant & substation) and associated public realm and landscaping. Upper floors comprise residential dwellings, communal outdoor podium deck amenity space. Rooftop green roofs and roof plant.

- it is seen as a positive that Plot E incorporates a CHP facility and it forms part of Phase 1 of the redevelopment

- despite incorporating a large amount of ancillary facilities at ground level, it is seen as a positive that the proposed ground floor wraps the inactive spaces with active frontages, thus promoting activation, natural surveillance and animation at street level
- it is seen as a positive that Plot E and Plot B are coming forward at the same time and incorporate Piper Way outdoor green which is a considerable boon in terms of urban greening, SUDs, play features, public realm and amenity
- it is seen as a positive that Plot E incorporates some variety of residential typologies (mansion / villa blocks and terraces arranged around a podium deck)
- the number and location of cores is supported. It is seen as a positive that at upper levels cores have access to natural light, ventilation and views out
- it is seen as a positive that the proposal utilises a podium deck for further communal amenity and greening
- it is seen as a positive that the proposal maximises dual aspect and a more broken down massing, allowing visual relief, varied outlook and sunlight penetration
- the proposed height for Plot E is broadly supported as it is located to the middle of the master-plan, has limited environmental impact on neighbouring properties, provides a considerable number of high quality accommodation and meets the ground floor in a positive in terms of landscaping and activation way
- Plot E incorporates good amount of well-located outdoor amenity mainly on the adjoining Piper Way space and communal spaces at L01
- the proposed architecture is simple yet varied, broadly well-articulated, promoting good levels of sensory richness and visual interest. The proposed fenestration is broadly supported and the use of balconies to aid in creating slenderness and aiding visual variety and rhythm is seen as a positive design move

Despite some of its minor weaknesses, Plot E provides a good balance of broadly attractive architecture, high quality accommodation and outdoor amenity to its residents, and is broadly supported by the Placemaking Team.

Plot B

Plot B comprises a 6 storey linear block which re-pairs an existing urban block with the existing properties to the west (Somerset Road, Rowlls Road). Ground floor comprises residential dwellings, residential core entrances, carparking to the rear, ancillary spaces (refuse, cycle & plant), associated public realm and landscaping (incl. Piper Way), informal play space and features both with public and communal accesses. Upper floors comprise residential dwellings, as well as green roofs and roof plant.

- Plot B contributes towards a more sympathetic transition to the low-rise fine-grain existing context at Somerset and Rowlls Roads and its scale and height are broadly supported
- the proposed public and private outdoor spaces are clearly defined and address the adjoining existing context appropriately (back to back relationship)
- the proposed ground floor is broadly supported as wraps around inactive uses and it contributes to a vibrant, activated and animated public realm. However it is seen as a weakness that bedrooms at ground level are orientated to the public front resulting in suboptimal privacy for those dwellings
- despite there being quite a few single-aspect dwellings, at least there are no north-only facing dwellings. The proposed bay windows and adjoining balconies go

someway to alleviate the excessive number of single dwellings but does not alleviate it fully

- it is seen as a positive that Plot B and Plot E are coming forward at the same time and incorporate Piper Way outdoor green which is a considerable boon in terms of urban greening, SUDs, play features, public realm and amenity. Plot E is broadly well-situated in the development, adjoining good amounts of greening comprising casual play features
- It is seen as a positive that at upper levels cores have access to natural light, ventilation and views out
- the proposed architecture is simple yet varied, broadly well-articulated, promoting good levels of sensory richness and visual interest
- the use of bay windows is seen as a positive as it aids in integrating with the adjoining existing context architectural vernacular
- it is seen as a positive that Plot B utilises materiality and architectural embellishment sympathetic to the existing surroundings
- it is seen as a positive that Plot B utilises green and biosolar (mix of green and PV panels) roofs

Despite some of its minor weaknesses, Plot B provides a good balance of broadly acceptable quality of dwellings, high quality architecture and outdoor amenity to its residents, and is broadly supported by the Placemaking Team.

Suggested Conditions (Phase 1)

- 1:10 / 1:5 details and associated key plans / elevations / sections / 3d visuals of the key elements of the buildings / landscape before structural works for the installation of the element to commence:
 - all openings (windows, doors, entrance details, canopy / overhang details, gates, fencing, glazing systems)
 - balconies / terraces (including privacy screens)
 - railings, parapets / datums
 - facade recesses, projections, spandrels and shadow gaps
 - brick coursing details
 - publicly visible signage
 - publicly visible lighting
 - publicly visible RWPs and rainwater accessories
 - (intake and exhaust) vents, grilles and any other public visible ventilation openings
 - green, biodiverse roofs
 - PV panels
 - roof plant
 - trees, planters and greening
 - surfacing and SUDs
 - street furniture and play equipment
 - boundary treatment details
 - front garden landscaping details
 - communal amenity landscaping details
 - community centre details
 - cycle parking details
 - bin store details
- Sample material palette of all external facing materials, preferably for this scale and type of project to be constructed as a mock-up on site (in bays). Sample materials to

include landscaping, external lighting and boundary treatments (gates, fences etc) in addition to architectural materials, and to comprise details of manufacturing specification. Materials to be provided before commencement of structural works supporting the material



Report for – Royal Borough of Kingston Upon Thames
Cambridge Road Review
Final Review Report FRR 002
Final



Document version control

Version	Date	Author	Reviewed by	Reviewed and approved by
1.0	05/05/2021	Various		
2.0	19/05/2021	Various		
3.0	24/11/2021	Various		

Report for: **Royal Borough of Kingston Upon Thames**

Main contributors: [REDACTED]

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Contents

1.0	Introduction to the Review	1
2.0	Review of the Submitted Clarifications and Potential Regulation 25 Requests	2
3.0	Mitigation Measures	10

Appendices

Appendix A – Interim Review Report

Appendix B – Final Review Report 001

1.0 Introduction to the Review

- 1.1.1 The Temple Team were commissioned by Royal Borough of Kingston Upon Thames (RBKT) to carry out an independent review of the Environmental Statement (ES) submitted in support of the planning application for the Cambridge Road development (planning application number: 20/02942/FUL). The output of the review was an Interim Review Report (IRR) (**Appendix A**) submitted to Cambridge Road Kingston Ltd 'the Applicant', dated 26th January 2021.
- 1.1.2 In response to the IRR the Applicant submitted the 'Cambridge Road Response to IRR' document (herein after referred to as the 'IRR Response Document') dated April 2021. This was reviewed in April 2021; the Final Review Report 001 (**Appendix B**) contained the review of this response.
- 1.1.3 The Applicant submitted a further response to those clarification and potential Regulation 25 requests considered outstanding in the FRR001, in the 'Cambridge Road Response to FRR' document dated April 2021. A review of the specific responses to the remaining clarification and potential Regulation 25 requests is presented within **Chapter 2** of this FRR002.

2.0 Review of the Submitted Clarifications and Potential Regulation 25 Requests

- 2.1.1 The Applicant has responded to the remaining clarifications and potential Regulation 25 requests in the 'Cambridge Road Response to FRR' document dated April 2021.
- 2.1.2 **Table 2.1** below provides a review of the remaining requests for clarifications and potential 'further information' (under Regulation 25) in the April 2021 FRR001.
- 2.1.3 Each clarification and potential 'further information' (under Regulation 25) request has been dealt with individually in **Table 2.1** and the Temple Team have stated whether the Applicant's response is deemed to be acceptable to close out the issue, or whether further clarification or information is required. If there are outstanding issues following the reassessment, a further round of review may be required.

Table 2.1: Assessment of the Responses to the April 2021 FRR

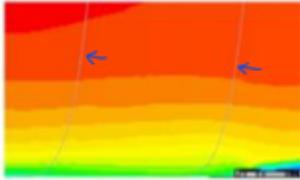
Chapter (References)	Request Type	RBKT Comment / Request IRR	RBKT Comment / Request FRR	FRR002 Review Commentary	Review Conclusions Reponses Considered to be Acceptable (Green) or Unacceptable (Red)
Review of ES Format, Presentation and Scope IRR Ref: 2	Clarification	The Applicant should clarify where in the ES a scenario other than the maximum parameters is considered the reasonable worst case scenario in this ES.	<p>The Applicant has confirmed that the net uplift in homes of 1,338 dwellings has been considered the worst case scenario for population and human health. The use of an uplift figure net of lost dwellings is agreed, however this is based on a maximum number of units. The potential for the outline component of the scheme to deliver fewer than the maximum parameter number of units has not been considered. This would lead to a lower uplift figure, which would be a worst case scenario for employment generation and for housing provision. The Applicant should clarify how this has been taken into account in the assessment. For example, the Applicant could confirm that the maximum number of units also represents a minimum number of units for this scheme (and any reduction in the number of units would be subject to later assessment) or qualitatively provide a sensitivity test for a reasonable smaller number of units and outline if whether there would be any changes to the conclusions or residual effect. This is particularly important for housing provision where a significant moderate beneficial effect is anticipated.</p> <p>Likewise, with regard to air quality. The height of the emission stack generally corresponds with the height of the building from stack protrudes. If the height of the proposed building is shorter than the maximum parameters applied for, residents could be exposed to a greater effect than assessed. The Applicant should comment on whether there is any potential for the distance between the emissions stack and the top floor of the adjacent building to be less than that modelled.</p>	<p>The Applicant has confirmed that the maximum number of dwellings also represents the minimum for the purpose of this assessment. RBKT should note that any reduction in the number of units (for example at reserved matters stage) should be subject to further assessment.</p> <p>The Applicant has confirmed that it is not anticipated that the distance between the emissions stack and the top floor of the adjacent building is to decrease, but if this were to change significantly then a remodel of the receptors would be undertaken to take into account any revised impacts. RBKT should note that fany uture changes to the stack height or building heights that would reduce the distance between the two should be subject to further assessment.</p>	<p>Acceptable No further clarification required.</p>

<p>Air Quality IRR Ref: 11</p>	<p>Clarification</p>	<p>The Applicant should clarify why an assessment of the air quality effects of the combined construction traffic and operational traffic at a later phase of construction has not been assessed.</p>	<p>The Applicant has said that:</p> <ul style="list-style-type: none"> a detailed construction schedule has not been produced; construction traffic did not meet the criteria for assessment. <p>This is not adequate for RKBT to be assured that combined construction and operational traffic will not be significant. The operational assessment has already shown moderate adverse impacts at multiple receptors. The combined impacts, even with low levels of construction traffic, has the potential to be greater.</p> <p>Table 5.3 provides an indicative number of HDV movements during construction. It is not stated whether this is expected to be an average or peak number of vehicles, nor when peak construction traffic would be expected, given overlapping construction phases. Table 5.3 shows 24 HDV trips, this is only just under the screening threshold of 25 trips. If this level of HDV traffic were expected during the construction of phases 4 and 5, the total number of HDVs from construction and operation (for example deliveries to retail and commercial space in Plot C (Phase 1) and Plots G and K (Phase 3) would be greater than this screening threshold</p>	<p>The Applicant has confirmed that:</p> <ul style="list-style-type: none"> there will be an average of 24 HDV trips per day during construction; there would be a 50/50 split east and west out of the site for these 24 trips. <p>The Applicant has assessed 24 HDVs across the road network during the operational phase. Results show negligible impacts at most receptors and moderate adverse impacts at two receptors.</p> <p>The Applicant has not stated the likely significance of effects. Given the pessimistic assumptions in the assessment, including using 2018 emission factors for future scenarios, it would be reasonable to conclude that combined impacts are not significant overall.</p>	<p>Acceptable No further clarification required.</p>
<p>Air Quality IRR Ref: 13</p>	<p>Clarification</p>	<p>Clarification regarding whether the traffic data used in the operational phase dispersion modelling assessment are correct should be provided, and the assessment</p>	<p>The Applicant has stated that the air quality assessment assumes that forecast traffic accurately reflects the development traffic scenario.</p> <p>This does not address the concern raised in paragraph 5.1.6 of the IRR, about whether the transport assessment and air quality assessment data are consistent.</p>	<p>The Applicant has stated that Markides Associates confirmed that the traffic data provided were correct. Markides Associates also confirmed that the Proposed Development is expected to lead to a net reduction in traffic, although this reduction was not assessed.</p>	<p>Acceptable No further clarification required.</p>

		updated if required.			
Air Quality IRR Ref: 17	Clarification	Clarification is required regarding why NO ₂ concentrations predicted at DT24 were discarded. Where a technical justification is not plausible, this should be included.	The Applicant has said that DT24 is close to Cromwell Road Bus Station, with idling and queuing buses. This does not provide any context of the extent to which any results in the assessment may or may not represent locations with local elevated concentrations, such as close to the Bus Station or bus stops.	The Applicant has considered localised conditions at DT24, root mean square errors and model performance in asserting that the model without DT24 gives a better overall reflection of conditions at sensitive receptor locations and the site.	Acceptable No further clarification required.
Air Quality IRR Ref: 21	Clarification	Clarification on the traffic input data used to complete the air quality neutral assessment should be provided.	The Applicant has stated that traffic data were provided by the transport consultants. The Applicant has also provided updated air-quality-neutral calculations for building emissions, since an error in presented calculations had been found. The Applicant has not confirmed the traffic data used in the air-quality-neutral assessment, only the source.	The Applicant has given the traffic data by use class.	Acceptable No further clarification required.
Air Quality IRR Ref: 23	Potential Regulation 25	Prediction of impacts of scheme on NO ₂ concentrations (hourly and annual) at receptors proposed closest to flue.	The Applicant has provided NO ₂ contour plots at 38m and 35m AOD. How calculations have been undertaken and which results represent relevant exposure is unclear and confusing. In particular, buildings are different heights across the Proposed Development. Providing contour plots of predicted NO ₂ at arbitrary heights is at best confusing and at worst misleading. In order to clarify the method used to derive NO ₂ concentrations and the likely impacts at relevant receptors, the Applicant should provide the following: <ul style="list-style-type: none"> • Background NO_x/NO₂ concentrations • Road contributions to NO_x/NO₂ • Energy emission contributions to NO_x/NO₂. 	The Applicant has given modelled annual and hourly impacts at all floor levels. There are some deficiencies in the results: <ul style="list-style-type: none"> • Total NO₂ in Table A16.1 and Table A16.2 do not match background plus road contribution plus energy emissions contribution. • The Applicant has included only one receptor location (in the x-y plane) per building. This will not pick up the greatest impacts from the flues. 	Acceptable This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action is required.

			<p>This should be presented for a range of receptor locations on the facades of buildings closest to the flues, from ground-floor to top-floor level. The vertical and horizontal resolution of receptors should be fine enough to establish that the greatest impacts from the flues have been picked up. All assumptions for conversion of NO_x to NO₂ and combining contributions from different sources should be stated explicitly.</p>	<ul style="list-style-type: none"> It is unclear what the Applicant means in saying, "...there has been no NO_x to NO₂ conversion for short-term (1-hour) concentrations." Has all NO_x been treated as NO or as NO₂? <p>Nonetheless, given the contributions presented, emissions from the flue are not likely to affect site suitability.</p>	
<p>Wind Microclimate IRR Ref: 26</p>	<p>Clarification To be considered a potential Regulation 25 request from this point forward.</p>	<p>Confirm the means by which the weather station data has been transposed to Site. Please also confirm if the wind roses presented are at the measurement station, if they have been transposed to open country, or if they have been transposed to Site.</p>	<p>It is essential that the wind statistics are transposed from the site of the weather station to the site of the Proposed Development. Without this step, the reported conditions will be incorrect. Given the significance of the accuracy of wind input data for wind microclimate studies, it is prudent to now ask for a full description of how this data is derived. This includes the periods for which the data was gathered, and details on how the data was analysed and checked for abnormalities. The presented wind roses look to be inconsistent with other similar studies, and the seasons presented do not appear self-consistent.</p> <p>New plots of comfort and safety will need to be provided once the wind roses have been transposed to site.</p>	<p>The applicant has agreed to transpose the wind data from the weather stations, detailing their process and presenting an updated set of results; the fact that the results are visibly impacted is indicative of the importance of this stage of the analysis. The transposition process is broadly in line with standard industrial practise, and the resulting wind roses appear plausible. The applicant would usually be expected to provide a map of the roughness patches considered in their analysis in order to demonstrate the level of detail considered. Without such a map, it is still hard to comment on the accuracy of this step, and in turn place total confidence in the fidelity of the presented results. Nonetheless, the updated results do appear plausible.</p>	<p>Acceptable This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action is required.</p>
<p>Wind Microclimate IRR Ref: 28</p>	<p>Clarification</p>	<p>Are gust speeds derived & used? If so, how are the gust speeds and gust equivalent mean (GEM) derived?</p>	<p>The Applicant's response states, "<i>The wind conditions derived from averaging the last 20% of the transient simulation</i>"</p> <p>This indicates that only the mean velocities are derived. Gust velocities represent the peak values of the transient velocity magnitude; they are greater than the mean values, and often drive safety exceedances. Without</p>	<p>Initial comment Even though the solver is transient and gusts are simulated, it is understood that only a mean value is extracted from the time histories, indicating that gusts are not correctly accounted for in the final conditions. For transient simulations (and wind</p>	<p>Acceptable No further clarification required.</p>

			<p>consideration of the gust velocities (via the industry standard Gust Equivalent Mean), the reported conditions cannot be relied upon, particularly with respect to safety.</p>	<p>tunnel measurements), in addition to the mean speed, an extreme value analysis must be performed on the time histories in order to derive a 3-second gust wind speed, and from that a gust-equivalent mean (GEM) is calculated. The mean and the GEM are then compared and the higher value (this will often be the GEM) combined with the wind statistics to derive the wind conditions. Without a quantification and inclusion of the GEM (derived from a 3-second gust speed), the results are recording purely mean conditions and cannot be relied upon as they are likely to be under-conservative.</p> <p>It is expected that a new set of results will be issued once the effects of gusts are included.</p> <p>It is also noted that the ES chapter 10.22 states that gust conditions are assessed - this is disputed in light of this issue.</p> <p>Further comment The Applicant has revised the safety and comfort assessment to include the GEM. The wind microclimate chapter has been updated in light of these assessments and is considered an accurate representation of the likely wind conditions.</p>	
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Wind Microclimate IRR Ref: 31	Clarification	Please confirm details of upstream profile of the ABL (both target and achieved).	It is accepted that the inlet velocity is pre-set to a standard value. It would be helpful to see a plot of this in the context of the Proposed Development, but more crucial is some evidence of what happens to that profile once it has entered the domain. The typical way to demonstrate this is to run an "empty tunnel", i.e. the same boundary conditions, but with no model present. The ABL profile is then plotted at various downstream stations and compared with the target inlet profile.	The image has come through at a very poor resolution, but it is just about enough to make out that within the short area upstream of the model, the profile is maintained to some degree, so this is a positive sign. However, downstream of the model, the profile seems to gradually flatten off - this is a sign that the turbulence profile is decaying and may be an indication of a problem with the setup. Again, profiles from an "empty tunnel" would have helped to give confidence that the profile setup is performing correctly throughout the domain, independent from the model. Nevertheless, given that the upstream performance appears to demonstrate some stability, it is not anticipated that there is great potential for this to lead to inaccurate results. 	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 33	Clarification	Please provide details of convergence criteria.	An example of a time history showing the averaging period is required, as well as some description of how each time step is judged to have converged correctly is required.	The Applicant's comprehensive answer demonstrates that the sample period is stable and suitably long, and that the extraction of values can be considered robust.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 36	Clarification	Confirm direction of key wind angles for significant wind	Given the directionality of the prevailing wind, it is highly unusual for an exceedance of the safety criteria to be driven from a northerly direction in London. It would typically require a wind speed	Given that the queried effect is no longer present in the updated result set, this point is less of a concern. The additional information provided	Acceptable No further clarification required.

		effects. If it is not prevailing directions, some further explanation is required, including demonstration of the flow fields / streamlines.	significantly greater than those arising from the south-west sector; the wind velocity plots do not seem to show such a variation. Please could the Applicant provide velocities per-angle for 2 (or more) points; one within the area noted to exceed the safety criteria, and another near the south-south-east corner of the proposed development.	by the Applicant is appreciated, and the updated result set looks more plausible.	
Wind Microclimate IRR Ref: 40	Clarification	Summer exceedance of safety shown in figure 21 – please confirm this is intentional.	In our opinion, it is extremely unlikely to have a single outlier of safety exceedance in summer, in an otherwise calm location. At a given point within the exceedance, velocities measured for each angle and their contributions to the safety exceedance would be suitable. Please also provide some images of the flowfield for the angle which is driving the safety exceedance.	Whilst the isolated acceleration still seems strange, the applicants explanation is appreciated, and the re-issued results do look plausible.	Acceptable No further clarification required.

3.0 Mitigation Measures

3.1.1 **Table 3.1** below provides a summary of mitigation measures proposed by the Applicant across all topics, both embedded and additional, identified in the ES.

3.1.2 RBKT should ensure they secure the delivery of these mitigation measures by means of an appropriate approval, obligation, agreement and or condition.

Table 3.1: Summary of Mitigation Measures

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
Topics scoped out of the ES	Pre-Construction	None.	Intrusive site investigation for land contamination. Ground gas monitoring. Remediation Strategy (if required) to be agreed with RBKT.
	Construction	None.	Best Practice Measures for noise and vibration mitigation during construction. Construction Traffic Management Plan.
	Operation	Drainage Strategy. Framework Travel Plans. Energy Strategy. Measures outlined in Sustainability Statement.	None.
Population and Human Health	Pre-Construction	None.	Decanting Strategy – relocating existing residents and businesses during demolition and construction phases.
	Construction	None.	Construction Environmental Management Plan (CEMP).
	Operation	Retail and office floorspace. Community floorspace. Open Space.	Financial contributions for secondary education.
Air Quality	Pre-construction	None.	None.
	Construction	None.	A construction environmental management plan (CEMP) including all dust mitigation measures listed in Table 7.26 (to be reviewed on an ongoing basis) and a dust/ PM ₁₀ monitoring strategy.
	Operation	Provision of electric vehicle charge points or provision for charging points for all parking bays. Provision of secure cycle storage infrastructure. Implementation of travel plans. Provision of measures to support sustainable transport modes	None.

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
		including features to encourage sustainable transport methods.	
Biodiversity	Pre-construction	None.	Update PEA and bat scoping surveys for outline elements (phases 2-5), as part of RM panning submissions.
	Construction	Embedded landscape scheme to mitigate for loss of habitat.	Implementation of CEMP.
	Operation	Timing of works or ecological supervision to protect nesting birds.	Ecological Management Plan. Lighting Strategy.
Daylight, Sunlight and Overshadowing	Pre-construction	None.	None.
	Construction	None.	None.
	Operation		<p>Design Code commitments for reserved matters applications, as follows:</p> <p>Further inclusion of streets to minimise continuous obstructions;</p> <p>Introduction of gaps within the massing of each plot, such as between two blocks;</p> <p>Ensuring the gaps between blocks and streets are as wide as possible to allow an increase in sky visibility and where possible, locate these opposite neighbouring receptors;</p> <p>Orientation of blocks in relation to neighbouring receptors to minimise continuous obstructions;</p> <p>Where possible, position buildings within the Site away from boundaries with surrounding residential properties;</p> <p>Staggering of building heights;</p> <p>Incorporation of set-backs on the upper floors of taller elements; and</p> <p>Incorporation of chamfered edges of blocks both vertically and horizontally (where possible) to allow for additional daylight availability.</p>
Wind Microclimate	Pre-construction	None.	Further CFD modelling of the roof terrace to demonstrate that the balustrades on the roof terrace sufficiently mitigate the uncomfortable wind conditions. This should be secured as a pre-construction condition.
	Construction	None.	None.
	Operation	None.	The following should be secured by condition: Additional deciduous tree at north-east corner of building P2.

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
			Mesh between columns on the north elevation of the podium level terrace between buildings C1 and C2. Seating to be limited to suitable areas on podium level terraces on Block E and between Block C1 and C2.
TVIA	Pre-construction	None.	Hoarding and tree protection.
	Construction	None.	Early landscape establishment, lighting control and movement and stockpiling of materials; direct and indirect impacts arising from the demolition and construction stage would be controlled through the implementation of a Construction Management and Construction Logistics Plan.
	Operation	Embedded design.	Landscape and Biodiversity Management Strategy and a programme of appropriate monitoring agreed with the regulatory authority.
Additional Recommended Measures			
<p>Population and Human Health Financial contributions for healthcare provision.</p> <p>Air Quality Inclusion of air quality mitigation measures and dust/ PM₁₀ monitoring strategy in the CMS (as an alternative to including in a CEMP). The LPA should enact a condition which requires for NRMM used at site with engines with a power rating between 37 and 560kW to meet the appropriate emissions standards based on their engine emissions stage (unless exempt) and that NRMM are registered at www.nrmm.london as they are onboarded to the scheme throughout the entire construction phase. This website also provides details on the applicable emissions standards. Any boilers installed at site should be natural gas fuelled, meet the 40mgNO_x/kWh emissions criteria referenced in the Sustainable Design and Construction Supplementary Planning Guidance and discharge vertically without a cowl designed in such a way as to impede dispersion/ vertical buoyancy.</p> <p>Wind Microclimate Any landscaping condition should ensure the retention of trees included in the landscaping scheme that are necessary for the mitigation of wind microclimate effects, particularly those outlined above in this table.</p>			

Appendix A – Interim Review Report

Report for – Royal Borough of Kingston Upon Thames
Cambridge Road ES Review
Interim Review Report
Final



Document Version Control

Version	Date	Author	Reviewed by	Reviewed and Approved by
1.0	27/01/2021	Various	██████████	██████████

Report for: **Royal Borough of Kingston Upon Thames**

Main Contributors: ██████████

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1.0 INTRODUCTION TO THE REVIEW

1.1 Introduction

1.1.1 The Temple Team have been commissioned by Royal Borough of Kingston Upon Thames (RBKT) to carry out an independent review of the Environmental Statement (ES) submitted in support the planning application for the Cambridge Road development (planning application numbers 20/02942/FUL). This Interim Review Report (IRR) supports a review of the ES prepared by Barton Willmore on behalf of Cambridge Road (Kingston) Ltd ‘the Applicant’.

1.1.2 The review identifies whether the ES meets the requirements set out in Schedule 4, of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (hereafter referred to as the EIA Regulations), including:

- a description of the Proposed Development comprising information on the site, design, size and other relevant features of the development;
- 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;
- A description of the relevant aspects of the current state of the environment (baseline) and the likely evolution without implementation of the development (future baseline)
- a description of the factors likely to be influenced by the Proposed Development and likely significant effects of the Proposed Development on the environment;
- a description of EIA methodology, limitations and assumptions;
- a description of any features of the Proposed Development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment (mitigation measures);
- a non-technical summary (NTS) of the information referred to above; and
- any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

1.1.3 The Institute of Environmental Management’s (IEMA’s) Quality Mark ES Review Criteria have formed the basis of review. The review has also taken account of the Planning Practice Guidance in relation to EIAs.

1.2 The ES Review Process

1.2.1 This report constitutes the IRR which collates the findings of the review of the ES. Each section of the report provides a list of clarifications and potential Regulation 25 request information requests required from the Applicant. Importantly, these are only potential Regulation 25s at this stage – this is to reflect the importance of these points, but also provides the Applicant with an opportunity to contest / respond.

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- 1.2.2 The Applicant is invited to provide a response to the IRR addressing the clarifications and potential Regulation 25 request information requests raised. Any response provided by the Applicant will then be reviewed by RBKT and Temple will also undertake a further review to establish whether these issues have been adequately addressed.
- 1.2.3 Should the response to the IRR be considered to formally constitute ‘further information’ the Applicant will be informed in writing, and the submission processed as required by the EIA Regulations. A Regulation 25 request will be raised where it is considered that without the missing information the ES is deemed to be deficient in terms of the EIA Regulations and that inclusion of the information has the potential to alter the assessment of significant effects.
- 1.2.4 If it is deemed that information requested in the IRR remains outstanding and is considered to be ‘further information’ the Applicant will be informed in writing. Without this information the ES is not considered to be complete. If the planning application were to be determined without this information, it could only be refused.
- 1.2.5 Mitigation measures are relied upon in the ES to limit or remove any significant adverse environmental effects. It is the Council’s responsibility to ensure that any required mitigation is secured. To assist with this, the Temple Team have identified the mitigation measures relied upon in the ES in Table 10.1 – this includes both mitigation that forms part of the scheme for approval, and that that needs to be secured e.g. via condition or planning obligation.

2.0 REVIEW OF SCHEME AND SITE INFORMATION

2.1 Description of the Site and Surroundings

2.1.1 The description of the Site and surrounding context is considered acceptable.

2.2 Description of the Proposed Development

Construction

2.2.1 Demolition and construction phasing are clearly presented, including the rehousing strategy. A good description of construction activities is provided, including a list of likely construction plant, construction traffic trips and indicative routes, and an outline of controls to protect the environment. Further details on construction methodology are presented in the appendices in the Construction Methods Statement, including piling methods, foundation works, and crane specifications.

2.2.2 An estimate of construction materials and waste is not provided. **This is included as a clarification in the summary table below.**

Operation

2.2.3 The explanation of the hybrid nature of the scheme and the parameters applied to the outline component of the scheme are clear. An indicative number of residential units in the outline scheme is presented (1,718), however as the text states that 'up to' 1,718 units will be provided, this is also taken to be the maximum number of units proposed. The amount of affordable housing is also given. Non-residential floorspace for the detailed and maximum floorspace for the outline elements are provided; this is predominantly use class E (subdivided into office and retail) with some use class D1 community floor space. Building heights are given in metres (AOD) and number of storeys. Areas of landscaping at ground level, biodiverse roofs, and play space are provided. A good summary of transport and access arrangements including car and cycle parking, and proposed drainage, energy and sustainability measures are provided.

2.3 Consideration of Alternatives

2.3.1 The 'do-nothing' approach is taken to be the continuation of the estate in its current form – there is sufficient explanation of this, and the comparison of environmental effects between this scenario and the Proposed Development is not provided as it is taken as the baseline.

2.3.2 The exclusion of the consideration of alternative sites is adequately justified with reference to local policies and site allocation.

2.3.3 The description of design evolution makes adequate reference to the key environmental constraints that have informed the development, specifically how townscape and visual, daylight and sunlight and wind microclimate concerns have informed the massing, how the open space has been designed to retain as many trees as possible and incorporate ecological enhancements, and how the design has sought to integrate community facilities including the multi-use games area (MUGA).

Summary of Clarifications Required
1. An estimate of the quantity of construction materials and wastes should be provided.
Summary of Potential Regulation 25 Information Requests
None.

3.0 REVIEW OF ES FORMAT, PRESENTATION AND SCOPE

3.1 Scope of the EIA

- 3.1.1 The ES has been presented in line with the Scoping Report and Scoping Opinion, which are both appended to the ES. Mitigation measures relied upon to support the scoping out of certain chapters are clearly presented; these are summarised in Table 10.1 of this document. Reports are appended to the ES for a number of topics scoped out, which is helpful to evidence that no likely significant effects are anticipated.
- 3.1.2 Climate Change is scoped out as a standalone chapter as agreed at the scoping stage but addressed in the ES as follows:
- Operational regulated carbon dioxide emissions and savings as a result of the energy strategy, showing compliance with London Plan;
 - Summary of Travel Plan measures to reduce carbon emissions from operational travel; and
 - Summary of sustainability strategy measures - this includes but is not limited to measures that would contribute towards greenhouse gas reduction or climate change adaptation. Some of these measures would benefit from greater information, in particular how circular economy principles will be enacted, however no further action is required.

3.2 EIA Methodology

- 3.2.1 The EIA methodology is clearly presented in the ES, as are the assumptions and limitations inherent in the EIA.
- 3.2.2 The worst-case approach to parameters in the outline component of the application is acceptable in general, although a question regarding the extent to which the maximum parameter model can be considered the worst-case scenario for wind microclimate has been raised in the review of that chapter, below.
- 3.2.3 It is not clear how the worst-case scenario has been applied for other assessments where the maximum parameters of the scheme do not represent the worst-case scenario. For example, the socio-economic assessment considers a net uplift in housing of 1,338 dwelling, this assumes a gross provision of 2,170 dwellings, which is the maximum number for the development. For air quality, both the height of the top floor and of the emissions stack would lead to lower magnitude effects if taller. The Applicant should clarify where in the ES a scenario other than the maximum parameters is considered the reasonable worst case scenario in this ES. **This has been included as a clarification in the summary table below.**
- 3.2.4 An acceptable statement of competence has been provided.

3.3 Consultation

- 3.3.1 A summary of the consultation process for the scheme has been set out in the EIA.
- 3.3.2 Consultation specific to the ES is summarised in each topic chapter. In most cases this consultation is limited to the request for a scoping opinion and subsequent discussions.

3.4 Non-Technical Summary

- 3.4.1 The summary of the Site, Proposed Development, construction, and EIA methodology as presented in the NTS is acceptable.
- 3.4.2 The use of figures and images would have been helpful for a non-technical audience to understand the scheme.
- 3.4.3 In general the NTS adequately summarises both pre-mitigation and residual effects, although the summary lacks details for a number of topics. The level of detail for pre-mitigation effects could have been greater for biodiversity, which simply notes negative effects for a number of receptors, this could have been expanded. The positive effects of the Proposed Development on vegetation, bats, birds, invertebrates and hedgehogs are noted in the ES main volume Biodiversity Chapter and the NTS summary of all residual effects, but are not noted in the biodiversity summary of the NTS.
- 3.4.4 The summary of daylight, sunlight and overshadowing in the NTS does not indicate the properties that would experience significant adverse effects. While there is a large number of these properties, a narrative could have been provided that grouped neighbouring properties with similar effects together, to give richer detail on how residential receptors would be affected. It would have been best practice to include this information however the minimum information for an NTS is included under the EIA Regulations and therefore no further action is required.
- 3.4.5 A specific requirement for the better representation of TVIA effects is presented in the review of that chapter, below.

3.5 Overall Presentation

- 3.5.1 The overall presentation of the ES is considered acceptable. Figures are presented at the end of documents or in appendices rather than in the text, which makes it more difficult to reference figures, however no further action is required.

3.6 Cumulative Effects

- 3.6.1 The list of cumulative schemes does not include the Eden Campus development (planning application numbers 20/02495/FUL and 20/02499/OUT). Although this is further away from the Site than other developments, it is adjacent to the Eden Walk scheme included in the cumulative assessment and is of sufficient scale to merit inclusion. The Applicant should clarify whether any of the cumulative effects presented in the ES would differ, were the Eden Campus scheme to be included in the cumulative assessment. **This is included as a clarification in the summary table below.**

Summary of Clarifications Required
2. The Applicant should clarify where in the ES a scenario other than the maximum parameters is considered the reasonable worst case scenario in this ES
3. The Applicant should clarify whether any of the cumulative effects presented in the ES would differ, were the Eden Campus scheme to be included in the cumulative assessment.
Summary of Potential Regulation 25 Information Requests
None.

4.0 POPULATION AND HUMAN HEALTH

4.1 Scope of Technical Chapter

- 4.1.1 The scope is generally appropriate and proportionate to the type, location and scale of development proposed. It is evident that the methodology and approach used for assessing economic and social effects are industry standard and clear, which are referenced throughout the chapter.
- 4.1.2 The impact of new residents on demand for child play space has not been included, either in the baseline or the assessment (it is noted that it is mentioned within the open space assessment). Furthermore, there is no reference to playspace requirements for the Proposed Development based on Greater London Authority (GLA) and Royal Borough of Kingston Upon Thames (RBKuT) policies. In particular, RBKuT's 'Planning Obligation SPD' highlights that any development with child occupancy over 10 children needs to provide on-site provision (based on policy requirement) or an equivalent financial contribution will be sought to fund off-site provision. This should either be included or a rationale for not including be provided. The assessment, if included, should provide information on the quantum of play space and GLA's playspace requirement (10 m² per child) for the Proposed Development. **This is included as a potential Regulation 25 in the summary box below.**
- 4.1.3 It is important to understand why the Applicant has decided not to use the GLA's Population Calculator to estimate the Proposed Development's new population. For new developments within London, the GLA's Population Calculator is typically seen as a standard approach and may provide a worst-case scenario for assessing the new populations effect on socio-economics indicators compared to the Applicant's current methodology. This should either be included or a rationale for not including be provided. **This is included as a clarification in the summary box below.**
- 4.1.4 The Applicant has defined the assessment area for the healthcare receptor as a 3 km radius of the Site. However, the Applicant has not provided a reasonable justification to inform their use of this assessment area. It is normally standard practice to assess healthcare facilities that are 1 km from the Site based on guidance provided in the '*Approaching Urban Design: The Design Process*'¹. By using a wider assessment area (of 3 km) this could lead to an under or overestimation of local GP capacity and including GP practices within the assessment that existing or new residents (within the local area) with mobility issues may struggle to reach. If not, this should either be included or a rationale for not including be provided. **This is included as a clarification in the summary box below.**

4.2 Baseline Conditions

- 4.2.1 The baseline conditions section is relatively thorough at a local authority level, making use of the most up to date information including 2011 Census, other ONS sources (mid-year population estimates / 2018-based population / household projections) and recent primary

¹ Approaching Urban Design: The Design Process, M Roberts and C Greed, Pearson Education

healthcare and school capacity information. It is evident that the assessor has used the most up-to-date datasets where required.

- 4.2.2 However, there are a number of datasets that have been excluded that could have provided a more rounded sense of the characteristics of the immediate areas surrounding the development such as the latest Indices of Multiple Deprivation (IMD 2019). No further action is required.

4.3 Prediction of Impact Magnitude and Significance

- 4.3.1 The assessment is necessarily qualitative, based on a professional judgement as would be expected, and backed by quantitative data which is set out clearly (including how the figures have been calculated and reference to relevant source documents).
- 4.3.2 In terms of employment, the Applicant states that *“The level of employment generated is not anticipated to be such that the calculation of additionality factors such as leakage, displacement or composite multiplier effects will be necessary on this occasion”*. This is not agreed; it is important to conduct a robust assessment to include ‘net’ employment figures. In particular, due to the opportunities provided by the Proposed Development it would be good to understand how existing and new residents may benefit from the employment generated on-site. By considering additionality factors, this would enable the assessor to understand the number of jobs that would impact local people. If not, this should either be included or further rationale for not including be provided. **This is included as a clarification in the summary box below.**
- 4.3.3 Within the ES chapter, there has been no mention of affordable housing . Information outlined in the accommodation schedule shows that only 40% of the Proposed Development will consist of affordable housing which is below the RBKuT’s requirement of 50%; the shortfall is explained in a viability assessment submitted with the planning application but the assessment of housing provision should take into account the provision of affordable housing. It would be expected that an assessment would note an adverse effect on affordable housing for not meeting this policy, even if the tenure is accepted by RBKuT on the basis of a viability assessment. **This is included as a potential Regulation 25 in the summary box below.**

4.4 Mitigation and Monitoring

- 4.4.1 In terms of healthcare, the Applicant has identified 17 GP practices located within a 3 km radius of the Site which show a patient to GP ratio of 1:1,959 which is above the HUDU benchmark of 1:1,800. The applicant concluded that the overall impact of the Proposed Development on relevant healthcare facilities is negligible. This is largely based on the Applicant highlighting that six out of the relevant 17 GP practices *“assessed are currently operating below the HUDU standard of 1 GP per 1,800 patients and collectively demonstrate capacity to accommodate a further 16,638 patients”*. As stated in paragraph 1.1.5, the *‘Approaching Urban Design: The Design Process’* provides guidance that residents should be able to access healthcare facilities within 1 km of their homes. Following this approach would result in only three out of the 17 GP practices being assessed and a GP to patient ratio of 1:3,740 which is significantly higher than the HUDU benchmark. Therefore, using the Applicant and 1 km radius approach would result in GP

to patient ratios being above the HUDU benchmark. Based on these approaches, it could be deemed that an ‘adverse’ criterion may be applicable for the healthcare receptor and that the Applicant should be liable to CIL or financial payments to mitigate the negative effects of the Proposed Development on the local healthcare provision. **This is included as a potential Regulation 25 in the summary box below.**

4.5 Cumulative Effect

4.5.1 The cumulative assessment considers a reasonably comprehensive set of socio-economic and health impacts which outlines specific population and employment figures for the cumulative schemes.

4.6 Commentary on the Conclusions of the ES

4.6.1 For most of the chapter, the analysis of the data is clearly presented and appears to be robust. However, there are discrepancies surrounding assessment conclusions for the healthcare associated with the Proposed Development.

4.7 Commentary on the Adequacy of NTS

4.7.1 The NTS is, in general, an adequate summary of what is concluded in the chapter. The NTS provides information on the construction and operational phases.

Summary of Clarifications Required	
4.	Clarification into why the Applicant has decided not to use the GLA’s Population Calculator to estimate the Proposed Development’s new population.
5.	Clarification into why the Applicant has defined the assessment area for the healthcare receptor as an arbitrary 3 km radius of the Site.
6.	Further clarification to justify why the Applicant has not provided a robust assessment to include ‘net’ employment figures.
Summary of Potential Regulation 25 Information Requests	
7.	Assessment of childcare / early children centre provision within the local impact area and no actual assessment of significance has been provided. This should either be included or a rationale for not including be provided.
8.	The Applicant should ensure that the assessment of housing provision considers the proportion of affordable housing provided by this scheme
9.	Based on the Applicant’s healthcare assessment, the assessor’s opinion is that there should be an ‘adverse’ criterion for the healthcare receptor. Therefore, the Applicant should be liable to CIL or financial payments as a mitigation measure unless the Applicant provides further evidence to justify their original assessment conclusion.

5.0 AIR QUALITY

Policies, Guidance, Legislation and Standards

- 5.1.1 Air quality policies, guidance, legislation, and standards referred to are appropriate.
- 5.1.2 In preparing this review, we have consulted the following documents submitted to accompany the application:
- Air quality chapter of the Environmental Statement (AQESC), including Appendices 7.1 – 7.3;
 - The air quality sections of the Scoping Report and Non-Technical Summary;
 - The Scoping Opinion; and,
 - Some elements of Chapters 1, 3 and 5 of the Environmental Statement, the transport assessment, construction logistics plan, energy statement and construction method statement have been reviewed insofar as they relate to the assessment.

Assessment Methodology and Significance Criteria

- 5.1.3 The assessment methodology and significance criteria used in the assessment are appropriate, unless specified below.

Construction Phase

- 5.1.4 Regarding the construction phase traffic assessment, clarification is required on whether the 16 light duty vehicles includes all traffic attributed to construction personnel commuting to and from the Site would be generated. **This is included as a clarification in the summary table below.**
- 5.1.5 Where a potentially significant increase in construction vehicle movements (AADT) are proposed as part of the Proposed Development, either in isolation or when assessed in combination with traffic already generated when operational, these should be assessed and/or mitigated. While it is accepted that construction traffic in isolation is under 25 HDVs and therefore under the screening threshold for a full assessment, the Applicant should clarify why an assessment of the air quality effects of the combined construction traffic and operational traffic at a later phase of construction has not been assessed. **This has been included as a clarification in the table below.**

Operational Phase

- 5.1.6 Regarding the operational phase impact assessment, the Transport Assessment for the Site shows that traffic data attributable to the Proposed Development is expected to decrease because of the development, yet the air quality assessment traffic data shows an increase. Clarification is required that the traffic data used in the air quality assessment is correct and the assessment updated if not. **This has been included as a clarification in the table below.**

- 5.1.7 Regarding model verification, clarification should be provided regarding the heights above ground level at which diffusion tubes are modelled. This should be determined using professional judgement by the Applicant, with reference to the estimated heights provided in the latest Air Quality Annual Status Report. **This has been included as a clarification in the table below.**
- 5.1.8 Furthermore, clarification should be provided that the latest version (8.0) of the NO_x to NO₂ calculator was used, including the '2018' and 'All London traffic' settings. **This has been included as a clarification in the table below.**
- 5.1.9 In addition, the Applicant should provide clarification regarding why pollutant concentrations at diffusion tube 24 were discarded as it is not necessarily unreasonable to include diffusion tubes where monitored concentrations substantially exceed modelled concentrations if model setup is considered appropriate. Where a technical justification is not plausible, this should be included in amended model verification. **This has been included as a clarification in the table below.**
- 5.1.10 Moreover, clarification should be provided regarding how PM₁₀ and PM_{2.5} concentrations were verified as the background concentration used is not presented. **This has been included as a clarification in the table below.**
- 5.1.11 The Local Air Quality Management Technical Guidance (2016) states that verification should not be undertaken at kerbside sites (as opposed to roadside ones, located 1 m - 15 m from the kerb) unless these represent relevant exposure. With this in mind, clarification regarding whether the two kerbside sites are appropriate to be included within the model verification should be provided and the verification redone if required. **This has been included as a clarification in the table below.**
- 5.1.12 Section 7.13 of Appendix 7.1 states that version 9 of the Emissions Factor Toolkit (EFT) was used to generate emissions from vehicles whereas Section 7.48 of the main ES Chapter states that version 10 was used. Clarification is required to determine which EFT has been used and which settings (e.g. London outer, London inner, etc.) have been used. **This has been included as a clarification in the table below.**
- 5.1.13 Clarification is needed regarding how NO_x was converted to NO₂ from point source contributions to calculate the annual mean NO₂ concentrations. **This has been included as a clarification in the table below.**
- 5.1.14 It is considered that the stack flue diameter in the assessment (and consequently velocity) is likely to be incorrect, as it matches that presented in the datasheet for one boiler whereas at exit point, it would need to accommodate four boilers. In light of the above, we request clarification that the model input data are correct at the point of flue exit, and on how annual and hourly NO₂ concentrations were assessed to account for the plant. **This has been included as a clarification in the table below.**
- 5.1.15 Moreover, the assessment of NO₂ (hourly and annual) concentrations is undertaken at 26.2 m above ground level, labelled as the top floor, whereas the Proposed Development plans for Block E show roof level to be 47.6m AOD (where ground level is 12m AOD), suggesting the top floor is significantly higher than 26.2m above ground level.. Consequently, we also request the assessment is updated to include a greater spatial

resolution of receptors in the vicinity of the boiler plant flue so that its impacts on annual and hourly mean NO₂ concentrations can be properly assessed. Elevation plans should be referred to when setting receptor and building heights. This should be presented inclusive of the background and road source contribution. **This is included as a Regulation 25 information request in the table below.**

- 5.1.16 Finally, we request information regarding the scheme's impact on daily mean PM₁₀ concentrations at existing and proposed receptor locations should be provided. **This is included as a Regulation 25 information request in the table below.**

Baseline Conditions

- 5.1.17 Whilst the London Atmospheric Emissions Inventory (LAEI) data could have been cited, this is immaterial and accepted. The remainder of the baseline assessment is accepted.

Assessment of Effects

Enabling and Construction

- 5.1.18 A detailed assessment of emissions from construction vehicles was screened out in accordance with the 'Land use planning & development control: planning for air quality' guidance (Environmental Protection UK & the Institute of Air Quality Management, 2014) ('the IAQM 2014 guidance') due to the site generating 24 heavy goods vehicles (HGVs). vehicles and 16 light duty vehicles & cars each day. Whilst the transport statement suggests that 4-6 vehicle movements can be expected each hour, this is considered unlikely to occur for every hour during which the Site is open and would not occur at weekends. Consequently, we consider that HGVs are not significantly likely to affect air quality. As noted above, we have requested clarification that these 16 vehicle movements include employee commutes.
- 5.1.19 Demolition has not been considered within the construction dust assessment and no justification regarding why this was not assessed when the planning application includes demolition of the existing buildings. This should be included within a revised assessment. However, it is noted that mitigation to minimise dust generated from demolition activities applicable to a high-risk site have been recommended within Table 7.26 of the AQESC.
- 5.1.20 The air quality ES Chapter has stated that trackout will occur from an exit along Cambridge Road. This contradicts the construction logistics plan and construction management plan submitted with the application. This should be considered within a revised assessment, however as trackout mitigation for a high-risk site has been recommended the recommended mitigation is unlikely to need to be increased.
- 5.1.21 The earthworks, construction and trackout activities are assessed as high dust emissions magnitude for a worst-case assessment in the absence of detailed information regarding site conditions. A conservative approach is accepted. The Applicant should note that the total site area is 88,556 m² (according to the Planning Boundary Plan, 2020) and is therefore less than the 100,000 m² assumed when determining the dust emissions magnitude for earthworks.

- 5.1.22 The report has assumed that earthworks, construction and demolition activities could take place across the Proposed Development site and has determined that there are 10-100 residences located within 20 m of the Site. However, we have observed over 100 high sensitivity receptors (residences) within 20 m of the Proposed Development. On this basis, the sensitivity of the receptors to human health effects would be considered **medium** for at least demolition, earthworks and construction and with consequent implications on the dust risk. We therefore consider that the dust risk assessment should be updated to ensure that the dust emissions magnitude, receptor sensitivity and dust risks are present and correct for all four types of construction related activity. **This is included as a Regulation 25 information request in the table below.**

Completed Development

Road Traffic and Plant Emissions

- 5.1.23 The site suitability assessment and impact assessment is acceptable, notwithstanding comments regarding the proposed assessment methodology outlined above.

Air Quality Neutral

- 5.1.24 The air quality neutral assessment (presented in Appendix 7.3 of the AQESC) indicates that it has been prepared in accordance with the 'Air quality neutral planning support update' (Air Quality Consultants on behalf of the Greater London Authority, 2014) ('the GLA AQN guidance'). Paragraph 7.19 also states that "*Development traffic is associated with the proposed office and serviced apartments only*"; however, it is assumed that not all apartments proposed at the Site are serviced (based on the proposed tenure mix) and traffic for the retail and community space have been included despite traffic data not being available. We therefore request clarification on how traffic data provided has been divided between land use classes. **This is included as a clarification in the summary table below.**
- 5.1.25 Regarding transport emissions, Appendix 7.3 also contains numerous errors in the text and calculations used to calculate the transport emissions benchmark. However, provided that the Applicant can confirm the number of trips for each land use type are correct, the data in Table 7.7 appears correct and we would concur that the development is air quality neutral from a transport emissions perspective.
- 5.1.26 We agree that the scheme is likely to be air quality neutral from a building emissions perspective.

Cumulative Effects

- 5.1.27 The qualitative cumulative effects assessment is acceptable.

Mitigation Measures

- 5.1.28 Similarly to the Applicant, we recommend that dust mitigation and monitoring be integrated into a Construction Environmental Management Plan (CEMP), for which a planning condition should be implemented. Monitoring requirements should be guided by the requirements set in the 'Control of dust and emissions during construction and demolition' guidance (Mayor of London, 2014) and/or guidance published by the IAQM.

- 5.1.29 Any controls recommended in the CEMP should be integrated into the Construction Method Statement. Alternatively, to recommending a CEMP by condition, the Applicant may wish to update their Construction Method Statement (CMS) submitted with the application to account for any mitigation measures specified in the AQESC/ updated dust risk assessment, including a monitoring strategy. The Construction Method Statement, if approved in full at planning stage to account for the above, would negate the need for inclusion of air quality related sections in the CEMP, which we anticipate will be produced to consider other elements of construction management at post-planning stage. If the latter option is taken, the CMS should be reviewed by an air quality specialist prior to approval.
- 5.1.30 A planning condition establishing controls on non-road mobile machinery (NRMM) is recommended.
- 5.1.31 We have recommended a condition setting maximum emissions limits for the plant as we understand they are likely to be used for less than 500 hours per annum and would thus not be subject to regulation under the Environmental Permitting Regulations. No other operational phase impacts are considered to require regulation via planning condition.

Residual Effects

- 5.1.32 The assessment of residual effects is acceptable.

Commentary on the Conclusions of the ES

- 5.1.33 Clarifications are required in line with the comments above (relating to enabling and construction effects) to determine whether the conclusions of the ES are appropriate.

Commentary on the Adequacy of NTS

- 5.1.34 The NTS provides a reasonable, if brief, summary of the air quality chapter.

Summary of Clarifications Required
<p>10. Regarding the construction phase traffic assessment, clarification is required on the number of additional vehicle movements attributable to construction personnel commuting to and from site would be generated.</p> <p>11. The Applicant should clarify why an assessment of the air quality effects of the combined construction traffic and operational traffic at a later phase of construction has not been assessed</p> <p>12.</p> <p>13. Clarification regarding whether the traffic data used in the operational phase dispersion modelling assessment are correct should be provided, and the assessment updated if required.</p> <p>14. Clarification is required regarding the height at which the diffusion tubes were modelled.</p> <p>15. The settings used within the NO_x to NO₂ calculator should be provided and where not applicable to London, may require adjustment (if settings used result in materially different predicted pollutant concentrations).</p> <p>16. Clarification regarding whether the automatic monitor was adjusted using the 'Diffusion tubes' tab on the NO_x to NO₂ calculator and why two kerbside diffusion tube sites were included in the verification should be provided. Where not technically justified, verification and adjustment should be updated.</p> <p>17. Clarification is required regarding why NO₂ concentrations predicted at DT24 were discarded. Where a technical justification is not plausible, this should be included.</p> <p>18. Clarification is required regarding what background concentrations were used to enable PM₁₀/PM_{2.5} verification.</p> <p>19. Clarification is required regarding which version of the Emissions Factor Toolkit (EFT) was used and which type of vehicles assumed.</p> <p>20. Clarification that the input data are correct at the flue exit is required, as established in paragraphs 13 and 14 above. Modifications to the assessment may also be required, should any input data be incorrect.</p> <p>21. Clarification on the traffic input data used to complete the air quality neutral assessment should be provided.</p>
Summary of Potential Regulation 25 Information Requests
<p>22. Calculation or prediction of impacts of scheme on 24-hour mean PM₁₀ concentrations.</p> <p>23. Prediction of impacts of scheme on NO₂ concentrations (hourly and annual) at receptors proposed closest to flue.</p> <p>24. The dust risk assessment should be updated as outlined in Paragraph 21.</p>

6.0 BIODIVERSITY

6.1 Scope of Technical Chapter

- 6.1.1 The Biodiversity Chapter assesses potential impacts on statutory and non-statutory designated sites within the Zone of Influence, habitats within the Site, roosting, foraging and commuting bats, birds, invertebrates and hedgehog. Due to the urban nature of the Site, the habitats present and the nature of the proposals, these important ecological features are considered to be appropriate.

6.2 Survey Methodology

- 6.2.1 The Chapter is based on Phase 1 Habitat surveys, bat scoping, dusk emergence and dawn re-entry surveys, walked activity transect survey and static activity surveys for bats and breeding bird surveys. These followed appropriate best practice methodology, except for minor limitations to the bat emergence/re-entry surveys, the static bat activity surveys and the breeding bird surveys. However, the reviewer considers that these limitations are not significant enough to undermine the accuracy of the assessment and therefore no further action is required. The Site was subject to an updated ecological survey in October 2020, which provides further confidence on the accuracy of the results.

6.3 Baseline Conditions

- 6.3.1 The Biodiversity Chapter provides baseline information on the statutory and non-statutory designated sites within the vicinity of the Site, habitats present within the Site and species populations which are likely to be supported by the Site. The Chapter assesses the value of these ecological features in line with levels of geographical importance as set out in best practice guidance for Ecological Impact Assessment. The reviewer considers that the information provided on the baseline conditions is appropriate and these features have been accurately assessed in terms of significance.
- 6.3.2 Biodiversity Net Gain calculations are provided in the appendix to this Chapter, based on the baseline habitat information recorded during the extended Phase 1 habitat survey visits. The assessment of habitat condition aligns with the habitat descriptions provided. However, the biodiversity unit score calculated for each habitat type does not appear to consider connectivity, such that it is not possible to confirm whether the calculated unit scores are accurate. As such, the reviewer cannot confirm whether they agree with the baseline assessment of the biodiversity value of the habitats on Site, in terms of Biodiversity Units. **This is included as a clarification in the summary table below.**
- 6.3.3 Due to the phased nature of the scheme and length of time which is likely to occur between the ecology survey work completed to date and the construction phase(s), the baseline conditions may change. The Chapter confirms that update survey work will be completed as each phase comes forward, and impacts reassessed. The reviewer agrees with this approach, and that these update surveys should be conditioned to ensure that suitable mitigation is implemented, such as licenced work to bat roosts (if required).
- 6.3.4 The reviewer agrees with the assessment of future baseline included in this Chapter.

6.4 Prediction of Impact Magnitude and Significance

- 6.4.1 The Chapter concludes that in the absence of mitigation, there will be potential negative impacts on Kingston Cemetery Site of Importance for Nature Conservation (SINC), foraging and commuting bats, birds including breeding house sparrow and hedgehog as a result of the construction and operation phases of the Proposed Development. The reviewer confirms that the assessment of these impacts is appropriate.
- 6.4.2 Impacts on habitats have been assessed partially through the completion of a Biodiversity Impact Assessment (BIA), as appended to this Chapter. The proposed habitats have been allocated Biodiversity Unit scores to be compared with the baseline conditions to assess overall net change. The post-construction Biodiversity Unit scores have been calculated using sensible assumptions on target condition but it is not clear whether factors including connectivity, time to target condition and difficulty of creation have influenced the unit calculations. Therefore, it is not possible for the reviewer to confirm whether they agree with the conclusion that there will be an overall net biodiversity gain in terms of Biodiversity Units.

6.5 Mitigation and Monitoring

- 6.5.1 The Chapter confirms that mitigation will include the implementation of a Construction Environmental Method Statement (CEMP) to mitigate potential impacts during the construction phase on Kingston Cemetery SINC, foraging and commuting bats, nesting birds and hedgehog. The reviewer agrees with this approach and that the CEMP should be secured through planning condition.
- 6.5.2 The Chapter confirms that the proposed landscaping will be managed appropriately in accordance with an Ecological Management Plan (EMP). The reviewer agrees with this approach and that the EMP should be secured through planning condition. The EMP should ensure that the target condition of proposed habitats are achieved so that a measurable biodiversity net gain is delivered.
- 6.5.3 The Chapter confirms that impacts on foraging and commuting bats during the operational phase will be mitigated through a sensitive lighting strategy. The reviewer agrees with this approach, and that this detailed lighting strategy should be secured through planning condition.
- 6.5.4 The Chapter confirms that the future condition of the Site will be monitored by update survey work to be undertaken before commencement of each phase of the development. The reviewer agrees with this approach, that a minimum of an update PEA and Bat Scoping Survey should be completed for each future phase of the development.

6.6 Cumulative Effects

- 6.6.1 The Chapter concludes that cumulative impacts on ecological receptors will be negligible to permanent positive at the local level. The reviewer agrees with this assessment.

6.7 Commentary on the Conclusions of the ES

- 6.7.1 The Chapter includes a summary of the assessment of biodiversity, concluding that there will be no significant negative impacts on biodiversity as a result of the Proposed Development at construction or operational phase, either alone or in combination with other developments. It concludes that in some cases, there will be a minor positive impact at the Site or local level on habitats, bats, nesting birds, stag beetle and hedgehog. The reviewer agrees with this conclusion.

6.8 Commentary on the Adequacy of NTS

- 6.8.1 The Biodiversity section of the NTS largely aligns with the main text Chapter. Inconsistencies include the lack of reference in the NTS Biodiversity section to positive residual impacts on important ecological features as concluded in the Biodiversity Chapter, although these are noted in the final summary at the end of the NTS. No further action required.

Summary of Clarifications Required
25. Clarification on the methodology used to complete the calculations of Biodiversity Units, as appended to the Chapter in the BIA report. The applicant should confirm that the unit calculation aligns with the most up-to-date methodology for Biodiversity Net Gain, as updated by Natural England in 2019 (Metric 2.0 Beta Test).
Summary of Potential Regulation 25 Information Requests
N/A

7.0 DAYLIGHT, SUNLIGHT AND OVERSHADOWING

7.1 Scope of Technical Chapter

7.1.1 The scope of this chapter is appropriate for the Proposed Development. The assessment follows the guidelines and calculation methodology from the BRE guidance (the BRE Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice) which is referenced in the London Plan and relevant for this assessment to show the predicted impacts of the development on the surrounding area. The assessment does not reference BS EN 17037: 2018 Daylight in buildings but as this is not used to assess the impact on neighbouring buildings the BRE guidance is the relevant standard.

7.2 Baseline Conditions

- 7.2.1 The baseline conditions have been appropriately calculated for identified sensitive receptors in the surrounding area.
- 7.2.2 Residential properties surrounding the Site have been identified as having a possible reduction in daylight and sunlight availability following completion of the Proposed Development.
- 7.2.3 Commercial spaces have been excluded as these are considered to be less sensitive to changes in daylight and sunlight. This approach is considered appropriate.
- 7.2.4 Vertical Sky Component (VSC) has been assessed in line with BRE Guidance.
- 7.2.5 The No Sky Line (NSL) has been assessed in line with the BRE Guidance.
- 7.2.6 Annual Probable Sunlight Hours (APSH) has been assessed in line with the BRE Guidance.
- 7.2.7 Overshadowing has been assessed in line with the BRE Guidance.
- 7.2.8 Internal Daylight, Sunlight and Overshadowing has been assessed in a standalone report.
- 7.2.9 The methodology was in line with that outlined in the Scoping Opinion.

7.3 Prediction of Impact Magnitude and Significance

- 7.3.1 Significance of effect have been identified as follows:
- 0 to 19.9% - Negligible;
 - 20% - 29.9% reduction – Minor;
 - 30% to 39.9% reduction – Moderate; and
 - Above 40% reduction – Major.
- 7.3.2 Vertical Sky Component (VSC) has been assessed to have negligible to major significance.
- 7.3.3 The No Sky Line (NSL) has been assessed to have negligible to major significance.

- 7.3.4 Annual Probable Sunlight Hours (APSH) has been assessed to have negligible to moderate significance.
- 7.3.5 Overshadowing has been assessed to have negligible to major significance. 6 of 138 assessed areas would be assessed as major. This is agreed.

7.4 Mitigation and Monitoring

- 7.4.1 The assessment is based on the detailed elements of Phase 1 of the Development as well as the outline elements of Phases 2 to 5, representing the full extents of the maximum parameters and portraying a worst case scenario. A list of mitigation measures going forward are given in section 9.144.

7.5 Cumulative Effects

- 7.5.1 Cumulative effects have not been considered as there are no schemes close enough to have a cumulative effect. Looking at the cumulative schemes plan there is only one scheme in close proximity. However, this cumulative scheme (scheme A) would not affect the same receptor windows as the Proposed Development so this is considered valid.

7.6 Commentary on the Conclusions of the ES

- 7.6.1 The conclusion contained within the ES chapter is accurate. There will be a reduction in daylight and sunlight availability to some neighbouring properties, but it is expected for a scheme of this size and in such close proximity to the neighbouring properties identified as sensitive receptors.

7.7 Commentary on the Adequacy of NTS

- 7.7.1 The NTS is accurate but very basic with very little information given.

Summary of Clarifications Required
None.
Summary of Potential Regulation 25 Information Requests
None.

8.0 WIND MICROCLIMATE

- 8.1.1 The wind microclimate assessment submitted as part of the Environmental Statement in support of the planning application for Cambridge Road was undertaken by SRE on behalf of the Applicant. The study employs a CFD (computational fluid dynamics) based assessment to deliver an appraisal of the wind microclimate and includes proposals for wind mitigation measures to be incorporated within the design.
- 8.1.2 This review benchmarks the EIA against industry standard best-practice and makes recommendations and requests for further clarification where required to confirm that the conclusions of the report can be relied upon.
- 8.1.3 The review is based on the following documents:
- 26902 ES Chapter 10 Wind_FINAL_Nov 2020.pdf;
 - Appendix 10.1 - Microclimate Analysis Report.pdf;
 - Appendix 10.2 - Microclimate Analysis Report Appendices_Part1.pdf; and
 - Appendix 10.2 - Microclimate Analysis Report Appendices_Part2.pdf.

8.2 Scope of Technical Chapter

- 8.2.1 The Technical Chapter covers the relevant issues expected of a standard wind microclimate assessment and appears to follow an industry-standard approach to combining localised wind climate statistics with numerical simulations to derive Lawson Comfort Criteria for the locations within the study area. These criteria are then used to judge whether the areas are suitable for their intended locations, and then recommendations are made for mitigation where required.

Methodology

- 8.2.2 Appendix 10.1, paragraph 3.2: The wind climate statistics are derived from Heathrow airport weather station data; please can the author confirm the means by which the weather station data has been transposed to Site, and at what reference height has it been transposed to? Please also confirm if the wind roses presented are at the measurement station, if they have been transposed to open country, or if they have been transposed to Site. **This is included as a clarification request in the summary table below.**
- 8.2.3 In ES paragraph 10.28 the author notes that a Lattice-Boltzmann solver has been used, which is an emerging technology in the field of wind microclimate simulations. Please can the author make a comment regarding the reliability of this methodology, including the nature of their validation and QA processes, and to what extent they expect their results to be comparable to more conventional CFD or wind tunnel based analyses? **This is included as a clarification request in the summary table below.**
- 8.2.4 In relation to ES paragraph 10.28, it is known that gust (as opposed to mean) wind speeds can frequently be the driving factor for wind conditions at a given location. The author mentions that a transient scheme is used. If the presented results are based on gust

velocities, please can the author provide details on how they are generated from the simulated velocities and how gust equivalent mean speeds (GEM) are derived? **This is included as a clarification request in the summary table below.**

- 8.2.5 Regarding ES paragraph 10.29 the author states that the “surface roughness applied to the CFD model is 0.3”. Please can they confirm that this is applied to all wall boundaries within the model, and if so, the justification for doing so? **This is included as a clarification request in the summary table below.**
- 8.2.6 In ES paragraph 10.65 there is a statement: “There are no safety exceedances due to strong winds in the baseline condition”, but this appears to contradict the statement in ES chapter 10.63 which states that there are 7 exceedances – please can the author clarify? **This is included as a clarification request in the summary table below.**
- 8.2.7 The upstream profile(s) of the atmospheric boundary layer is not presented in the report – please can the author provide details of the target profile, and the profile achieved in the simulation? **This is included as a clarification in the summary table below.**
- 8.2.8 It appears that the author has mixed 2 versions of the Lawson criteria to assess the scheme, and in so doing, has introduced some confusion throughout the report regarding the wind conditions at a given location. For example, in the table labelled Table 13.1 (in Chapter 10), “pedestrian sitting” is defined as being possible when the speed is 4ms^{-1} for >5% of the year, whilst in Table 13.2 “sitting” is defined as being possible when the speed is 4ms^{-1} for <5% of the year. Please can the author clarify, and use a single set of criteria? Furthermore, it is recommended that the safety plots do not attempt to show comfort, as this is presented elsewhere. **This is included as an information request in the summary table below.**
- 8.2.9 There is no statement regarding the criteria used to judge when the simulations are suitably converged – please can the author provide details? **This is included as a clarification in the summary table below.**
- 8.2.10 The plots of average wind speed provided in Appendix L are presented relative to a reference wind speed of 10ms^{-1} . Please can the Author clarify the height at which this reference wind speed is applied? **This is included as a clarification request in the summary table below.**

8.3 Baseline Conditions

- 8.3.1 The baseline conditions, as presented in Figures 10-12 of the full report, whilst not implausible, do appear to be slightly calmer than what may be expected in most locations. It would be good to understand the level of confidence the author has in the results, as well as the nature of QA checks conducted on the presented data. **This is included as an information request in the summary table below.**
- 8.3.2 Figure 12 demonstrates the presence of areas which have the potential for conditions to exceed the safety criteria for “frail” pedestrian users in close proximity to towers A, C & D. The contours displayed in the figure appear to suggest this is driven by winds originating from the northerly directions, but this is in contrast with the assertion of the prevailing wind direction being from the south-west. Indeed, it would be more plausible if these

exceedances were driven by westerly winds impacting the western faces of these buildings. Could the author confirm that the wind conditions have been correctly derived from the raw simulation outputs and the Site wind climate, or otherwise comment on the nature of this less expected result? **This is included as a clarification request in the summary table below.**

- 8.3.3 Plots showing compliance with the safety criteria are shown per-season. Conventionally and as standard practice, safety should be assessed on an annual basis by combination of predicted wind speeds with wind climate statistics derived for the whole year. Please clarify how the assessment of safety has been conducted. **This is included as an information request in the summary table below.**
- 8.3.4 Appendix 10.1 Executive Summary states “no distressful” conditions were found – this is contradicted in the following paragraph, and elsewhere in the report. **This is included as a clarification request in the summary table below.**

8.4 Prediction of Impact Magnitude and Significance

- 8.4.1 Similar to the baseline conditions, the wind conditions reported for scenario 2 appear to be slightly calmer than what may be expected. We would therefore again appreciate a comment from the author to confirm that they are confident in the results, and that adequate QA checks have been applied. A further comment to explain the reasoning for relatively calm conditions would also be appreciated. **This is included as an information request in the summary table below.**
- 8.4.2 It is also noted that the difference between winter and summer is rather subtle – we would usually expect most areas to have of the order of 1 (comfort) category difference between the seasons. It is requested that some comment be made to explain this. **This is included as a clarification request in the summary table below.**
- 8.4.3 Again, the most significant effects, as discussed in Section 4.4 of the main report appear to be driven by winds originating from the north. Please could the applicant confirm if this is the case, and if so, some justification? Furthermore, if the northerly winds are indeed driving exceedances of the safety criteria around a building to the north-west corner of the masterplan, it is strange that the taller, more exposed building to the north-east of it is not also giving rise to similar conditions. Please clarify. **This is included as a clarification request in the summary table below.**
- 8.4.4 Figure 21 shows an exceedance of the safety criteria during the summer months, which is quite uncommon, especially when compared with the comfort plot in Figure 17, which shows relatively benign conditions. The irregular shape of the exceedance area suggests there could be a numerical issue with the solution or plotting. Please can the author confirm the correct data is shown here? **This is included as a clarification request in the summary table below.**
- 8.4.5 The locations of entrances and areas designated for specific uses are not shown in the report – this prevents the reader from being able to confirm that the conditions (from the Lawson criteria) for a given location are suitable for the intended use. Please can the author provide a figure to show the location of intended uses, ideally including the appropriate

Lawson threshold. Further still, any areas where the threshold is exceeded should be marked. **This is included as a clarification in the summary table below.**

- 8.4.6 ES paragraph 10.30 states that the maximum parameter outline has been chosen for the geometry of the rest of the masterplan. If the massing of the masterplan is over-represented, it may offer more protection than is realistic. Please can the author provide some justification that this does not provide an under-conservative representation? **This is included as a clarification request in the summary table below.**

8.5 Mitigation and Monitoring

- 8.5.1 A dense planting scheme is illustrated in the report, and it is expected that this would offer a substantial improvement to the wind microclimate of the proposed scheme; such an improvement is shown in the results (Scenario 3). Robust modelling of foliage in CFD is a matter of ongoing research and should be treated with caution. Please can the author provide more details of their methodology, and how it has been validated? Additionally, given the level of uncertainty inherent in such methodologies, please can they provide details of any factors embedded within the methodology to ensure that the presented results are conservative? **This is included as a clarification in the summary table below.**
- 8.5.2 Within paragraph 10.100, one of the mitigation measures is to retain off-site planting. The Applicant should clarify how this mitigation measure would be secured. **This is included as a clarification request in the summary table below.**

8.6 Cumulative Effects

- 8.6.1 In ES paragraph 10.35 the author states that the cumulative effects have been assessed qualitatively to have no material impact. This is based on the fact that the only scheme to be assessed is:
- Greater than 100m from the proposed site,
 - Sited in line with an infrequent wind direction.
- 8.6.2 It would have been useful for the ES chapter to have confirmed that the smaller scale of the scheme (at 6 storeys) reduces the likelihood that the scheme will affect wind conditions at the Proposed Development. It is agreed that there would be unlikely to be cumulative effects.
- 8.6.3 It would have been useful to note in the cumulative section that the other schemes considered in the cumulative assessment in the rest of the ES are greater than 700 m from the Site and therefore unlikely to affect wind conditions at the Proposed Development, however no further action is required.

8.7 Commentary on the Conclusions of the ES

- 8.7.1 Overall, and as noted above, the conclusions of the ES do not seem implausible, and the requisite steps to reach a final conclusion do mostly appear to be present. However, a lack of detail regarding the execution of the individual steps do raise some concerns regarding the accuracy of the presented results, and hence the validity of the conclusions.

Furthermore, some questionable results do introduce a further element of doubt. The author is requested to provide some more details before a firm agreement could be drawn regarding the conclusions of the assessment.

8.8 Commentary on the Adequacy of NTS

8.8.1 The NTS provides an acceptable summary of the scheme.

Summary of Clarifications Required
26. Confirm the means by which the weather station data has been transposed to Site. Please also confirm if the wind roses presented are at the measurement station, if they have been transposed to open country, or if they have been transposed to Site.
27. Commentary on the use of the Lattice-Boltzmann solver and its comparability to other methods
28. Are gust speeds derived & used? If so, how are the gust speeds and gust equivalent mean (GEM) derived?
29. Has a surface roughness of 0.3 been applied to all wall boundaries?
30. Contradictory statement in ES 10.65 – please clarify.
31. Please confirm details of upstream profile of the ABL (both target and achieved).
32. Please present plots using consistent classifications within a single (& correct) derivative of the Lawson criteria.
33. Please provide details of convergence criteria.
34. What is the reference height for the wind speeds shown in the per-angle plots in appendix L?
35. Please explain why conditions for the baseline and scenario 2 appear to be calmer than would be expected for the scheme, and the level of confidence that you have in these results
36. Confirm direction of key wind angles for significant wind effects. If it is not prevailing directions, some further explanation is required, including demonstration of the flow fields / streamlines.
37. Explanation of the origins of exceedances of safety criteria, and confirmation that the modelling is correct here.
38. Please provide justification for the apparent similarity between summer and winter conditions.
39. Contradictory statement in Appendix 10.1 Executive Summary - please clarify.
40. Summer exceedance of safety shown in figure 21 – please confirm this is intentional.
41. Please provide a figure to show the distribution of chosen activity around the scheme, and whether suitable conditions are achieved.
42. Please provide justification for why the maximum parameter outline is considered to be the worst case scenario for wind conditions.
43. Please can the author provide more details of their methodology for assessing foliage in CFD.
44. Please clarify how the retention of trees offsite, listed as a mitigation measure, would be secured.
Summary of Potential Regulation 25 Information Requests
None.

9.0 TVIA

9.1 Scope of Technical Chapter

- 9.1.1 Barton Willmore Consultancy has undertaken a Townscape and Visual Impact Assessment (TVIA) together with Accurate Visual Representations (AVRs) prepared by Realm within Volume III of the Environmental Statement (ES) submitted for approval as part of the planning application. The Site comprises a built-up urban block in the existing Cambridge Road Estate in the Norbiton Ward of the Royal Borough of Kingston upon Thames.
- 9.1.2 The TVIA provides an understanding of relevant planning policy and guidance. A description is provided of the method and a description of the relevant baseline conditions of the Site and the surroundings. The TVIA assesses the likely significant effects of the Proposed Development on the surrounding townscape character and strategic and local views. The TVIA also assesses the likely cumulative effects of the Proposed Development with other reasonably foreseeable developments.
- 9.1.3 The TVIA references the wider ES and sets out in Volume 1 (Main Report) how the assessment considers the Scoping Opinion received and related pre-application feedback. Appendices 2.1 and 2.2 provide information on the scoping consultation undertaken.
- 9.1.4 The AVRs provide a clear indication of the proposed finish of the building; the TVIA contains a detailed methodology for the production of AVRs which demonstrates that they provide an accurate representation of views in accordance with the London View Management Framework, in accordance and the Landscape Institute Clarification TGN 06/19.
- 9.1.5 Wirelines have been used for cumulative schemes and for views where the proposed building is less visible.
- 9.1.6 The scope of the TVIA including the overall approach to assessment, study area, sources of information, level of baseline detail and number and location of views appear appropriate for the scale of the Proposed Development.

9.2 Baseline Conditions

- 9.2.1 The TVIA provides a detailed description of the baseline conditions including a review of townscape character areas identified for Norbiton. These include discussion of the scale and layout of the existing townscape context, where there may be significant townscape effects. This approach enables an understanding of the effect of the development on built form and existing townscape context within the study area and provides a suitable level of detail for the assessment of townscape effects.
- 9.2.2 The TVIA methodology states that viewing positions were selected in consultation with the Royal Borough of Kingston. The assessment contains 30 views as AVRs with views listed in Appendix A.3.

- 9.2.3 No reference can be found as to the reasoning for the geographic extent of likely significant effects for the study area. **This is included as a clarification in the summary table below.**

9.3 Prediction of Impact Magnitude and Significance

- 9.3.1 The assessment is based on the framework contained within the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA 3) and also the London View Management Framework Supplementary Planning Guidance (LVMF SPG, 2012).
- 9.3.2 The methodology for assessment of townscape and visual effects has been clearly separated. Overall levels of significance have been assessed in terms of the sensitivity of the resource affected and the magnitude of the effect, which complies with GLVIA 3.
- 9.3.3 The TVIA defines the sensitivity of townscape and visual receptors as dependent on the importance / value of the receptor and its susceptibility to change. However, whilst the townscape methodology provides a narrative to describe how susceptibility and value are understood and combined to show the sensitivity of a receptor, the methodology for visual receptors does not. Such a written narrative is important in enabling the reader to fully understand the process involved in assigning sensitivity values and should be included as part of the report. **This is included as a regulation 25 request for further information in the table below.**
- 9.3.4 The assessment of magnitude of effects is described in terms of the level of change experienced by the townscape or view. Sufficient explanation is provided in terms of the assessment of magnitude within the body of the assessment and an explanation of the factors that enable the levels of magnitude to be judged is provided within the methodology. Sensitivity and magnitude are then combined to provide an overall level of townscape and visual effects. It is not clear from the methodology how the different levels of sensitivity and magnitude are combined, either by a matrix or by the included table A.1.34 to maintain a consistent approach to assessment and to enable the reader to fully understand the assessment process. **This is included as a Regulation 25 request for further information in the table below.**
- 9.3.5 The methodology states that the rationale for the judgement of overall significance of effect is clearly explained to demonstrate how the final assessment has been derived and is compliant with GLVIA 3. Major and moderate effects are considered to be 'significant'. Assessment of nature of effect relies on what distinguishes effects as beneficial (positive), adverse (negative) or neutral (neither beneficial or adverse) as described within GLVIA3 (para 5.37).
- 9.3.6 The combination of existing, proposed and proposed cumulative views together with their written descriptor and assessment of effects provides good clarity in order to review the overall level of effects assigned to each viewpoint. In general, the assessment appears to be consistent with the methodology and logical.
- 9.3.7 Demolition and construction effects for townscape and visual receptors are described as temporary, local adverse effects of moderate significance. Appendices A.2 and A.3 contain a summary of the residual townscape and visual effects on the assessed receptors. Levels of effect are judged as predominantly beneficial, with five impacts

judged to be negligible adverse. It is agreed that the scale and mass and architectural treatment after completion would have a largely positive contribution to the surrounding townscape and identified views towards the Site. However, in line with regulation request at 1.3.4, it is not always clear how levels of magnitude and sensitivity have been combined to result in the stated overall effect and neither are the levels of effect consistent. For example, the assessment describes the significance of effect as negligible beneficial for viewpoint 15 (with sensitivity medium and magnitude large), whereas this would typically be assessed as of at least moderate significance. In contrast viewpoint 13 is also described as a negligible beneficial significance but as a result of combining a medium sensitivity with a small magnitude of effect. **This is included as a Regulation 25 request for further information in the table below.**

9.4 Mitigation and Monitoring

- 9.4.1 Section 1.4 states that the potential adverse effects have been considered throughout the design process and that mitigation has been incorporated in the design development. This is reiterated in Section 9.3 which describes all mitigation measures as embedded in terms of the building design. It is agreed that the design responds to the townscape and views surrounding the application site. This is considered appropriate.
- 9.4.2 Additional construction stage mitigation measures include the use of hoardings, tree protection, early landscape establishment, lighting control and movement and stockpiling of materials; direct and indirect impacts arising from the demolition and construction stage would be controlled through the implementation of a Construction Management and Construction Logistics Plan.
- 9.4.3 Additional operational stage mitigation measures include the implementation of a Landscape and Biodiversity Management Strategy and a programme of appropriate monitoring agreed with the regulatory authority.
- 9.4.4 It is anticipated that planning permission will be conditional upon production of these measures.

9.5 Cumulative Effects

- 9.5.1 No significant cumulative effects are predicted for the scheme. It would have been helpful for a plan indicating the locations of cumulative schemes to be presented in the TVIA in order to provide further clarity. Further clarification is required on why there are not anticipated to be any further cumulative effects, in particular for the Hampden Road development and viewpoints 17, 18, 19 and 30 and for developments in Kingston Town Centre with respect to views 1,2,3,4 and 27. **This is included as a clarification in the summary table below.**

9.6 Commentary on the Conclusions of the ES

- 9.6.1 The conclusions to the TVIA provide a useful overall summary of the scheme and those significant beneficial and adverse effects on the local townscape character and views. Tables in Appendices A.2 and A.3 contain a useful summary of townscape and visual effects.

9.6.2 It is stated that significant (adverse) effects will only be experienced during the construction stage. As per comments at 1.34 and 1.37 the levels and consistency of effects assessed clarification.

9.7 Commentary on the Adequacy of NTS

9.7.1 The NTS provides a summary of the existing site and proposed scheme. However, the summary of changes to the townscape and visual receptors and the residual impacts that would be experienced through the lifecycle of the project is not sufficiently reported. Where effects are summarised, they do not correspond with those in the TVIA document. For example, in the NTS it is stated that residual effects range between neutral and major adverse when in the TVIA residual effects range between negligible and moderate adverse. Likewise, the NTS considers only the TVIA effects after 15 year’s tree maturation, claiming that effects would range between neutral and major beneficial, whereas the TVIA states effects range between neutral and moderate beneficial. Year 1 operation effects should also be presented, and a separation in the NTS summary should be made between townscape effects and visual impact effects. **This is included as a potential Regulation 25 request in the summary table below.**

Summary of Clarifications Required
45. Clarification as to the reasoning for the geographic extent of likely significant effects for the study area.
46. Further clarification is required on why there are not anticipated to be any further cumulative effects
Summary of Potential Regulation 25 Information Requests
47. A narrative should be provided to enable the reader to fully understand the process involved in assigning a level to susceptibility and value and how they are combined to show the sensitivity of a receptor.
48. Information should be provided that clearly demonstrates how the level of significance is decided upon from the combination of different levels of sensitivity and magnitude.
49. Information should be provided to demonstrate consistency in deciding overall levels of significance.
50. The summary of changes to the townscape and visual receptors and the residual impacts that would be experienced through the lifecycle of the project is not sufficiently reported within the NTS; where effects are summarised, they do not correspond with those in the TVIA document.

10.0 SUMMARY OF MITIGATION MEASURES

10.1.1 The table below provides a summary of mitigation measures proposed by the Applicant across all topics, both embedded and additional.

Table 10.1: Summary of Mitigation Measures

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
Topics scoped out of the ES	Pre-Construction	None.	Intrusive site investigation for land contamination. Ground gas monitoring. Remediation Strategy (if required) to be agreed with RBKT.
	Construction	None.	Best Practice Measures for noise and vibration mitigation during construction. Construction Traffic Management Plan.
	Operation	Drainage Strategy. Framework Travel Plans. Energy Strategy. Measures outlined in Sustainability Statement.	None.
Population and Human Health	Pre-Construction	None.	Decanting Strategy – relocating existing residents and businesses during demolition and construction phases.
	Construction	None.	Construction Environmental Management Plan (CEMP).
	Operation	Retail and office floorspace. Community floorspace. Open Space.	Financial contributions for secondary education.
Air Quality	Pre-construction	None.	None.
	Construction	None.	A construction environmental management plan (CEMP) including all dust mitigation measures listed in Table 7.26 (to be reviewed on an ongoing basis) and a dust/ PM ₁₀ monitoring strategy.
	Operation	Provision of electric vehicle charge points or provision for charging points for all parking bays. Provision of secure cycle storage infrastructure. Implementation of travel plans. Provision of measures to support sustainable transport modes	None.

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
		including features to encourage sustainable transport methods.	
Biodiversity	Pre-construction	None.	Update PEA and bat scoping surveys for outline elements (phases 2-5), as part of RM panning submissions.
	Construction	Embedded landscape scheme to mitigate for loss of habitat.	Implementation of CEMP.
	Operation	Timing of works or ecological supervision to protect nesting birds.	Ecological Management Plan. Lighting Strategy.
Daylight, Sunlight and Overshadowing	Pre-construction	None.	None.
	Construction	None.	None.
	Operation		<p>Design Code commitments for reserved matters applications, as follows:</p> <p>Further inclusion of streets to minimise continuous obstructions;</p> <p>Introduction of gaps within the massing of each plot, such as between two blocks;</p> <p>Ensuring the gaps between blocks and streets are as wide as possible to allow an increase in sky visibility and where possible, locate these opposite neighbouring receptors;</p> <p>Orientation of blocks in relation to neighbouring receptors to minimise continuous obstructions;</p> <p>Where possible, position buildings within the Site away from boundaries with surrounding residential properties;</p> <p>Staggering of building heights;</p> <p>Incorporation of set-backs on the upper floors of taller elements; and</p> <p>Incorporation of chamfered edges of blocks both vertically and horizontally (where possible) to allow for additional daylight availability.</p>
Wind Microclimate	Pre-construction	None.	None.
	Construction	None.	None.
	Operation	None.	<p>Additional deciduous tree at north-east corner of building P2.</p> <p>Mesh between columns on the north elevation of the podium level terrace between buildings C1 and C2.</p> <p>Seating to be limited to suitable areas on podium level terraces on Block E and between Block C1 and C2.</p>

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
TVIA	Pre-construction	None.	Hoarding and tree protection.
	Construction	None.	Early landscape establishment, lighting control and movement and stockpiling of materials; direct and indirect impacts arising from the demolition and construction stage would be controlled through the implementation of a Construction Management and Construction Logistics Plan.
	Operation	Embedded design.	Landscape and Biodiversity Management Strategy and a programme of appropriate monitoring agreed with the regulatory authority.
Additional Recommended Measures			
<p>Population and Human Health Financial contributions for healthcare provision.</p> <p>Air Quality Inclusion of air quality mitigation measures and dust/ PM₁₀ monitoring strategy in the CMS (as an alternative to including in a CEMP).</p> <p>The LPA should enact a condition which requires for NRMM used at site with engines with a power rating between 37 and 560kW to meet the appropriate emissions standards based on their engine emissions stage (unless exempt) and that NRMM are registered at www.nrmm.london as they are onboarded to the scheme throughout the entire construction phase. This website also provides details on the applicable emissions standards.</p> <p>Any boilers installed at site should be natural gas fuelled, meet the 40mgNO_x/kWh emissions criteria referenced in the Sustainable Design and Construction Supplementary Planning Guidance and discharge vertically without a cowl designed in such a way as to impede dispersion/ vertical buoyancy.</p>			

Appendix B Final Review Report 001



Report for – Royal Borough of Kingston Upon Thames
Cambridge Road ES Review
Final Review Report FRR 001
Final



Document version control

Version	Date	Author	Reviewed by	Reviewed and approved by
1.0	14/04/2021	Various	██████████ ██████████	██████████

Report for: **Royal Borough of Kingston Upon Thames**

Main contributors: **Various**

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Contents

1.0	Introduction to the Review	1
2.0	Review of the Submitted Clarifications and Potential Regulation 25 Requests	2
3.0	Mitigation Measures	21

Appendices

Appendix A – Interim Review Report

1.0 Introduction to the Review

- 1.1.1 The Temple Team were commissioned by Royal Borough of Kingston Upon Thames (RBKT) to carry out an independent review of the Environmental Statement (ES) submitted in support of the planning application for the Cambridge Road development (planning application number: 20/02942/FUL). The output of the review was an Interim Review Report (IRR) (**Appendix A**) submitted to Cambridge Road Kingston Ltd 'the Applicant', dated 26th January 2021.
- 1.1.2 The Applicant has now submitted a response to the January 2021 IRR. This document (the FRR 001) consists of a review of that response. This is included within **Table 2.1** of this FRR.
- 1.1.3 Mitigation measures are relied upon in the ES to limit or remove any significant adverse environmental effects. It is the Council's responsibility to ensure that any required mitigation is secured. To assist with this, the Temple Team have identified the mitigation measures relied upon in the ES in **Table 3.1** - this includes both mitigation that forms part of the scheme for approval, and that needs to be secured e.g. via condition or planning obligation.

2.0 Review of the Submitted Clarifications and Potential Regulation 25 Requests

- 2.1.1 Each clarification request and potential Regulation 25 information request has been dealt with individually in **Table 2.1** and the Temple Team have stated whether the Applicant's response is deemed to be acceptable to close out the issue, or whether further clarification or information is required.
- 2.1.2 Any additional information submitted by the Applicant which is directly relevant to reaching a reasoned conclusion on the likely significant effects should be treated by RBKT as 'further information' and appropriately consulted on in accordance with Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Table 2.1: Assessment of the responses to the January 2021 IRR

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Review of Site and Scheme Information IRR Ref: 1	Clarification	An estimate of the quantity of construction materials and wastes should be provided.	The indicative volume of construction materials to be used within the Development has been confirmed by the Applicant as 198,650 m ³ . Approximately 82,000m ³ of construction waste will be produced.	Acceptable No further clarification required

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Review of ES Format, Presentation and Scope IRR Ref: 2	Clarification	The Applicant should clarify where in the ES a scenario other than the maximum parameters is considered the reasonable worst case scenario in this ES.	<p>The Applicant has confirmed that the net uplift in homes of 1,338 dwellings has been considered the worst case scenario for population and human health. The use of an uplift figure net of lost dwellings is agreed, however this is based on a maximum number of units. The potential for the outline component of the scheme to deliver fewer than the maximum parameter number of units has not been considered. This would lead to a lower uplift figure, which would be a worst case scenario for employment generation and for housing provision. The Applicant should clarify how this has been taken into account in the assessment. For example, the Applicant could confirm that the maximum number of units also represents a minimum number of units for this scheme (and any reduction in the number of units would be subject to later assessment) or qualitatively provide a sensitivity test for a reasonable smaller number of units and outline if whether there would be any changes to the conclusions or residual effect. This is particularly important for housing provision where a significant moderate beneficial effect is anticipated.</p> <p>Likewise, with regard to air quality. The height of the emission stack generally corresponds with the height of the building from stack protrudes. If the height of the proposed building is shorter than the maximum parameters applied for, residents could be exposed to a greater effect than assessed. The Applicant should comment on whether there is any potential for the distance between the emissions stack and the top floor of the adjacent building to be less than that modelled.</p>	<p>Unacceptable</p> <p>The Applicant should consider whether the maximum parameter also represents the worst case scenario for employment generation and housing provision.</p> <p>The Applicant should comment on whether there is any potential for the distance between the emissions stack and the top floor of the adjacent building to be less than modelled.</p>

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Review of ES Format, Presentation and Scope IRR Ref: 3	Clarification	The Applicant should clarify whether any of the cumulative effects presented in the ES would differ, were the Eden Campus scheme to be included in the cumulative assessment.	The Applicant has considered the potential for cumulative effects of the Eden Campus development on a topic-by-topic basis and concludes that there would be no additional cumulative effects. This is agreed.	Acceptable No further clarification required

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Population and Human Health IRR Ref: 4	Clarification	Clarification into why the Applicant has decided not to use the GLA's Population Calculator to estimate the Proposed Development's new population.	<p>The Applicant's response to this clarification is related to RBKT's Scoping Opinion and that that Scoping Opinion did not request the use of the GLA's Population Calculator to estimate Proposed Development's new population. In terms of approaches, the Applicant assumes that their population estimate approach is more robust than the GLA Population Calculator. However, despite the GLA's Population Calculator not providing forecast figures, it is important to note that the calculator considers the following within its methodology:</p> <ul style="list-style-type: none"> • "Identifying sites using the London Development Database to identify new developments built between 2001 and 2011. • Identifying new 2011 Census output areas that consist wholly or primarily of new development. • Using census data to identify housing characteristics and population yield. • Creating geographical aggregations of output area data. • Building a tool for estimating child yield from new development based on characteristics of the development."¹ <p>The methodology for GLA's Population Calculator is also a robust and industry standard approach to estimate additional population generated by new Proposed Developments. However, it is acknowledged that the Scoping Opinion did not require the Applicant to use the GLA's Population Calculator. Therefore, this justification provided by the Applicant is considered acceptable.</p>	Acceptable No further clarification required.

¹ GLA Intelligence, GLA Yield Calculator, September 2014 (updated in June 2019)

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Population and Human Health IRR Ref: 5	Clarification	Clarification into why the Applicant has defined the assessment area for the healthcare receptor as an arbitrary 3 km radius of the Site.	<p>The Applicant has stated that since 2015, people have a legal right to register with any General Practitioner (GP) of their choice to best suit their needs. Meaning that there is not a requirement for residents to register to a GP within a specific catchment area.</p> <p>The Applicant has considered GP practices within a 3km radius as the study area. The Applicant justifies this study area definition as it captures the GP branches that are 'linked' to the GP practices located within 1km of the Site. Therefore, it is acknowledged due to the linked GP surgeries being considered, that the study area for the healthcare receptor can be considered to be acceptable.</p> <p>It is agreed that the Applicant's justification is appropriate.</p>	<p>Acceptable No further clarification required.</p>
Population and Human Health IRR Ref: 6	Clarification	Further clarification to justify why the Applicant has not provided a robust assessment to include 'net' employment figures.	<p>Within Table 6.13 of the ES Chapter, the Applicant has not provided a robust approach to defining the 'net' operational employment figures which should include leakage, displacement, and multiplier additionality figures.</p> <p>It is acknowledged that the Applicant has deducted the Site's existing on-site uses from the Development's gross job estimate to generate an 'net' employment figure for the operational phase. However, a future recommendation is that the Applicant uses the Additionality Guide in calculating 'net' operational employment figures.</p> <p>It is understood that even if the Applicant used the Additionality approach, there was likely to be no change in the overall conclusion of the employment receptor. Therefore, no further justification is required from the Applicant.</p>	<p>Acceptable No further clarification required.</p>

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Population and Human Health IRR Ref: 7	Potential Regulation 25	Assessment of childcare / early children centre provision within the local impact area and no actual assessment of significance has been provided. This should either be included or a rationale for not including be provided.	<p>It is generally standard practice to consider the Proposed Development's impact on local childcare and early children centre provision. However, the Applicant has stated that effects on childcare/ early years provision were not scoped into the assessment and the Scoping Opinion did not request its inclusion.</p> <p>It is acknowledged that the Scoping Opinion did not require the Applicant to assess childcare provision. Therefore, this justification provided by the Applicant is considered acceptable.</p>	Acceptable No further clarification required.
Population and Human Health IRR Ref: 8	Potential Regulation 25	The Applicant should ensure that the assessment of housing provision considers the proportion of affordable housing provided by this scheme.	<p>The Applicant has stated that RBKT's Scoping Opinion does did not request the inclusion of an affordable housing assessment. Also, within the Chapter, the Applicant stated that <i>"the purpose of the EIA process is not to demonstrate policy compliance. The Planning Statement will consider the August 2020 proposed development's compliance against the RBKT's affordable housing"</i>.</p> <p>Nonetheless, it is expected that the Applicant should still reference information related to affordable housing included within the Planning Statement.</p> <p>It is understood that the Applicant addresses affordable housing through within its Planning Statement. It is agreed that a decision related to the affordable housing will be dependent on the analysis outlined within the Planning Statement. Therefore, the Applicant's response is considered acceptable.</p>	Acceptable No further clarification required.

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Population and Human Health IRR Ref: 9	Potential Regulation 25	Based on the Applicant's healthcare assessment, the assessor's opinion is that there should be an 'adverse' criterion for the healthcare receptor. Therefore, the Applicant should be liable to CIL or financial payments as a mitigation measure unless the Applicant provides further evidence to justify their original assessment conclusion.	<p>The Applicant believes that available GP practices' capacity should not be determined using the GP to patient ratio of all GP practices combined (i.e. those with and without capacity). It is agreed that since 2015, there is not a specific policy about GP catchment areas and people have a legal right to register with any GP of their choice.</p> <p>The Applicant needs to be aware that the healthcare receptor should consider all of the GPs within the Study Area. Largely, as GP surgeries that are oversubscribed are likely to indirectly affect other GPs that are under capacity. Therefore, it likely that there will be some adverse effects produced by the additional population on the healthcare receptor.</p> <p>As the Applicant has suggested that 6 out of the 17 surgeries are currently operating under capacity, which is acknowledged will be able to accommodate the Proposed Development's additional population. Furthermore, the Applicant has stated that when combining the surplus capacity across the six GP surgeries (that are currently under-capacity) there is capacity to accommodate a further 16,638 patients. This is significantly in excess of the additional demand created by the Development (3,225 places).</p> <p>The Applicant's justification is considered acceptable.</p>	Acceptable No further clarification required.
Air Quality IRR Ref: 10	Clarification	Regarding the construction phase traffic assessment, clarification is required on the number of additional vehicle movements attributable to construction personnel commuting to and from site would be generated.	The Applicant has stated that construction personnel in London typically do not use private vehicles for commuting and said, " <i>It is not envisaged that the site would accommodate construction traffic parking other than a limited staging and servicing area</i> ".	Acceptable No further clarification required.

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Air Quality IRR Ref: 11	Clarification	The Applicant should clarify why an assessment of the air quality effects of the combined construction traffic and operational traffic at a later phase of construction has not been assessed.	<p>The Applicant has said that:</p> <ul style="list-style-type: none"> a detailed construction schedule has not been produced; construction traffic did not meet the criteria for assessment. <p>This is not adequate for RKBT to be assured that combined construction and operational traffic will not be significant. The operational assessment has already shown moderate adverse impacts at multiple receptors. The combined impacts, even with low levels of construction traffic, has the potential to be greater.</p> <p>Table 5.3 provides an indicative number of HDV movements during construction. It is not stated whether this is expected to be an average or peak number of vehicles, nor when peak construction traffic would be expected, given overlapping construction phases. Table 5.3 shows 24 HDV trips, this is only just under the screening threshold of 25 trips. If this level of HDV traffic were expected during the construction of phases 4 and 5, the total number of HDVs from construction and operation (for example deliveries to retail and commercial space in Plot C (Phase 1) and Plots G and K (Phase 3)) would be greater than this screening threshold</p>	<p>Unacceptable</p> <p>The Applicant should clarify whether the combined total of construction and phased occupation HDVs would exceed the screening threshold at peak. If so, an assessment of the air quality effects of the combined construction and operational traffic should be provided.</p>
There was no IRR Ref 12 in the original IRR due to a formatting error.				
Air Quality IRR Ref: 13	Clarification	Clarification regarding whether the traffic data used in the operational phase dispersion modelling assessment are correct should be provided, and the assessment updated if required.	<p>The Applicant has stated that the air quality assessment assumes that forecast traffic accurately reflects the development traffic scenario.</p> <p>This does not address the concern raised in paragraph 5.1.6 of the IRR, about whether the transport assessment and air quality assessment data are consistent.</p>	<p>Unacceptable</p> <p>The Applicant should clarify whether the traffic data used in the operational-phase dispersion modelling assessment are correct.</p>

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Air Quality IRR Ref: 14	Clarification	Clarification is required regarding the height at which the diffusion tubes were modelled.	The Applicant has responded that they were modelled at heights specified in the Kingston upon Thames 2019 Air Quality Annual Status Report and provided these heights.	Acceptable No further clarification required.
Air Quality IRR Ref: 15	Clarification	The settings used within the NOx to NO2 calculator should be provided and where not applicable to London, may require adjustment (if settings used result in materially different predicted pollutant concentrations).	The Applicant has confirmed the settings for the scenarios. These are appropriate for local authority and traffic mix.	Acceptable No further clarification required.
Air Quality IRR Ref: 16	Clarification	Clarification regarding whether the automatic monitor was adjusted using the 'Diffusion tubes' tab on the NOx to NO2 calculator and why two kerbside diffusion tube sites were included in the verification should be provided. Where not technically justified, verification and adjustment should be updated.	The Applicant has confirmed that the 'diffusion tubes' tab was used. The Applicant has stated that the verification factor would be slightly more conservative with kerbside diffusion tube sites not included.	Acceptable No further clarification required.
Air Quality IRR Ref: 17	Clarification	Clarification is required regarding why NO2 concentrations predicted at DT24 were discarded. Where a technical justification is not plausible, this should be included.	The Applicant has said that DT24 is close to Cromwell Road Bus Station, with idling and queuing buses. This does not provide any context of the extent to which any results in the assessment may or may not represent locations with local elevated concentrations, such as close to the Bus Station or bus stops.	Unacceptable Whilst it is accepted that DT24 is close to Cromwell Road Bus Station, the applicant should consider the extent to which this result may be reliable. Further justification is required. The Applicant should consider if included how would this change the conclusions presented?
Air Quality IRR Ref: 18	Clarification	Clarification is required regarding what background concentrations were used to enable PM10/ PM2.5 verification.	The Applicant has provided clarification regarding background concentrations.	Acceptable No further clarification required.

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Air Quality IRR Ref: 19	Clarification	Clarification is required regarding which version of the Emissions Factor Toolkit (EFT) was used and which type of vehicles assumed.	The Applicant has confirmed that the EFT version 10.1 was used.	Acceptable No further clarification required.
Air Quality IRR Ref: 20	Clarification	Clarification that the input data are correct at the flue exit is required, as established in paragraphs 13 and 14 above. Modifications to the assessment may also be required, should any input data be incorrect.	The Applicant has confirmed that eight boilers were modelled, each with its own flue, and that volume flow rates and other data are correct.	Acceptable No further clarification required.
Air Quality IRR Ref: 21	Clarification	Clarification on the traffic input data used to complete the air quality neutral assessment should be provided.	<p>The Applicant has stated that traffic data were provided by the transport consultants.</p> <p>The Applicant has also provided updated air-quality-neutral calculations for building emissions, since an error in presented calculations had been found.</p> <p>The Applicant has not confirmed the traffic data used in the air-quality-neutral assessment, only the source.</p>	Unacceptable The Applicant should provide information on the traffic data used for the air-quality-neutral assessment, including the split between land-use classes, as discussed in 5.1.24 of the IRR.
Air Quality IRR Ref: 22	Potential Regulation 25	Calculation or prediction of impacts of scheme on 24-hour mean PM10 concentrations.	The Applicant has provided predictions for 24-hour-mean PM10. All impacts are negligible.	Acceptable This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action is required.

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Air Quality IRR Ref: 23	Potential Regulation 25	Prediction of impacts of scheme on NO ₂ concentrations (hourly and annual) at receptors proposed closest to flue.	<p>The Applicant has provided NO₂ contour plots at 38m and 35m AOD.</p> <p>How calculations have been undertaken and which results represent relevant exposure is unclear and confusing. In particular, buildings are different heights across the Proposed Development. Providing contour plots of predicted NO₂ at arbitrary heights is at best confusing and at worst misleading. In order to clarify the method used to derive NO₂ concentrations and the likely impacts at relevant receptors, the Applicant should provide the following:</p> <ul style="list-style-type: none"> • Background NO_x/NO₂ concentrations • Road contributions to NO_x/NO₂ • Energy emission contributions to NO_x/NO₂. <p>This should be presented for a range of receptor locations on the facades of buildings closest to the flues, from ground-floor to top-floor level. The vertical and horizontal resolution of receptors should be fine enough to establish that the greatest impacts from the flues have been picked up. All assumptions for conversion of NO_x to NO₂ and combining contributions from different sources should be stated explicitly.</p>	<p>Unacceptable</p> <p>The Applicant should present the impacts of the scheme (hourly and annual) at receptors proposed closest to the flues.</p>

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Air Quality IRR Ref: 24	Potential Regulation 25	The dust risk assessment should be updated as outlined in Paragraph 21.	<p>The Applicant has stated, “<i>It is noted that there may be more than 100 receptors within 20m of the site...</i>” and noted that the site has been classified as high-risk for construction-phase activities. Since the mitigation measures correspond to the highest level of mitigation, the Applicant considers that adjusting the risk assessment is superfluous.</p> <p>This is not considered best practice, as an assessment should accurately report the level of risk prior to mitigation. It would be helpful if the Applicant could provide updated relevant sections to the dust risk assessment. However, provided that mitigation measures appropriate for a high risk site are secured, no further action is required.</p>	<p>Acceptable This is not considered further information.</p> <p>RBKT should be aware that the number of receptors presented in the dust risk assessment underestimates the number of people exposed to a high dust risk.</p> <p>The mitigation measures for high dust risk provided in Table 7.26 of the EIA (according to the GLA guidance) must be included in the CEMP, which will be secured by condition.</p>
Biodiversity IRR Ref: 25	Clarification	Clarification on the methodology used to complete the calculations of Biodiversity Units, as appended to the Chapter in the BIA report. The applicant should confirm that the unit calculation aligns with the most up-to-date methodology for Biodiversity Net Gain, as updated by Natural England in 2019 (Metric 2.0 Beta Test).	The Applicant has confirmed that they have used the Metric 2.0 methodology. This will have included a consideration of connectivity. This is therefore considered acceptable.	<p>Acceptable No further clarification required.</p>

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Wind Microclimate IRR Ref: 26	Clarification To be considered a potential Regulation 25 request from this point forward.	Confirm the means by which the weather station data has been transposed to Site. Please also confirm if the wind roses presented are at the measurement station, if they have been transposed to open country, or if they have been transposed to Site.	It is essential that the wind statistics are transposed from the site of the weather station to the site of the Proposed Development. Without this step, the reported conditions will be incorrect. Given the significance of the accuracy of wind input data for wind microclimate studies, it is prudent to now ask for a full description of how this data is derived. This includes the periods for which the data was gathered, and details on how the data was analysed and checked for abnormalities. The presented wind roses look to be inconsistent with other similar studies, and the seasons presented do not appear self-consistent. New plots of comfort and safety will need to be provided once the wind roses have been transposed to site.	Unacceptable New plots of comfort and safety will need to be provided once the wind roses have been transposed to site. In light of the potential for the response to this request to change the reported effect significance for the assessment, this should be considered a potential Regulation 25 request from this point forward.
Wind Microclimate IRR Ref: 27	Clarification	Commentary on the use of the Lattice-Boltzmann solver and its comparability to other methods.	It is appreciated that the Applicant has provided some details regarding the verification of their chosen flow solver. Given that no analysis method is perfect, and that LBM is (relatively speaking) an emerging technology, a comment on the applicability (or relative strengths & weaknesses regarding the specific application) would be helpful here. Notwithstanding, this is considered acceptable.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 28	Clarification	Are gust speeds derived & used? If so, how are the gust speeds and gust equivalent mean (GEM) derived?	The Applicant's response states, " <i>The wind conditions derived from averaging the last 20% of the transient simulation</i> " This indicates that only the mean velocities are derived. Gust velocities represent the peak values of the transient velocity magnitude; they are greater than the mean values, and often drive safety exceedances. Without consideration of the gust velocities (via the industry standard Gust Equivalent Mean), the reported conditions cannot be relied upon, particularly with respect to safety.	Unacceptable Without consideration of the gust velocities (via the industry standard Gust Equivalent Mean), the reported conditions cannot be relied upon, particularly with respect to safety.

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Wind Microclimate IRR Ref: 29	Clarification	Has a surface roughness of 0.3 been applied to all wall boundaries?	The Applicant has confirmed that 0.3 is applied as upstream roughness value.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 30	Clarification	Contradictory statement in ES 10.65 – please clarify.	The Applicant has clarified the number of exceedances of the safety criteria.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 31	Clarification	Please confirm details of upstream profile of the ABL (both target and achieved).	It is accepted that the inlet velocity is pre-set to a standard value. It would be helpful to see a plot of this in the context of the Proposed Development, but more crucial is some evidence of what happens to that profile once it has entered the domain. The typical way to demonstrate this is to run an "empty tunnel", i.e. the same boundary conditions, but with no model present. The ABL profile is then plotted at various downstream stations and compared with the target inlet profile.	Unacceptable The Applicant should clarify inlet velocity in the context of the Proposed Development.
Wind Microclimate IRR Ref: 32	Clarification	Please present plots using consistent classifications within a single (& correct) derivative of the Lawson criteria.	It would still be preferable to plot results using a single set of comfort categories, but the Applicant has clarified the inconsistency in Table 13.1 – "sitting" is defined as being possible when the speed is 4ms-1 for <5% of the year.	Acceptable No further clarification required. Revisions to the assessment in light of IRR 26 (above) should present comfort and safety plots separately and ensure that a single Lawson comfort criteria is presented consistently throughout the plots.
Wind Microclimate IRR Ref: 33	Clarification	Please provide details of convergence criteria	An example of a time history showing the averaging period is required, as well as some description of how each time step is judged to have converged correctly is required.	Unacceptable The Applicant should provide further detail on convergence criteria, including a time history showing the averaging period.

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Wind Microclimate IRR Ref: 34	Clarification	What is the reference height for the wind speeds shown in the per-angle plots in appendix L?	The Applicant has confirmed that the reference wind speed is applied at a height of 10m.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 35	Clarification	Please explain why conditions for the baseline and scenario 2 appear to be calmer than would be expected for the scheme, and the level of confidence that you have in these results.	The Applicant has provided an acceptable response, but nonetheless the conditions reported are much calmer than seen on similar studies in the local area. This may be explained by some of the other requests for clarification in this review, such as IRR 26.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 36	Clarification	Confirm direction of key wind angles for significant wind effects. If it is not prevailing directions, some further explanation is required, including demonstration of the flow fields / streamlines.	Given the directionality of the prevailing wind, it is highly unusual for an exceedance of the safety criteria to be driven from a northerly direction in London. It would typically require a wind speed significantly greater than those arising from the south-west sector; the wind velocity plots do not seem to show such a variation. Please could the Applicant provide velocities per-angle for 2 (or more) points; one within the area noted to exceed the safety criteria, and another near the south-south-east corner of the proposed development.	Unacceptable Please could the Applicant provide velocities per-angle for 2 (or more) points; one within the area noted to exceed the safety criteria, and another near the south-south-east corner of the Proposed Development.
Wind Microclimate IRR Ref: 37	Clarification	Explanation of the origins of exceedances of safety criteria, and confirmation that the modelling is correct here.	The Applicant has referred to a previous answer - agreed that these can be considered as a single item.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 38	Clarification	Please provide justification for the apparent similarity between summer and winter conditions.	The similarity between seasons appears to be consistent with the presented wind roses, but as mentioned previously in IRR 26, there remains some doubt as to their validity - please see previous comment	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 39	Clarification	Contradictory statement in Appendix 10.1 Executive Summary - please clarify.	The Applicant has clarified.	Acceptable No further clarification required.

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
Wind Microclimate IRR Ref: 40	Clarification	Summer exceedance of safety shown in figure 21 – please confirm this is intentional.	In our opinion, it is extremely unlikely to have a single outlier of safety exceedance in summer, in an otherwise calm location. At a given point within the exceedance, velocities measured for each angle and their contributions to the safety exceedance would be suitable. Please also provide some images of the flowfield for the angle which is driving the safety exceedance.	Unacceptable Please can the Applicant provide some data to support a single outlier of safety exceedance in summer. Please also provide some images of the flowfield for the angle which is driving the safety exceedance.
Wind Microclimate IRR Ref: 41	Clarification	Please provide a figure to show the distribution of chosen activity around the scheme, and whether suitable conditions are achieved.	The Applicant has provided an access map which implies conditions are suitable for their designated activities, however it is not possible to tell from this map where open spaces are, some of which should target sitting conditions. From looking at Figure 34 of the Design and Access Statement it is clear that there is a large amount of public open space on this scheme and that this area would be suitable for standing and sitting conditions, with sufficient area having conditions suitable for sitting. This should be reconfirmed with the revised results in response to IRR 26.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 42	Clarification	Please provide justification for why the maximum parameter outline is considered to be the worst case scenario for wind conditions.	The Applicant has confirmed that this is at the request of the other stakeholders, and that the massing may be updated accordingly.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 43	Clarification	Please can the author provide more details of their methodology for assessing foliage in CFD.	The Applicant has provided details of the methodology for assessing foliage in the CFD Assessment. This is considered acceptable.	Acceptable No further clarification required.
Wind Microclimate IRR Ref: 44	Clarification	Please clarify how the retention of trees offsite, listed as a mitigation measure, would be secured.	It is standard practice to include existing landscaping, and it is accepted that the retention cannot be guaranteed. However, as the Applicant states, with safety conditions presented annually, this mitigation is not required to be secured as there are safe conditions at this location. This should be confirmed with the revised assessment in response to IRR 26.	Acceptable No further clarification required.

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
TVIA IRR Ref 45	Clarification	Clarification as to the reasoning for the geographic extent of likely significant effects for the study area.	The response states that the study area was established by a desk based ZTV analysis, field survey in liaison with RBKT and professional judgement. This is considered acceptable.	Acceptable No further clarification required.
TVIA IRR Ref 46	Clarification	Further clarification is required on why there are not anticipated to be any further cumulative effects.	The response states that, there would be little in the way of any relationship with the development due to the scale and location of the cumulative schemes. This is considered acceptable.	Acceptable No further clarification required.
TVIA IRR Ref 47	Potential Regulation 25	A narrative should be provided to enable the reader to fully understand the process involved in assigning a level to susceptibility and value and how they are combined to show the sensitivity of a receptor.	Appendix A.1 combined with Appendix A.2 and Section 11 of ES Volume 3 provides a sufficient description of the assessment narrative.	Acceptable This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action is required.
TVIA IRR Ref 48	Potential Regulation 25	Information should be provided that clearly demonstrates how the level of significance is decided upon from the combination of different levels of sensitivity and magnitude.	Appendices A.1 and A.2 together with the written descriptors provide a narrative which explains levels of significance based on professional judgement.	Acceptable This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action is required.
TVIA IRR Ref 49	Potential Regulation 25	Information should be provided to demonstrate consistency in deciding overall levels of significance.	It is agreed that the levels of significance fall within what could be considered as reasonable professional judgement using the methodology outlined in Appendix A.1.	Acceptable This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action is required.

Chapter (References)	Request Type	Initial IRR Comment / Request	FRR 001 Review Commentary and review conclusions.	Review Conclusions Responses Considered to be Acceptable (Green) or Unacceptable (Red)
TVIA IRR Ref 50	Potential Regulation 25	The summary of changes to the townscape and visual receptors and the residual impacts that would be experienced through the lifecycle of the project is not sufficiently reported within the NTS; where effects are summarised, they do not correspond with those in the TVIA document.	The updated NTS provides an account of the Proposed Development throughout the project lifecycle as requested.	Acceptable This is considered acceptable and does not constitute 'further information' under Regulation 25 of the EIA Regulations. No further action is required.

3.0 Mitigation Measures

3.1.1 Mitigation measures that have been updated in the FRR are highlighted in **bold** in the Table below. **Table 3.1** below provides a summary of mitigation measures proposed by the Applicant across all topics, both embedded and additional, identified in the ES.

3.1.2 RBKT should ensure they secure the delivery of these mitigation measures by means of an appropriate approval, obligation, agreement and or condition.

Table 3.1: Summary of Mitigation Measures

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
Topics scoped out of the ES	Pre-Construction	None.	Intrusive site investigation for land contamination. Ground gas monitoring. Remediation Strategy (if required) to be agreed with RBKT.
	Construction	None.	Best Practice Measures for noise and vibration mitigation during construction. Construction Traffic Management Plan.
	Operation	Drainage Strategy. Framework Travel Plans. Energy Strategy. Measures outlined in Sustainability Statement.	None.
Population and Human Health	Pre-Construction	None.	Decanting Strategy – relocating existing residents and businesses during demolition and construction phases.
	Construction	None.	Construction Environmental Management Plan (CEMP).
	Operation	Retail and office floorspace. Community floorspace. Open Space.	Financial contributions for secondary education.
Air Quality	Pre-construction	None.	None.
	Construction	None.	A construction environmental management plan (CEMP) including all dust mitigation measures listed in Table 7.26 (to be reviewed on an ongoing basis) and a dust/ PM ₁₀ monitoring strategy.
	Operation	Provision of electric vehicle charge points or provision for charging points for all parking bays. Provision of secure cycle storage infrastructure. Implementation of travel plans.	None.

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
		Provision of measures to support sustainable transport modes including features to encourage sustainable transport methods.	
Biodiversity	Pre-construction	None.	Update PEA and bat scoping surveys for outline elements (phases 2-5), as part of RM panning submissions.
	Construction	Embedded landscape scheme to mitigate for loss of habitat.	Implementation of CEMP.
	Operation	Timing of works or ecological supervision to protect nesting birds.	Ecological Management Plan. Lighting Strategy.
Daylight, Sunlight and Overshadowing	Pre-construction	None.	None.
	Construction	None.	None.
	Operation		<p>Design Code commitments for reserved matters applications, as follows:</p> <p>Further inclusion of streets to minimise continuous obstructions;</p> <p>Introduction of gaps within the massing of each plot, such as between two blocks;</p> <p>Ensuring the gaps between blocks and streets are as wide as possible to allow an increase in sky visibility and where possible, locate these opposite neighbouring receptors;</p> <p>Orientation of blocks in relation to neighbouring receptors to minimise continuous obstructions;</p> <p>Where possible, position buildings within the Site away from boundaries with surrounding residential properties;</p> <p>Staggering of building heights;</p> <p>Incorporation of set-backs on the upper floors of taller elements; and</p> <p>Incorporation of chamfered edges of blocks both vertically and horizontally (where possible) to allow for additional daylight availability.</p>
Wind Microclimate	Pre-construction	None.	None.
	Construction	None.	None.
	Operation	None.	<p>Additional deciduous tree at north-east corner of building P2.</p> <p>Mesh between columns on the north elevation of the podium level terrace between buildings C1 and C2.</p> <p>Seating to be limited to suitable areas on podium level terraces on Block E and between Block C1 and C2.</p>

Topic	Phase of Implementation	Embedded Mitigation Measure	Additional Mitigation Measure
			Retention of off-site planting to the north of Building P2.
TVIA	Pre-construction	None.	Hoarding and tree protection.
	Construction	None.	Early landscape establishment, lighting control and movement and stockpiling of materials; direct and indirect impacts arising from the demolition and construction stage would be controlled through the implementation of a Construction Management and Construction Logistics Plan.
	Operation	Embedded design.	Landscape and Biodiversity Management Strategy and a programme of appropriate monitoring agreed with the regulatory authority.
Additional Recommended Measures			
<p>Population and Human Health Financial contributions for healthcare provision.</p> <p>Air Quality Inclusion of air quality mitigation measures and dust/ PM₁₀ monitoring strategy in the CMS (as an alternative to including in a CEMP). The LPA should enact a condition which requires for NRMM used at site with engines with a power rating between 37 and 560kW to meet the appropriate emissions standards based on their engine emissions stage (unless exempt) and that NRMM are registered at www.nrmm.london as they are onboarded to the scheme throughout the entire construction phase. This website also provides details on the applicable emissions standards. Any boilers installed at site should be natural gas fuelled, meet the 40mgNO_x/kWh emissions criteria referenced in the Sustainable Design and Construction Supplementary Planning Guidance and discharge vertically without a cowl designed in such a way as to impede dispersion/ vertical buoyancy.</p>			



Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

20/02942/FUL Cambridge Road Estate

8 June 2021 at 08:45

To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>
Cc: [Redacted]

Hi Harsha,

Thank you for your email.

The impact on the bus services was reviewed and it was concluded that there is sufficient capacity on route 131 in this area to absorb the uplift in demand. There is also adequate capacity to accommodate the remainder who will use route K5 or any of the routes on the London Road corridor. Therefore, given these considerations, we won't seek a contribution for enhancing capacity on local bus services.

With regards to the impact on the surface rail services we are unable to comment on that as it is not part of our network.

Kind regards,

[Redacted signature]

[Redacted signature]

Assistant Planner | South Area Team | City Planning

E: v [Redacted email address]

9th Floor, 5 Endeavour Square, Stratford, London E20 1JN



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TfL Reference: KNGT/20/32
Your Reference: 20/02942/FUL

Harsha Bhundia
Kingston Planning

By e-mail

March 2021

Dear Harsha,

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

Cambridge Road Estate, Kingston – TfL’s Detailed Comments

Thank you for consulting TfL Spatial Planning.

Please note that these comments represent an officer level view from Transport for London and are consistent with the Mayor’s initial response to the application at Stage 1.

The new London Plan was adopted on the 2nd March 2021 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. TfL expects all current planning proposals to consider the policies set out within this document.

Following recent events, the applicant should consider the Streetspace for London plan, which sets out how to create more space on streets for walking, cycling and social distancing as the lockdown is lifted. This may be important before, during and after construction and as it is a changing situation, it should be consulted regularly.

Proposed Development

The outline scheme entails the redevelopment of Cambridge Road Estate to deliver a mixed-use development within 15 plots comprising of:

- 2,170 residential dwellings
- 290 sqm office
- 1,395 sqm flexible retail/commercial
- 1,250 sqm community floorspaces

The redevelopment will occur across 5 phases.

The detailed scheme (Phase 1) will provide 452 units of the residential units along with 395 sqm of the flexible retail/commercial floorspace, and all of the community and floorspaces within plots B, C and E.

Site Description

The site is bound by the A2043 Cambridge Road to the east, Kingston Cemetery and Crematorium to the south, Bonner Hill Road to the west and Hawks Road to the north. The site is approximately 1.2km from the A307 Wheatfield Way, which forms part of the Strategic Road Network (SRN).

The nearest train stations are Norbiton station, located north east of the application site, Kingston station located north west of the site and Berrylands station to the south. There are 10 bus routes within an acceptable walking distance. Based on TfL's Webcat toolkit the application site has a Public Transport Access Level (PTAL) of 1b, on a scale of 0 to 6b where 6b is the highest.

Healthy Streets

The proposed development will see an increase in pedestrian and cycling trips to/from the site and the local area and provides opportunities to reduce car dominance and promote sustainable and active travel due to its car-lite nature. The development also includes on-site public realm improvements and active frontages. The Go Cycle scheme is proposing a fully segregated cycle route along the A2043 between Kingston Town Centre and New Malden.

The proposals include a new crossing, with a raised table outside Plots K1 and K2 and Cambridge Gardens. The raised table is proposed to be constructed with different materials in order to enhance the public realm and assist in reducing vehicle speeds. It also improves the healthy streets indicator 'easy to cross' and should be secured through S106. The proposed layout of the estate will improve the permeability and connectivity for pedestrians and cyclists.

The proposals support Healthy Streets indicators in terms of promoting clean air, encouraging use of sustainable transport, reducing car dominance, and increasing pedestrian and cyclist safety.

Trip Generation

The trip generation was calculated using the TRICS database using both the private flats and affordable flats categories.

The completed development is expected to give rise to a net increase of 606 two-way person trips in the AM peak hour and 707 in the PM peak hour, which can be accommodated on the strategic public transport network.

It is welcomed that 86% of the net increase of trips associated with the development will be from active and sustainable modes. This will help meet targets of the new London Plan and Policy 1 of the Mayor's Transport Strategy to reduce Londoners' dependency on cars, with the central aim for all trips in London to be made on foot, by cycle or using public transport by 2041.

Car Parking and Access

The development is proposing a car lite scheme with a parking ratio of 0.4 spaces per dwelling, providing a total of 868 spaces which accords with the new London Plan. The applicant is proposing to provide 3% of all spaces as blue badge (BB) parking bays, in line with the new London Plan standards. Car parking will be provided through a mix of on-street, parking courts, podium parking and basement parking.

In accordance with the new London Plan, 20% of all spaces will be active Electric Vehicle Charing Points (EVCP), and 80% of all spaces will have passive EVCP.

In addition, residents will not be eligible for parking permits for the surrounding CPZ's or for any future CPZ's, which should be secured through an appropriate legal mechanism. Car club membership will be secured for 3 years for all new residents.

The Car Parking Management Plan accompanying the planning application should be secured by condition.

Cycle Parking

A total of 3,914 long-stay and 112 short-stay cycle parking spaces are proposed which is in line with new London Plan policy T5.

The proposed cycle parking provision for each land use is shown as follows:

Land Use	Masterplan	
	Long Stay	Short Stay
Residential (C3)	3,902	56
Office (B1)	4	1
Flexible Retail/Commercial	8	42
Community Use		13
Total	3,914	112

Lockers, changing rooms and shower facilities will be provided for the commercial units, which will help encourage and promote cycling.

Cycle parking should be located in secure, sheltered and accessible locations, and should meet design standards set out in Chapter 8 of the London Cycle Design Standards (LCDS) and this should be secured by condition.

Bus Infrastructure

In order to accommodate a new vehicular access to the site, the applicant is proposing changes to bus stop locations. TfL do not support or agree to the changes proposed. Further discussions and engagement are required with TfL to identify an acceptable solution. It should be noted that any costs associated with changes to bus infrastructure are required to be fully funded by the applicant.

Construction

An outline Construction Logistics Plan (CLP) has been submitted and it is understood that construction access to the site during Phase 1 will be from Hawks Rd to the south of the Hawks Rd /Cambridge Rd signalised junction.

A detailed Construction Logistics Plan (CLP) is to be produced prior to the beginning of construction. This should be secured by condition and be produced with regard to TfL's best practice guidance. TfL should be consulted on the final CLP.

Delivery and Servicing

The Outline Delivery and Servicing Plan (DSP) should be secured by condition and be produced with regard to TfL's best practice guidance.

Travel Plan

A Phase 1 Travel Plan (TP) has been provided. It is understood that the baseline modal split indicates that at least 73% of users will use a sustainable mode of transport. The targets will aim to increase the modal share for cycle by a minimum of 5% should be sought which is supported.

The Phase 1 TP should be secured, enforced, monitored and reviewed by the applicant as part of the s106.

Mayoral CIL

This development will be liable for the Mayor of London's CIL based on the recently revised (MCIL2) charging rates of £60 per square metre.

Summary

In summary, the proposed development is a car-lite scheme and will provide a total of 4,026 cycle parking spaces, which helps promote sustainable and active travel, in line with the Healthy Streets requirements set out in new London Plan policy T2. However, in order to be fully compliant with the Mayor's Transport Strategy and the new London Plan, further action required from the applicant is summarised below:

1. Further work is required to agree changes to bus infrastructure.
2. Any costs associated with changes to bus infrastructure are required to be fully funded by the applicant.
3. Car Parking Management Plan, Travel Plan, Construction Logistics Plan and Delivery and Servicing Plan should be secured by condition.

I hope you find these comments useful and trust you will consider them fully when determining the planning application. Please do not hesitate to contact me if you have any questions.

Yours sincerely,


TfL Spatial Planning

Email: v 



Consultation reminder re CRE scheme ref 20/02942/FUL

[REDACTED]@kingston.gov.uk
To: Harsha Bhundia <harsha.bhundia@kingston.gov.uk>

29 January 2021 at 16:14

Good afternoon Harsha,

As per the consultation request, I have reviewed the proposals for the above address and have the following comments to make:

Having spent some time studying the submitted Arboricultural Details and Masterplan, and following discussion with the developers which has led to significant alterations being made specifically for the purpose of retaining key trees, I am satisfied that the current submission has effectively minimised the loss of important Category A & B trees and particularly the mature London Planes which are so notable on site. They have achieved this while creating a scheme which in my opinion provides excellent amenity space with good site movement, continuity of design and an overall improvement and significant increase in tree cover which only adds to the overall design and will greatly complement the development as it ages, both to the benefit of residents and members of the public traversing its streets and parkland spaces.

I therefore agree with the following statements copied from within the Arboricultural method Statement, that the tree removals that are being proposed are acceptable in light of the overall gain and that the losses associated are more than mitigated by the proposed planting of new trees:

3.5.8. In support of the proposed tree removals, BS5837:2012 section 5.1.1 states: 'The constraints imposed by trees, both above and below ground should inform the site layout design, although it is recognised that the competing needs of development mean that trees are only one factor requiring consideration. Certain trees are of such importance and sensitivity as to be major constraints on development or to justify its substantial modification. However, care should be taken to avoid misplaced tree retention; attempts to retain too many or unsuitable trees on a site can result in excessive pressure on the trees during demolition or construction work, or postcompletion demands for their removal.'

3.5.9. It is therefore deemed acceptable to remove the listed trees and, as part of the detailed landscape design for the scheme, include suitable and sustainable replacements as and where appropriate.

3.5.10. Replacement trees will be proposed through landscape design and will more than mitigate for their removal by providing robust long term tree cover in keeping with the

proposals.

However, in agreement with 3.5.10 above, it is necessary that we seek such assurance of replanting and landscape detail through the submission of a detailed landscape and planting plan. Naturally these should be proposed in phases which match the phases of development where possible. It is by this vehicle that we will also be able to ensure that the trees being planted are of size and species that are suitable to sustain and increase biodiversity and amenity within the site and to provide instant impact upon installation. A detailed management and watering plan should also be provided demonstrating the upkeep of the scheme and in particular the method undertaken to care for and support the introduction of large specimen trees in order to prevent their failure within the landscape.

It is also worth drawing particular attention to the below section taken from the Arboricultural method Statement, as this will require the further submission of an updated Tree Protection Plan and Arboricultural Method Statement to reflect the installation of services in key locations.

3.10. Services

It is fundamental to tree protection that infrastructure design is sensitively approached, as trenching close to trees may damage roots and affect tree health and

stability. Details of services have not been provided at the time of writing. The Tree Protection Plan, showing the constraints posed by retained trees will be passed to the infrastructure engineers to inform their design, ensuring that all services avoid areas of potential conflict. As per BS5837:2012 Figure 1, once further details become available as part of the detailed/technical design for the site, the TPP and AMS will be revised to incorporate these details for services for inclusion in the Tender documentation.

Overall I now support this application and look forward to the above additional details being received as the development progresses.

If I can help any further with this please let me know.

Warm regards,



Tree & Landscape Officer for the ~
Royal Borough of Kingston upon Thames
Guildhall II,
High Street,
Kingston upon Thames,
KT1 1EU

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**CAMBRIDGE ROAD ESTATE, THE ROYAL
BOROUGH OF KINGSTON UPON
THAMES**

REVIEW OF APPLICANT'S FINANCIAL VIABILITY ASSESSMENT

Final Report

SUBMITTED ON BEHALF OF CLIENT:

ROYAL BOROUGH OF KINGSTON UPON THAMES
NOV 2021

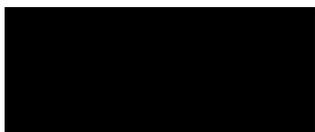
QUALITY STANDARDS

Carter Jonas has prepared this Financial Viability Assessment review report in accordance with the Royal Institution of Chartered Surveyors (RICS) Professional Statement 'Financial Viability in Planning: Conduct and Reporting' 1st Edition, May 2019.

The authors of the FVA review report are:



 Associate, MRICS



 Partner, MRICS

The version of the report is dated Nov 2021.

The authors, whilst undertaking the review of the FVA have acted:

- With objectivity;
- Impartially;
- Without interference; and
- With reference to all appropriate available sources of information.

Terms of Engagement

Carter Jonas has been instructed by The Royal Borough of Kingston Upon Thames to undertake a detailed review of the Financial Viability Assessment (FVA) of the subject planning application scheme to determine the most viable position in relation to the level of affordable housing, in accordance with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).

Carter Jonas confirms that it has no Conflicts of Interest in acting for The Royal Borough of Kingston Upon Thames in reviewing the FVA submitted by the Applicant.

In preparing the FVA review report Carter Jonas confirms that no performance related or contingent fees have been agreed.

Limitations

This report has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of Carter Jonas. We accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

CONTENTS

QUALITY STANDARDS.....2

1. EXECUTIVE SUMMARY4

2. INTRODUCTION.....9

 2.1. Background9

 2.2. The Planning Application.....9

3. METHODOLOGY15

 3.1. Approach15

4. CRITIQUE OF BENCHMARK LAND VALUE17

5. ASSESSMENT OF APPLICATION SCHEME INPUTS20

 5.1. Scheme Values20

 5.2. Scheme Costs30

6. MODELLING AND CONCLUSIONS40

7. UPDATED VIABILITY CONCLUSIONS (APRIL 21).....42

8. Viability Update (Revised Offer - Nov 2021).....50

1. EXECUTIVE SUMMARY

Carter Jonas has been appointed by The Royal Borough of Kingston Upon Thames (RBKT) as local planning authority to review the Financial Viability Assessment (FVA) prepared by U.L.L. Property (ULL) on behalf of the Applicant, Cambridge Road (RBK) LLP, in respect of a planning application at Cambridge Road Estate.

We understand that prior to the regeneration proposals commencing there were 832 properties on the Estate consisting of 653 social rent homes and 179 leasehold/freehold homes. At the point of submission of the hybrid outline planning application, 22 leaseholder/freeholder properties had been acquired by the Council as part of the land assembly process. The existing accommodation comprises a mixture of flats, maisonettes, houses and bungalows and includes 4 x 15 storey towers and a number of 5 storey decked access blocks. The proposed hybrid application seeks permission for demolition of the existing buildings and erection of 2,170 residential units, 290 sqm of flexible office floorspace, 1,395 sqm of flexible retail/commercial floorspace, 1,250 sqm of community floorspace, open space and associated access.

Detailed permission is sought for Phase 1 which comprises 452 residential units, 1,250 sqm of community floorspace, 290 sqm of flexible office floorspace and 395 sqm of flexible retail / commercial floorspace in addition to open space and associated access, servicing, parking and landscaping.

We understand that of the proposed 2,170 new units of which 767 will be Social Rent tenure and 100 Shared Equity tenure with the remaining 1,303 provided as private market sale. It has been indicated that the development will comprise 5 phases.

ULL has concluded that the project results in a deficit of £50,841,000 with the proposed scheme delivering a residual land value of £2,651,000 which has been compared to the assumed Benchmark Land Value of £53,492,000 but also reflecting £80,463,182 land assembly cost.

Despite the extent of the deficit, ULL have indicated that the Applicant is willing to proceed with the estate renewal programme in the knowledge that the scheme requires a high level of market performance to overcome the deficit which they hope will be driven by a strong regeneration factor as the project progresses.

Carter Jonas has reviewed the FVA, including both the Benchmark Land Value and the Residual Land Value of the proposed scheme. A summary of the outcome of our review are set out in the table below.

Revenue	Applicant Assumptions	Carter Jonas	Comments
Private Residential Sales Values	£650,349,297 (£701.77psf)	-	Agree
Social Rent	£70,420,823 (£125.44psf / £91,813 per unit)	See Comments	Query raised in respect of length of rent guarantee, current assumption is into perpetuity. If this is not the case, significant impact on value.

Social Rent Grant	£60,200,000	-	We assume grant is forthcoming at the level indicated.
Shared Equity	£26,869,946 (£308.40psf / £268,699 per unit)	See Comments	Value implications should intermediate owners opt not to take up a unit and these be converted to a more typical affordable tenure i.e. shared ownership. Also apply value to the unsold equity should be investigated further – up to 80% agreed on other ER projects CJ's have been involved in.
Shared Equity Grant	£2,644,000	-	We assume grant is forthcoming at the level indicated.
Commercial	£7,194,000 (£15psf @ 7%)	-	Agreed on the basis the values reflect the amount of community space (40%) proposed
Parking Revenue	£8,100,968 (£16,105 per space avg.)	-	A further breakdown regarding the car parking strategy is required.
Residential Ground Rents	Not included	-	Mirrored the Applicant's assumptions for the purpose of the base modelling but undertaken sensitivity analysis on the basis ground rents is included but risk adjusted.
Additional Revenue (GLA Loan)	£117,086,336	-	The Applicant should confirm the terms of the loan and how interest has been accounted for in respect of the loan.
Costs			
Total Construction Costs	£485,572,442	£481,516,916.88	Limited information has been provided and only relating to Phase 1 with the costs then applied to the subsequent phases. JA's review found the overall costs applied for P1 to generally be reasonable but identified a potential cost saving of circa 0.8%
Home Loss & Disturbance Payments	£4,090,500	-	Agreed
Contingency	N/A	N/A	Assumed to be include within the overall cost allowance but not separately stated.
Professional Fees	8% (£38,845,795)	8% (£38,845,795)	We would usually expect an all-in professional fees allowance ranging from 6%-8% for larger schemes of this nature. For the purpose of our initial modelling, we have adopted an all-in 8% professional fee allowance i.e. inclusive of £11.2m Council's costs indicated below.

Council Pre-planning Fees	£2,400,000	Included above	See comments above
Council Post-planning Fees	£8,799,000		
S106	£6,515,000	-	We have assumed this figure to be correct for the purpose of modelling but recommend this is reviewed and validated by the Council.
CIL	£15,601,643	-	We have assumed this figure to be correct for the purpose of modelling but recommend this is reviewed and validated by the Council.
Commercial Sales & Letting Fees <ul style="list-style-type: none"> Letting Agent Letting Legal Letting Marketing Sales Agent Sales Legal Purchaser Costs 	<ul style="list-style-type: none"> 10% 5% 1% 1% 0.25% 6.8% 	-	Agreed
Residential Sales Fees <ul style="list-style-type: none"> Marketing Sales Agent (Private) Sales Legal (Private) 	<ul style="list-style-type: none"> 1% 1.25% £750 per unit 	-	Agreed
Finance Cost	5.5% (£38,243,744)	-	Agreed as reasonable on the basis the project is led by the LLP, which is jointly funded by its members on a 50/50 basis between Countryside Properties and the Royal Borough of Kingston upon Thames.
Target Return (blended)	Private - 17.5% on GDV Commercial - 15% on GDV Affordable - 6% on GDV	See comments	For the purpose of our modelling we have removed the profit allowance which has been applied to the Grant in respect of the affordable housing.
Leaseholder & Freeholder Buybacks <ul style="list-style-type: none"> Dwellings Ely Court Bull & Bush 	<ul style="list-style-type: none"> £72,753,182 £5,210,000 £2,500,000 	-	Further justification / validation is required but cost assumptions have been mirrored for the purpose of our own modelling. Insufficient information has been provided to allow validation of the costs adopted.
GLA Loan Repayments	£117,086,336	-	The Applicant should confirm the terms of the loan and how interest has been accounted for in respect of the loan.
Benchmark Land Value	£53,492,000	See comments	We would concur with the approach adopted to value the existing flats but not the houses, which have been valued on a OMV basis. We understand that the houses, like the

			flats, are used as temporary housing or let as social rented units and therefore in our opinion and in the context of the overall objectives of the estate renewal projects should be valued on the same basis as the existing flats.
--	--	--	---

As can be seen in the above table, we are not in disagreement with most assumptions adopted by the Applicant / ULL in their assessment. However, there are also areas / inputs where further clarification is required. The approach we have adopted has been to mirror ULL’s inputs but if adequate justification is not forthcoming this could have a significant impact on the outputs and conclusions indicated below.

In terms of our initial analysis, we have made changes to the base appraisal as follows:

- Reflected an all-in professional fee allowance of 8% (including Council Costs)
- Reduction in base build cost of 0.8% applied across all phases
- Removal of developer’s profit from the affordable housing grant

The inputs requiring further justification / validation include: -

- Vacant possession costs – and how the documents provided relate to the VPC assumptions adopted.
- Construction cost – cost information relating to P1 only has been provided to date
- Justification as to why the value of the existing houses is based on OMV and not on current income / same basis as the existing flats
- Further details in respect of the terms of the GLA loan are to be provided
- Clarification in respect of the length of time the rent guarantee is in place for the proposed social rented units (possible impact on value)
- S106 and CIL costs to be kept under review as the review progresses

The outcome of our own modelling is set out in the table below.

Item	ULL	Carter Jonas
Applied Profit	15.25% (blended)	£14.79% (blended)
Benchmark Land Value	£53,492,000	£53,492,000*
Land Assembly Costs	£80,463,182	£80,463,182*
Residual Land Value	£2,651,633	£16,344,779
Project Deficit / Required Funding	-£50,841,000	£37,147,221

*subject to further validation

Through the adoption of our assumptions the table above illustrates a reduction in the project deficit from £50.84m to £37.15m at this stage but as indicated above there remain several assumptions which require further validation.

We have also undertaken sensitivity analysis around the inclusion of ground rents (risk adjusted) and stepped increases / decreases in private sales values and construction costs to illustrate the potential to reduce the project deficit further assuming positive market movements. The outcome of this analysis is detailed in Section 6.

2. INTRODUCTION

2.1. Background

Carter Jonas has been instructed by The Royal Borough of Kingston Upon Thames (as local planning authority) to undertake a viability review in respect of a proposed development at Cambridge Road Estate.

The Cambridge Road Estate is located to the east of the town centre of Kingston in the Royal Borough of Kingston Upon Thames. The estate was built in the 1960s and 1970s as a local authority housing complex comprising a mix of houses, maisonettes, decked access apartments and tower blocks. The estate comprises 854 residential dwellings including Ely Court (27 units owned by Clarion Housing) in addition to the Bull and Bush Hotel.

The site is located approximately 0.7 miles from Kingston town centre to the west and is a circa 10 minute walk to Norbiton Railway Station with services providing trains to London Waterloo. Kingston Station is a circa 15 minute walk which provides rail services to London Waterloo Station. By road, the site is within close proximity of the A3 trunk road which provides access to London and the south coast.

The Application relates to the comprehensive renewal of the Cambridge Road Estate including demolition of all existing buildings on-site to be replaced with 2,170 new homes of mixed tenure in addition to non-residential accommodation. The Hybrid Outline planning application for the scheme is for the phased demolition of the existing residential buildings comprising 854 residential units.

The detailed application (Phase 1), proposes 452 residential units of which 272 are private for sale and the remainder as affordable housing accommodation split between Social Rented units and Shared Equity units. In addition, Phase 1 will also provide 19,696 sq ft (NIA) of non-residential accommodation. The outline element includes Phases 2-5 which will provide the remaining residential units proposed and 13,875 sq ft NIA of further non-residential accommodation.

ULL has submitted a Financial Viability Assessment (FVA) on behalf of the Applicant, Cambridge Road (RBK) LLP, dated December 2020.

This report presents a summary of the planning application, the financial viability assessment and Carter Jonas' response to the FVA.

2.2. The Planning Application

The Applicant is seeking consent for a hybrid application for detailed planning consent for Phase 1 and outline planning consent for the rest of the site:

'Hybrid Planning Application for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works.

Detailed permission is sought for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works’.



The tables below provides a summary of the housing mix proposed within the detailed and outline parts of the application.

Private Units

Type	Number	Average (sq m)	Average (sq ft)
1 bed flat	558	51.03	549
2 bed flat	541	69.10	744
3 bed flat	158	88.62	954

3 bed maisonette	32	107.34	1,155
3 bed house	14	123.28	1,327
TOTAL	1,303		

Social Rent Units

Type	Number	Average (sq m)	Average (sq ft)
1 bed flat	298	51.59	555
2 bed flat	330	69.48	748
3 bed flat	77	84.44	909
3 bed maisonette	6	104.45	1,124
3 bed house	6	115.84	1,247
4 bed flat	3	106.16	1,143
4 bed maisonette	13	119.55	1,287
4 bed house	31	119.50	1,286
5 bed house	2	149.50	1,609
6 bed maisonette	1	157.18	1,692
TOTAL	767		

Shared Equity Units

Type	Number	Average (sq m)	Average (sq ft)
1 bed flat	20	50.90	548
2 bed flat	37	71.06	765
3 bed flat	12	94.12	1,1013
3 bed maisonette	22	103.51	1,114
3 bed house	9	115.69	1,245
TOTAL	100		

The planning application provides a total of 2,170 units which represents a net increase of 1,338 dwellings in total as well as an increase in non-residential uses.

The table below provides a summary of the proposed net additional units by affordable tenure.

Tenure		Units	Habitable Rooms	Sqm (GIA)
Social Rent	Existing	653	2,238	42,196
	Proposed	767	2,350	67,240
	Uplift	114	+112	25,044
Intermediate	Existing	0	0	0
	Proposed	100	365	10,551
	Uplift	100	+365	10,551
Private (incl. existing leaseholders)	Existing	179	807	14,322
	Proposed	1303	3,762	108,420
	Uplift	1,168	+2,955	94,098
TOTAL	Existing	832	3,045	56,518
	Proposed	2,170	6,477	186,211
	Uplift	1,338	+3,432	+129,693
Total Affordable Homes		867	2,715	77,791
Net Additional Affordable Homes		+214	+477	+35,595

In respect of the non-residential accommodation the proposals provide for 19,696 sq ft (NIA) (Phase 1) and 13,875 sq ft (NIA) (Phase 3) of commercial and community floor space to provide a range of uses. The Applicant proposes to deliver the scheme in 5 phases over an 11 year period. For ease of reference, we detail the residential content for each of the 5 phases in the tables below:

Phase 1

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	102	54	11	167
2 bed flat	137	43	5	185
3 bed flat	31	36	12	79
3 bed maisonette	2	4	2	8
3 bed house	0	0	0	0
4 bed flat	0	2	0	2
4 bed maisonette	0	4	0	4
4 bed house	0	4	0	4
5 bed house	0	2	0	2
6 bed maisonette	0	1	0	1
Total	272	150	30	452

Phase 2

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	130	27	0	157
2 bed flat	103	46	0	149
3 bed flat	36	7	0	43
3 bed maisonette	14	2	3	19
3 bed house	6	4	9	19

4 bed flat	0	0	0	0
4 bed maisonette	0	1	0	1
4 bed house	0	7	0	7
5 bed house	0	0	0	0
6 bed maisonette	0	0	0	0
Total	289	94	12	395

Phase 3

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	161	61	0	222
2 bed flat	162	77	0	239
3 bed flat	63	28	0	91
3 bed maisonette	8	0	0	8
3 bed house	0	2	0	2
4 bed flat	0	0	0	0
4 bed maisonette	0	2	0	2
4 bed house	0	0	0	0
5 bed house	0	0	0	0
6 bed maisonette	0	0	0	0
	394	170	0	564

Phase 4

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	84	75	9	168
2 bed flat	54	83	32	169
3 bed flat	0	0	0	0
3 bed maisonette	6	0	4	10
3 bed house	8	0	0	8
4 bed flat	0	0	0	0
4 bed maisonette	0	6	0	6
4 bed house	0	0	0	0
5 bed house	0	0	0	0
6 bed maisonette	0	0	0	0
Total	152	164	45	361

Phase 5

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	81	81	0	162
2 bed flat	85	81	0	166
3 bed flat	28	6	0	34
3 bed maisonette	2	0	13	15
3 bed house	0	0	0	0

4 bed flat	0	1	0	1
4 bed maisonette	0	0	0	0
4 bed house	0	20	0	20
5 bed house	0	0	0	0
6 bed maisonette	0	0	0	0
Total	196	189	13	398

The FVA puts forward an assessment based on a residual land value on the assumption of the replacement of the existing 653 social rented units and 179 leaseholder/freeholder units with the provision a total of 767 social rented units, 100 shared equity units and 1,303 private units.

The Shared Equity units do not meet the RB Kingstons or the GLA's affordability criteria and therefore would not be considered affordable housing. This being the case the affordable housing provision is therefore 35% by unit with the proposals increasing the overall number of Social rented units by 92.

The FVA concludes that assuming a Benchmark Land Value of £53,492,000 the scheme would result in a project deficit of £50,841,000. Despite the extent of this deficit, ULL has commented that the proposed scheme requires a high level of market performance to be driven by a strong 'regeneration factor' as the project progresses to assist with overcoming the projected deficit.

3. METHODOLOGY

3.1. Approach

Carter Jonas' review of the Applicant's FVA has had regard to the RICS Guidance Note "Financial Viability in Planning". We do not take issue with the overarching methodology used by the Applicant within their assessment. They have:

- Assessed the realisable value of the proposed scheme;
- Assessed the costs associated with delivering the scheme;
- Assessed a Benchmark Land Value
- Undertaken an appraisal to calculate the Residual Land Value which has been compared to their opinion of Benchmark Land Value to establish the reasonableness of the planning obligations being proposed.

ULL has used the Argus Developer appraisal programme to assess the viability of the developments. This is a commercially available, widely used software package for the purposes of financial viability assessments. The methodology underpinning viability appraisals is the residual method of valuation, commonly used for valuing development opportunities. Firstly, the gross value of the completed development is assessed and the total cost of the development is deducted from this.

The approach adopted by ULL has been to adopt a number of assumptions in relation to the proposed scheme to arrive at a residual land value. Of particular note is the value of the existing Council owned flats (£26,842,000) and 82 houses (£26,650,000) which make up the adopted BLV of £53,492,000 for modelling purposes. There are also the buyback costs for the 179 leaseholders and freeholders and Ely Court (Owned by Clarion Housing) and Bull & Bush Hotel which total £80,463,182 in addition to the home loss and disturbance payments included as a cost in the appraisal.

The proposals also assume a loan from the GLA of £117,086,336 which is assumed to be paid back during the lifetime of the project.

With this approach, if the residual land value for the proposed scheme falls below the Benchmark Land Value, then the scheme is deemed to be unviable and is therefore unlikely to come forward unless the level of affordable housing and/or planning obligations or additional funding is made available.

ULL has undertaken the Financial Viability Assessment (FVA) on behalf of the Applicant and has concluded that the project produces a deficit of £50,841,000. ULL has commented that the proposed scheme requires a high level of market performance to be driven by a strong 'regeneration factor' as the project progresses to assist with overcoming the projected deficit.

Given that the calculations are being made well in advance of commencement of the development, the figures used in the Applicant's appraisal can only be recognised as a projection. As such, it is essential that all assumptions are carefully scrutinised by RBKT to ensure that they reflect current market conditions and have not been unreasonably depressed in respect of the value or overestimated in respect of the development costs.

Carter Jonas' approach has been to critically examine all of the assumptions on which the ULL appraisal is based, including a critical assessment of the applicant's cost plan by our QS Johnson Associates. Our approach has then been to undertake sensitivity analysis where in our opinion inputs are not in line with current market conditions.

4. CRITIQUE OF BENCHMARK LAND VALUE

Determining an appropriate Benchmark Land Value is often the most important factor in determining viability. Put simply, if the value generated by the development does not exceed a reasonable assessment of the undeveloped value of the site, there is no financial incentive to bring forward the development with all its associated risk.

Arriving at an appropriate BLV is not a straightforward exercise and this is acknowledged at 3.4.6 of the RICS Guidance Note which states that:

The assessment of Site Value in these circumstances is not straightforward, but it will be, by definition, at a level at which a landowner would be willing to sell which is recognised by the NPPF.

In arriving at an appropriate BLV regard should be had to existing use value, alternative use value, market/transactional evidence (including the property itself if that has recently been subject to a disposal/acquisition), and all material considerations including planning policy. Existing Use Value is widely used in establishing Benchmark Land Value and is supported in the latest mayoral SPD and the NPPF PPG update.

However, due to the ownership of the site and its redevelopment through an estate renewal strategy there are additional considerations to be made.

The existing site comprises 854 residential units of which 675 are owned by the Council and used as temporary housing or let as social rented units. 179 of these units are owned by leaseholders/freeholders of which we understand the Council has acquired 22 as part of the land assembly leaving 157 remaining.

For the purposes of this exercise, ULL has included the value of the Council owned units within their assessment of the site's Benchmark Land Value. The land assembly costs for the leaseholder/freeholder buybacks, in addition to the home loss and disturbance payments have been included separately as a development cost within the appraisal.

The existing social rented and temporary housing units comprise the following:

Unit Number	Private Unit
1 bed 2 person flat	255
2 bed 4 person flat	145
2 bed 4 person maisonette	89
3 bed 5 person flat	1
3 bed 5 person maisonette	34
3 bed 6 person maisonette	1
3 bed 5 person duplex	68
1 bed 2 person bungalow	5
2 bed 4 person house	36
3 bed 5 person house	30
3 bed 6 person house	7
4 bed 6 person house	0

4 bed 7 person house	3
5 bed 9 person house	1
TOTAL	675

Under normal circumstances an EUV+ approach would be appropriate. This reflects the value of the land in its existing use and adds a premium to the landowner as an incentive to bring the land forward for development.

In the case of existing social housing, a property's value would be assessed using an Existing Use Value – Social Housing (EUV-SH) approach. ULL has valued the flats and houses separately adopting a discounted cash flow approach in respect of the flats and a comparable method in respect of the houses. We comment on each of these in turn below:

Existing Flats

In respect of the existing flats, ULL has modelled the existing units using a discounted cash flow adopting the current rents charged. We are informed that the annual rent is £2,988,896 in respect of the 593 flats which equates to an average rent of circa £5,040 per year and £420 per calendar month. ULL has adopted the following assumptions within the cashflow:

- 15-year life
- 30% operating expenditure
- 2% inflation
- 2% rental growth
- 4.5% discount rate

ULL arrive at an outturn capital value of £26,842,000 and no reversionary value is included at year 15. We have reviewed the cashflow model and do not take issue with the assumptions adopted and therefore concur with the value adopted for this element of the assessment.

Existing Houses

In respect of the 82 Council owned houses, these have been assumed as saleable on the open market with vacant possession. Limited evidence has been provided with the FVA including only 2 houses currently on the market on the estate with asking prices as follows:

- Cambridge Grove Road - 4 bedroom house - £385,000
- Burrill Road - 3 bedroom house - £450,000

Based on the above, ULL has adopted an average sale value of £325,000, which they indicate reflects the variable condition of the units. This has then been applied to the 82 units resulting in a total value for the houses of £26,650,000. Therefore, on this basis the existing houses have been valued at circa 14 times the value of the existing flats.

Firstly, it is our opinion that insufficient evidence has been provided to support the sales value being applied. As mentioned above only two transactions have been detailed and these relate to a 3 and 4 bed unit. In considering the average value of the houses further, detailed consideration should be had to the mix and size of the units and in this case, there are a number of smaller units which is likely to impact the average sales value being adopted.

With the above said we would also question the overall approach adopted by the Applicant in respect of establishing the value of this element of the BLV. We understand that the houses, like the flats, are also used as temporary housing or let as social rented units and therefore in our opinion, and in the context of the overall objectives of estate renewal projects, should be valued on the same basis as the existing flats. The approach adopted in respect of the houses does not reflect the existing situation or rental income currently being achieved from the 82 houses. This is also a point that has been highlighted by the GLAVT.

We have also reviewed the cashflow in respect of the timing of the payments and these have been apportioned accordingly across the phases rather than as an upfront cost, which is an approach we agree with.

5. ASSESSMENT OF APPLICATION SCHEME INPUTS

This section of the report presents the Applicant's appraisal inputs together with Carter Jonas's interrogation of these inputs and appropriate adjustments where applicable.

5.1. Scheme Values

5.1.1. Private Sales Values

We provide a summary of the ULL adopted average sales values on a per phase basis below:

Unit	Total Area	Average Area	No. Units	Average £psf	£/psf Range
Phase 1					
Phase 1 - 1 bed	56,299	552	102	£716	£697-£726
Phase 1 - 2 bed	100,307	732	137	£668	£652-£698
Phase 1 - 3 bed	32,121	973	33	£625	£585-£640
Total	188,727		272	£675	
Phase 2					
Phase 2 - 1 bed	71,415	572	130	£718	£702-£726
Phase 2 - 2 bed	77,058	748	103	£695	£652-£738
Phase 2 - 3 bed	47,111	1,002	47	£622	£566-£660
Phase 2 - 3 bed house	11,022	1,225	9	£646	£622-£656
Total	206,606		289	£684	
Phase 3					
Phase 3 - 1 bed	88,732	551	161	£740	£716-£750
Phase 3 - 2 bed	122,563	757	162	£720	£695-£781
Phase 3 - 3 bed	61,693	979	63	£653	£612-£670
Phase 3 - 3 bed maisonette	5,124	1,281	4	£588	£588
Phase 3 - 3 bed house	4,652	1,163	4	£660	£660
Total	282,764		394	£708	
Phase 4					
Phase 4 - 1 bed	46,913	558	84	£749	£737-£760
Phase 4 - 2 bed	39,862	738	54	£754	£743-£771
Phase 4 - 3 bed maisonette	9,457	1,182	8	£600	£573-£643
Phase 4 - 3 bed house	8,496	1,416	6	£523	£523
Total	104,728		152	£719	
Phase 5					
Phase 5 - 1 bed	45,554	562	81	£762	£727-£783

Phase 5 - 2 bed	66,665	784	85	£744	£736-£818
Phase 5 - 3 bed	29,462	1,052	28	£687	£606-£701
Phase 5 - 3 bed maisonette	2,218	1,109	2	£692	£692
Total	143,899		196	£737	
TOTAL					
	926,724			£702	

ULL has identified a number of new build schemes reported in both May 2020 and updated in November 2020 to inform their applied values. We have sought to verify their evidence and identify our own in order to assess the values adopted.

5.1.2. National Housing Overview

UK house prices increased by 7.6% in the year to November 2020. On a non-seasonally adjusted basis, average house prices in the UK increased by 1.2% between October 2020 and November 2020, compared with a fall of 0.4% during the same period a year earlier (October 2019 and November 2019).

The RICS November 2020 Residential Market Survey shows prices continuing to rise sharply across most parts of the UK although near term expectations for both prices and transactions point to a more moderate picture over the coming months. House price growth was strongest in Yorkshire and The Humber and London where prices increased by 8.7% in the year to November. The lowest annual growth was in the East of England where prices increased by 4.8% in the same period.

The Bank of England reported that following several months of buoyant activity, there was a modest slowdown in November which was largely due to the Covid-19 restrictions in various parts of the UK. However, demand was stated to be supported by buyers waiting to complete house purchase transactions before the temporary cur in stamp duty ends in March 2021.

Interestingly, The UK Property Transactions Statistics showed that in November 2020, on a seasonally adjusted basis, the estimated number of transactions of residential property with a value of £40,000 or greater was 115,190. This is 19.13% higher than a year ago and between October and November 2020, UK transactions increased by 8.6% on a seasonally adjusted basis.

House price figures for January saw prices fall slightly according to Nationwide, indicating an annual change of 6.4% after a monthly drop of -0.3%. This follows figures for December with Nationwide's reporting an annual price increase of 7.3% and on a monthly basis, marginal growth of 0.9% following a 0.9% increase the previous month. Nationwide report an average UK house price of £229,748. Robert Gardiner, Nationwide's Chief Economist said;

“January saw the annual rate of house price growth slow modestly to 6.4%, from 7.3% in December. House prices fell by 0.3% month-on-month, after taking account of seasonal effects – the first monthly

decline since June. To a large extent, the slowdown probably reflects a tapering of demand ahead of the end of the stamp duty holiday, which prompted many people considering a house move to bring forward their purchase. While the stamp duty holiday is not due to expire until the end of March, activity would be expected to weaken well before that, given that the purchase process typically takes several months (note that our house price index is based on data at the mortgage approval stage). The typical relationship between the housing market and broader economic trends has broken down over the past nine months. This is because many peoples' housing needs have changed as a direct result of the pandemic, with many opting to move to less densely populated locations or property types, despite the sharp economic slowdown and the uncertain outlook. Indeed, the total number of mortgages approved for house purchases in 2020 actually exceeded the number approved in 2019, and house price growth ended 2020 at a six-year high, even though the economy was probably around 10% smaller than at the start of 2020, with the unemployment rate around a percentage point higher."

Meanwhile, data from Halifax's house price index for January 2021 shows growth of 5.4% over the last year. In the last quarter, house prices were 1.6% higher than in the preceding three months with an average house price of £251,968. The Halifax Managing Director stated the following;

"The average UK house price slipped by -0.3% in January, the biggest monthly fall since April last year. Whilst this pushed the typical property value down to its lowest level since October, at just under £252,000, prices are around £13,000 higher than a year ago. There are some early signs that the upturn in the housing market could be running out of steam, with the annual rate of house price inflation cooling to its lowest level since August. Industry figures for agreed sales remain well above pre-pandemic levels but new instructions to sell have decreased noticeably, and total stock held by estate agents has risen to its highest level since before the EU referendum in 2016. The stamp duty holiday has undoubtedly helped to fuel growing demand amongst households for larger properties. However, given the current time to completion across the market, transactions in the early part of 2021 probably don't include many borrowers who expect to benefit from the stamp duty reprieve. How far and how deep any slowdown proves to be is a challenge to predict given the prevailing uncertainty created by the pandemic. With swathes of the economy still shuttered, and joblessness continuing to edge higher, on the surface this points to slower market activity and downward price pressures in the near-term. That said, we saw the power of homeowners to drive the market in the second half of last year as many people looked to find new properties with greater space, spurred on by increased time spent at home. Such structural demand changes, coupled with any further policy interventions by government, could yet sustain underlying market activity for some time to come."

5.1.3. Local Market Commentary

Kingston Upon Thames has an average price of £506,339 after annual growth of 3.2% according to information from the Land Registry as of November 2020. Generally, residential developer activity in Kingston is strong with there being increasing competition for sites. Developers continue to see good prospects for both commercial and residential development given the good transport links and connectivity to central London via rail links.

5.1.4. Analysis - Comparable Evidence

As mentioned above, included within the ULL report is evidence of local residential schemes in the surrounding area in addition to a number of sales located in the immediate area. The schemes highlighted are:

- Villiers Point (Dairy Crest Depot)
- The Harriers, Beaufort Road
- Royal Exchange
- One New Malden, 1 Blagdon Road

Villiers Point - a development of 49 units, of which 39 are designated as private tenure, by Congress Real Estate situated circa 0.7 miles to the south of the estate. ULL reports asking prices ranging from £656-£755psf with sales ranging from 1 bed flats to 4 bedroom houses. As at January 2021, we understand that 24 units have sold leaving 15 remaining, and we detail a number of these below:

Unit Type	Area (sq ft)	Asking Price	£/psf
1 bed flat	542	£399,950	£738
3 bed town house	1,110	£860,000	£775
3 bed town house	1,364	£999,950	£733
3 bed town house + private garage	1,505	£1,125,000	£748
4 bed semi	1,523	£1,150,000	£755

The Harriers - is a James Taylor development of 89 new homes of which 19 are houses and 80 are flats. ULL report asking prices ranging from £535-£788psf with an average of £699psf. The site fronts Beaufort Road and Fassett Road and is located approximately 0.9 miles to the south west of the estate. The sales website reports the following asking prices:

- Studio apartments - £335,000
- 1 bed apartments - £416,150
- 2 bed apartments - £560,000
- 3 bed apartments - £710,500

We detail a number of the most recent available asking prices below:

Plot	Floor	Beds	Area (sq ft)	Asking Price	£/psf	Date
C-07	G	1	438	£345,100	£788	Dec 2020
C-20	2	3	1123	£720,650	£642	Dec 2020
C-39	4	3	1565	£837,375	£535	Dec 2020
C-42	4	3	1451	£812,000	£560	Dec 2020
C-1	G	2	973	£609,000	£626	Sept 2020
C-2	G	2	973	£609,000	£626	Sept 2020

C-29	3	3	1125	£730,000	£649	Sept 2020
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Royal Exchange - situated circa 0.7 miles to the west between Ashdown Road, Brook Street and Eden Street, the St George scheme comprises 320 flats of which 267 are private. The development rises to 16 storeys and will provide river views and beyond Hampton Court Park which is reflected in the ULL reported average asking price of £632psf. Construction is progressing and completions will be phased from the middle of 2022 through to the end of 2023. To date, three blocks have been released, although the Rutherford block of 49 units was briefly released and then taken off the market in Q1 2020. 67 of 84 units in the Richardson block have been sold and 50 units have sold in the Wakefield block from a total of 73. The price list shows 1 bed units at £565,000 and 2 bed units at £746,500 with an average of £890psf according to Molior. We detail the most recent of these in the table below:

Plot	Floor	Beds	Area (sq ft)	Asking Price	£/psf	Date
143	6	1	633	£585,000	£924	Dec 2020
233	2	2	960	£819,000	£853	Dec 2020
272	4	2	921	£830,000	£901	Dec 2020
291	6	2	793	£746,500	£941	Dec 2020
305	8	2	1060	£894,000	£843	Dec 2020
226	1	2	1060	£808,000	£762	Sept 2020

One New Malden - is a Vision Homes development situated approximately 1.9 miles to the south east of the estate and comprises 93 apartments, part of which are new build and part conversion. ULL report asking prices of £632psf. Molior reports as at 22nd December 2020, that 4 units remain unsold at the end of Q4 2020 with the price list showing 2 beds at £525,000 (802 sq ft) and £550,000 (818 sq ft) and a 3 bed at £775,000 (1,257 sq ft).

ULL has also highlighted a number of nearby sales which we include below for reference:

- 2 bed flat, corner of Gloucester and Cambridge Road, asking £285,000, first floor, 2 bathrooms and balcony, circa 10-15 years old with allocated parking measuring 659 sq ft. Asking price equates to £432psf.
- 2 bed flat, corner of Hawks Road and Cambridge Road, 602 sq ft with 2 bathrooms and allocated car parking. Asking price of £345,000 equates to £573psf.
- 3 bed terraced house, 1066 sq ft on Burritt Road with an asking price of £455,000 equating to £422psf. The house is on the Cambridge Road Estate, has a garage and has been subject to interior refurbishment.
- 3 bedroom house on the estate at Willingham Way is for sale at £335,000 and measures 1,073 sq ft which equates to £312psf.
- 1 bed flat at Remenham Court, Carlisle Close sold for £330,000 in January 2021 equating to £628psf.
- 3 bedroom terraced house at 43 Chatham Road measuring 1,220 sq ft sold in June 2020 for £730,000 equating to £598psf.

As indicated above the FVA adopts values ranging from £675psf to £737psf and having reviewed the comparables provided and undertaken our research we believe the private sales values adopted represent a fair reflection of the current market reflecting the characteristics of the development and the development mix proposed.

However, given the extent of the deficit indicated we have also undertaken sensitivity assuming a stepped increase in the private residential values to illustrate how with improved market conditions the deficit maybe overcome during the lifetime of the development.

5.1.5. Ground Rents

On 21st December 2017 the Communities Secretary announced a Government proposal to introduce legislation to ensure that ground rents on new long leases of flats and houses are set at zero. Whilst the legislation has yet to be passed, we gather that the proposal has all-Party support although there is no timetable for the proposed legislation as yet.

In their report, ULL state that based on the Government’s position to introduce this legislation they consider it reasonable to assume no ground rent sales within their appraisal. This is common in development appraisals, particularly for larger developments which are expected to be completed after the legislation is likely to have been introduced.

However, we are aware that the GLAVT’s view is that until legislation has passed, the value associated with ground rents should be included. As such we have undertaken sensitivity analysis reflecting the inclusion of ground rents at an average of £500pa but applied a yield of 10% to reflect the current uncertainty of this income.

Affordable Housing

The adopted Development Plan for Royal Borough of Kingston upon Thames comprises the following suite of documents: The London Plan (2016), Royal Borough of Kingston upon Thames Core Strategy (2012), Kingston Town Centre Area Action Plan (2008). The Affordable Housing SPD (2013) is an additional document of particular relevance.

The proposed redevelopment of CRE will provide 767 social rented units and 100 shared equity units. The Shared Equity units do not meet RB Kingstons or the GLA’s affordability criteria as a such the affordable housing provision equates to 35% across the 5 phases as illustrated in the table below:

Social Rent Units

Type	Number	Average (sq m)	Average (sq ft)
1 bed flat	298	51.59	555
2 bed flat	330	69.48	748
3 bed flat	77	84.44	909

3 bed maisonette	6	104.45	1,124
3 bed house	6	115.84	1,247
4 bed flat	3	106.16	1,143
4 bed maisonette	13	119.55	1,287
4 bed house	31	119.50	1,286
5 bed house	2	149.50	1,609
6 bed maisonette	1	157.18	1,692
TOTAL	767		

Shared Equity Units

Type	Number	Average (sq m)	Average (sq ft)
1 bed flat	20	50.90	548
2 bed flat	37	71.06	765
3 bed flat	12	94.12	1,1013
3 bed maisonette	22	103.51	1,114
3 bed house	9	115.69	1,245
TOTAL	100		

It is proposed that the scheme replaces all the existing 854 residential units of which 675 are owned by the Council and used as temporary housing or let as social rented units. The table below provides a summary of the proposed uplift in affordable housing units by tenure.

Tenure		Units	Habitable Rooms	Sqm (GIA)
Social Rent	Existing	653	2,238	42,196
	Proposed	767	2,350	67,240
	Uplift	114	+112	25,044
Intermediate	Existing	0	0	0
	Proposed	100	365	10,551
	Uplift	100	+365	10,551
Private (incl. existing leaseholders)	Existing	179	807	14,322
	Proposed	1303	3,762	108,420
	Uplift	1,168	+2,955	94,098
TOTAL	Existing	832	3,045	56,518
	Proposed	2,170	6,477	186,211
	Uplift	1,338	+3,432	+129,693
Total Affordable Homes		867	2,715	77,791
Net Additional Affordable Homes		+214	+477	+35,595

Of the total proposed units of 2,170, 35% are proposed as Social Rented tenure with a further 100 units proposed as Shared Equity.

We detail the phase-by-phase GDV for the social rented units below in addition to the grant funding in the form of the Housing Zone Grant and Building Council Homes Grant.

Phase	Total Area	ULL GDV	Actual GDV Paid	Grant	Total (rounded)
1	115,635	£13,374,447	£14,625,546	£15,000,000	£29,625,546
2	72,830	£8,419,150	£8,805,866	£4,700,000	£13,505,866
3	119,538	£14,448,421	£15,573,549	£8,500,000	£24,073,549
4	112,075	£13,615,581	£14,244,367	£13,100,000	£27,344,367
5	141,317	£16,563,909	£17,171,495	£18,900,000	£36,071,495
Total	561,395	£66,421,508	£70,420,823	£60,200,000	£130,620,823

It is worth noting that the area information detailed above is taken from the argus appraisal and differs slightly from the areas provided in the ULL report. The actual price being paid by the Council is £130,621,000 of which grant makes up £60,200,000. Therefore, the average capital value rate for the social rented units equates to £233psf with grant funding and £125psf excluding grant funding. ULL have undertaken their own modelling and concluded that the value of the social rented would be £118psf without grant and a total of £126,621,508 with grant. Therefore, given that the Council offer is £3,999,315 in advance of ULL's own calculations they consider the value adopted for the social rented units to be reasonable.

Carter Jonas' Affordable Housing Team has reviewed the value assumptions and run their own ProVal appraisal, which arrives at a capital value of £127psf for the 767 social rented units, which is marginally above ULL's modelling but within a reasonable tolerance of the value the Council has agreed to acquire the units for.

However, it is important to highlight the approach adopted in respect of the rents which have been promised to the existing tenants and for valuation purposes, assumed into perpetuity. It is not uncommon that there would be either a rent guarantee for set period but on expiry fall away (in the past these guarantees have often been for 10 years for instance) or fall away when they move or pass away etc, at which point a new tenancy will commence based on higher social rents which are capable of being charged at that point in time.

Our affordable housing team have therefore run a second model based on normal social rents which produces a much higher capital value of £195psf for the 767 social rented units (excluding grant), which would equate to approximately £109.55m.

Given the above, clarification should be sought to the extent / length of time of the rent guarantee for rehoused tenants.

We understand the 100 shared equity units are being provided for the existing leaseholders and freeholders on the estate and the equity ascribed to the purchaser is equivalent to the value of the home they currently own.

ULL has stated that it is not known which current owners will opt to acquire a share of homes on the estate and their assumptions in relation to this element of the development are necessarily broad at this stage.

Of course, we concur that it is difficult at this stage to predict the take up for the shared equity units but the Council should seek clarification of the strategy should flat owners seek to be bought out rather than opt for taking a shared equity unit i.e. is the intention that the units in question would then be converted to market tenure units or become a recognised affordable tenure?

For the purpose of their modelling ULL has assumed a 50% share sold with the remaining equity not included. Grant has also been obtained in respect of these units in the form of Housing Zone Grant and Building Council Homes Grant and included in the below table spread across each phase.

As before ULL has provided their opinion of value which is lower than the actual GDV assumed in the appraisal and being paid by the Council.

Phase	Total Area	ULL GDV	Actual GDV Paid	Grant	Total (rounded)
1	24,294	£7,288,000	£7,817,000	£750,000	£8,567,000
2	14,553	£4,367,000	£4,055,624	£300,000	£4,355,624
3	Nil	£0	£0	£0	£0
4	33,803	£10,142,000	£10,779,118	£1,230,000	£12,009,118
5	14,478	£4,344,000	£4,218,204	£364,000	£4,582,204
Total	87,128	£26,141,000	£26,869,946	£2,644,000	£29,513,946

The actual price being paid by the Council is £29,513,946 of which Grant makes up £2,644,000. Therefore, the average capital value rate for the shared equity units equates to £339psf with Grant funding and £308psf without grant funding. Similarly, to the social rented units ULL have undertaken their own modelling and consider the value of the shared equity units to be £300psf without grant and a total of £28,785,000 with grant. Therefore, the Council offer is £728,946 higher than the ULL values so deemed to be reasonable.

Based on the assumption that a 50% share of the equity is sold, we are in agreement with the values adopted. However, we would highlight that no value has been attributed to the residual value of the shared equity units which will be owned by the freeholder and this is a point also highlighted by the GLAVT.

ULL have responded specifically on this point saying “that the majority (63%) of these units are 3-bedroom units and 40% are houses. In the new scheme only 43% are 3-beds and only 8% are houses. Therefore, it is not possible that all the cash paid to leaseholders will come back into the scheme as purchases of shared equity units. While it is possible that more equity will be acquired in the new shared equity units, it is equally possible there will be less than 50% acquired (as currently modelled), and as the GLA states the assumptions are necessarily broad.”

This is a point that is difficult to address at this stage because there are many unknowns. In the context of the overall scheme deficit, sensitivity analysis should be undertaken to illustrate the impact of adopting a more optimistic assumption. On other estate renewal projects, we are aware of shared equity units being valued up to 80% on OMV's.

5.1.6. Grant Funding

As indicated above the project is supported by Grant funding which has been obtained in the form of Housing Zone Grant and Building Council Homes Grant.

In respect of the Social Rented units in the following sums per phase have been modelled:

Phase 1 – £15,000,000

Phase 2 - £4,700,000

Phase 3 - £8,500,000

Phase 4 - £13,100,000

Phase 5 - £18,900,000

Total – £62,000,000

Grant funding has also been assumed for the Shared Equity units, which has been apportioned amongst the phases as follows:

Phase 1 – £750,000

Phase 2 - £300,000

Phase 3 – No Shared Equity in this Phase

Phase 4 - £1,230,000

Phase 5 - £364,000

Total - £2,644,000

We have not been provided with any documentation regarding the availability of Grant but we assume it to be forthcoming at the level indicated.

5.1.7. Commercial Values

In addition to the residential content the proposed scheme will provide 33,571 sq ft of non-residential accommodation over a mix of uses, much of which will be community uses. Phase 1 will provide 19,696 sq ft (NIA) and the remaining 13,875 sq ft (NIA) will be situated within Phase 3.

ULL has stated that it is expected that community uses will make up circa 40% of the overall non-residential accommodation with the remainder provided as a mixture of office and retail floorspace. ULL has provided the following evidence to inform their value assumptions in respect of this which we detail below:

23-25 Cambridge Road - ground floor retail unit of 1,063 sq ft let in September 2019 for a rent of £20,000 per annum equating to £18.81psf.

46 Fairfield South - a basement and ground floor unit of 1,097 sq ft was let in October 2019 for £20,000 which equates to a rate of £18.23psf.

ULL has commented that after a review of rents for premises in the range of 1,000 - 10,000 sq ft, where leases have been signed in the past 2 years, the evidence indicates rents in the region of £20psf.

Given that a significant proportion of the proposed space at the new development will be community uses, ULL has considered a blended rent of £15psf across the space to be reasonable. ULL has applied an all risks yield of 7% to reflect the nature of businesses likely to occupy these premises.

Based on the high content of proposed community use we do not believe the values adopted to be unreasonable.

In overall terms the value attributed to the non-residential element equates to £7,193,786, which represents less than 1% of the overall gross development value of the scheme.

5.1.8. Parking Spaces

The FVA is silent on car parking but the appraisal includes 503 spaces. It is unclear why the sales value per space varies between phases but the overall parking GDV totals £8,100,968, which equates to £16,105 per space. Clarification should be provided as to how car parking values have been calculated. The average value per space is within the typical range within Kingston. For the purpose of our modelling, we have also adopted this figure within the appraisal.

5.1.9. Additional Revenue

Please see 5.2.7 - Revenue and cost allowances for GLA Loan Repayments of £117,086,336 have been included within the appraisal.

5.2. Scheme Costs

5.2.1. Build Costs

Build costs of c£485.5m have been adopted in the FVA and apportioned between the phases as indicated in the table below:

Phase	Sq ft	Build rate £psf	Cost £ (million)

1	474,611	£237.31	£112,631,783
2	375,023	£232.82	£87,312,281
3	540,108	£231.15	£124,848,533
4	321,171	£230.44	£74,009,466
5	382,680	£226.74	£86,770,379
Total	2,093,593		£485,572,442

A summary cost estimate has been prepared by the Applicant for Phase 1 only, which equates to circa £112m (£237psf) including allowances for external works and preliminaries. The cost plan does not include an allowance of OH&P or contingency within the cost plan.

Carter Jonas has sub-instructed quantity surveyors Johnson Associates (JA) to review this on behalf of the Council and further detail of this is set out in Appendix A.

Given the lack of information the approach taken by JA was to review the costs provided by the Applicant in respect of Phase 1 and then apply the reduction across the balance of the Phases (2-5). We note there is a slight difference from the Phase 1 total on the table below and the detailed breakdown provided but this is not material.

The tables below provide a summary of the information submitted.

Countryside Construction Costs				
Phase	sq ft	£/sf	Build Cost	Comment
1	474,611	£ 237.31	£112,629,936	Refer to Countryside build up (check as build up is for £112,431,785)
2	375,023	£ 232.82	£ 87,312,854	No build up provided
3	540,108	£ 231.15	£124,845,964	No build up provided
4	321,171	£230.44	£74,010,645	No build up provided
5	382,680	£226.74	£86,768,863	No build up provided
Total	2,093,593		£485,568,263	

Johnson Associates Construction Review

Phase	sq ft	£/sf	Build Cost	Comment
1	474,611	£ 235.33	£111,690,206	See detailed commentary on Phase 1 costs - $\frac{£237.31}{£235.33} = 0.8344\%$ reduction
2	375,023	£230.88	£86,584,358	Adjustment based on the above.
3	540,108	£229.22	£123,804,309	Adjustment based on the above.
4	321,171	£228.52	£73,393,136	Adjustment based on the above.
5	382,680	£224.85	£86,044,905	Adjustment based on the above.
Total	2,093,593		£481,516,916	

As can be seen from the table above JA has concluded that generally, the pricing is reasonable and includes substantial allowances for demolition and centralised plant. There does not appear to be any specific allowance for the forthcoming Building Regulation changes (Part F and L) which relate to energy efficiency, but we assume that this is factored into the build rates adopted.

In overall terms Johnson Associates identified a possible a 0.8% variance in the base construction, which we have adopted for the purpose of our modelling.

Given that no information has been provided in respect of Phases 2-5 for the purposes of our own modelling we have applied the same reduction as Phase 1.

5.2.2. Contingency

It does not appear a contingency has been applied and for the purpose of our modelling we have mirrored ULL's approach.

5.2.3. Professional Fees

Professional fees of 8% on build costs have been adopted in the FVA, which equates to circa £38.8m. In addition, a further allowance of £11.2m has been reflected towards anticipated costs incurred by the Council in preparing the proposal. The combined total amount of these two costs equates to c£50m.

We would usually expect an all-in professional fees allowance to range from 6%-8% for larger schemes of this nature. In the context of a £50m allowance we expect a more detailed breakdown of these costs to be provided to allow further validation.

For the purpose of our initial modelling, we have adopted an all-in 8% professional fee allowance i.e. inclusive of £11.2m.

5.2.4. Fees and Marketing Costs

ULL has adopted the following disposal fees across the phases:

Fees and Marketing Costs	
Marketing	1.0% of GDV
Letting Agent Fee	10% of Commercial Rental Value
Letting Legal Fee	5% of Commercial Rental Value
Sales Agent Fees (commercial)	1% of Commercial GDV
Sales Legal Fees (commercial)	0.25% of Commercial GDV
Sales Agent Fees (residential)	1.25% of residential GDV
Sales Legal Fees (residential)	£750 per unit
Purchaser's Costs	6.8% of Commercial GDV

We take no issue with the assumptions adopted by ULL in respect of marketing, sales and letting fees and have adopted the same in our own appraisal. We would also comment that ULL has applied marketing fees to the commercial and market sale units only, which we believe to be a reasonable approach given the context of the project.

5.2.5. Finance Cost

We understand that the project is led by the LLP, which is jointly funded by its members on a 50/50 basis between Countryside Properties and the Royal Borough of Kingston upon Thames. A finance rate has been applied at a cost of 5.5%. This reflects the average cost of capital to include debt interest (senior and mezzanine), and arrangement, exit and valuation fees.

We would comment that although the public sector can often secure finance at a lower level, based on the delivery approach adopted, we do not believe that the finance cost adopted is unreasonable and is marginally favourable to what has been agreed on other ER projects we have recently been involved in.

5.2.6. Community Infrastructure Levy / Section 106

The FVA has assumed an allowance of c£15.6m with respect to CIL payments and c£6.5m for payments relating to financial planning obligations. These amounts should be checked and verified by the LPA. We have not been provided with CIL calculations or the breakdown of the S106 costs and therefore would advise the local planning authority to request these in order to verify the figures adopted. However, for the purposes of our initial modelling we have adopted these estimates.

5.2.7. GLA Loan Repayments

Revenue and cost allowances for GLA Loan Repayments of £117,086,336 have been included within the appraisal. The loan has been drawn down in 4 phases:

Tranche 1 - £31,669,134

Tranche 2 - £28,151,650

Tranche 3 - £28,732,304,

Tranche 4 - £28,533,248.

No details have been provided in respect of this allowance including the terms of the loan, but we note that the same amounts have been adopted for the both the revenue and cost allowances.

5.2.8. Land Assembly Costs

There are 179 leaseholders and freeholders. We understand that 22 have already been acquired by the Council as part of the land assembly, which leaves 157 to be acquired.

The Council's adviser in relation to the land assembly is BNP Paribas, who estimate the freeholder and leaseholder buy-backs to amount to circa £73m.

In addition, we are aware that Clarion Housing owns 27 dwellings on the Estate (Ely Court) which the Council is negotiating to acquire as well as the Bull and Bush public house. The table below provides a summary of land assembly costs per phase.

Land Assembly Costs				
Phase	No of Dwellings	Estimated Cost	Item	Other Costs
1	26	£9,893,368	Ely Court	£5,210,000
2	38	£14,302,738	Bull & Bush	£2,500,000
3	36	£11,874,709		
4	48	£20,697,036		
5	31	£15,985,331		
	179	£72,753,182		£7,710,000

We have been provided with a redacted Property Costs estimate produced by BNP but it is not clear how the schedule relates to the costs adopted and presented in the table above.

In addition, the schedule does not appear to include any details or assumptions in relation to the acquisition cost of either the Ely Court units from Clarion or the Bull and Bush public house. In respect of the Clarion Homes further details are required on the terms of the purchase and whether this was based on a restriction of use or to be acquired at open market values.

In summary the land assembly costs require further validation but for the purpose of our initial modelling we have assumed the costs provided be accurate.

In addition to the above amounts, a sperate home loss and disturbance payments has been reflected in the appraisal of circa £4m, which we believe to be reasonable.

5.2.9. Development Programme

The FVA provides no commentary on the assumptions adopted in respect of the development programme but the live Argus file has been provided. As such we have sought to extract the relevant information to provide a comparison of inputs on a phased basis.

Development Programme					
Input	P1	P2	P3	P4	P5
Month Start	6	35	34	M61	M77
Number of Units	452	395	564	361	398
Number of Private Units	272	289	394	152	196
Sales Programme (Private)	M25-M78	M57-M113	M53-M121	M85-M114	M101-M139
Private Sales Rate (PM)	5.13	5.16	5.79	5.24	5.16
Construction Programme	M6-M54	M35-M80	M34-M85	M61-M100	M77-M120
Build rate (PM)	9.42	8.78	11.06	9.26	9.26
Buybacks (£)	£15,103,000	£16,803,000	£11,875,000	£20,697,000	£15,985,000
Timing of Buybacks	M1	M34	M33	M60	M76
Total Phase Programme	72	78	87	53	62

In overall terms the scheme will be delivered in 5 phases over an 11-year period. The private take up rate has been estimated at between 5 and 6 units a month but phases do overlap, which significantly increases the take

up rate, which closely aligns to the build rate. The build rate is generally between 9 and 10 units a month with a small increase in the largest P3 phase. As mentioned above the timing of the buybacks has been apportioned across the phases, which is an approach we believe to be reasonable.

5.2.10. Developer's Profit Margin

The level of developer's profit is always a complex judgement based on the risks associated with the subject development.

On the assumption that the estate renewal would be delivered with a joint venture partner they have adopted the following profit assumptions:

- Private Residential – 17.5% of GDV
- Affordable Housing – 6% of GDV
- Commercial – 15% of GDV

The blended profit rate for all uses within the scheme is calculated to be 15.25% on GDV but is reflective of the high affordable housing provision. The total level of profit derived from the scheme assuming the JV approach equates to £125,931,270.

Based on our experience of schemes across London, profit on GDV for private residential ranges typically range from 17% to 20% depending on the scale and complexity of the development. The applicant has adopted a profit margin on the private accommodation of 17.5%, which we consider reasonable in the context of estate renewal project but also considering the overall blended profit margin reflecting the quantum of affordable housing being provided.

For affordable housing, a lower profit margin is applied owing to the lower sales risk attached to units. ULL has adopted a profit margin of 6% on the affordable GDV but including grant. Given the Grant is a fixed income stream, which we assume to be guaranteed for the purpose of our modelling, we have not applied the 6% to this element.

For the commercial space at the scheme, a profit margin of 15% on GDV has been adopted by the Applicant. Again, this is a typical level of return which we are seeing across commercial developments of this type across London and we consider this a reasonable level of return.

In overall terms the overall profit allowance within ULL's appraisals equates to £125m and excluding the profit allowance on grant would reduce this to £122m (14.79% blended)

5.2.11. Summary Table

The table below provides a summary of the above analysis highlighting any areas of difference, which will form the basis of our sensitivity testing in the following section.

Revenue	Applicant Assumptions	Carter Jonas	Comments
Private Residential Sales Values	£650,349,297 (£701.77psf)	-	Agree
Social Rent	£70,420,823 (£125.44psf / £91,813 per unit)	See Comments	Query raised in respect of length of rent guarantee, current assumption is into perpetuity. If this is not the case, significant impact on value.
Social Rent Grant	£60,200,000	-	We assume grant is forthcoming at the level indicated.
Shared Equity	£26,869,946 (£308.40psf / £268,699 per unit)	See Comments	Value implications should intermediate owners opt not to take up a unit and these be converted to a more typical affordable tenure i.e. shared ownership. Also apply value to the unsold equity should be investigated further – up to 80% agreed on other ER projects CJ's have been involved in.
Shared Equity Grant	£2,644,000	-	We assume grant is forthcoming at the level indicated.
Commercial	£7,194,000 (£15psf @ 7%)	-	Agreed on the basis the values reflect the amount of community space (40%) proposed
Parking Revenue	£8,100,968 (£16,105 per space avg.)	-	A further breakdown regarding the car parking strategy is required.
Residential Ground Rents	Not included	-	Mirrored the Applicant's assumptions for the purpose of the base modelling but undertaken sensitivity analysis on the basis ground rents is included but risk adjusted.
Additional Revenue (GLA Loan)	£117,086,336	-	The Applicant should confirm the terms of the loan and how interest has been accounted for in respect of the loan.
Costs			
Total Construction Costs	£485,572,442	£481,516,916.88	Limited information has been provided and only relating to Phase 1 with the costs then applied to the subsequent phases. JA's review found the overall costs applied for P1 to generally be reasonable but

			identified a potential cost saving of circa 0.8%
Home Loss & Disturbance Payments	£4,090,500	-	Agreed
Contingency	N/A	N/A	Assumed to be included within the overall cost allowance but not separately stated.
Professional Fees	8% (£38,845,795)	8% (£38,845,795)	We would usually expect an all-in professional fees allowance ranging from 6%-8% for larger schemes of this nature. For the purpose of our initial modelling, we have adopted an all-in 8% professional fee allowance i.e. inclusive of £11.2m Council's costs indicated below.
Council Pre-planning Fees Council Post-planning Fees	£2,400,000 £8,799,000	Included above	See comments above
S106	£6,515,000	-	We have assumed this figure to be correct for the purpose of modelling but recommend this is reviewed and validated by the Council.
CIL	£15,601,643	-	We have assumed this figure to be correct for the purpose of modelling but recommend this is reviewed and validated by the Council.
Commercial Sales & Letting Fees <ul style="list-style-type: none"> • Letting Agent • Letting Legal • Letting Marketing • Sales Agent • Sales Legal • Purchaser Costs 	<ul style="list-style-type: none"> • 10% • 5% • 1% • 1% • 0.25% • 6.8% 	-	Agreed
Residential Sales Fees <ul style="list-style-type: none"> • Marketing • Sales Agent (Private) • Sales Legal (Private) 	<ul style="list-style-type: none"> • 1% • 1.25% • £750 per unit 	-	Agreed
Finance Cost	5.5% (£38,243,744)	-.	Agreed as reasonable on the basis the project is led by the LLP, which is jointly funded by its members on a 50/50 basis between Countryside Properties and the Royal Borough of Kingston upon Thames.

Target Return (blended)	Private - 17.5% on GDV Commercial - 15% on GDV Affordable - 6% on GDV	See comments	For the purpose of our modelling we have removed the profit allowance which has been applied to the Grant in respect of the affordable housing.
Leaseholder & Freeholder Buybacks <ul style="list-style-type: none"> • Dwellings • Ely Court • Bull & Bush 	<ul style="list-style-type: none"> • £72,753,182 • £5,210,000 • £2,500,000 	-	Further justification / validation is required but cost assumptions have been mirrored for the purpose of our own modelling. Insufficient information has been provided to allow validation of the costs adopted.
GLA Loan Repayments	£117,086,336	-	The Applicant should confirm the terms of the loan and how interest has been accounted for in respect of the loan.
Benchmark Land Value	£53,492,000	See comments	We would concur with the approach adopted to value the existing flats but not the houses, which have been valued on a OMV basis. We understand that the houses, like the flats, are used as temporary housing or let as social rented units and therefore in our opinion and in the context of the overall objectives of the estate renewal projects, should be valued on the same basis as the existing flats.

6. MODELLING AND CONCLUSIONS

ULL has provided Carter Jonas with a copy of its viability models in Argus Developer, which is a leading industry-standard development appraisal package commonly used by developers and agents to assess development viability.

Based on the review of the FVA inputs, we have highlighted a number of inputs that have a potential impact on land value. Carter Jonas has therefore undertaken a series of adjustments and scenario testing of the model provided by ULL to assess this impact.

Although this analysis does not constitute formal valuations under the provisions of the RICS Valuation – Global Standards ('Red Book') it does provide robust evidence to inform the Council's decision-making process in respect of the applicants planning application.

As has been highlighted in the summary table in the previous section we are not in disagreement with most assumptions adopted by the Applicant / ULL in their assessment. However, there are also areas / inputs where further clarification is required. The approach we have adopted has been to mirror ULL's inputs but if adequate justification is not forthcoming this could have a significant impact on the outputs and conclusions indicated below.

In terms of our initial analysis, we have made changes to the base appraisal as follows:

- Reflected an all-in professional fee allowance of 8% (including Council Costs)
- Reduction in base build cost of 0.8% applied across all phases
- Removed developer's profit from the affordable housing grant

The inputs requiring further justification / validation include: -

- Vacant possession costs – and how the documents provided relate to the VPC assumptions adopted.
- Construction cost – cost information relating to P1 only has been provided to date
- Justification as to why the value of the existing houses to be valued as OMV and not on current income / same basis as the existing flats
- Further details in respect of the terms of the GLA loan are to be provided
- Clarification in respect of the of the length of time of the rent guarantee in respect of the proposed social rented units (possible impact on value)
- S106 and CIL costs to be kept under review as the review progresses

6.1.1. Summary of viability modelling

The results of our review are set out in the table below.

Item	ULL	Carter Jonas
Applied Profit	15.25% (blended)	£14.79% (blended)
Benchmark Land Value	£53,492,000	£53,492,000*
Land Assembly Costs	£80,463,182	£80,463,182*
Residual Land Value	£2,651,633	£16,344,779
Project Deficit / Required Funding	-£50,841,000	£37,147,221

*subject to further validation

Through the adoption of our assumptions the table above illustrates a reduction in the project deficit from £50.8m to £37.1m. However, it is important to stress that several of the Applicant's assumptions require further validation which has the potential to reduce the deficit further. Most notably these include validation of the land assembly costs, the approach taken in respect of establishing the benchmark land value for the existing houses, the inclusion of value attributed to the unsold equity of the shared equity units and the assumed length of the rental agreement for the replacement social rented units.

6.1.2. Sensitivity Analysis

Despite the extent of the deficit indicated no modelling has been provided in respect of how this may be overcome over the lifetime of the project. In the absence of this Carter Jonas has undertaken sensitivity analyses around the inclusion of ground rents and stepped increase / decrease in private sales values and base construction costs to test the circumstances in which the Scheme would be viable. The outcome of this analysis is detailed in the table below.

RLV (£m)		Sales £sf				
		0	+2.5%	+5.0%	+7.5%	+10.0%
Construction Cost (Gross)	0	£18.84	£27.83	£36.83	£45.82	£54.81
	-2.5%	£28.21	£37.21	£46.20	£55.19	£64.18
	-5.0%	£37.58	£46.58	£55.57	£64.56	£73.55
	-7.5%	£46.95	£55.95	£64.94	£73.96	£82.91
	-10.0%	£56.33	£65.32	£74.31	£83.30	£92.28

Given the scale of the proposals the above sensitivity analysis indicates that relatively small positive movements in either sales values or construction costs result results in a project surplus being achieved.

7. UPDATED VIABILITY CONCLUSIONS (APRIL 21)

As indicated in the original review we were not in disagreement with the majority of the assumptions adopted by the Applicant / ULL in their assessment. However, within of draft report and initial analysis, we made changes to the following:

- Reflected an all-in professional fee allowance of 8% (including Council Costs)
- Reduction in base build cost of 0.8% applied across all phases
- Removed developer's profit from the affordable housing grant

In addition, there were areas where further clarification was required, but for the purposes of our draft report we adopted ULL's inputs but commented that should adequate justification not be forthcoming this would impact on the outputs and conclusions reported. These inputs are highlighted below for ease of reference:

- Vacant possession costs – and how the documents provided relate to the VPC assumptions adopted.
- Construction cost – cost information relating to P1 only has been provided to date.
- Car parking revenue - breakdown required.
- Justification as to why the value of the existing houses to be valued as OMV and not on current income / same basis as the existing flats.
- Further details in respect of the terms of the GLA loan are to be provided.
- Clarification in respect of the of the length of time of the rent guarantee in respect of the proposed social rented units (possible impact on value)
- S106 and CIL costs to be kept under review as the review progresses.

We are now in receipt of a letter from ULL dated 31 March 2021 which seeks to address the above points and we consider each of these in turn below:

Vacant Possession Costs / Land Assembly Costs

The total residential acquisition costs equate to a total of £72,753,182. Adding the estimated acquisition costs of The Bull & Bush (£2,500,000) and Ely Court (£5,210,000), the total assumed cost increases to £80,463,182 which has been split over the five phases in the ULL appraisal.

Within our review we queried the detail of the acquisition costs and specifically the value attributed to Ely Court (£5,210,000) and The Bull & Bush (2,500,000).

We have reviewed the PCE schedule and in addition to the estimated land assembly costs themselves we note the following costs have included:

- Home Loss Payment of 2.5% applied to owner occupier properties;
- Basic Loss Payment of 7.5% applied to investor & owner occupier properties;
- SDLT payment included on purchase of a new property of equivalent value, differing rates applied to owner occupier and investors;
- Surveyors costs of £2k, Fees of £3k & Misc costs of £250 have been allowed for both investor and owner occupier properties;

- Removal fee of £500 included for owner occupier properties;
- Council fees for SDLT and £2.5k legal fees included on all properties;
- Contingency of 10% applied to the total acquisition costs for the Council and owners where deals have yet to be completed. This figure equates to £5,948,416 to the 157 units which have yet to be agreed.

We do not take issue with these costs, which are typical for an exercise of this nature. However, whilst we understand the requirement for a contingency allowance in the cases where the acquisitions are yet to be agreed, we do consider that a 10% contingency overstates the risk associated. We have therefore reduced this allowance to 5% which equates to a reduction of £2,974,208.

Land Assembly Costs					
Phase	No of Dwellings	Estimated Cost	Revised Cost	Item	Other Costs
1	26	£9,893,368	£9,559,034	Ely Court	£5,210,000
2	38	£14,302,738	£13,816,669	Bull & Bush	£2,500,000
3	36	£11,874,709	£11,344,187		
4	48	£20,697,036	£19,777,498		
5	31	£15,985,331	£15,281,586		
	179	£72,753,182	£69,778,974		£7,710,000

In addition, we note the valuations of Ely Court and The Bull & Bush have yet to be prepared and therefore whilst we have included the total acquisition allowance of £7,710,000 within our own modelling, this remains subject to review.

Construction Costs

Build costs of circa £485.5m had been adopted by the Applicant although a cost estimate was prepared for Phase 1 only which equated to circa £112m (£237psf) including allowances for external works and preliminaries. The cost plan did not include an allowance of OH&P or contingency within the cost plan.

Carter Jonas sub-instructed quantity surveyors Johnson Associates (JA) to review this on behalf of the Council and given the lack of information the approach taken by JA was to review the costs provided by the Applicant in respect of Phase 1 and then apply the reduction across the balance of the Phases (2-5). We noted there was a slight difference from the Phase 1 total within the appraisal (£112,631,783) compared to the Countryside cost plan of £112,431,785 but this is not material.

Johnson Associates reviewed the cost plan for Phase 1 and concluded a cost of £111,693,883 was reasonable given the evidence provided in the first instance. This represented a difference of £737,902. For the purposes

of our initial review, we adopted the Phase 1 build cost of £112,631,783 which equated to a rate of £237.31psf and calculated the difference between the JA figure which equated to a rate of £235.33psf to derive a difference of 0.8344%. This reduction was then applied to the rates adopted in the later phases to derive a reduced overall build cost of £481,516,916. This represented a reduction of £4,055,526 when compared to the assumed overall cost of £485,572,442 which was in the ULL appraisal.

Following further dialogue and exchanges of information between Countryside and JA, an agreed cost of £112,157,782 in respect of the Phase 1 total which equates to a rate of £236.32psf has now been reached. This represents a reduction of 0.421% from the original Phase 1 figure of £112,631,783. We have therefore applied this reduction to the costs of Phases 2-5 based on the figures within the ULL appraisal and we detail the assumed build cost for the purposes of our updated assessment below:

Phase	Sq ft	Phase Build Cost	Build Rate £/psf	Updated Phase Build Cost	Updated Build Rate £/psf
1	474,611	£112,631,783	£237.31	£112,157,782	£236.32
2	375,023	£87,312,281	£232.82	£86,944,835	£231.84
3	540,108	£124,848,533	£231.15	£124,323,119	£230.18
4	321,171	£74,009,466	£230.44	£73,698,004	£229.47
5	382,680	£86,770,379	£226.74	£86,405,214	£225.79
Total	2,093,593	£485,572,442		£483,528,954	£230.96

Car Parking Revenue

The Applicant's FVA was originally silent on car parking but their appraisal reflected the provision of 503 spaces. In our draft report, we noted that the sales value per space varied between phases but the overall parking GDV totalled £8,100,968 equating to £16,105 per space.

For ease of reference and in response to our request to provide a breakdown, we include the ULL response below;

“Secure car parking spaces are valued at £17,500 base. Betterment is included at 1.5% p.a. from December 2022.

Phase 1 = 12 spaces at £17,500 plus a further 40 non secure spaces at a reduced value of £10,000

Phase 2 = 34 spaces at £18,118 – note our appraisal incorrectly shows 59 spaces which accounts for the lower value/space

Phase 3 = 131 spaces at £18,829

Phase 4 = 110 spaces at £19,183

Phase 5 = 116 spaces at £19,812 – note our appraisal incorrectly shows 151 spaces which accounts for the lower value/space”

Therefore, the total number of car parking spaces is 443. ULL has applied a base value of £17,500 for secure car parking and has incorporated an annual increase at 1.5% per annum from December 2020.

Having reviewed this response, we are in agreement with the value assumptions adopted in this case with a total car parking revenue of £8,100,933 with an average secure space valued at £19,109.

Benchmark Land Value

ULL had valued the existing houses at a total value of £26,650,000 which reflected an average price of £325,000. Within our draft report above, we questioned the appropriateness of applying full market values and why the same approach to valuing the existing flats had not been applied i.e., valuing on the basis of the income received. Specifically, the flats had been valued using a DCF which reflected the social rented designation by adopting the current rent received from the units whereas the houses had been valued on the basis of two comparable asking prices of 3 and 4 bedroom units which we considered to be a fairly crude basis of valuation and one which did not reflect the mix, tenure and specification of the 82 existing houses.

ULL has now provided a DCF of the houses which indicates a total value of £4,934,000. This is clearly a significant difference to the value adopted in the original review. The DCF provided follows a similar methodology as the existing flats with the exception of two key assumptions; rent has been assumed for a period of 25 years instead of 15 given the better condition and a lower OpEx cost of 25% has been assumed compared to 30% in respect of the flats. We do not take issue with the methodology or the assumptions adopted in arriving at the value of £4,934,000 in respect of the 82 social rented houses.

GLA Loan Terms

In our draft report we requested further information in respect of the terms of the GLA loans. In their response, ULL has indicated that these are assumed to be interest free and therefore the approach adopted in the appraisal has been to adopt the same repayment amounts as the loan amounts. We would also highlight that ULL did run sensitivity analysis, which we verified, which indicated that without the inclusion of the loan, overall finance costs would increase. Therefore, it can be concluded that the inclusion of the loan has a positive impact on viability.

Affordable Housing Revenue

In respect of the Social Rented units, the Carter Jonas Affordable Housing Team reviewed the value assumptions and considered the values adopted within a reasonable tolerance of the value the Council has agreed to acquire the units for. However, further clarification was required as to the approach adopted in respect of the rents which have been promised to the existing tenants and for valuation purposes, assumed into perpetuity.

We noted that it is not uncommon that there would be either a rent guarantee for a set period but on expiry fall away (in the past these guarantees have often been for 10 years for instance) or fall away when they move or pass away etc, at which point a new tenancy will commence based on higher social rents which are capable of being charged at that point in time. As such and given the above, clarification was sought to the extent / length of time of the rent guarantee for rehoused tenants.

In their response, ULL has stated that the rents for the existing CRE tenants will be the same as their current rent and these rent levels will remain into perpetuity, subject to rent fluctuations (increase/decreases) which applies to all Council stock. New tenants coming onto the estate will pay Council Social rents which are the policy rent that has previously been provided by the Council to Countryside.

Given the above, we do not take issue with the value applied to the Social Rented units.

In respect of the Shared Equity units, the Carter Jonas Affordable Housing team did not take issue with the value assumptions adopted in respect of these units. We understood that the 100 shared equity units were being provided for the existing leaseholders and freeholders on the estate and the equity ascribed to the purchaser was equivalent to the value of the home they currently own. ULL stated that it was not known which current owners will opt to acquire a share of homes on the estate and their assumptions in relation to this element of the development were necessarily broad at this stage.

We would highlight comments we made in regard to the approach adopted in respect of these units which for ease of reference is included below:

“Of course, we concur that it is difficult at this stage to predict the take up for the shared equity units but the Council should seek clarification of the strategy should flat owners seek to be bought out rather than opt for taking a shared equity unit i.e. is the intention that the units in question would then be converted to market tenure units or become a recognised affordable tenure?”

Based on the assumption that a 50% share of the equity is sold, we are in agreement with the values adopted. However, we would highlight that no value has been attributed to the residual value of the shared equity units which will be owned by the freeholder and this is a point also highlighted by the GLAVT.

ULL have responded specifically on this point saying “that the majority (63%) of these units are 3-bedroom units and 40% are houses. In the new scheme only 43% are 3-beds and only 8% are houses. Therefore, it is not possible that all the cash paid to leaseholders will come back into the scheme as purchases of shared equity units. While it is possible that more equity will be acquired in the new shared equity units, it is equally possible there will be less than 50% acquired (as currently modelled), and as the GLA states the assumptions are necessarily broad.”

This is a point that is difficult to address at this stage because there are many unknowns. In the context of the overall scheme deficit, sensitivity analysis should be undertaken to illustrate the impact of adopting a more

optimistic assumption. On other estate renewal projects, we are aware of shared equity units being valued up to 80% on OMV's."

Professional Fees

Professional fees of 8% on build costs had been adopted which equated to circa £38.8m. In our draft report we commented that a usual all-in professional fee allowance for larger schemes is 6%-8% and in the context of a £50m allowance, a more detailed breakdown should be provided to allow further validation.

In their rebuttal, ULL has provided a breakdown in a separate document which reports a total fee budget of £56,937,000 which is broken down as follows:

- JV Project Management Fee 1% of GDV less Grant - £7,609,295
- JV Sales & Marketing Fee 1% of GDV - £6,636,386
- JV Accountancy Fee - £1,120,000
- Planning and Design - £3,494,925
- Development Other - £3,400,925
- S&M Marketing (1.2% of private GDV) - £9,642,176
- S&M Overheads (Countryside employees) (0.5%) - £3,601,407
- S&M Incentives (1.5%) - £9,144,988
- Social Value - £1,795,000
- JV Supervisor - £780,000
- Contract Management Fee (2% of build sum) - £9,711,449
- TOTAL - £56,936,552

Within the ULL modelling they have included an all-in allowance of 8% which equates to £38,846,000 in addition to marketing, letting and disposal fees which in total arrive at a figure of £55,365,000. ULL conclude that this is therefore £1,572,000 lower than the LLP's budgeted costs.

Within our draft report, we did not disagree with the disposal, letting and marketing costs in respect of the commercial and residential accommodation. However, we considered that the 8% professional fee allowance should also include the Council's costs which were reported at £11.2m. Therefore, and for the purposes of our initial modelling we adopted an all-in 8% professional fee allowance inclusive of the £11.2m.

We are now in receipt of the Council's sunk costs up to 2020, future costs from 2021 - 2033 (although the copy provided only includes information up to 2027) and revenue costs from June 2019 to September 2020.

Whilst the further breakdown of costs is helpful to understand the division of costs within the JV, we maintain that an all-in cost allowance of 8% is reasonable and aligns with other estate regeneration projects we have been involved in. We have therefore maintained our position and continued to model an all-in 8% professional fee inclusive of the £11.2m Council costs.

Developer Profit

In our draft report we concluded that given the grant was a fixed income stream, which was assumed to be guaranteed, we questioned the appropriateness of applying a 6% profit margin to this element. ULL has since stated that while they understand the principle of this assertion, they do not consider it to be reasonable on account that the affordable provision is unviable, and the developer is not receiving the cost back to build the dwellings. Therefore, ULL conclude that the profit attached to the affordable housing should apply to the total affordable housing value including grant as a minimum.

We would acknowledge that this is a bit of a grey area, but we also highlight that in many instances affordable housing is not viable and is often cross funded by the private provision. We would also highlight that this project does not have an RP partner and therefore is proposed to be delivered by the JV, which includes the Council / existing landowner, and the value of the existing interest has already been accounted for in the assessment of the site’s BLV. We are not aware of how the profit is to be shared between the parties, but it is unlikely to be considered on the same basis assuming an RP involvement.

Given the above we believe that our approach of not applying profit to grant is appropriate and as such we have maintained our blended profit margin of 14.79% for modelling purposes.

7.1.1. Updated Viability Summary

Having considered the rebuttal from ULL and reviewed the additional information we have now reached agreement on a number of items. However, we have maintained our position in respect of the professional fees / council cost allowance and the removal of developer profit on grant. Further we have made a downward adjustment on the contingency in respect of the leaseholder buyback from 10% to 5% which reduces the overall figure by £2,974,208.

It is also important to highlight that information is required in respect of the valuations of Ely Court and Bull & Bush before we can agree the total value of £7,710,000 in respect of these items.

Adopting the now assumed agreed figures in respect of construction costs, car parking revenue and Benchmark Land Value and our position in respect of the elements detailed above, we arrive at a residual land value of £17,066,663.

ULL has not modelled the revised position in respect of the items detailed above. However, we have sought to consider this below:

Item	Carter Jonas
Applied Profit	£14.79% (blended)
Benchmark Land Value	£31,776,000
Land Assembly Costs	£77,488,974
Residual Land Value	£17,066,663
Project Deficit / Required Funding	-£14,709,337

The table above indicates that based on our inputs the scheme results in an overall scheme deficit of - £14,709,337. This represents a significant reduction in the viability deficit presented in the Applicant's original FVA but nevertheless there remains an overall deficit, which indicates that the affordable housing provision currently modelled would be considered the maximum reasonable given the characteristics of the scheme.

We would also highlight that although a £14.71m deficit is a significant shortfall, given the scale of development, this is relatively minor and positive movements in market conditions could result in a surplus position over the life of the project.

8. Viability Update (Revised Offer - Nov 2021)

By way of background, the original FVA was issued in December 2020 (the 'December 2020 FVA') which was subject to a comprehensive review. At that stage there were a large number of inputs, which required further justification and validation. The affordable housing offer reflected 767 social rented units which equates to a 35% affordable housing provision. A further 100 Shared Equity units were also proposed but the value attached to these units does not meet the Council's or the GLA's affordability criteria. The respective viability outputs at this stage are summarised in the table below.

Item	ULL	Carter Jonas
Applied Profit	15.25% (blended)	£14.79% (blended)
Benchmark Land Value	£53,492,000	£53,492,000*
Land Assembly Costs	£80,463,182	£80,463,182*
Residual Land Value	£2,651,633	£16,344,779
Project Deficit / Required Funding	-£50,841,000	£37,147,221

*the applicant's assumptions were adopted but subject to validation.

April update

The applicant's viability consultant provided a rebuttal to the original review in April 2021. This was also reviewed with the findings detailed in Section 7 of this report. In summary although the applicant provided additional supporting information, which ultimately resulted in a narrowing of the respective viability positions there remained several areas of difference and most notably in respect of the benchmark land value. For ease of reference Carter Jonas' viability position as at April 2021 is detailed in the table below.

Item	Carter Jonas
Applied Profit	£14.79% (blended)
Benchmark Land Value	£31,776,000
Land Assembly Costs	£77,488,974
Residual Land Value	£17,066,663
Project Deficit / Required Funding	-£14,709,337

Update Offer (Oct)

Following ongoing discussions with the LPA and the GLA we have been advised that there have been some amendments to the scheme design as well as an improved affordable housing offer.

Specifically, we understand that of the proposed 2,170 new units, 921 will now be provided as affordable housing which is split between Social Rent (767 units) and Intermediate (154 units) with the remaining 1,303 provided

as private market sale and 20 Shared Equity units. For ease of reference a revised accommodation by tenure and phase is detailed below:-

Private Units

Type	Number	Average (sq m)	Average (sq ft)
1 bed flat	528	51.67	556
2 bed flat	497	69.54	749
3 bed flat	158	89.59	964
3 bed maisonette	32	107.34	1,155
3 bed house	14	123.28	1,327
TOTAL	1,229		

Social Rent Units

Type	Number	Average (sq m)	Average (sq ft)
1 bed flat	298	51.61	556
2 bed flat	330	69.48	748
3 bed flat	77	84.44	909
3 bed maisonette	6	104.45	1,124
3 bed house	6	115.84	1,247
4 bed flat	3	106.16	1,143
4 bed maisonette	13	119.55	1,287
4 bed house	31	119.50	1,286
5 bed house	2	149.50	1,609
6 bed maisonette	1	157.18	1,692
TOTAL	767		

Shared Equity Units

Type	Number	Average (sq m)	Average (sq ft)
1 bed flat	50	50.88	548
2 bed flat	81	71.73	772
3 bed flat	12	94.84	1,021
3 bed maisonette	22	103.51	1,114

3 bed house	9	115.69	1,245
TOTAL	174		

Phase 1

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	109	54	4	167
2 bed flat	135	43	7	185
3 bed flat	41	36	2	79
3 bed maisonette	2	4	2	8
3 bed house	0	0	0	0
4 bed flat	0	2	0	2
4 bed maisonette	0	4	0	4
4 bed house	0	4	0	4
5 bed house	0	2	0	2
6 bed maisonette	0	1	0	1
Total	287	150	15	452

Phase 2

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	130	27	0	157
2 bed flat	104	46	0	150
3 bed flat	36	7	0	43
3 bed maisonette	14	2	3	19
3 bed house	6	4	9	19
4 bed flat	0	0	0	0
4 bed maisonette	0	1	0	1
4 bed house	0	7	0	7
5 bed house	0	0	0	0
6 bed maisonette	0	0	0	0
Total	290	94	12	396

Phase 3

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	163	61	0	224
2 bed flat	164	77	0	241
3 bed flat	64	28	0	92
3 bed maisonette	8	0	0	8
3 bed house	0	2	0	2
4 bed flat	0	0	0	0
4 bed maisonette	0	2	0	2
4 bed house	0	0	0	0
5 bed house	0	0	0	0

6 bed maisonette	0	0	0	0
	399	170	0	569

Phase 4

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	84	75	9	168
2 bed flat	53	83	33	169
3 bed flat	0	0	0	0
3 bed maisonette	6	0	4	10
3 bed house	8	0	0	8
4 bed flat	0	0	0	0
4 bed maisonette	0	6	0	6
4 bed house	0	0	0	0
5 bed house	0	0	0	0
6 bed maisonette	0	0	0	0
Total	151	164	46	361

Phase 5

Unit Number	Private Unit	Social Rent Unit	Shared Equity Unit	Total
1 bed flat	42	81	37	160
2 bed flat	41	81	41	163
3 bed flat	17	6	10	33
3 bed maisonette	2	0	13	15
3 bed house	0	0	0	0
4 bed flat	0	1	0	1
4 bed maisonette	0	0	0	0
4 bed house	0	20	0	20
5 bed house	0	0	0	0
6 bed maisonette	0	0	0	0
Total	102	189	101	392

Reflecting the above the revised affordable housing provision can be summarised as:-

- 767 social rent homes
- 20 shared equity/shared ownership
- 154 intermediate homes

The total number of Social rented and Intermediate home proposed equates to an affordable housing provision of 42% across the masterplan (by unit).

In relation to Phase 1, the affordable provision is as follows:

- 150 social rent homes

The above equates to 33% affordable housing provision across in Phase 1 (by unit).

In addition to the above a further 15 shared equity units are proposed but these do not meet the Council's or the GLA affordability criteria and as such would not be considered affordable housing.

The revised housing mix for the affordable homes in Phase 1 is:

- 1 bed – 58 homes (35.2%)
- 2 bed – 50 homes (30%)
- 3 bed – 44 homes (27%)
- 4 bed – 10 Homes (6%)
- 5 bed – 2 Homes (1.2%)
- 6 bed – 1 Home (0.6%)

Revised Viability Inputs

When modelling the viability of the revised affordable housing offer, the applicant has either modelled the previously agreed assumptions or made a commercial decision to accept Carter Jonas's inputs as detailed below:-

- Construction Costs – following ongoing dialogue the construction costs have been agreed in the sum of £483,528,954 and are reflected in the update modelling.
- Council's costs:- Carter Jonas indicated that these costs should be considered as part of the overall professional fees allowance and this is a point that has now been accepted by the applicant.
- Land assembly costs - Carter Jonas considered that the total Land Assembly Costs figure was overstated and should be reduced from £80,463, 182 (as above) to £77,488,974. This position has been accepted by the applicant and reflected by the applicant.
- Benchmark land value – this was a main area of difference between and specifically the approach adopted by the applicant in valuing the existing houses. The applicant has now revised their approach and Carter Jonas's benchmark land value of £31,766,000.

In addition to the above, given the change in the affordable housing provision there have been updates to both the private and affordable housing values as well as grant funding. Having reviewed the information provided we are satisfied that the variation in values is proportionate to the revised tenure split and the housing grant increase reflecting the revised affordable housing tenures.

Specifically in respect of the private sales values the approach adopted by the applicant has been to maintain the sales £/sq ft rate to each phase of private sales as originally modelled and agreed. We do not believe this to be an unreasonable approach given that although Net Sales Area for each phase of private sales units has changed, the mix of accommodation (i.e. the proportions of 1-bedroom, 2-bedroom and 3 bedroom dwellings) has not altered significantly.

As per the private values the change in affordable values appears to be driven by the revised affordable mix. We provided detailed comments on the affordable values adopted in the previous section of this report. In terms of GLA loan and grant being applied we have not been provided with any supporting information but as per our original review and given the ongoing discussions / relationship with the GLA and the Council in respect of this project we assume that the level of funding / grant reflected would be forthcoming.

Adjustments have been made to both CIL and S106 to reflect the revised affordable housing offer and although this appears reasonable should be validated by the appropriate Council officer.

Updated Modelling Position

Reflecting the above, the applicant's revised modelling has concluded that the project results in a deficit of £18,154,000. This reflects a residual land value of £13,602,000 against a Benchmark Land Value of £31,766,000.

Given that agreement has now been reached on vast majority of inputs our modelling result in a very similar viability outputs to the applicant. The small difference in residual land value relates to the timing of the Phase 5 units where the private units have decreased but the sales programme does not appear to have been adjusted. Given the scale of the scheme making the required change has a negligible impact on the overall finance costs.

For ease of reference set out in the table below is our respective viability positions

Item	Applicant / ULL	Carter Jonas
Applied Profit	14.79% (blended)	14.79% (blended)
Benchmark Land Value	£31,766,000	£31,766,000
Land Assembly Costs	£77,488,974	£77,488,974
Residual Land Value	£13,600,586	£13,604,354
Project Deficit / Required Funding	-£18,164,000	-£18,161,646

Reflecting the scheme changes / increased affordable housing offer our revised modelling results in overall scheme deficit, which has marginally increased compared to the deficit reported in April 2021. Given there this deficit we would concur that the revised offer would be considered the maximum in this instance.

However, it is also important to stress that is a large scheme with a GDV of more than £815m so although a £18m deficit is a significant shortfall, relatively minor positive movements in market conditions could result in a surplus position over the life of the project. As such we would recommend that the usual early and late-stage review mechanisms are applied to ensure that any improvements in scheme viability are captured by the LPA.

Response from the Placemaking Team (DRAFT)

Date of Response: [25/11/2021]

Case Officer: Harsha Bhundia

Planning Reference: 20/02942/FUL

Site Address: Cambridge Road Estate, London Borough of Kingston upon Thames, KT1 3HW

Proposal: Part detailed / part outline planning permission for a mixed use development, including demolition of existing buildings and erection of up to 2,170 residential units (Use Class C3), 290sqm of flexible office floorspace (Use Class E), 1,395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), 1,250sqm community floorspace (Use Class F2), new publicly accessible open space and associated access, servicing, landscaping and works: Detailed permission for Phase 1 for erection of 452 residential units (Use Class C3), 1,250sqm community floorspace (Use Class F2), 290sqm of flexible office floorspace (Use Class E), 395sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal, refuse/recycling and bicycle storage, energy centre and works. Outline permission for 1718 residential units (Use class C3), 1000 sqm of flexible retail/commercial floorspace (Use Class E/Sui Generis) (with Scale, Layout, Appearance and Landscaping reserved) is sought for the remainder of the development. This application is accompanied by an Environmental Statement.

Target Determination Date: TBC

Thank you for consulting the Placemaking Team on the above application.

Placemaking Summary

Design Code / Design Guidelines Comments

The applicant's submission comprises a hybrid application which consists of:

- an outline master-plan for "access" only, which is:
 - defined by design guidelines / design code
 - demonstrated through an indicative master-plan
- detailed design / full application for Phase 1 only

Whilst an indicative master-plan has been produced by the applicant to demonstrate the design code / guidelines principles, CRE is a large redevelopment site which is phased to be completed over a period of around 15 years. Given the submitted master-plan may require changes and amendments over that period of time and the outline application for the master-plan includes only "access", whilst "scale", "layout", "landscaping" and "appearance" are all reserved matters at this stage, it is important that the outline permission and the associated design guidelines / code allow a good balance between defining elements and priorities while also allowing flexibility and adaptability over time. Flexibility and adaptability is particularly pertinent in relation to:

- carparking and vehicular access requirements / arrangements

- wider context and potential wider regeneration, especially if CRE redevelopment is consented
- areas of technology where innovation is highly likely over time (communications, servicing, sustainability and green tech, street furniture, architecture and landscaping design, detailed design elements, materials, cladding to name only a few)
- meanwhile uses programme while the development is progressing for some of the surrounding existing areas, potential events and ways to stay actively engaged with the community and collect emerging feedback throughout the process

Whilst the submitted outline is for “access” only, the applicant has submitted extensive design guidance for the master-plan which includes elements of site layout, massing, height, new character / identity creation, public realm and landscaping, architecture, articulation and materiality.

Some of the key positives in the submitted design code / design guidelines include:

- clear outline of built form typologies to guide future phases
- clear outline of key site-wide routes / links / streets and visibility lines
- introduction and definition of a principal new green space for the estate and smaller outdoor spaces within each development plot
- clear outline of street character / character areas, which includes architecture, materiality and landscaping, to guide future phases
- clear outline of maximum plot envelope parameters (*page 17*) and minimum separation distances between buildings
- developed design examples to inform min. street widths and the variety of elements these need to include to achieve a vibrant, varied and well-designed public realm and character whilst also accommodating servicing and traffic requirements
- clear outline of utmost height parameters
- clear outline of street hierarchy
- clear outline of public, communal and private environments
- clear outline of “foreground buildings” and “primary facades” and their relationship with surrounding public realm, context and the new character areas
- principles outlining breaking down and architectural articulation of massing
- clear outline of materiality and colour palettes principles to inform coherence and consistency of the character areas being defined in the development
- examples of “moments” palette which contribute and inform the overall character and the pedestrian experience as well as encourage play, art and enjoyment
- clear outline of continuous greening and trees which aid biodiversity, sensory richness and placemaking
- examples of podium garden layout and principles to guide quality of communal amenity
- clear outline of principles for details including street furniture, surfacing, carparking principles, landscaping and tree species, play space, architectural articulation of massing, elevations, fenestration, balconies and bay windows, entrances, screens and gates, front garden treatment, materials and principles, refuse, signage, rooftop principles, architectural details and embellishment

Some of the key considerations going forward, once the detailed design development of the future phases commences, include:

- review of consistency and coherence of desire lines, access and movement patterns as per the outlined principles
- review of proposed height in relation to the indicative master-plan and the design guidelines / code maximum parameter. Important to note that the indicative master-plan does not match the utmost height being suggested in the submitted design guidelines / code, and that difference will need to be considered and reconciled through the detailed planning application for each phase
- review of cumulative effects, particularly in relation to:
 - sunlight / sun hours into key public spaces
 - sunlight for surrounding blocks
 - wind
 - acoustic / noise (which should include materiality and location of building services)
 - outlook, privacy and overlooking
 - servicing, back-of-house and traffic requirements
 - glare and light pollution
- review the consistency, coherence and character of the proposed appearance (architecture, landscaping, detailing and materiality) as per outlined principles
- review of the proposed materiality and colour
- the submitted indicative master-plan demonstrates good levels of sunlight penetration, and accords with the BRE guidelines of at least 2 hours in at least 50% of the outdoor open space on March 21st, for all of the new proposed public spaces, which includes Cambridge Grove Gardens, Madingley Square, Fordham Gardens, and all of the key (north-south) streets in the development. Furthermore, the proposal also achieves satisfactory sunlight penetration into all of the communal courtyards and back-of-house amenity with the exception of Plot G where the internal courtyard is overshadowed and does not achieve the BRE guidelines. Nevertheless, it is considered that Plot G is workable and can be amended to move some of the mass and height as well as amend the layout of the building to allow more sunlight to penetrate the raised courtyard. This re-working of Plot G which could occur at detailed design stages when it is submitted as a full application, should also give further consideration in terms of impact on the newly redeveloped property to the north. All in all, the proposal makes excellent efforts to maximise sunlight penetration while also optimising the site capacity

Other than that, given the above considerations are reviewed at detailed design for each phase in a holistic manner and to a reasonable degree, the proposed guidelines / code is considered to be of high quality and broadly ensures a development which at its completion can be a healthy, inclusive, vibrant, and sustainable place to live. The proposed design guidelines / code is supported by the Placemaking Team.

Suggested Conditions (Design Code / Design Guidelines)

Phasing / meanwhile uses conditions?

Meanwhile public realm strategy for phases 3,4 and 5

Better maintenance programme for later phases commencing at

(Indicative) Masterplan Comments

Cambridge Road Estate is in the 20% of most deprived neighbourhoods in England and is the most deprived neighbourhood in Kingston. The estate, which was built in the late 1960s and early 1970s, follows modernist master-planning principles which result in the lack of well-defined streets and a confusing site layout, unnecessary level changes and physical barriers, poor legibility and way-finding, associated anti-social behaviour (ASB) and high crime rates, largely ineffective and poorly maintained landscaping, with some areas excessively hard-landscaped and car-dominated, and an outdated and austere urban fabric and architecture.

The proposed development, which comprises an outline masterplan and a detailed Phase 1, facilitates comprehensive and holistic redevelopment of the estate following good practice urban design principles and master-planning. These include:

- a street-based approach with clearly defined public and private environments largely utilising the urban perimeter block form
- facilitating wider links and desire lines, encouraging active sustainable travel through a clear public transport and cycling provisions strategy
- considerate and sympathetic distribution of height and mass across the master-plan which responds to its low-rise fine-grain surroundings through change in scale and typology at its site boundary edges
- considerately addressing and mending surrounding urban blocks and site boundary edges by utilising terraces, linear, villa / mansion block typologies and scaling down in those locations
- introducing a slight angle / crank to the arrangement of the building blocks creates a more varied, less relentless and oppressive rhythm of blocks and streets and allows expanded street landscaping and greening in those locations
- optimising housing provision and housing quality by distributing height and density on the north-south axis, resulting in maximising east-west aspect and access to sunlight
- further breaking down of the blocks aids in largely maximising dual aspect, minimising the number of single aspect dwellings
- utilising the urban perimeter block and raised courtyards typology to provide additional communal amenity per block whilst wrapping around inactive back-of-house ancillary spaces. The additional communal amenity areas further facilitate greening, play, relaxation, privacy and enjoyment
- encourages much improved in comparison to the original estate active frontages and natural surveillance which should have considerable positive effects on designing out ASB and crime in the area
- incorporates a variety of uses across the site which include commercial, workspace, community and residential and utilises a variety of residential typologies which facilitate choice and variety of dwelling sizes and tenure
- well-balanced and effective car-parking, vehicular access and servicing strategy which minimises the impacts of the car, reduces the amount of space lost to roads and parking, and optimises the provision of urban greening, well-designed, attractive and varied public realm, safe and inclusive landscaping and amenity
- providing a strategy and Phase 1 of development which encourages high quality architecture, attention to detail, visual coherence for the area, promotes sensory richness and variety

- providing a clear and reasonable phasing strategy which incorporates some of the new publicly accessible outdoor green spaces in the masterplan as well as communal facilities as part of Phase 1 of the development
- incorporates shared energy facilities in Phase 1 of the development, and a series of sustainable strategies which include:
 - BREEAM “Excellent”
 - 35% reduction in CO2, relying on connecting to an existing Heat District Network, utilising energy efficiency measures (“Beyond Best Practice” construction score) and use PV panels
 - embracing principles of “Circular Economy”
 - embracing use of SUDs, urban greening, biodiversity and ecology
 - embracing inclusive access
 - designing to reduce overheating of the new buildings
 - designing to avoid noise and acoustic nuisances
 - optimising water use efficiency
 - promoting sustainable transport
 - addressing recycling and waste management in a well integrated, discreet and considered manner
 - using locally sourced, responsible supplier, low environmental impact materials where possible

As such, the proposed master-plan is considered a significant improvement to the existing condition of the estate, articulates a positive, well-considered and sympathetic to its context vision which promotes healthy living and wellbeing, sustainability, high quality, inclusive, safe and well-designed public realm and urban greening, well-designed architecture which pays attention to detail and encourages coherence, a holistic approach to creation of a new character / identity for the area and sense of community. The proposed indicative master-plan is supported by the Placemaking Team.

Phase 1

Phase 1 of the development, submitted as a detailed application, includes plots B, C and E of the master-plan and the associated public realm for those plots (Madingley Gardens, portion of Washington Avenue and Madingley Avenue, Westwick Street, Piper Way, Chesterton Street, Franklin Street and a portion of the frontage onto Cambridge Road).

Plot C

Plot C comprises an urban block which is defined by three tower and villa blocks (buildings C1, C2 and C3) located to the north and east, joined by a 2-storey linear base, as well as an outdoor Multi-Use Games Area (MUGA), Madingley Gardens, to the south-east. Buildings C1 (13 storey tower block) and C2 (12 storey tower block) to the north, and C3 (10 storey villa block) to the south. Ground floor comprises Community Centre (G+1), workspace, retail, residential core entrances, ancillary spaces (refuse, cycle, plant & substation) and associated public realm and landscaping. Upper floors comprise residential dwellings, communal outdoor podium deck amenity spaces. Includes basement floor which comprises carparking & water tank provisions. Rooftop green roofs and roof plant.

- community facilities, retail, workspace and Madingley Gardens outdoor are strongly supported and it is positive that these are being brought forward as part of Phase 1 of the master-plan. The location of the proposed active uses at ground is supported as it activates key streets, focal points and important corners of the proposed building

- it is seen as a positive that the proposal has been set some distance away from Cambridge Road, thus curtailing some of the noise and air pollution impacts on the development
- the number and location of cores is supported. It is seen as a positive that the cores utilise a walk-through corridor to either side of the building
- the amount of public-facing ancillary spaces is somewhat excessive and may result in a rather inanimate elevation at places. It may have been more appropriate to locate some of these facilities below ground and utilise some more of the ground floor for other active uses
- it is seen as a positive that the proposal utilises roof areas for further communal amenity and greening
- it is seen as a positive that the proposal maximises dual aspect and a more broken down massing, allowing visual relief, varied outlook and sunlight penetration
- the proposed height for Plot C is supported and is considered to be justified via its ground floor uses as well as its role as one of the key gateways into the wider redevelopment
- Plot C incorporates good amount of well-located outdoor amenity on the surrounding streets as well as at Madingley Gardens space and communal spaces at L01 and L02
- the proposed architecture is simple yet varied, broadly well-articulated, promoting good levels of sensory richness and visual interest. The proposed fenestration is broadly supported and the use of balconies to aid in creating slenderness and aiding visual variety and rhythm is seen as a positive design move

Despite some of its minor weaknesses, Plot C provides a good balance of of broadly attractive architecture, high quality accommodation and outdoor spaces and facilities, and is broadly supported by the Placemaking Team.

Plot E

Plot E comprises an urban perimeter block which is defined by four tower, villa blocks (buildings E1, E2, E3 and E4) and two terraces (E5 & E6), joined by a single storey podium deck base. Buildings E1 and E2 (two 12 storey tower blocks) and E5 (4 storey terraces) to the north, and E3 (11 storey villa block), E4 (8 storey villa block) and E6 (4 storey terraces) to the south. Ground floor comprises residential dwellings, residential core entrances, Combined Heat & Power (CHP), carparking and ancillary spaces (refuse, cycle, plant & substation) and associated public realm and landscaping. Upper floors comprise residential dwellings, communal outdoor podium deck amenity space. Rooftop green roofs and roof plant.

- it is seen as a positive that Plot E incorporates a CHP facility and it forms part of Phase 1 of the redevelopment
- despite incorporating a large amount of ancillary facilities at ground level, it is seen as a positive that the proposed ground floor wraps the inactive spaces with active frontages, thus promoting activation, natural surveillance and animation at street level
- it is seen as a positive that Plot E and Plot B are coming forward at the same time and incorporate Piper Way outdoor green which is a considerable boon in terms of urban greening, SUDs, play features, public realm and amenity
- it is seen as a positive that Plot E incorporates some variety of residential typologies (mansion / villa blocks and terraces arranged around a podium deck)

- the number and location of cores is supported. It is seen as a positive that at upper levels cores have access to natural light, ventilation and views out
- it is seen as a positive that the proposal utilises a podium deck for further communal amenity and greening
- it is seen as a positive that the proposal maximises dual aspect and a more broken down massing, allowing visual relief, varied outlook and sunlight penetration
- the proposed height for Plot E is broadly supported as it is located to the middle of the master-plan, has limited environmental impact on neighbouring properties, provides a considerable number of high quality accommodation and meets the ground floor in a positive in terms of landscaping and activation way
- Plot E incorporates good amount of well-located outdoor amenity mainly on the adjoining Piper Way space and communal spaces at L01
- the proposed architecture is simple yet varied, broadly well-articulated, promoting good levels of sensory richness and visual interest. The proposed fenestration is broadly supported and the use of balconies to aid in creating slenderness and aiding visual variety and rhythm is seen as a positive design move

Despite some of its minor weaknesses, Plot E provides a good balance of broadly attractive architecture, high quality accommodation and outdoor amenity to its residents, and is broadly supported by the Placemaking Team.

Plot B

Plot B comprises a 6 storey linear block which re-pairs an existing urban block with the existing properties to the west (Somerset Road, Rowlls Road). Ground floor comprises residential dwellings, residential core entrances, carparking to the rear, ancillary spaces (refuse, cycle & plant), associated public realm and landscaping (incl. Piper Way), informal play space and features both with public and communal accesses. Upper floors comprise residential dwellings, as well as green roofs and roof plant.

- Plot B contributes towards a more sympathetic transition to the low-rise fine-grain existing context at Somerset and Rowlls Roads and its scale and height are broadly supported
- the proposed public and private outdoor spaces are clearly defined and address the adjoining existing context appropriately (back to back relationship)
- the proposed ground floor is broadly supported as wraps around inactive uses and it contributes to a vibrant, activated and animated public realm. However it is seen as a weakness that bedrooms at ground level are orientated to the public front resulting in suboptimal privacy for those dwellings
- despite there being quite a few single-aspect dwellings, at least there are no north-only facing dwellings. The proposed bay windows and adjoining balconies go some way to alleviate the excessive number of single dwellings but does not alleviate it fully
- it is seen as a positive that Plot B and Plot E are coming forward at the same time and incorporate Piper Way outdoor green which is a considerable boon in terms of urban greening, SUDs, play features, public realm and amenity. Plot E is broadly well-situated in the development, adjoining good amounts of greening comprising casual play features

- It is seen as a positive that at upper levels cores have access to natural light, ventilation and views out
- the proposed architecture is simple yet varied, broadly well-articulated, promoting good levels of sensory richness and visual interest
- the use of bay windows is seen as a positive as it aids in integrating with the adjoining existing context architectural vernacular
- it is seen as a positive that Plot B utilises materiality and architectural embellishment sympathetic to the existing surroundings
- it is seen as a positive that Plot B utilises green and biosolar (mix of green and PV panels) roofs

Despite some of its minor weaknesses, Plot E provides a good balance of broadly acceptable quality of dwellings, high quality architecture and outdoor amenity to its residents, and is broadly supported by the Placemaking Team.

Suggested Conditions (Phase 1)

- 1:10 / 1:5 details and associated key plans / elevations / sections / 3d visuals of the key elements of the buildings / landscape before structural works for the installation of the element to commence:
 - all openings (windows, doors, entrance details, canopy / overhang details, gates, fencing, glazing systems)
 - balconies / terraces (including privacy screens)
 - railings, parapets / datums
 - facade recesses, projections, spandrels and shadow gaps
 - brick coursing details
 - publicly visible signage
 - publicly visible lighting
 - publicly visible RWPs and rainwater accessories
 - (intake and exhaust) vents, grilles and any other public visible ventilation openings
 - green, biodiverse roofs
 - PV panels
 - roof plant
 - trees, planters and greening
 - surfacing and SUDs
 - street furniture and play equipment
 - boundary treatment details
 - front garden landscaping details
 - communal amenity landscaping details
 - community centre details
 - cycle parking details
 - bin store details
- Sample material palette of all external facing materials, preferably for this scale and type of project to be constructed as a mock-up on site (in bays). Sample materials to include landscaping, external lighting and boundary treatments (gates, fences etc) in addition to architectural materials, and to comprise details of manufacturing specification. Materials to be provided before commencement of structural works supporting the material