

Further analysis of the areas covered by the Article 4 Direction in Kingston upon Thames

February 2023

Report prepared by the Strategic Planning Team

The Royal Borough of Kingston upon Thames

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1. Introduction

The purpose of this report is to provide a more detailed analysis of the areas covered by the Article 4 Direction removing Class MA permitted development rights in Kingston upon Thames. The Article 4 Direction was made on 30th July 2021 and confirmed on 18th July 2022.

This report has been prepared in response to feedback from officers from the Department of Levelling Up, Housing and Communities (DLUHC) and makes recommendations on modifications to the boundaries of the areas covered by the Article 4 Direction as originally made.

The completed proforma showing statistics on the size of the areas covered by the existing Article 4 Direction and following proposed modifications to the boundaries are included in Appendix A.

Maps showing both the existing and proposed modifications to the boundaries of the areas covered by the Article 4 Direction are included in Appendix B.

2. Methodology

The starting point for identifying locations to be considered for coverage by an Article 4 Direction were the borough's:

- designated town centres (including local centres); and
- designated industrial locations.

The entirety of the areas covered by the existing designations in the adopted Policies Map was covered by the Article 4 Direction as originally made on 31 July 2021. Local Centres are represented by frontages on the borough's adopted Policies Map, therefore polygons covering the buildings on the frontages were drawn for these locations.

It should be noted that the existing Article 4 Direction excludes many buildings in class E use which are located outside of designated town centres and industrial areas have been excluded from the Article 4 direction, therefore Class MA permitted development rights are still available to use for these buildings. Notable locations that are not covered by the Direction are set out in Chapter 9 of this report.

Following feedback from officers from the DLUHC, a further and more detailed analysis of these areas has been carried out, including an assessment of:

- significance of the area in terms of commercial activity
- the concentration of buildings in Class E use within the area;
- the vulnerability to conversion from Class E to residential use; and
- the wholly unacceptable adverse impacts from potential loss of Class E uses.

Each area is ranked by a high, medium or low rating and an assessment of whether there should be any changes made to the boundaries has been made. The colours in the assessment column indicate whether it is recommended that there should be:

- no changes made to the boundaries for that area or areas [green];
- some modifications to the boundaries for that area or areas [yellow]; or
- the entire area or areas should no longer be covered by the Article 4 Direction [red].

The main town centres (Kingston Town Centre, New Malden, Surbiton and Tolworth) have been assessed by sub-areas. The purpose of analysing the main town centres by character area is to make it easier to assess the concentration of Class E uses and the potential impacts of conversion. The assessment by sub-areas is not intended to be used for making a binary decision as to whether the whole of the sub-area remains covered by the Article 4 Direction or not.

Each local centre and industrial area has been assessed as a whole. For the industrial areas, the assessment has included a review of the planning history of buildings to assess whether the original planning permission allows for the lawful use of the building as use covered by Use Class E. The buildings in Class E use identified to be retained within the modified boundaries are either in office, light industrial or other Class E uses and have been assessed as to whether they contain elements necessary for habitation, including windows to allow natural daylight inside.

3. Kingston Town Centre

Kingston Town Centre is designated as a Metropolitan Centre and is the most important economic centre in the borough. The analysis of Kingston Town Centre has been based on sub-areas derived from the different character areas identified in the Kingston Town Centre Area Action Plan 2008, as shown in the extract below:

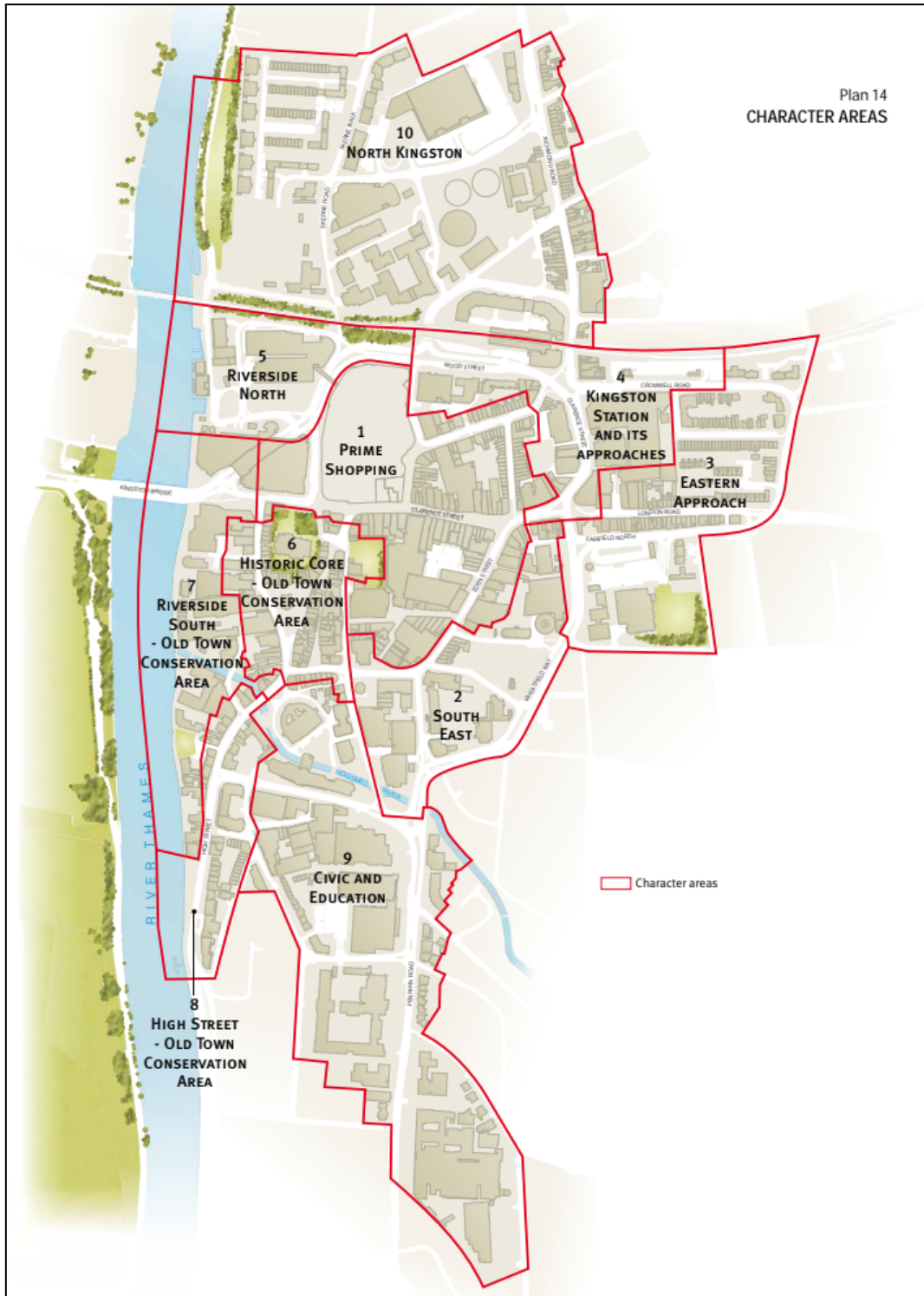


Figure 3.1: Map showing the different character areas of Kingston Town Centre.

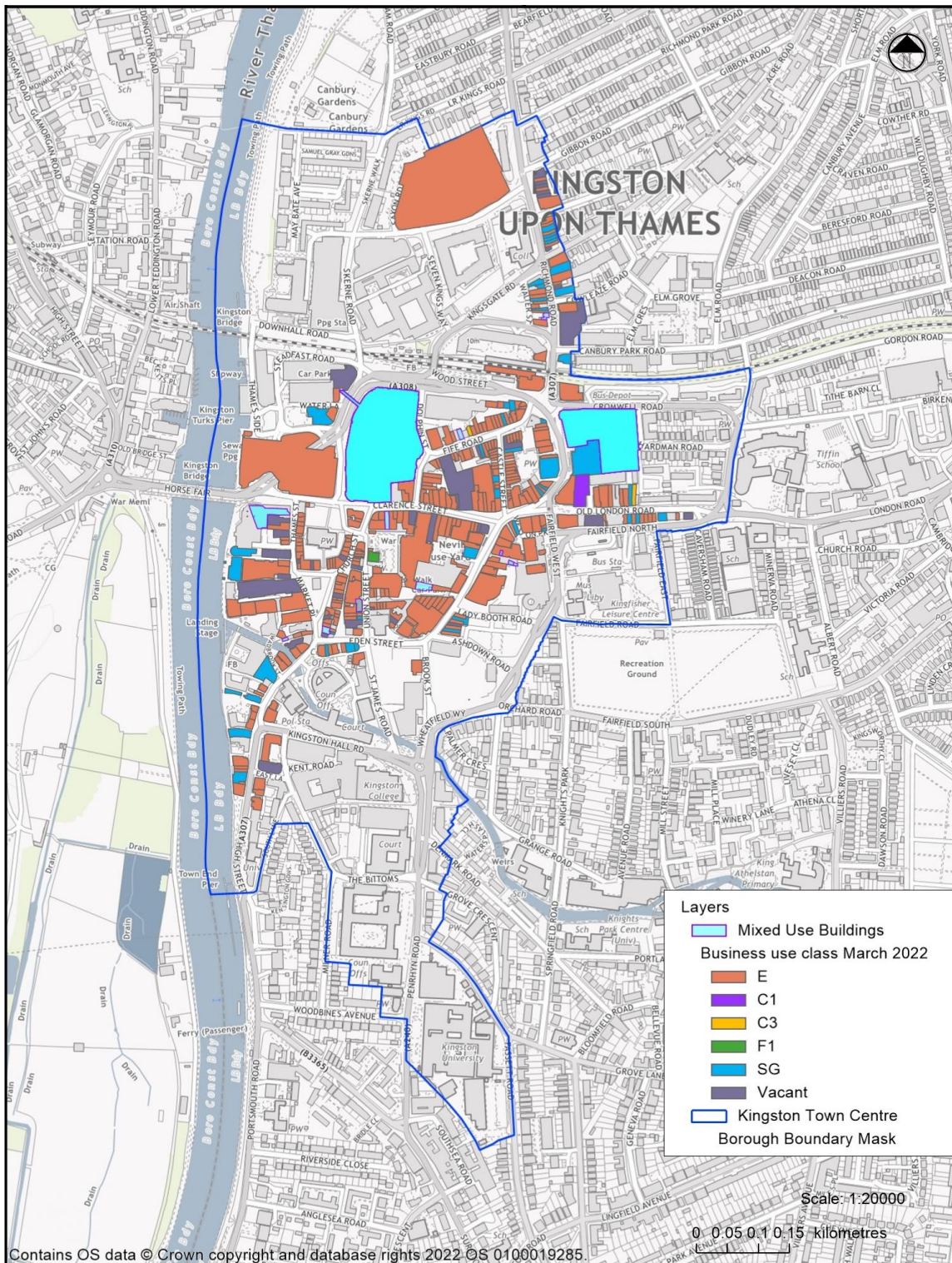


Figure 3.2: Map showing uses within Kingston Town Centre’s shopping frontages.

The vast majority of occupied units within Kingston town centre’s frontages are occupied by a main town centre use. Class E is the dominant use throughout the town centre. However, the concentration is lower along Richmond Road and Old London Road.

At present, there is minimal residential within the designated town centre frontages. The C3 uses within Kingston Town Centre’s shopping frontages primarily consist of development

where a large entrance lobby exists within the shopping frontages that serves residential units on the upper floors.

The vacancy rate across Kingston Town Centre is 13%. Vacancy units are dispersed across the Town Centre but concentrations exist along Richmond Road and in the Rotunda.

Table 3.1: Assessment of character areas in Kingston Town Centre

| Character Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|-------------------|--|--------------------------|-------------------------------|---|---|--|
| 1. Prime Shopping | The primary shopping area is focussed on Clarence Street and includes the Bentall Centre, John Lewis department store, Marks and Spencer store and the Eden Walk shopping centre. It extends into the Market Place and along secondary frontages in Fife Road, Castle Street and Eden Street. | High | High | Low - Low vacancy rate and high retail values. Units on outside of Bentalls Centre could be vulnerable to conversion. | Forms the core of the retail offer in Kingston Town Centre. Loss of this retail would threaten the vitality and viability of the wider town centre and could result in Kingston losing its metropolitan status. | Part of the retail core. No modifications should be made to this area. |
| 2. South East | This mixed use area between Eden Street and the relief road (Wheatfield Way) has retail and related uses, offices, a nightclub, parking, cafés/restaurants and a little residential. There are many poor quality buildings, routes and spaces. Only the listed former Post Office and sorting office/telephone exchange buildings are noteworthy. The area includes two sites that are undergoing redevelopment - The Old Post | Medium | Medium | Medium - smaller individual units may be desirable for conversion as well as offices on upper floors | Contributes significantly to the wider retail and leisure offer of Kingston Town Centre. Loss of Class E uses, would threaten the vitality and viability of the wider town centre as a metropolitan centre. | The boundaries should be modified to exclude Ashdown Road car park from the area covered by the Direction. |

| Character Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--|--|--------------------------|-------------------------------|---|---|--|
| | Office site (residential-led development) and the Surrey House site (office-led development). | | | | | |
| 3. Eastern Approach | The eastern approach to the town centre extends from the railway line southwards across housing, Old London Road and the relief road to the Cattle Market car park, Kingfisher leisure centre and the listed Kingston Library and Museum. | Medium | Low | Medium - smaller units, particularly on Old London Road may be desirable for conversion as well as offices on upper floors | Unique independent retail offering on Old London Road contributes significantly to the wider retail offering of Kingston Town Centre and differentiate Kingston from other town centres. Loss of these retail units would lessen the town centre's ability to compete with other major town centres in the region | Old London Road forms part of the retail core. The boundaries should be amended so that only the commercial units on Old London Road are covered by the Direction. Nos.43-47 Old London Road should also be excluded as they are listed buildings. |
| 4. Kingston Station and its approaches | Kingston Station and its approaches have a poor quality environment on the busy relief road. There are offices along Wood Street completed in the late 1980s. The area is one of the hubs for evening entertainment with the Prism nightclub and the | High | Medium | Low - Low vacancy rate, units with the railway station and rotunda unsuitable for conversion. Smaller individual units may be | Contributes significantly to the commercial offer of Kingston Town Centre. Loss of Class E uses, would threaten the vitality and viability of the wider town centre as a metropolitan centre. | The south-west part of this area forms part of the retail core of the town centre. The boundaries should be amended so that only the units within the Primary Shopping Area and all the units in |

| Character Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---|---|--------------------------|-------------------------------|--|--|--|
| | Rotunda leisure development. | | | desirable for conversion as well as offices on upper floors | | Class E use on Wood Street and Cromwell Road are covered by the Direction. |
| 5. Riverside North | This area includes part of the John Lewis department store, the Bentalls car parks and the Vicarage Road and Turks sites. | Medium | Low | Low - Units are unlikely to be suitable for conversion. | Contributes moderately to the wider retail and leisure offer of Kingston Town Centre. | The boundaries should be amended so that only buildings in Class E use or with potential for Class E use are covered by the Direction. |
| 6. Historic Core - Old Town Conservation Area | The historic core of the Old Town Conservation Area around the Market Place is an exceptional example of a largely intact Medieval street pattern and has an impressive range of good quality vernacular architecture from the 15th century onwards. The Market Place historically provided a focus for trade, local government and hospitality and although this has changed, it retains its role as Kingston's premier public space, with its daily market and shops. | High | High | Medium - smaller individual units may be desirable for conversion as well as offices on upper floors | Contributes significantly to the wider retail and leisure offer of Kingston Town Centre. Loss of Class E uses, would threaten the vitality and viability of the wider town centre as a metropolitan centre. The condition in the legislation on conservation areas may not provide enough protection to resist individual units or buildings from conversion, but over | Part of the retail core and has historical significance to the town centre. No modifications should be made to this area. |

| Character Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|----------------|-------------------------|--------------------------|-------------------------------|-----------------------------|---|------------|
| | | | | | time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area. | |

| | | | | | | |
|--|---|-------------|---------------|---|---|---|
| <p>7. Riverside South - Old Town Conservation Area</p> | <p>This part of the Old Town Conservation Area fronts onto the Thames and stretches from Kingston Bridge south to Town End Gardens and High Street. It has experienced the greatest degree of change over the past century, as trade and industry declined, and was replaced with redevelopment for residential and recreational use, including Bishops Palace House in the 1970s and Charter Quay in 2001. The area has a mix of uses with offices, residential, restaurants and bars, and the Minima Yacht Club and a mix of architectural styles. The high density, mixed use Charter Quay development has been particularly successful in establishing itself as a riverside attraction and destination, adding to the centre's vitality by providing cafes, restaurants and bars, the Rose Theatre building, residential development, a wetland area, a high quality public realm with a public piazza and the completion of</p> | <p>High</p> | <p>Medium</p> | <p>Medium - smaller individual units may be desirable for conversion as well as offices on upper floors</p> | <p>Contributes significantly to the wider retail and leisure offer of Kingston Town Centre. Loss of Class E uses, would threaten the vitality and viability of the wider town centre as a metropolitan centre. The condition in the legislation on conservation areas may not provide enough protection to resist individual units or buildings from conversion, but over time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area.</p> | <p>Provides a significant leisure offer through the restaurants along the riverside. The whole area, apart from the John Lewis, should be covered by the Article 4 Direction.</p> |
|--|---|-------------|---------------|---|---|---|

| Character Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---|--|--------------------------|-------------------------------|--|--|--|
| | the riverside walk from Kingston Bridge to Town End Pier. The very attractive Kingston Bridge dates from 1828 and is Grade II* listed. It was widened in 1914 and 2001 and is a primary landmark from which there are extensive and panoramic views of Kingston's riverside. Next to Kingston Bridge is Bishops Palace House, which occupies a large footprint with a 50m river frontage. | | | | | |
| 8. High Street - Old Town Conservation Area | This area includes the full extent of the High Street and the Guildhall area. The High Street offers a range of shops, restaurants and pubs, plus offices, flats and the Rose Theatre - which is a significant attraction. It has a range of building styles from 16th century vernacular through to the recent theatre. There are five listed buildings, plus the 12th century Clattern Bridge, a Scheduled Ancient | High | Medium | Medium - smaller individual units may be desirable for conversion as well as offices on upper floors | Contributes significantly to the wider retail and leisure offer of Kingston Town Centre. Loss of Class E uses, would threaten the vitality and viability of the wider town centre as a metropolitan centre. The condition in the legislation on conservation areas may not provide enough protection to resist | Provides a significant leisure offer through the restaurants on the High Street. All units along the High Street up to and including Town End Parade should be covered by the Article 4 Direction, but exclude the buildings along South Lane. No.37-41 should be excluded as it is a listed building. |

| Character Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|-----------------------------|---|--------------------------|-------------------------------|---|---|---|
| | Monument. The High Street acts as the southern gateway to the Old Town Conservation Area and the town centre from Portsmouth Road. | | | | individual units or buildings from conversion, but over time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area. | |
| 9. Civic and Education Area | This area extends southwards from the Guildhall to Kingston University, taking in the Courts, Kingston College, Surrey County Hall and car parks. | Medium | Low | Low - Majority of units likely unavailable for conversion | There is already significant need for office space within the borough, loss of this office space would exacerbate the problem. | Does not form part of the retail core, but offices adjacent the retail core should be protected given the significant need for office floorspace in the borough. The boundaries should be amended to exclude the whole area apart from Drapers Court and the Guildhall complex. |

| Character Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--------------------|--|--------------------------|-------------------------------|--|--|---|
| 10. North Kingston | This area extends from the riverside and Canbury Gardens across to Richmond Road and from the railway northwards to Lower Kings Road. It has been the subject of major regeneration over the last 20 years, with the redevelopment of the former Power Station, gas works, station yard and factory sites for housing, a supermarket, health and fitness club and multi-storey car park, with associated new roads and environmental improvements. | Medium | Low | Medium - Higher than average vacancy rate on Richmond Road | Akin to a local centre, the shopping parades along Richmond Road provide a valuable retail and leisure offer for the significant residential population that lives in the areas north of the railway line. Loss of Class E units would negatively impact local residents access to these services, particularly by foot. | Most of this area is now in residential use, but the parades along Richmond Road provide a valuable retail and leisure offer for the significant residential population that lives in the areas north of the railway line. The boundaries should be amended so that only the units along Richmond Road (up to Gibbon Road), should be covered by the Direction. No.22-30 Richmond Road should be excluded as it is a listed building. |

4. New Malden District Centre

New Malden District Centre is one of the main town centres in the borough and provides essential shops and services for the surrounding neighbourhoods. The assessment of New Malden has been broken down into four areas, as shown on the map in Figure 4.1.

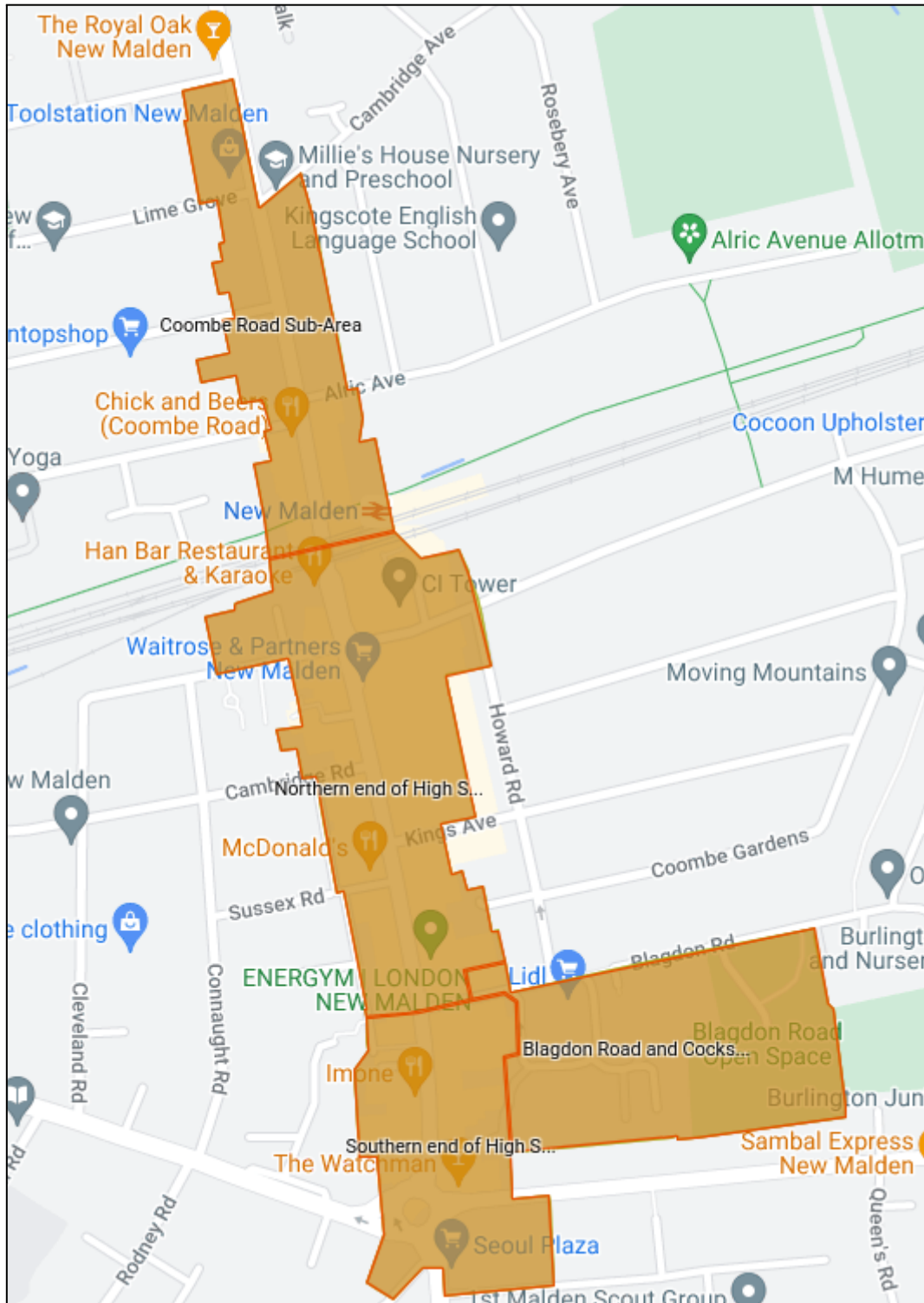


Figure 4.1: Map showing the different sub-areas of New Malden District Centre

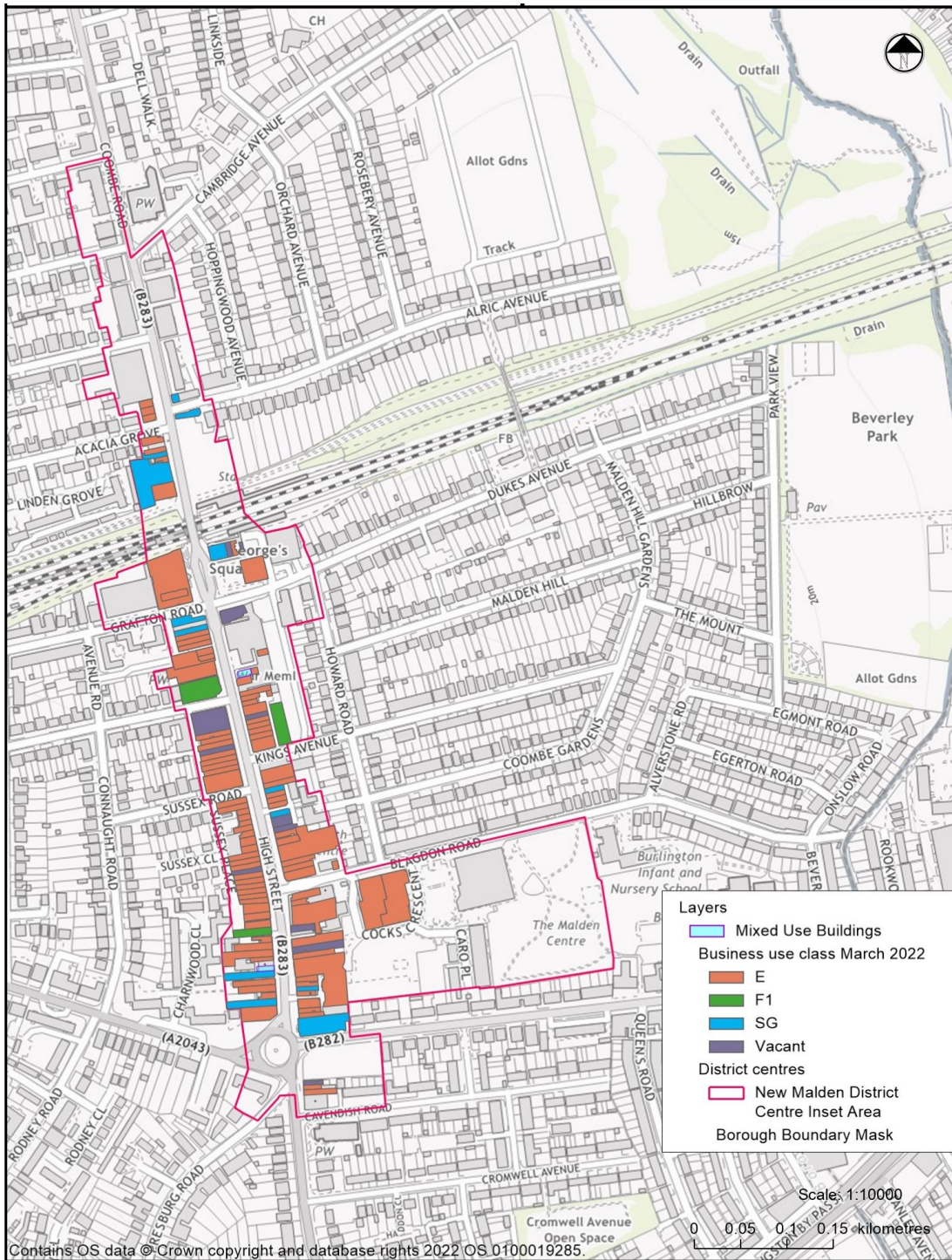


Figure 4.2: Map showing uses within New Malden District Centre's shopping frontages

The vast majority of occupied units within New Malden district centre's frontages are occupied by a main town centre use. Class E is the dominant use throughout the district centre. There is currently no ground-floor residential uses within the designated shopping frontages. The vacancy rate within the shopping frontages of New Malden district centre is 10%. Vacant units are dispersed throughout the district centre.

Table 4.1: Assessment of sub-areas in New Malden District Centre

| Sub-Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---|--|--------------------------|-------------------------------|---|--|--|
| Coombe Road | Comprises a range of shops, restaurants, offices and residential uses north from the railway line. The site adjacent the station is being redeveloped as for mixed-uses. | Medium | Medium | High - offices in this area have already been converted | The southern end of Coombe Road provides many commercial units that benefit from being adjacent to the railway station. The railway line should not be treated as a <i>de facto</i> edge of the core of the high street as it contains many main town centre uses. Furthermore, the vacant site immediately adjacent to New Malden Railway Station is under construction for a new development that will bring higher footfall and create brand new Class E uses that will improve the vitality of this town centre. | Only the west side of Coombe Road up to junction with Chestnut Grove, plus 72 Coombe Road and 82-88 Coombe Road, and the east side of Coombe Road up to Alric Avenue (including units on north side of Alric Avenue) should be covered by the Article 4 Direction. |
| Northern end of High Street (to junction with Blagdon Road) | Comprises the retail and leisure core of the town centre, including two office buildings that dominate the | High | High | Low - units within main shopping frontages likely to be undesirable | Retail core of the district centre, where loss of Class E uses would threaten the viability | The whole area should be covered by the Article 4 Direction. |

| Sub-Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---|--|--------------------------|-------------------------------|--|--|--|
| | skyline. | | | for residential conversion | and vitality of the wider district centre. | |
| Blagdon Road and Cocks Crescent | Comprise a retail, leisure and residential uses. | Medium | Low | Low - no vacant units, larger units may be unsuitable for conversion | Akin to a local centre, the retail and leisure units along Blagdon Road provide a valuable retail and leisure offer for the significant residential population that lives in the area east of the town centre. | The Article 4 Direction should be scaled back so that only 23-29 Blagdon Road and 2-8 Blagdon Road are covered. |
| Southern end of High Street and Fountain Roundabout | Comprises a range of retail and leisure uses. | High | High | Low - units within main shopping frontages likely to be undesirable for residential conversion | Retail core of the district centre, where loss of Class E uses would threaten the viability and vitality of the wider district centre. The building at 2 Kingston Road has been identified as part of a larger site for having for redevelopment in the First Draft of the new Local Plan for the Borough (currently out for consultation), therefore it has the | The Article 4 Direction should be scaled back so that 184 High Street and 120 Malden Road (both public houses) are not covered by the Article 4 Direction. |

| Sub-Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|----------|-------------------------|--------------------------|-------------------------------|-----------------------------|---|------------|
| | | | | | potential to increase footfall for the high street in future. | |

5. Surbiton District Centre

Surbiton District Centre is one of the main town centres in the borough and provides essential shops and services for the surrounding neighbourhoods. The assessment of Surbiton has been broken down into four areas, as shown in the map below.

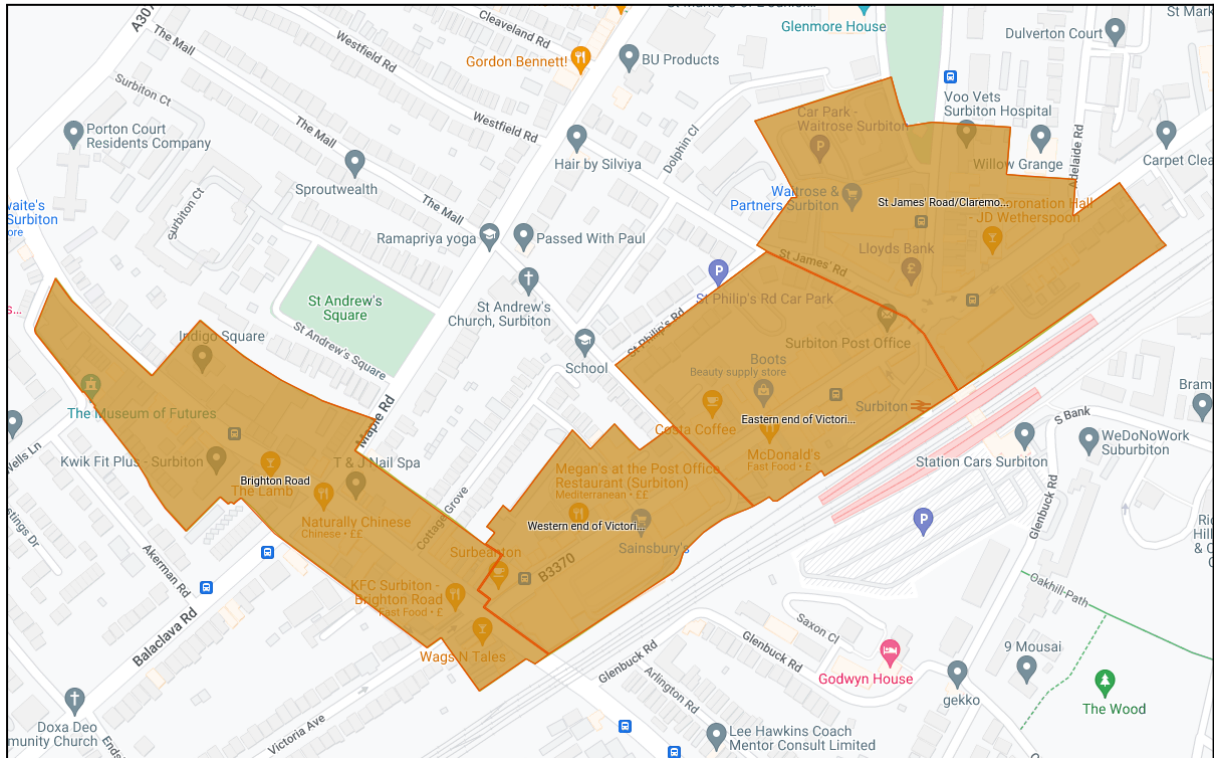


Figure 5.1: Map showing the different sub-areas of Surbiton District Centre

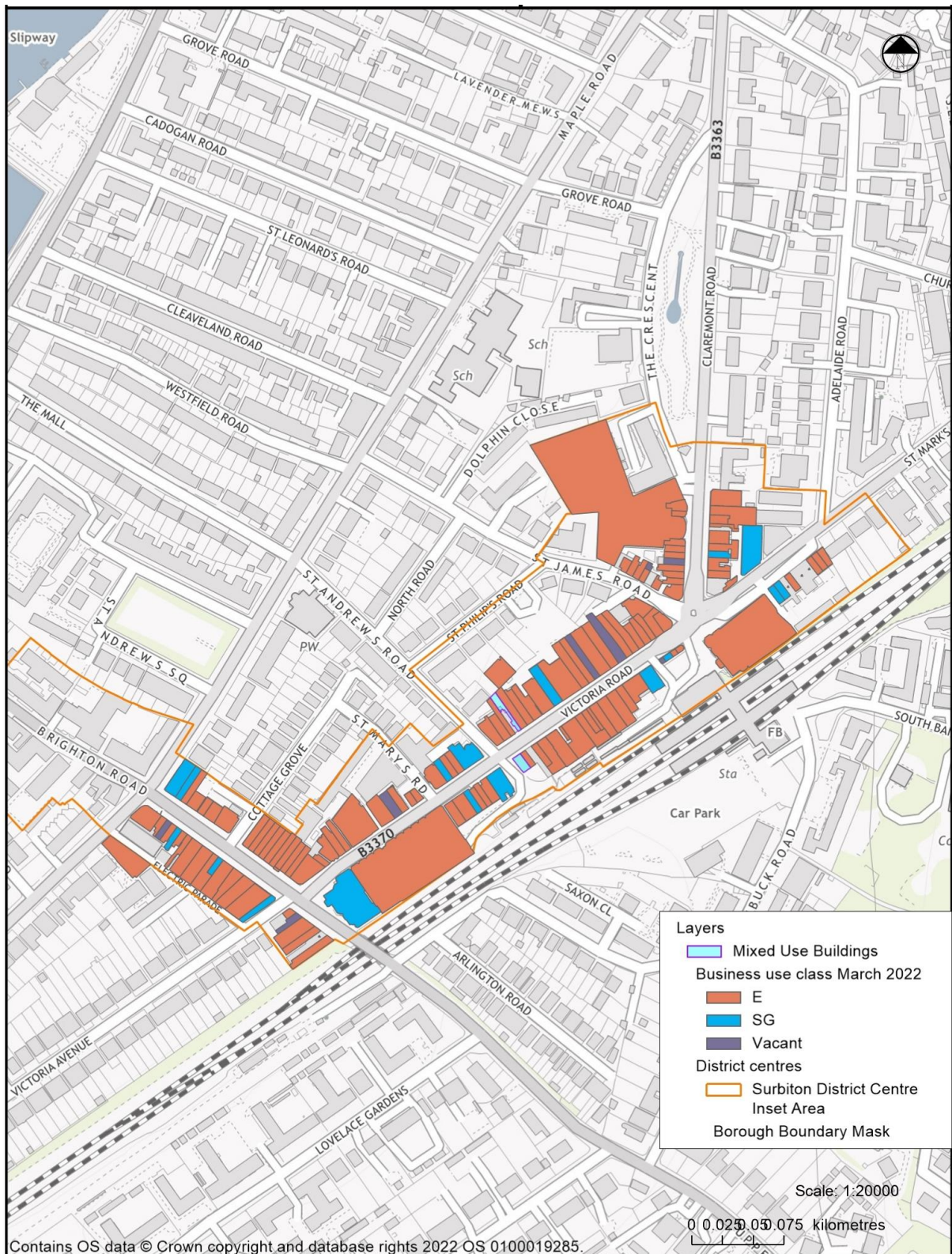


Figure 5.2: Map showing uses within Surbiton District Centre's shopping frontages.

The vast majority of occupied units within Surbiton District Centre's frontages are occupied by a main town centre use. Class E is the dominant use throughout the district centre's shopping frontages.

There is currently no ground floor residential use within the designated shopping frontages. Surbiton district centre has the lowest vacancy rate out of the major town centres in the borough at 6 per cent. The vacant units are dispersed throughout the district centre.

Outside of the shopping frontages, there are fewer Class E uses.

Table 5.1: Assessment of sub-areas in Surbiton District Centre

| Sub-Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---------------|--|--------------------------|-------------------------------|---|--|--|
| Brighton Road | Comprises a mix of retail, leisure and residential uses, with a distinct change in character to more residential buildings north of the junction with Maple Road and Balaclava Road. The Surbiton Town Centre Conservation Area is covered by the Direction as a key characteristic of this area is the long-standing historic use of Brighton Road for commercial uses. | Medium | Medium | Medium - Units on the fringes of the town centre may be desirable for conversion. | The southern part of Brighton Road forms part of the retail and leisure core of the district centre, where the loss of Class E uses would threaten the viability and vitality of the wider district centre. The condition in the legislation on conservation areas may not provide enough protection to resist individual units or buildings from conversion, but over time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area. | The boundaries should be modified so that only the area up to the junction with Maple Road and Balaclava Road is covered by Direction. |

| Sub-Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---|---|--------------------------|-------------------------------|---|---|---|
| Western end of Victoria Road (up to junction with St Andrew's Road) | Comprises part of the retail and leisure core of the town centre. The Surbiton Town Centre Conservation Area is covered by the Direction as a key characteristic of this area is the long-standing historic use of Victoria Road for commercial uses. | High | High | Low - Low vacancy rate, units within shopping frontages likely to be undesirable for residential conversion | Retail core of the district centre, where the loss of Class E uses would threaten the viability and vitality of the wider district centre. The condition in the legislation on conservation areas may not provide enough protection to resist individual units or buildings from conversion, but over time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area. | Only include buildings fronting onto Victoria Road. |
| Eastern end of Victoria Road (up to junction with St Andrew's Road) | Comprises part of the retail and leisure core of the town centre. The Surbiton Town Centre Conservation Area is covered by the Direction as a key characteristic of this area is the long-standing historic | High | High | Low - Low vacancy rate, units within shopping frontages likely to be undesirable for residential | Retail core of the district centre, where the loss of Class E uses would threaten the viability and vitality of the wider district centre. The condition in the | Nos.2-8 Victoria Road and Nos.5-7 St James' Road are listed buildings and therefore not affected by Class MA permitted development rights, so |

| Sub-Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---|--|--------------------------|-------------------------------|---|--|--|
| | use of Victoria Road for commercial uses. | | | conversion | legislation on conservation areas may not provide enough protection to resist individual units or buildings from conversion, but over time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area. | should be excluded. Only include buildings fronting onto Victoria Road should be covered by the Direction. |
| St James Road / Claremont Road / St Mark's Hill | Comprises a mix of retail, leisure and residential uses. The Surbiton Town Centre Conservation Area is covered by the Direction as a key characteristic of this area is the long-standing historic use of this sub-area for commercial uses. | High | High | Low - Low vacancy rate, units within shopping frontages likely to be undesirable for residential conversion | St James' Road and Claremont Road form part of the retail and leisure core of the district centre, where the loss of Class E uses would threaten the viability and vitality of the wider district centre. The condition in the legislation on conservation areas may not provide enough protection to resist | The Article 4 Direction should cover the offices at 1 The Crescent, but not cover the residential units and Waitrose. Only the offices and shopping parade on south-eastern side of St Mark's Hill should be covered by the Article 4 Direction. |

| Sub-Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|----------|-------------------------|--------------------------|-------------------------------|-----------------------------|---|------------|
| | | | | | individual units or buildings from conversion, but over time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area. | |

6. Tolworth District Centre

Tolworth District Centre is one of the main town centres in the borough and provides essential shops and services for the surrounding neighbourhoods. The assessment of Tolworth has been broken down into four areas, as shown in the map below.

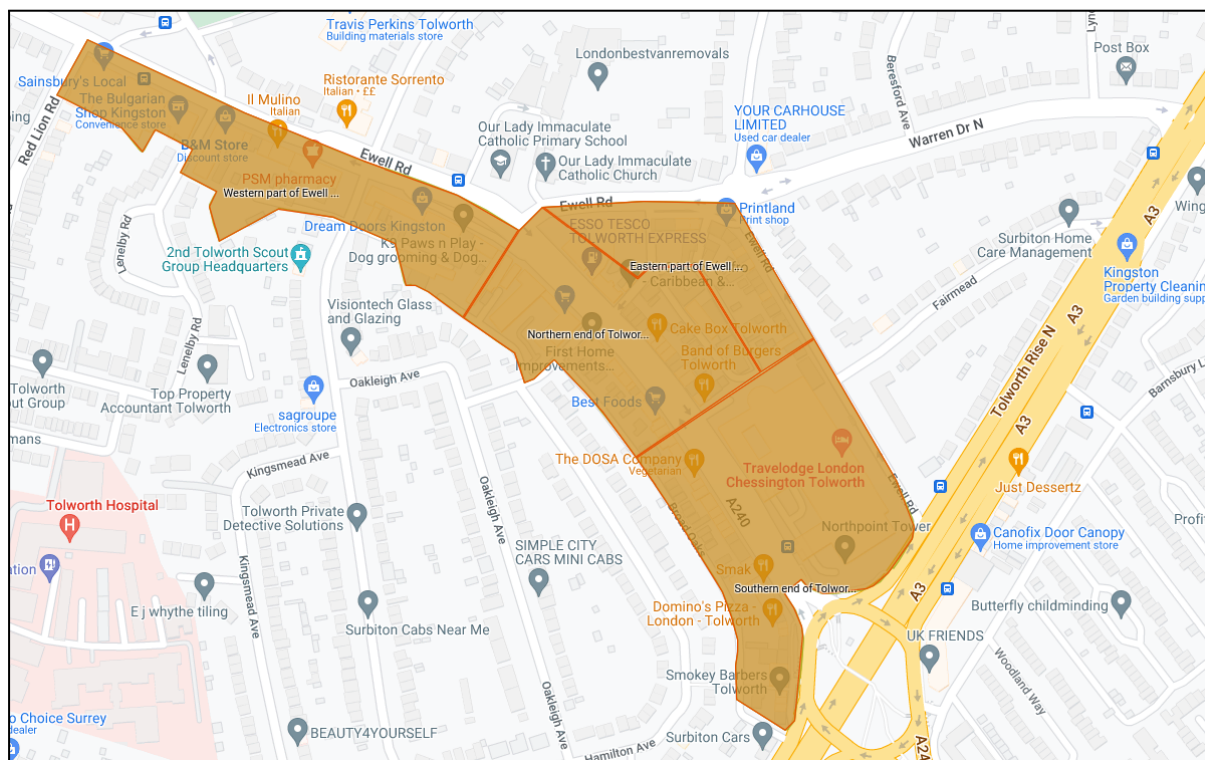


Figure 6.1: Map showing the different sub-areas of Tolworth District Centre.

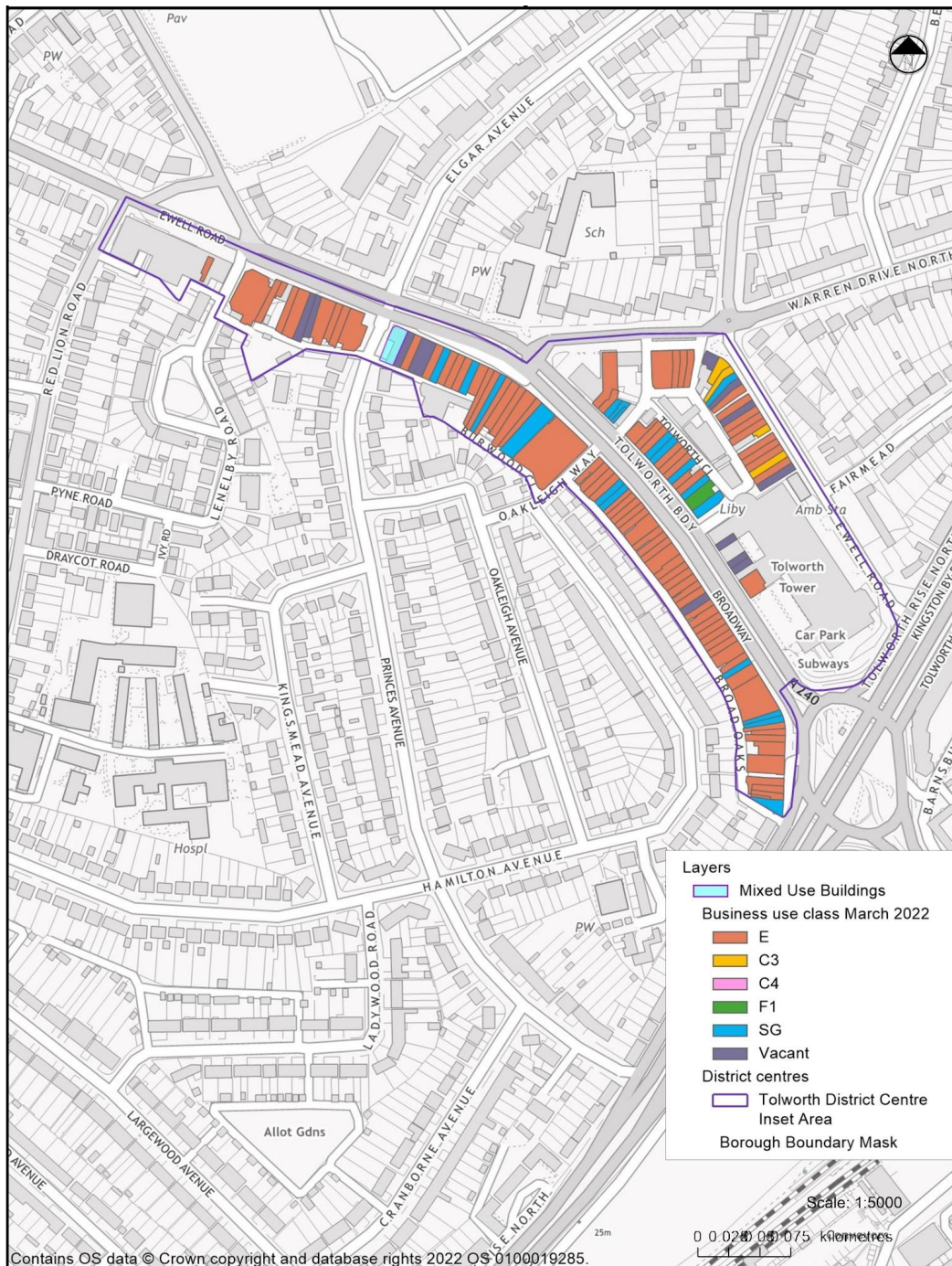


Figure 6.2: Map showing uses within Tolworth District Centre’s shopping frontages

The vast majority of occupied units within Tolworth district centre’s frontages are occupied by a main town centre use. Class E is the dominant use throughout the district centre.

There is currently no ground floor residential within the designated shopping frontages. However, some ground-floor residential uses exist along Ewell Road outside of the designated shopping frontage. These units were previously commercial.

The vacancy rate within the shopping frontages of Tolworth district centre is 9%.

Table 6.1: Assessment of sub-areas in Tolworth District Centre

| Sub-Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--|--|--------------------------|-------------------------------|--|---|--|
| Western part of Ewell Road (up to junction with Tolworth Broadway) | Comprises a mix of retail, leisure and residential uses. | High | High | Medium - Units on the fringes of the town centre may be desirable for conversion. | Akin to a local centre, the shopping parades along this part of Ewell Road provide a valuable retail offer for the significant residential population that lives in the areas around the town centre. | The boundaries should be modified to excluded outbuildings and parking spaces to the rear from being covered by the Direction. |
| Eastern part of Ewell Road (up to junction with Tolworth Broadway) | Comprises a mix of retail and residential uses. Many of the units along Ewell Road south of the junction with Raeburn Avenue/Warren Avenue are now in residential use. | Medium | Medium | High - Existing conversions within frontage | Akin to a local centre, the shopping parades along part of Ewell Road provide a valuable retail offer for the significant residential population that lives in the areas around the town centre. | The boundaries should be modified to remove Nos.436 to 468 Ewell Road (inclusive) from the area covered by the Direction. |
| Northern end of Tolworth Broadway and Tolworth Close | Comprises part of the retail and leisure core of the town centre. | High | High | Low - units within main shopping frontages likely to be undesirable for residential conversion | Retail core of the district centre, where the loss of Class E uses would threaten the viability and vitality of the wider district centre. | The boundaries should be modified to exclude Tolworth Close from the area covered by the Direction. |

| Sub-Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--|---|--------------------------|-------------------------------|--|--|--|
| Southern end of Tolworth Broadway and Tolworth Tower | Comprises part of the retail and leisure core of the town centre. Tolworth Tower dominates the skyline. | High | High | Low - units within main shopping frontages likely to be undesirable for residential conversion | Retail core of the district centre, where the loss of Class E uses would threaten the viability and vitality of the wider district centre. | The whole area should be covered by the Article 4 Direction. |

7. Local Centres

The borough has 25 designated Local Centres that are covered by the Article 4 Direction. The maps below show the current boundaries for the areas covered by the Direction and the uses for the buildings within each Local Centre.

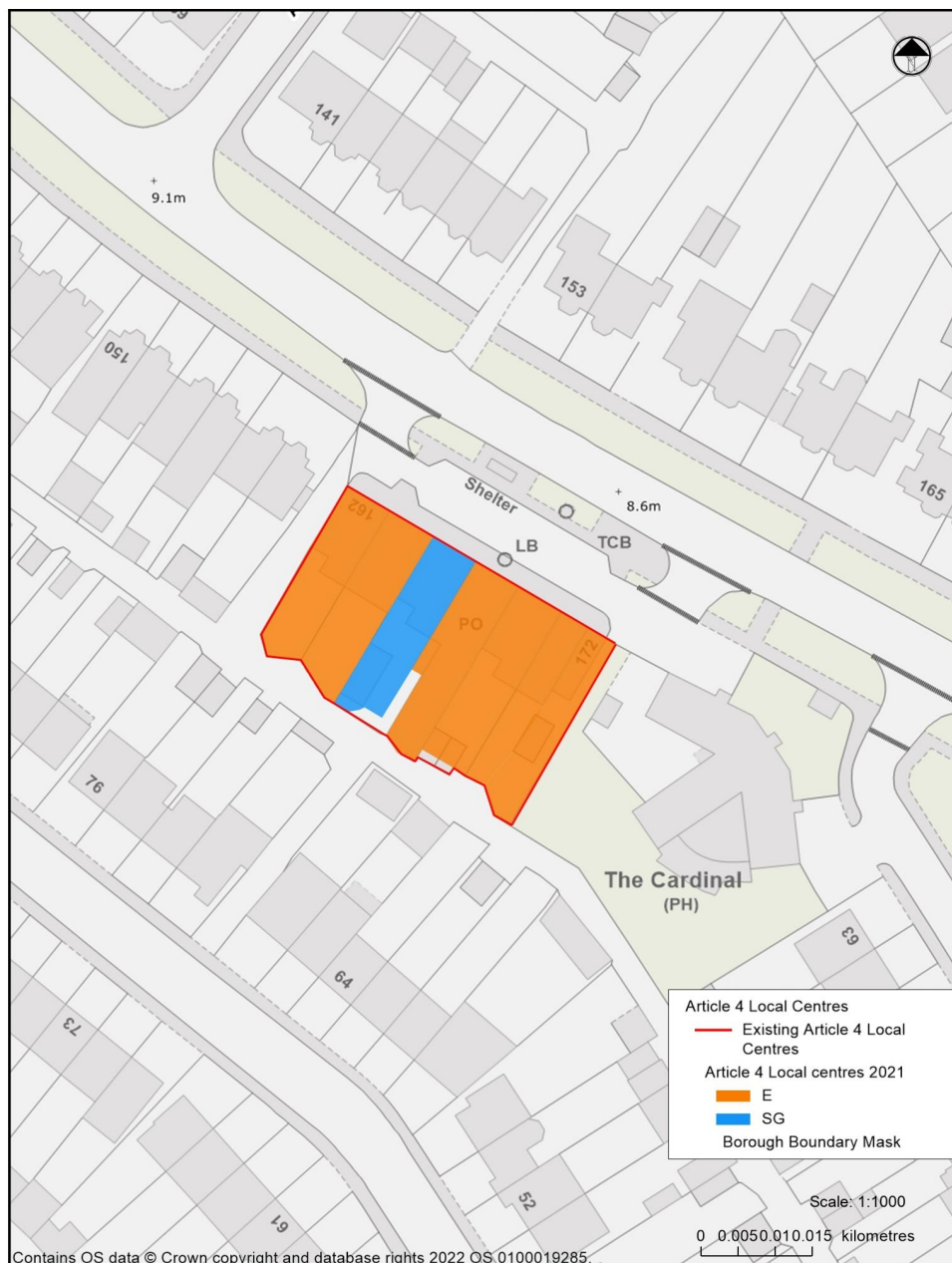


Figure 7.1: Map showing uses within Tudor Drive Local Centre.



Figure 7.2: Map showing uses within Richmond Road Local Centre.



Figure 7.3: Map showing uses within Kings Road Local Centre.



Figure 7.4: Map showing uses within Kingston Vale Local Centre.

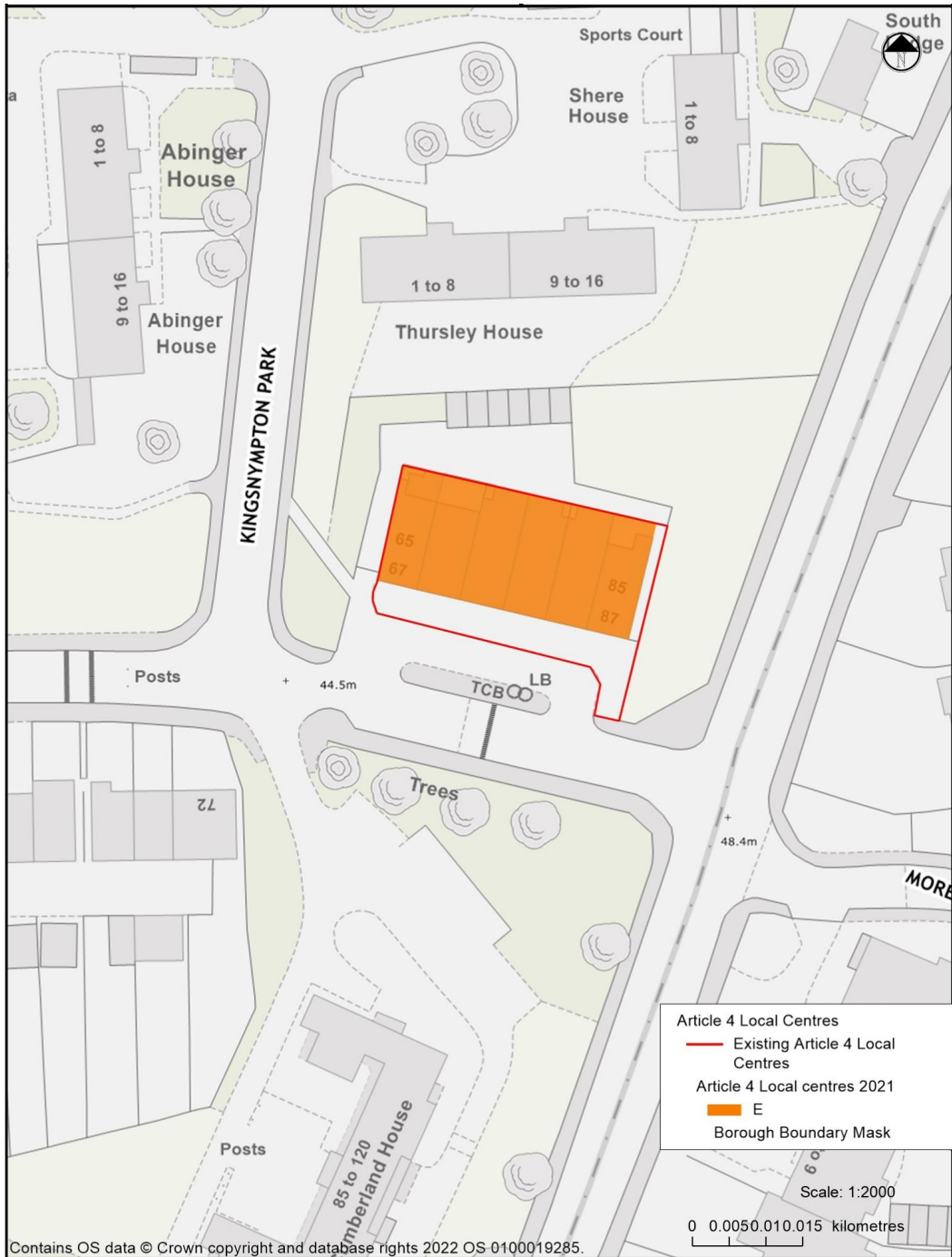


Figure 7.5: Map showing uses within Crescent Road Local Centre.

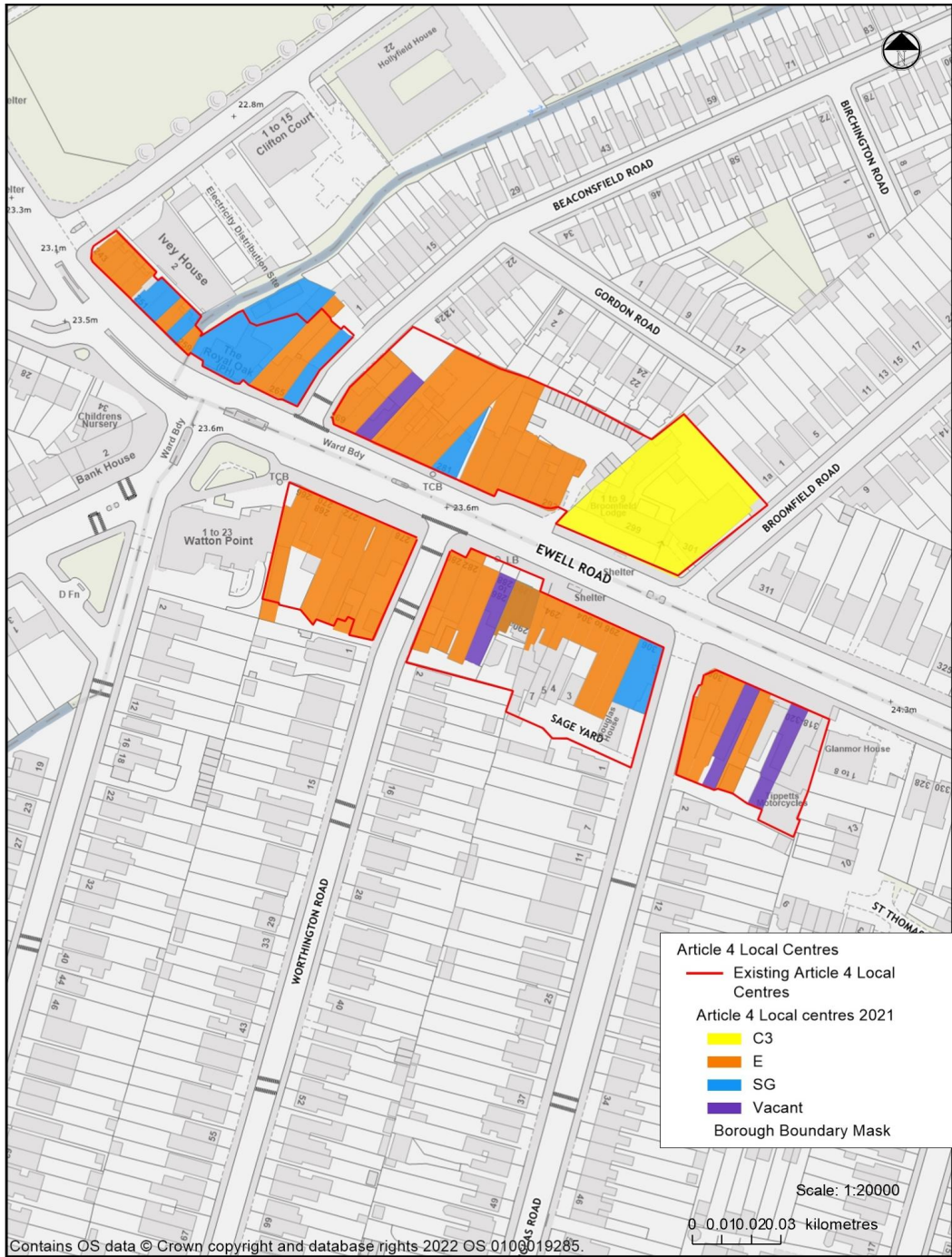


Figure 7.6: Map showing uses within Ewell Road South Local Centre.

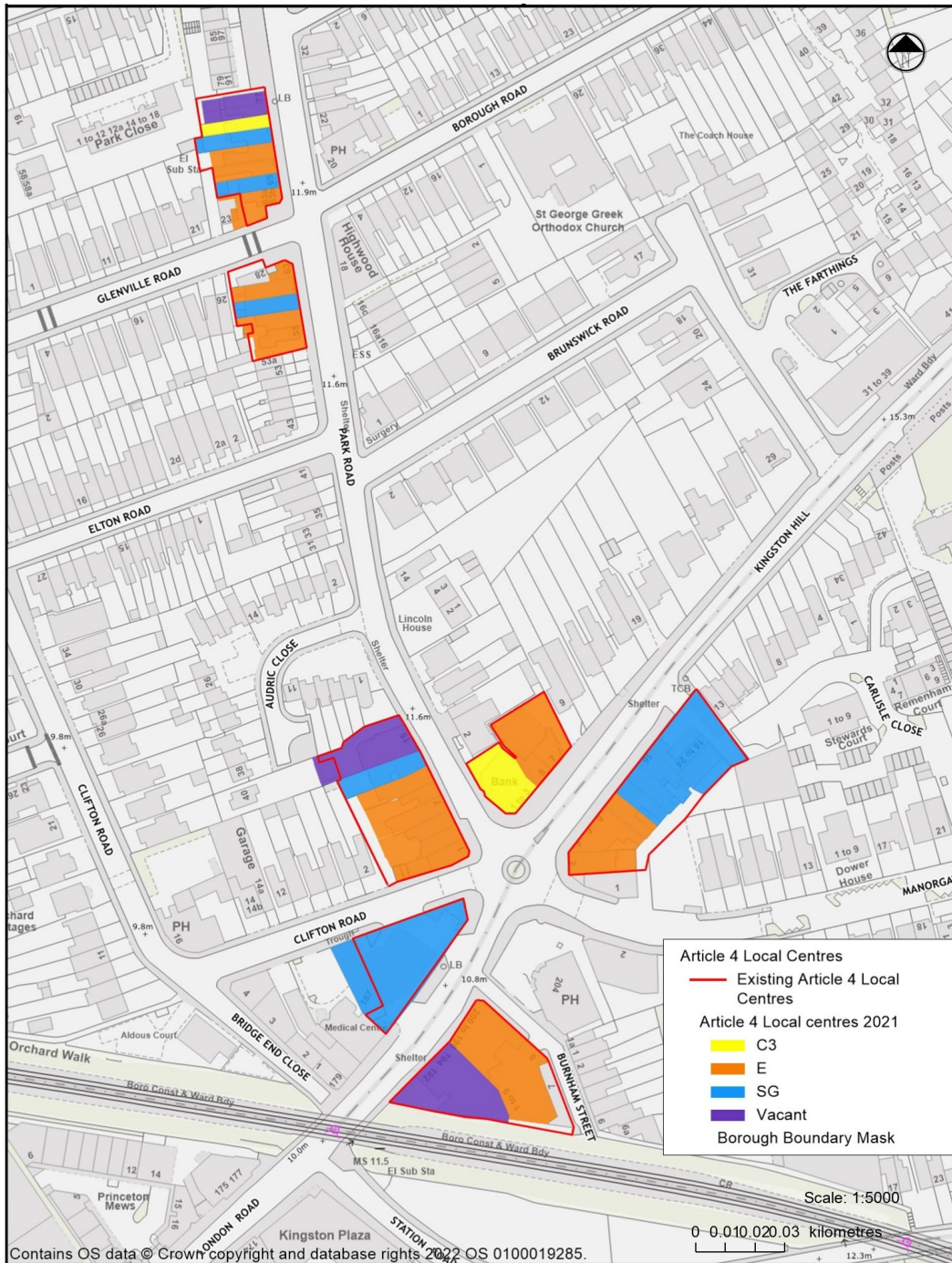


Figure 7.7: Map showing uses within Kingston Hill and Park Road Local Centre.

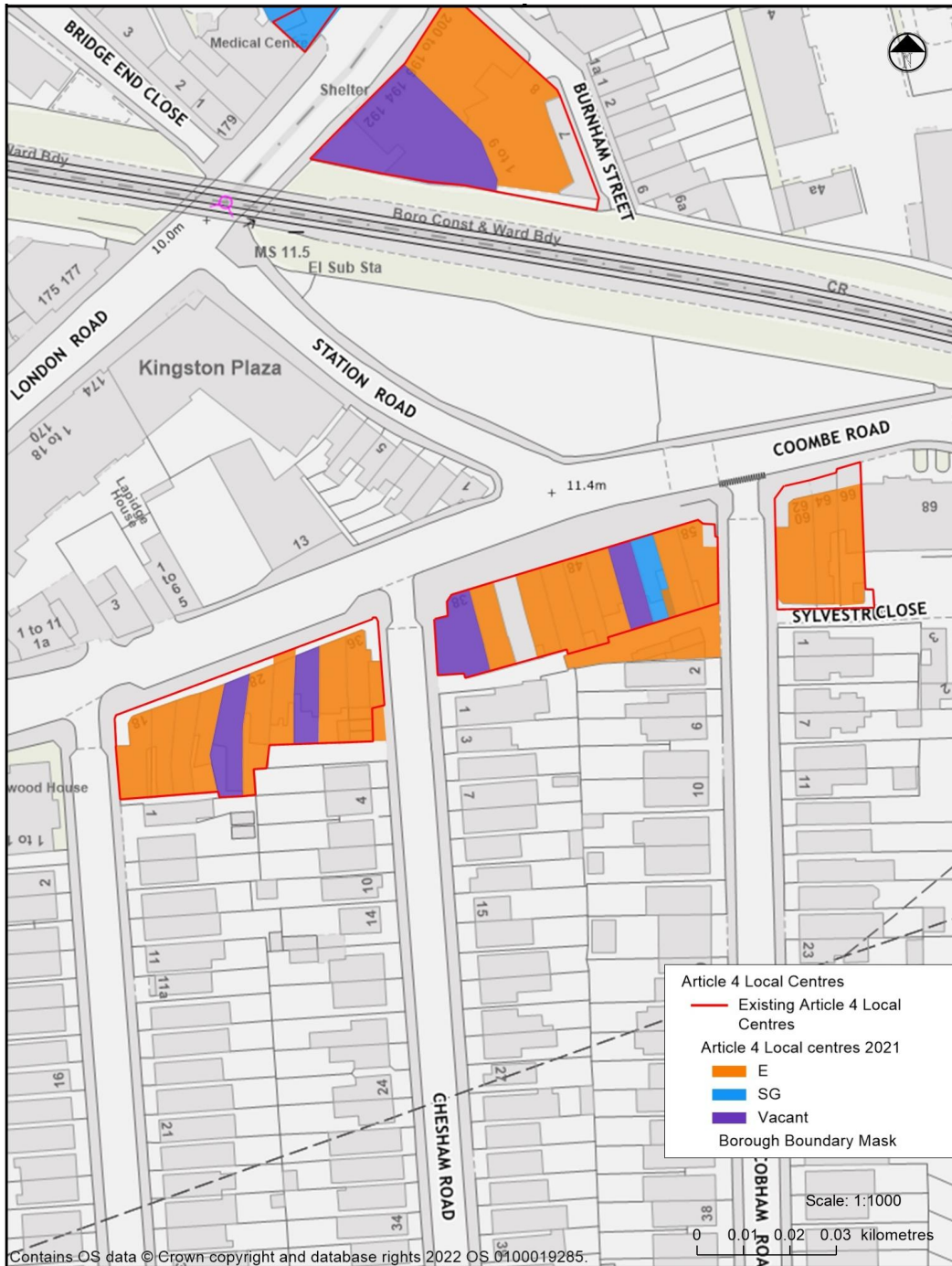


Figure 7.8: Map showing uses within Coombe Road Local Centre.



Figure 7.9: Map showing uses within Cambridge Road Local Centre.

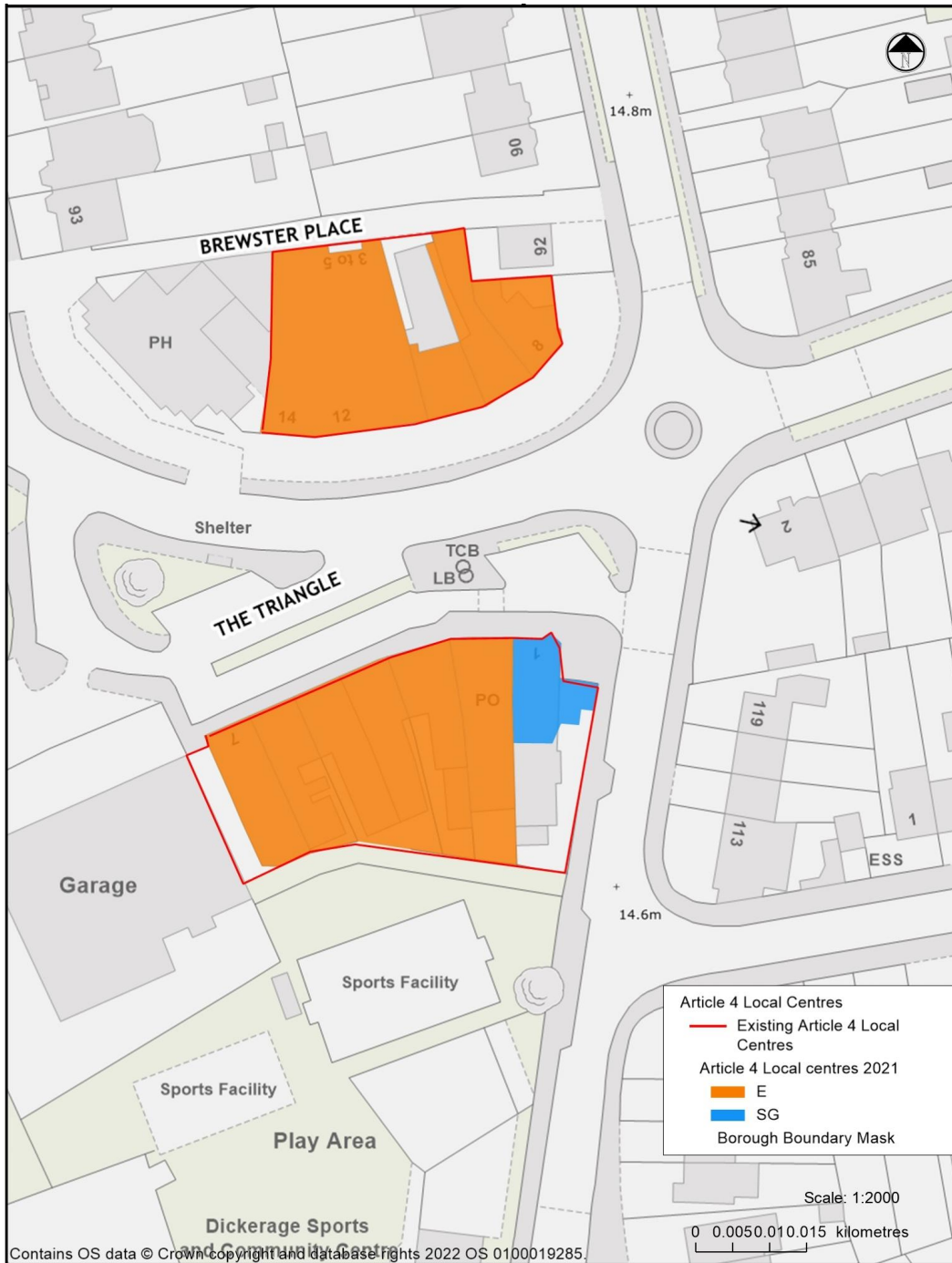


Figure 7.10: Map showing uses within The Triangle Local Centre.

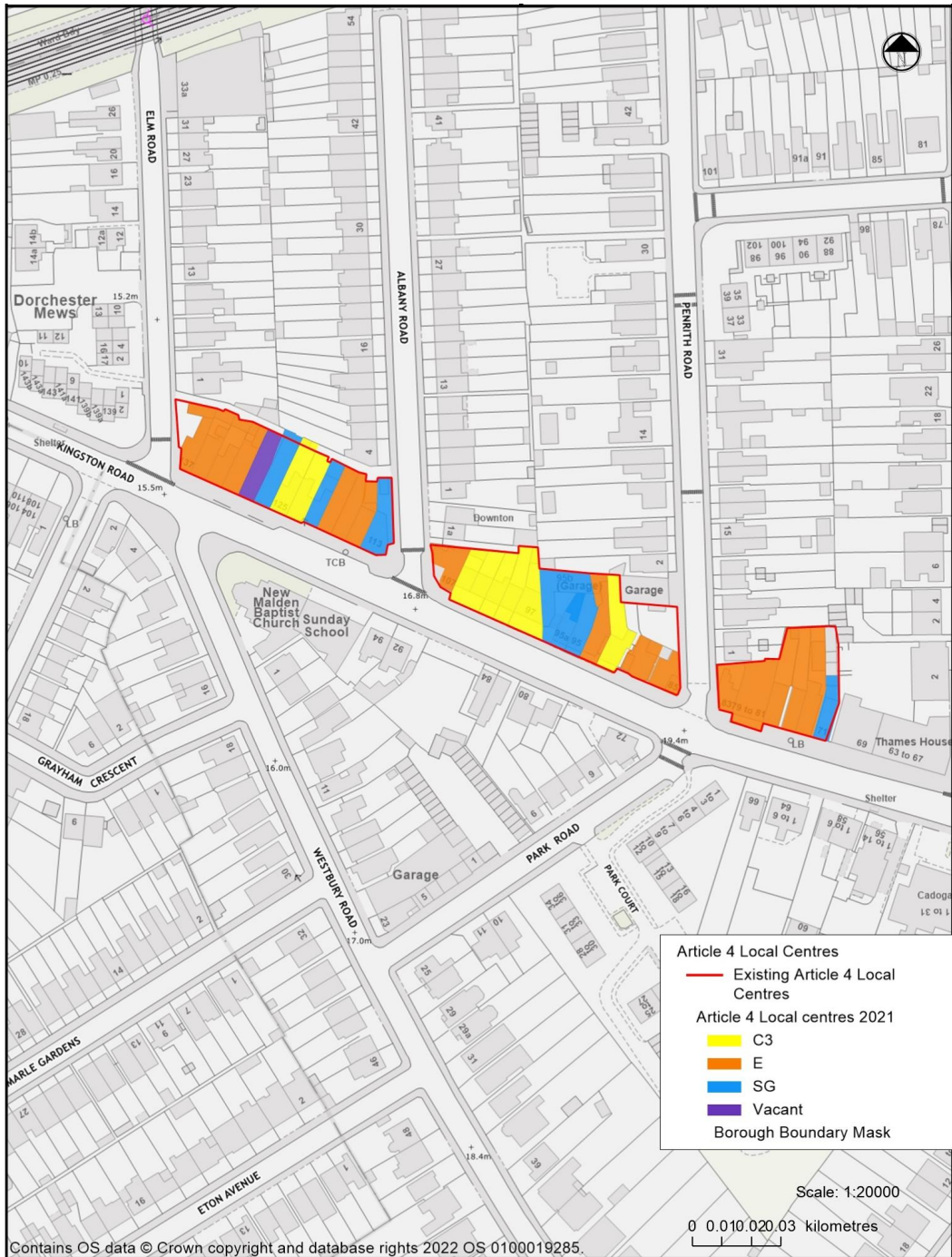


Figure 7.12: Map showing uses within Kingston Road East Local Centre.

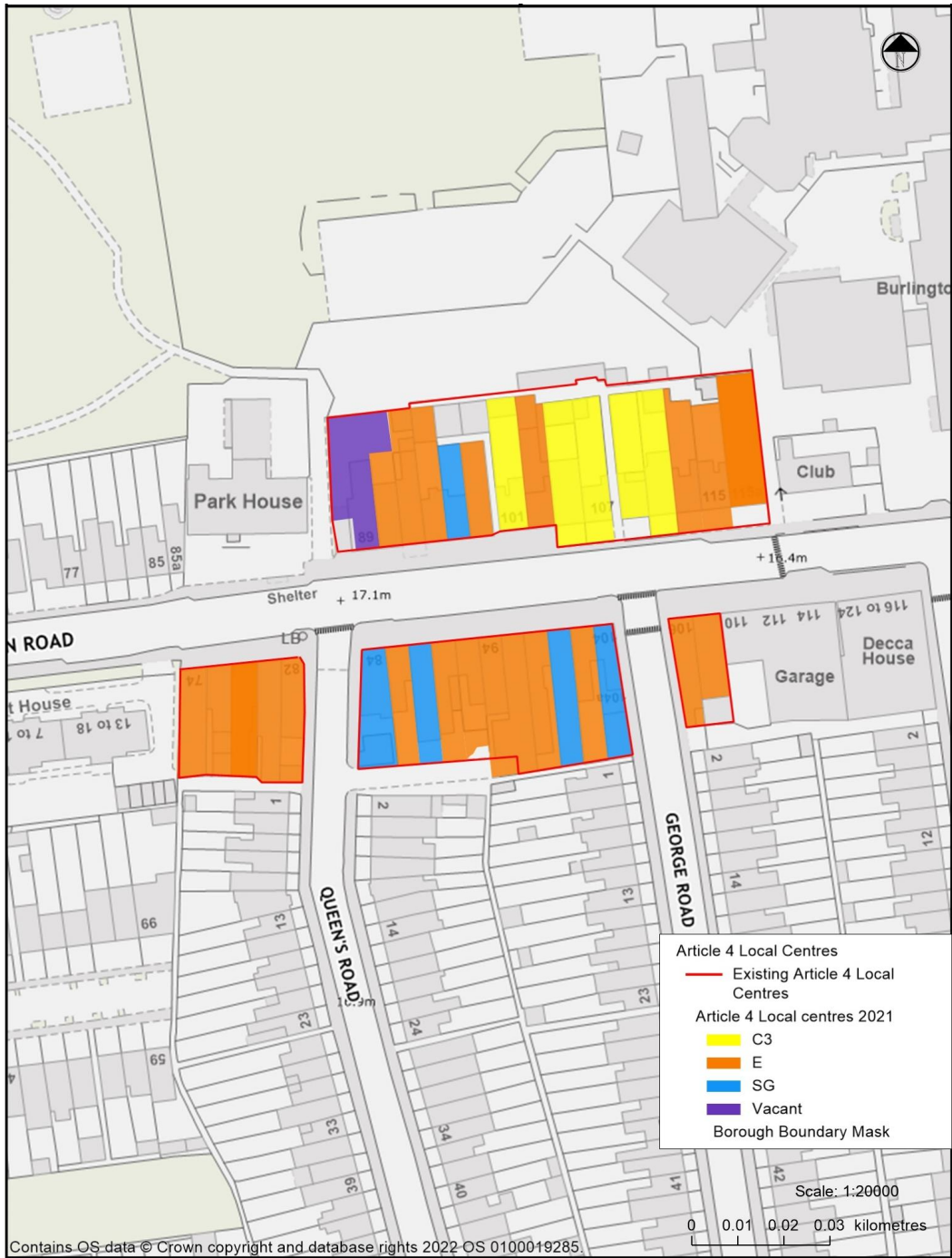


Figure 7.13: Map showing uses within Burlington Road Local Centre.



Figure 7.14: Map showing uses within South Lane Local Centre.



Figure 7.15: Map showing uses within Chiltern Drive Local Centre.

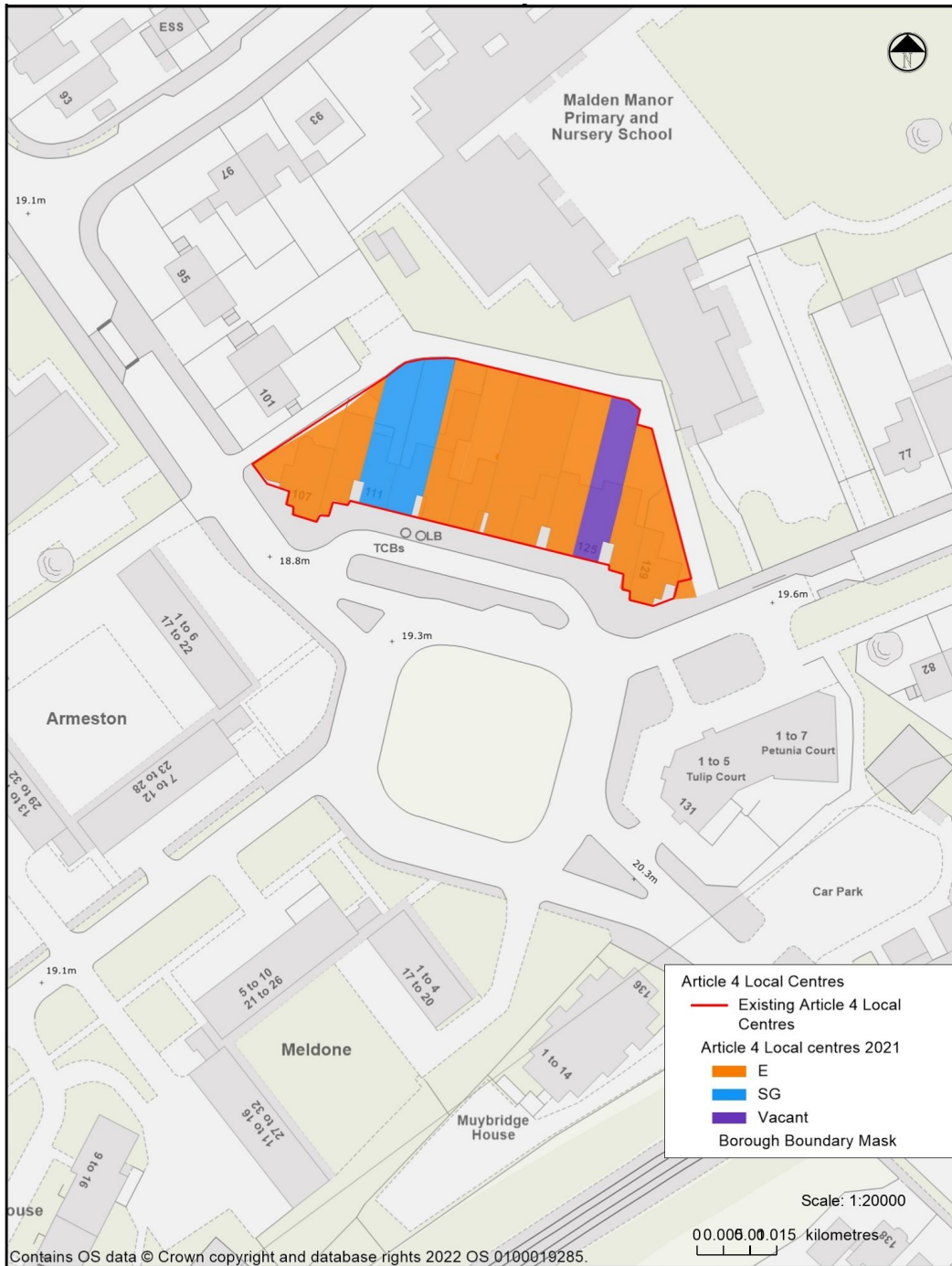


Figure 7.16: Map showing uses within Malden Manor Local Centre.



Figure 7.17: Map showing uses within Plough Green Local Centre.

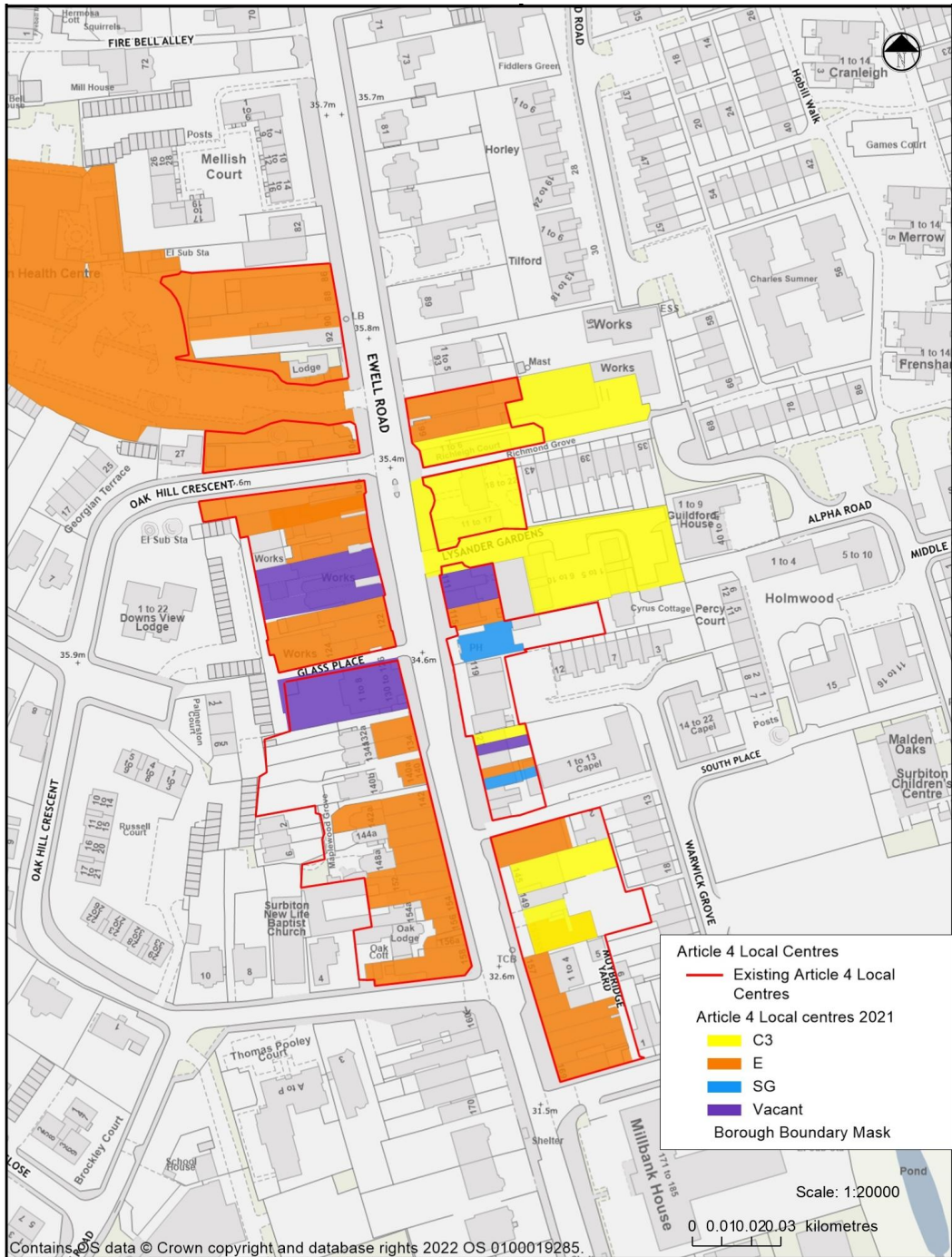


Figure 7.18: Map showing uses within Ewell Road North Local Centre.

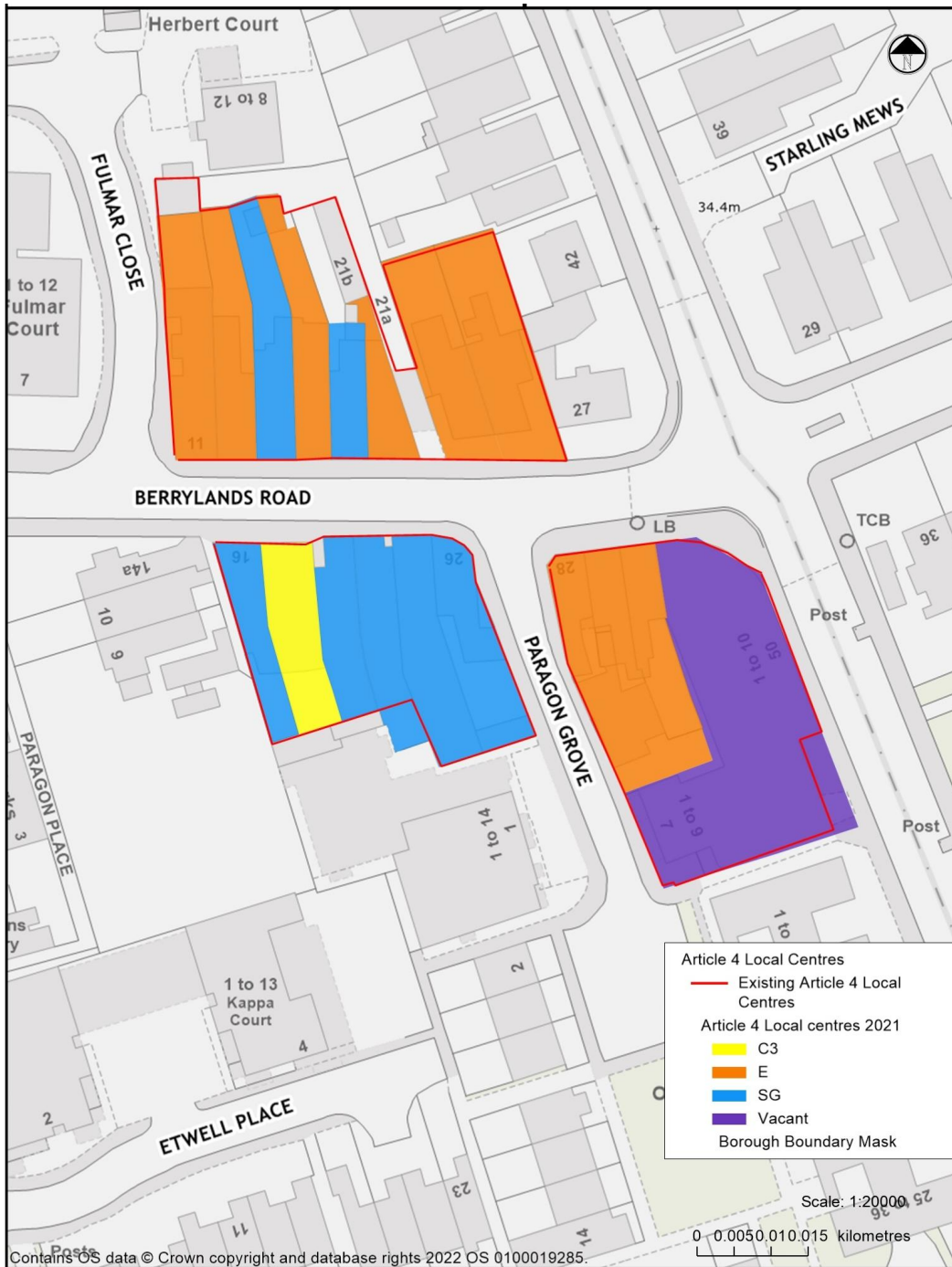


Figure 7.19: Map showing uses within Berrylands Road Local Centre.

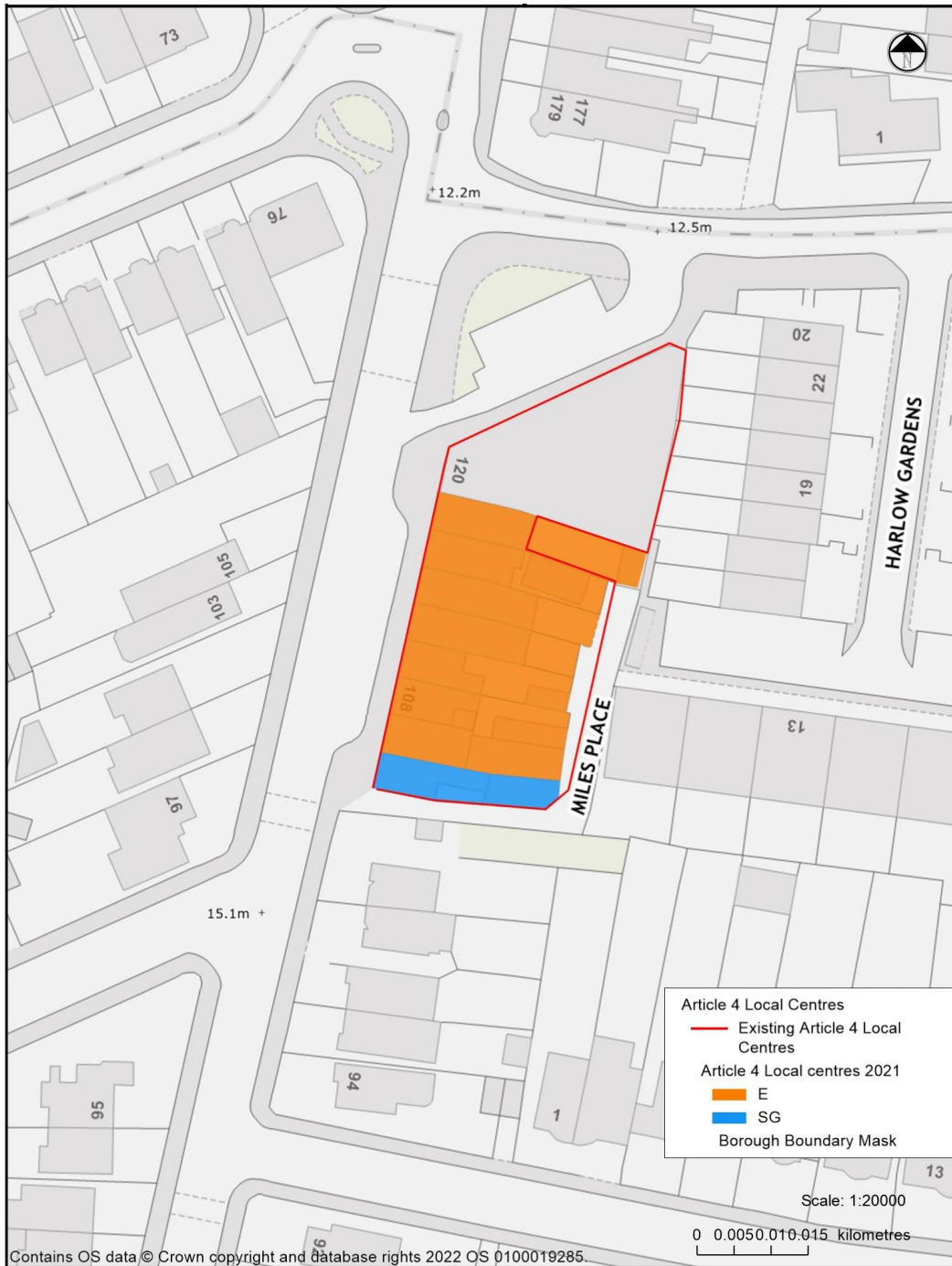


Figure 7.20: Map showing uses within Villiers Avenue Local Centre.

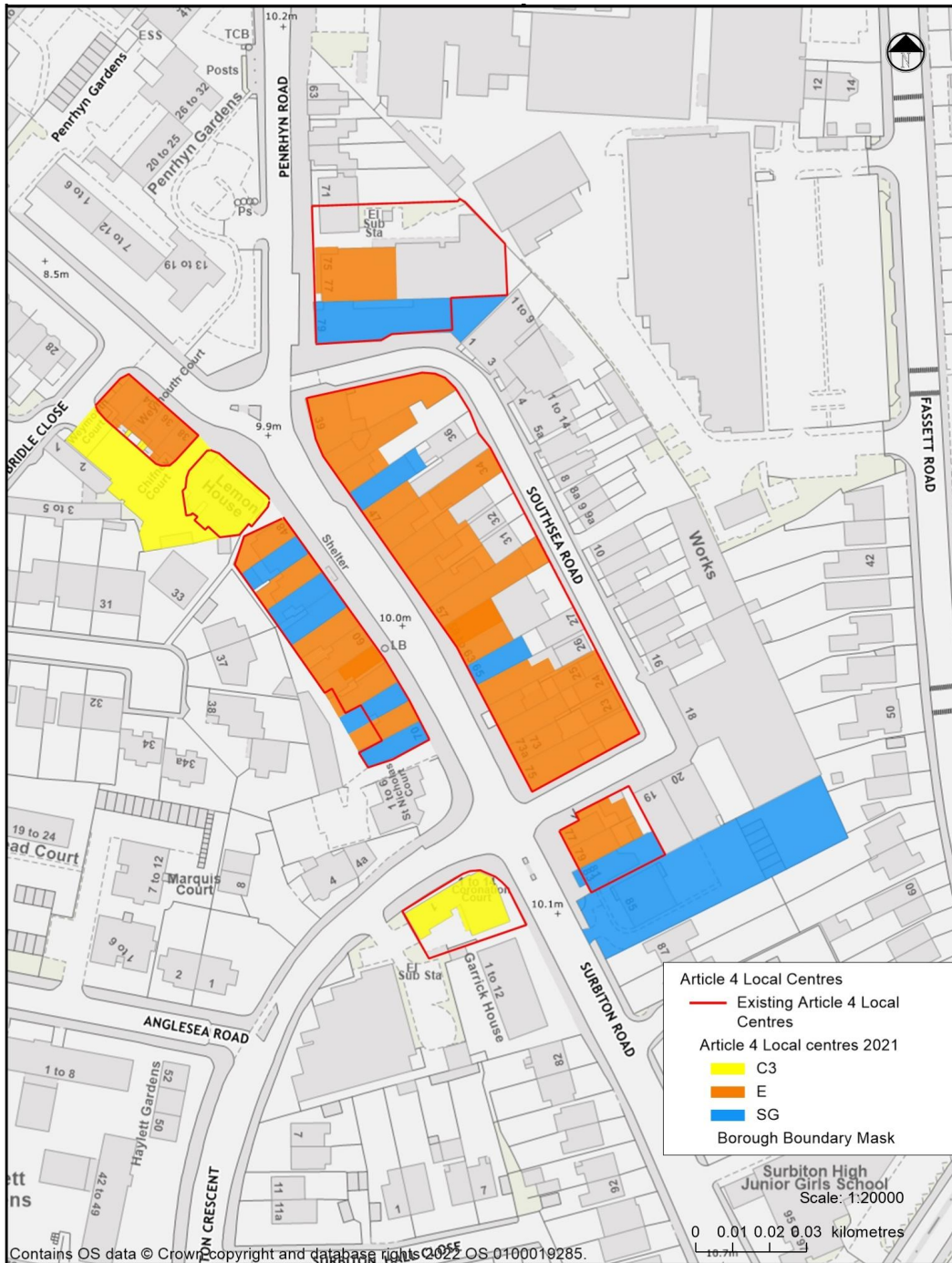


Figure 7.21: Map showing uses within Surbiton Road Local Centre.

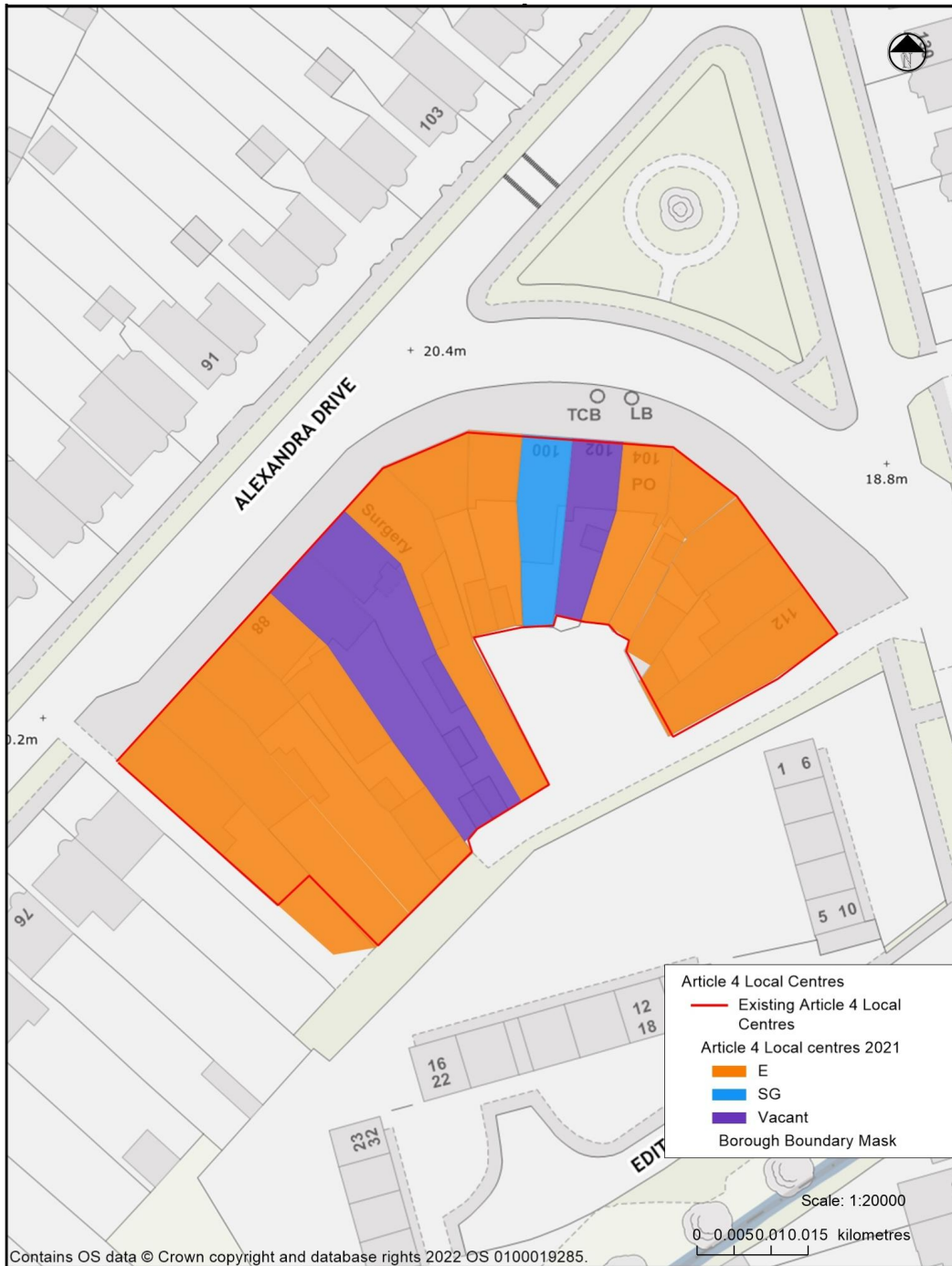


Figure 7.22: Map showing uses within Alexandra Drive Local Centre.

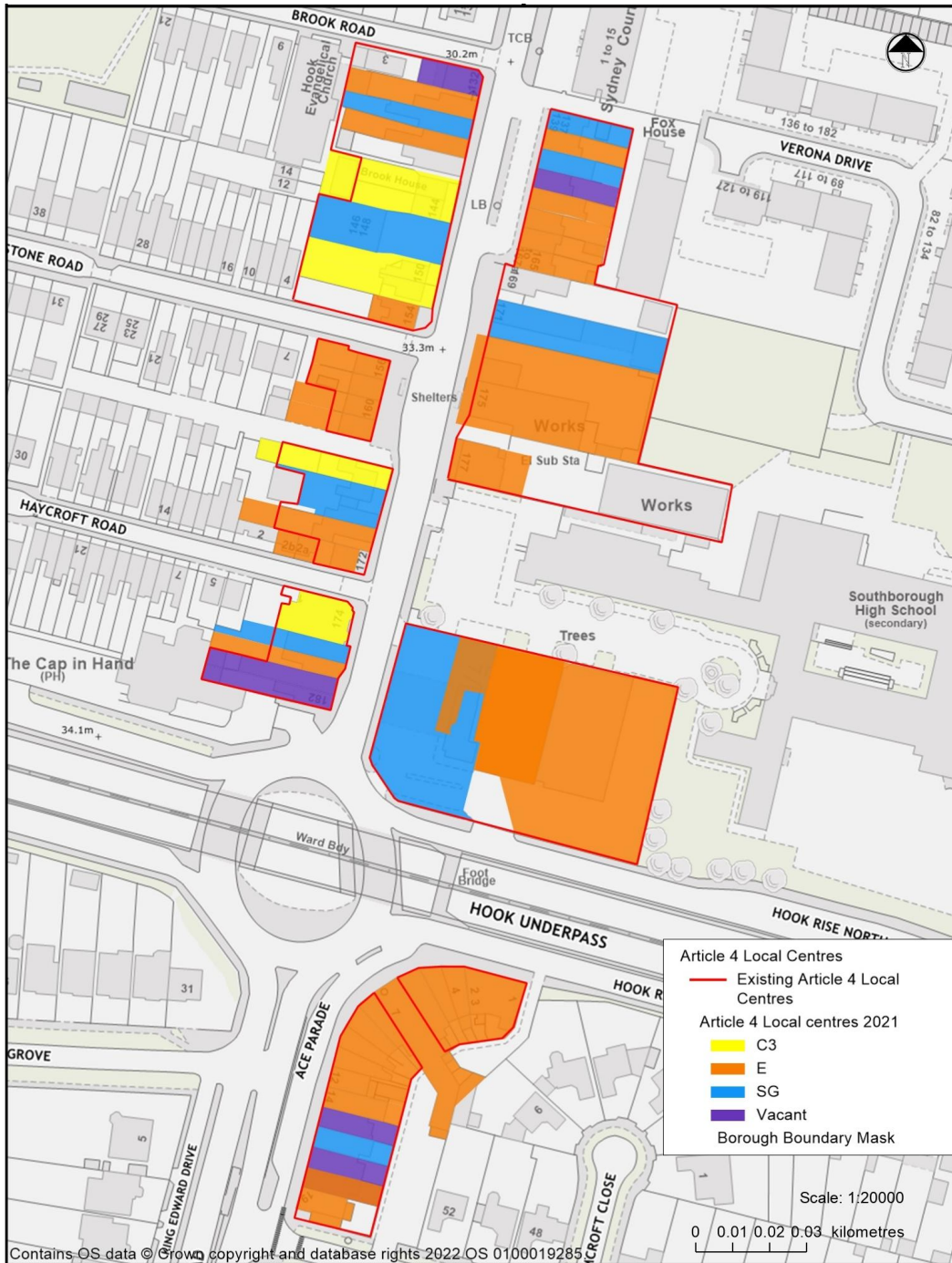


Figure 7.23: Map showing uses within Ace of Spade Local Centre.

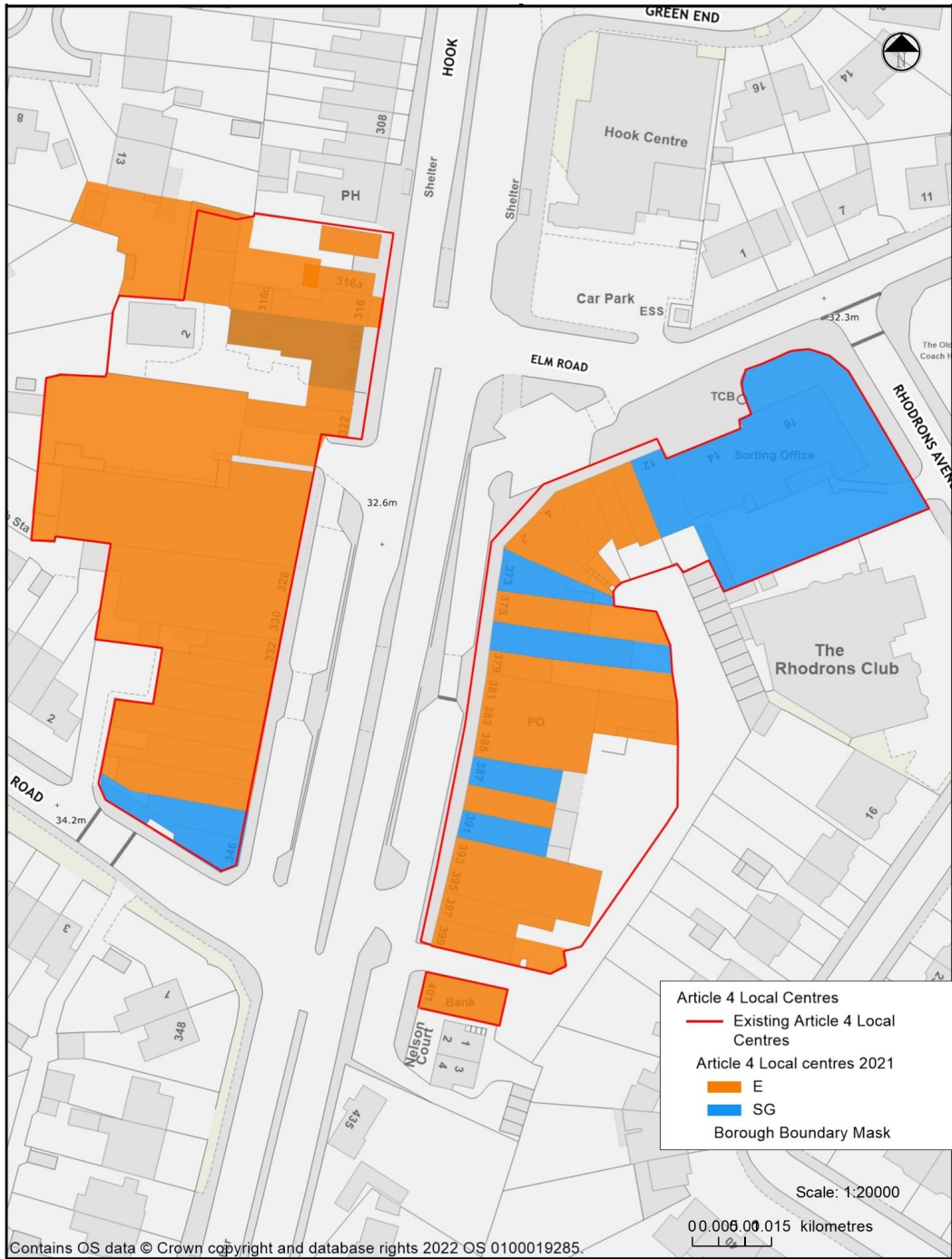


Figure 7.24: Map showing uses within Hook Parade Local Centre.

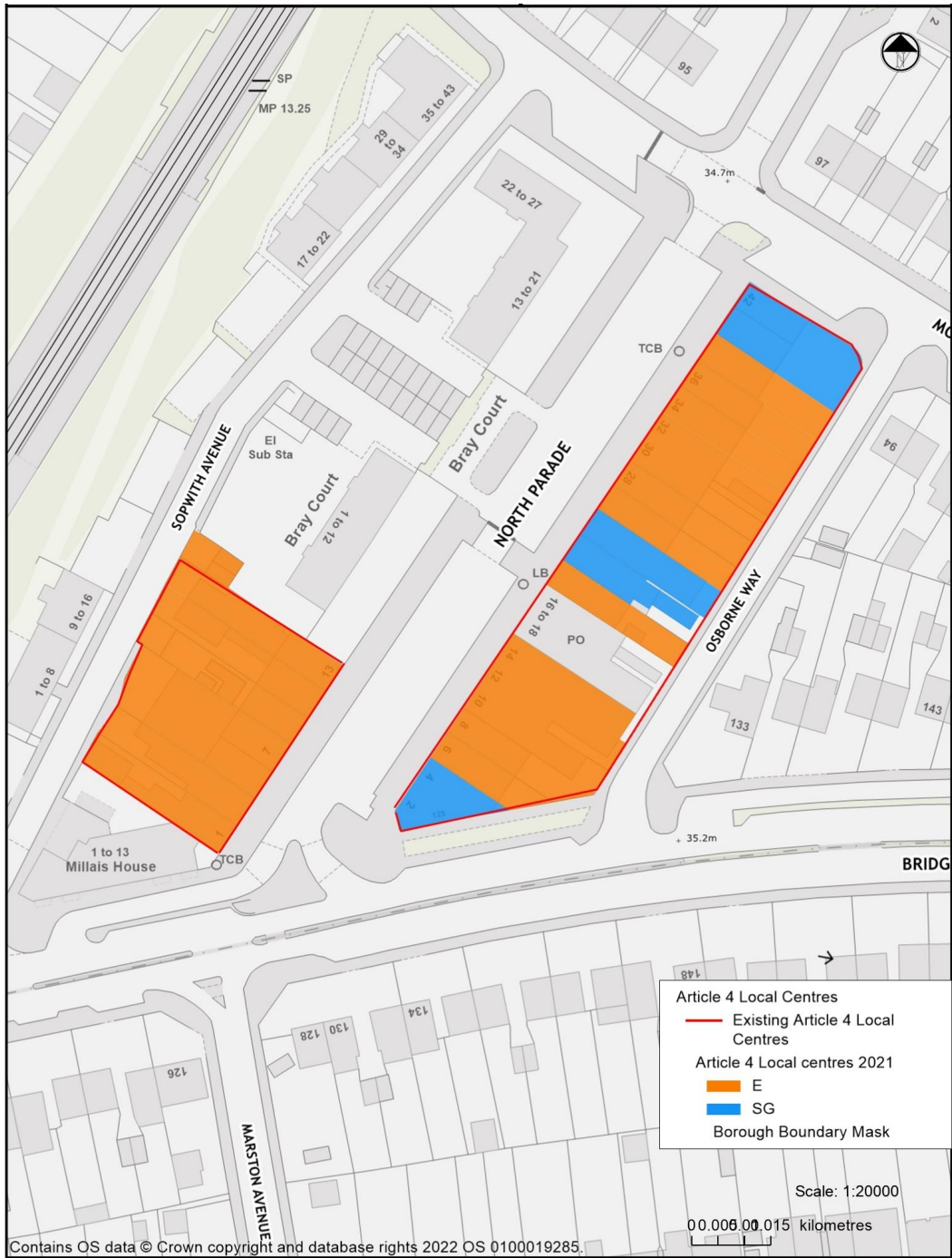


Figure 7.25: Map showing uses within Chessington North Parade Local Centre.

Table 7.1: Assessment of the Local Centres

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---------------|--|--------------------------|-------------------------------|-----------------------------|--|--|
| Tudor Drive | A single parade of shops with most units in Class E use and no vacant units. This is an important local centre for the local community, with few other shops and services within easy access. | Medium | High | Low - No vacant units | Loss of Class E uses would limit Tudor Drive's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | No modifications should be made. |
| Richmond Road | A moderately sized local centre and the biggest local centre in North Kingstown. Most of the units are in Class E use, but some units are vacant or have been converted into residential use. The local centre is split by several junctions onto Richmond Road. | Medium | High | Medium - some vacant units | Loss of Class E uses would limit Richmond Road's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | The boundaries should be modified to exclude buildings on the periphery that are not in Class E use. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---------------|--|--------------------------|-------------------------------|--|---|--|
| Kings Road | A small local centre that is broken up across three very small parades. Most of the units are in Class E use and there is only one vacant unit. This local centre is well used and serves the surrounding residential area. | Medium | Medium | High - interspersed by residential units | Loss of Class E uses would limit King Road's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | The boundaries should be modified to exclude Nos.141, 153 and 161 as these units are not in Class E use. |
| Kingston Vale | A small local centre, but it is located in a part of the borough that is poorly served by shops and services so it is important that it be protected. A care home now exists on the site of a former petrol filling station. | Medium | Medium | Low - Low vacancy rate | Loss of Class E uses would limit Kingston Vale's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. This is a location that has a very poor provision of essential shops and services. | The boundaries should be modified to exclude Sherwood Grange care home. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|------------------|--|--------------------------|-------------------------------|-----------------------------|---|--|
| Crescent Road | A small local centre, but one which provides essential shops and services for the surrounding residential area. All the units are in Class E use. | Medium | High | Low - No vacant units | Loss of Class E uses would limit Crescent Road's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. This is a location that has a very poor provision of essential shops and services. | No modifications should be made. |
| Ewell Road South | One of the larger local centres with a range of shops and services. Over three-quarters of the units are in Class E use and fewer than 10 percent of units are vacant. | Medium | High | Low - Low vacancy rate | Loss of Class E uses would limit Ewell Road South's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | The boundaries should be amended to remove 299 Ewell Road (residential use). |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|-----------------------------|---|--------------------------|-------------------------------|---|--|--|
| Kingston Hill and Park Road | <p>This local centre is effectively split into two parts, both with high concentrations of units in Class E. This local centre provides a wide range of shops and services. The Park Road Conservation Area is covered by the Direction at Kingston Hill and Park Road. A key characteristic of this area is the long-standing historic use of this part of the conservation area as a for retail purposes.</p> | Medium | High | Medium - interspersed by residential units, some vacant units | <p>Loss of Class E uses would limit Kingston Hill and Park Road's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. The condition in the legislation on conservation areas may not provide enough protection to resist individual units or buildings from conversion, but over time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area.</p> | <p>The boundaries should be amended to remove 1-3 Kingston Hill, 12 to 22 Kingston Hill (inclusive) and 187-201 London Road.</p> |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|----------------|---|--------------------------|-------------------------------|-------------------------------|---|---|
| Coombe Road | A moderately sized local centre that provides shops and services for the surrounding residential area. Over two-thirds of the units are in Class E use. There is a small number of vacant units. | Medium | High | Medium - some vacant units | Loss of Class E uses would limit Coombe Road's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | No modifications should be made. |
| Cambridge Road | A small local centre where about half the units are in Class E use. The redevelopment of the Cambridge Road Estate for over 2,000 new homes means that the significance of this local centre will grow. | Medium | Medium | Medium - Previous conversions | Loss of Class E uses would limit Cambridge Road's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | The boundaries should be amended to remove Nos.9-13, 27-29 and 37-39 as these units are not in Class E use. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--------------------|---|--------------------------|-------------------------------|-----------------------------|---|----------------------------------|
| The Triangle | A small local centre that is performing well, with all but one unit in Class E use and no vacant units. | Medium | High | Low - No vacant units | Loss of Class E uses would limit The Triangle's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | No modifications should be made. |
| Kingston Road West | A moderately sized local centre that provides shops and services for the surrounding residential area. Most of the units are in Class E use. There is only one vacant unit. | Medium | High | Low - Low vacancy rate | Loss of Class E uses would limit Kingston Road West's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | No modifications should be made. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--------------------|--|--------------------------|-------------------------------|--|---|---|
| Kingston Road East | A moderately sized local centre that provides shops and services for the surrounding residential area. Over half of units are in Class E use. There is only one vacant unit. | Medium | Medium | Medium - Previous conversions, interspersed by residential units | Loss of Class E uses would limit Kingston Road East's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | The boundaries should be amended to remove No.91, Nos.95B to 105 Kingston Road (inclusive) No.123 and No.125 Kingston Road from the area covered by the Direction as they are not in Class E use. |
| Burlington Road | A moderately sized local centre that provides shops and services for the surrounding residential area, but which is in proximity to New Malden District Centre. About two-thirds of the units are in Class E use, with several units now in residential use. | Medium | Medium | Medium - Previous conversions, interspersed by residential units | Loss of Class E uses would limit Burlington Road's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | The boundaries should be amended to remove Nos.105 to 111 Burlington Road (inclusive) from the area covered by the Direction as they are in residential use. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|----------------|---|--------------------------|-------------------------------|--|--|----------------------------------|
| South Lane | A small single parade of shops with most units in Class E use and only one vacant unit. This is an important local centre for the local community, with few other shops and services within easy access. | Medium | Medium | Low - Low vacancy rate | Loss of Class E uses would limit South Lane's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. This is an area with a poor provision of essential shops and services. | No modifications should be made. |
| Chiltern Drive | A moderately sized local centre that provides shops and services for the surrounding residential area. Over half of the units are in Class E use. The new development approved adjacent the railway station has the potential to increase footfall and see the vacant units occupied in the short-term. | Medium | Medium | High - Previous conversions, high vacancy rate | Loss of Class E uses would limit Chiltern Drive's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. This is an area with a poor provision of essential shops and services. | No modifications should be made. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--------------|--|--------------------------|-------------------------------|-----------------------------|--|----------------------------------|
| Malden Manor | A small single parade of shops with most units in Class E use and only one vacant unit. This is an important local centre for the local community, with few other shops and services within easy access. | Medium | Medium | Low - Low vacancy rate | Loss of Class E uses would limit Malden Manor's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. This is an area with a poor provision of essential shops and services. | No modifications should be made. |
| Plough Green | A moderately sized local centre that provides shops and services for the surrounding residential area. Most of the units are in Class E use and there is only one vacant unit. | Medium | High | Low - Low vacancy rate | Loss of Class E uses would limit Plough Green's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. This is an area with a poor provision of essential shops and services. | No modifications should be made. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|------------------|---|--------------------------|-------------------------------|--|--|---|
| Ewell Road North | One of the larger local centres with a range of shops and services. Most of the units are in Class E use. The Oakhill Conservation Area is covered by the Direction at Ewell Road North Local Centre. A key characteristic of this area is the long-standing historic use of this part of the conservation area as a high street. | Medium | High | Medium - Some vacant units, previous conversions | The condition in the legislation on conservation areas may not provide enough protection to resist individual units or buildings from conversion, but over time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area. | There are several vacant units and residential units on the east side of Ewell Road. The boundaries should be amended to remove Nos.101 (1-4 Richleigh Court), 103-109 Ewell Road (1-22 Lysander Gardens) and 127 to 131 (inclusive) from the areas covered by the Direction. |
| Berrylands Road | A moderately sized local centre that provide shops and services for the surrounding residential area. Only half of the units are in Class E use, with several units now in residential use. | Medium | Low | Medium - Previous conversions | Loss of Class E uses would limit Berrylands Road's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | Only one unit on the south side of Berrylands Road is in Class E use. The boundaries should be modified to exclude the units from 16 to 26 Berrylands Road (inclusive) from the area covered by the Direction. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|-----------------|--|--------------------------|-------------------------------|-----------------------------|--|---|
| Villiers Avenue | A single small parade of shops with most units in Class E use and only one vacant unit. This is an important local centre for the local community, with few other shops and services within easy access. | Medium | High | Low - Low vacancy rate | Loss of Class E uses would limit Villiers Avenue's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | No modifications should be made. |
| Surbiton Road | A moderately sized local centre where about three-quarters of the units are in Class E use and there are not any vacant units. | Medium | High | Low - No vacant units | Loss of Class E uses would limit Surbiton Road's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | There are buildings in residential use on the south-west side of the local centre. The boundaries should be modified to exclude the 40-46 Surbiton Road (Lemon House) and 1 Surbiton Crescent (Coronation Court) from the areas covered by the Direction. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|-----------------|---|--------------------------|-------------------------------|--|--|---|
| Alexandra Drive | A moderately sized local centre that provide shops and services for the surrounding residential area. Most of the units are in Class E use, with only a few vacant units. | Medium | High | Low - Low vacancy rate | Loss of Class E uses would limit Alexandra Drive's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | No modifications should be made. |
| Ace of Spades | One of the largest local centres in the borough and that provides many shops and services for the surrounding residential areas. The local centre is split between the units on the north side (Hook Road) and the south side (Ace Parade) of the A3 dual carriageway. Most of the units are in Class E use, with parades interspersed with some vacant units, some not in Class E use and some residential uses. | Medium | High | Medium - Some vacant units, previous conversions | Loss of Class E uses would limit Ace of Spades' ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | The boundary should be modified to exclude units not in Class E use along Hook Road. Ace Parade should be retained in its entirety. |

| Local Centre | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--------------------------|---|--------------------------|-------------------------------|---|---|----------------------------------|
| Hook Parade | Hook Parade is the largest town centre in the South of the Borough Neighbourhood. | High | High | Low - Low vacancy rate, large busy shopping frontage, likely to be undesirable for residential conversion | The retail offer in Hook Parade is exceptionally important as the South of the Borough does not have any district centres. Loss of Class E uses would limit Hook Parade's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | No modifications should be made. |
| Chessington North Parade | An important town centre for residents in Chessington. Most of the units are in Class E use and there are not any vacant units. | Medium | High | Low - No vacant units | Loss of Class E uses would limit Chessington North Parade's ability to fulfil its role as a local centre which provides a valuable range of day-to-day goods and services and reducing the need for residents to travel for staple purchases. | No modifications should be made. |

8. Industrial Areas

The borough has 8 designated industrial areas, including two Strategic Industrial Locations (SIL) and eight Local Significant Industrial Sites (LSIS), all of which are covered by the Article 4 Direction. The following maps show the current boundaries of the areas covered by the Direction (in red) and the buildings in Class E use (in blue).

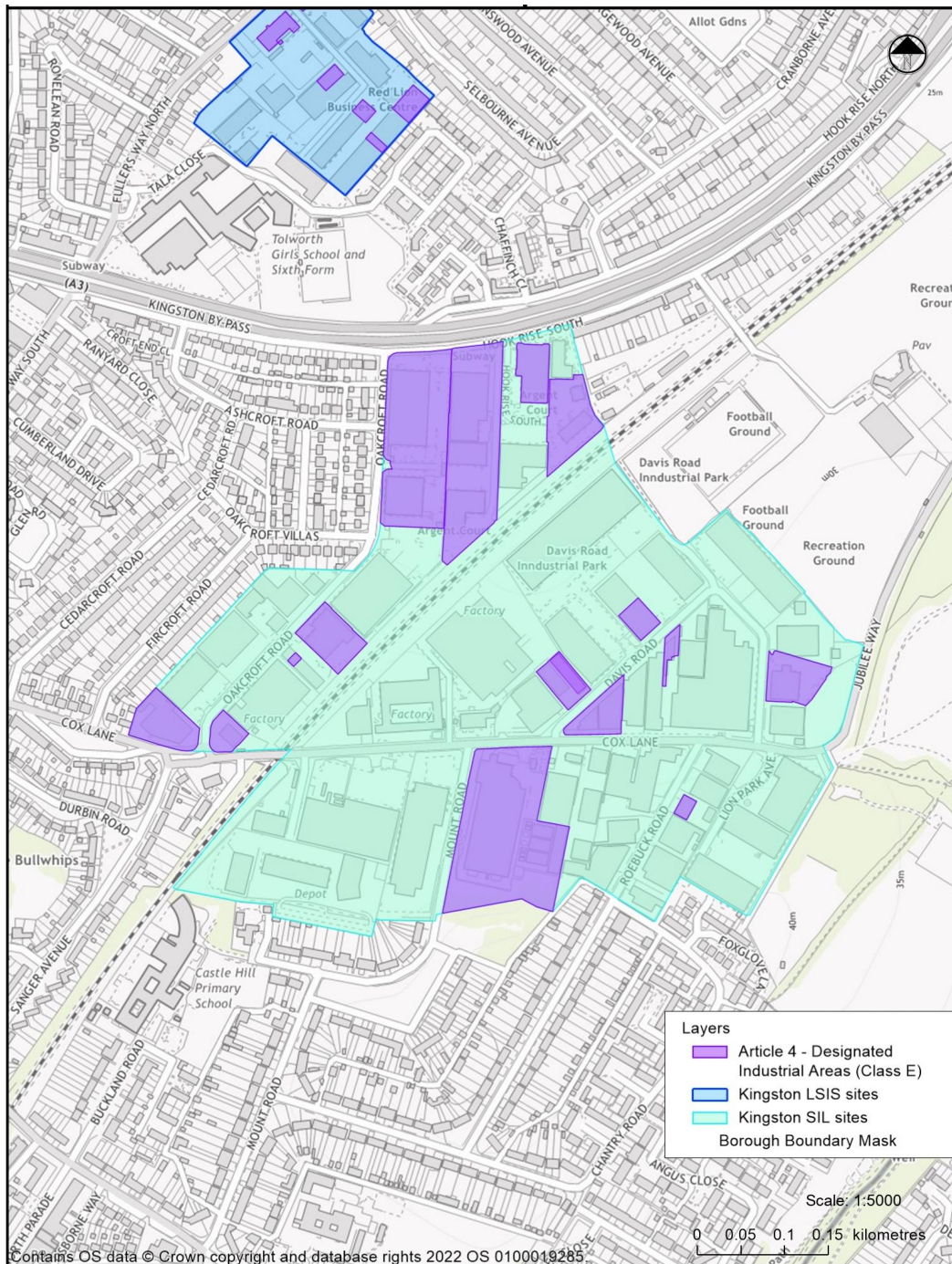


Figure 8.1: Map showing buildings in Class E use in Chessington Industrial Area.

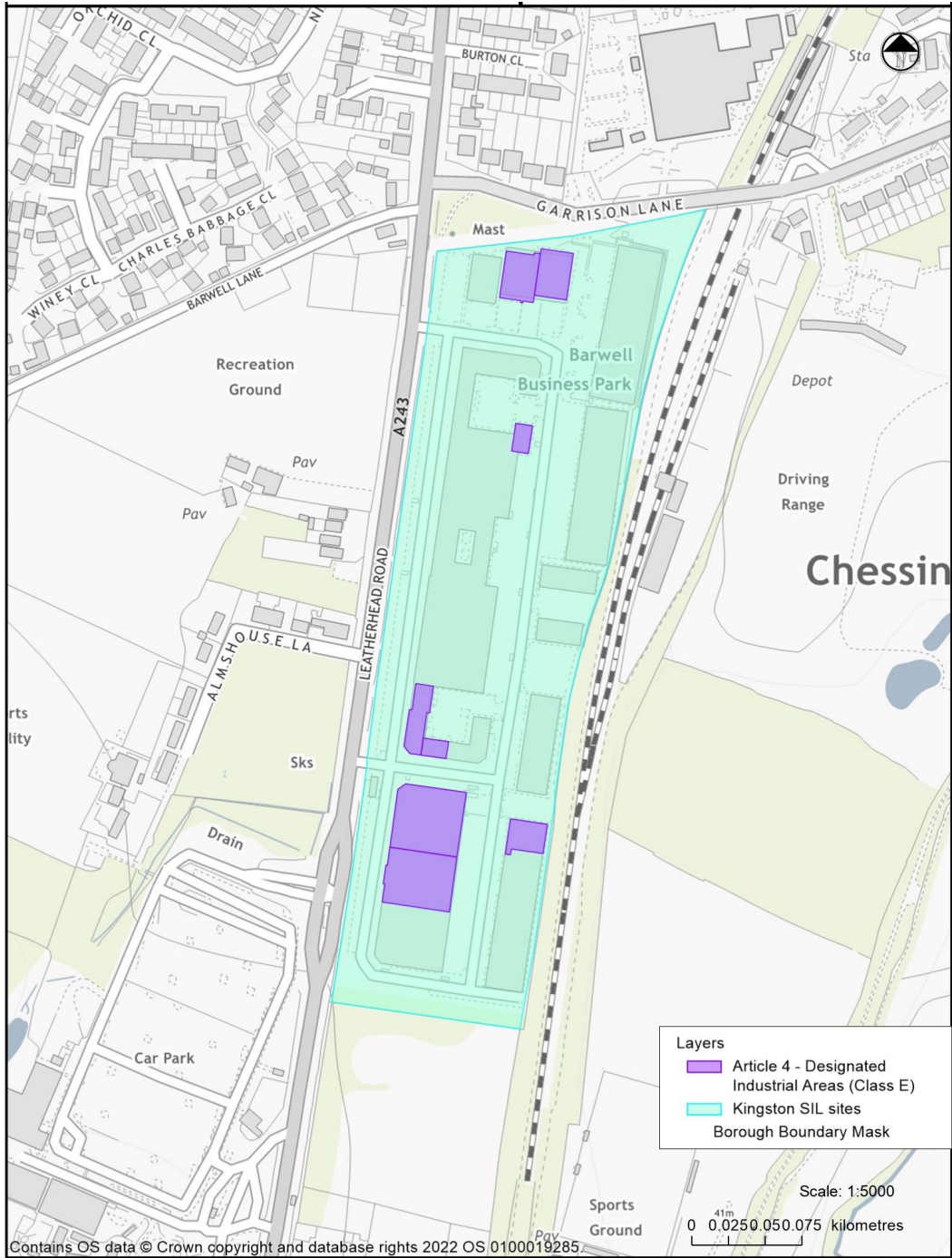


Figure 8.2: Map showing buildings in Class E use in Barwell Business Park.

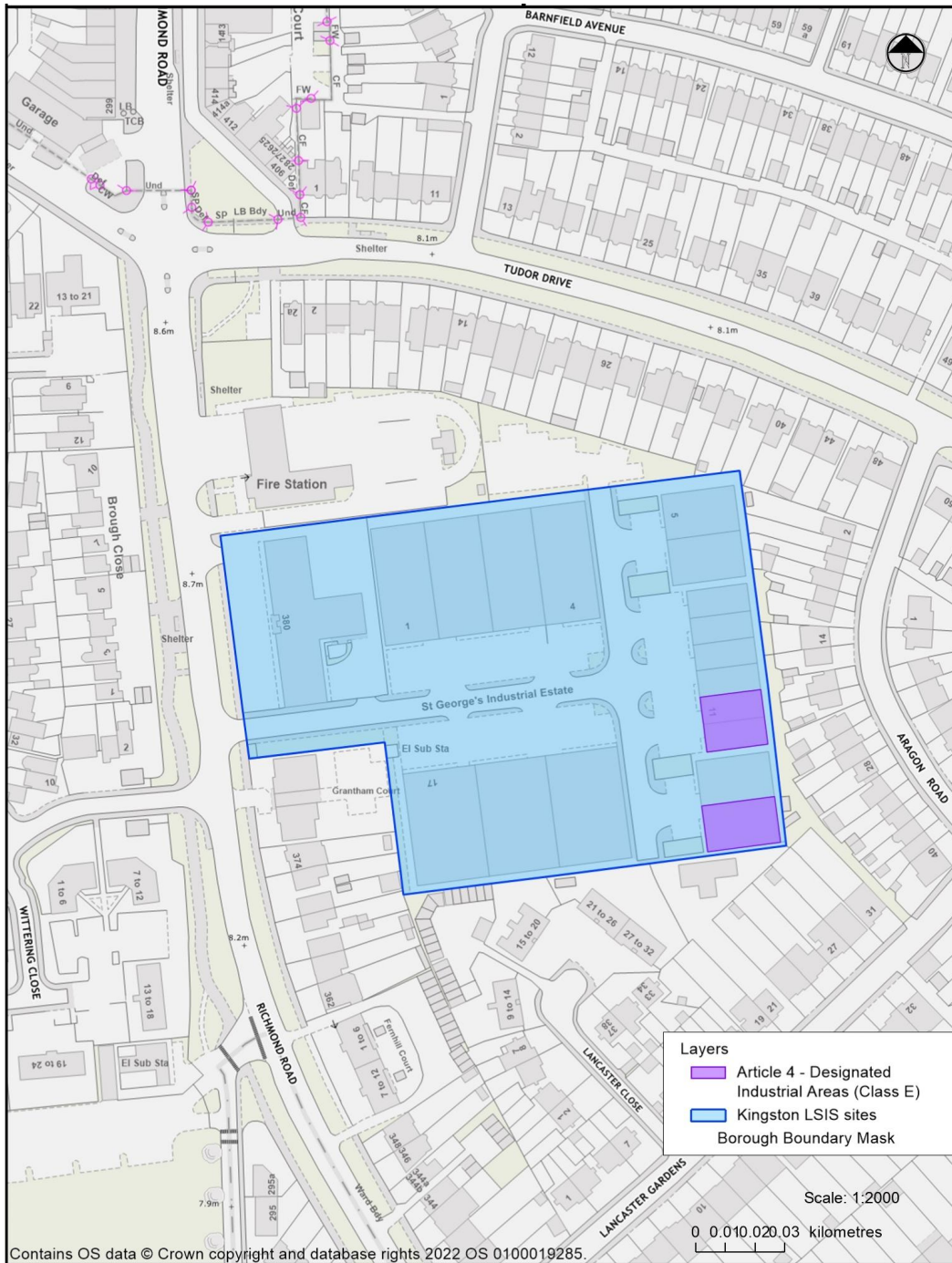


Figure 8.3: Map showing buildings in Class E use in St George's Industrial Estate LSIS.

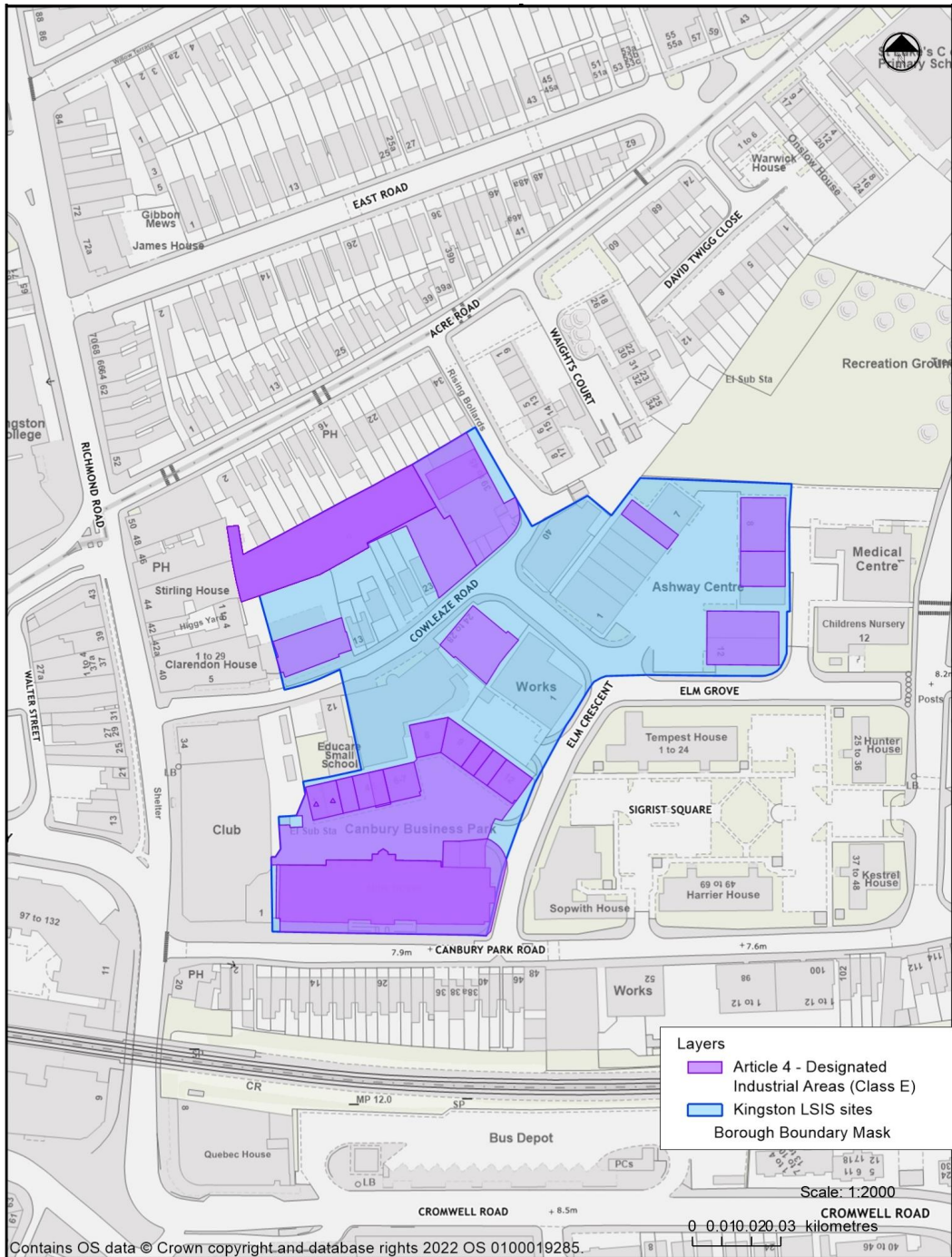


Figure 8.4: Map showing buildings in Class E use in Canbury Park LSIS.

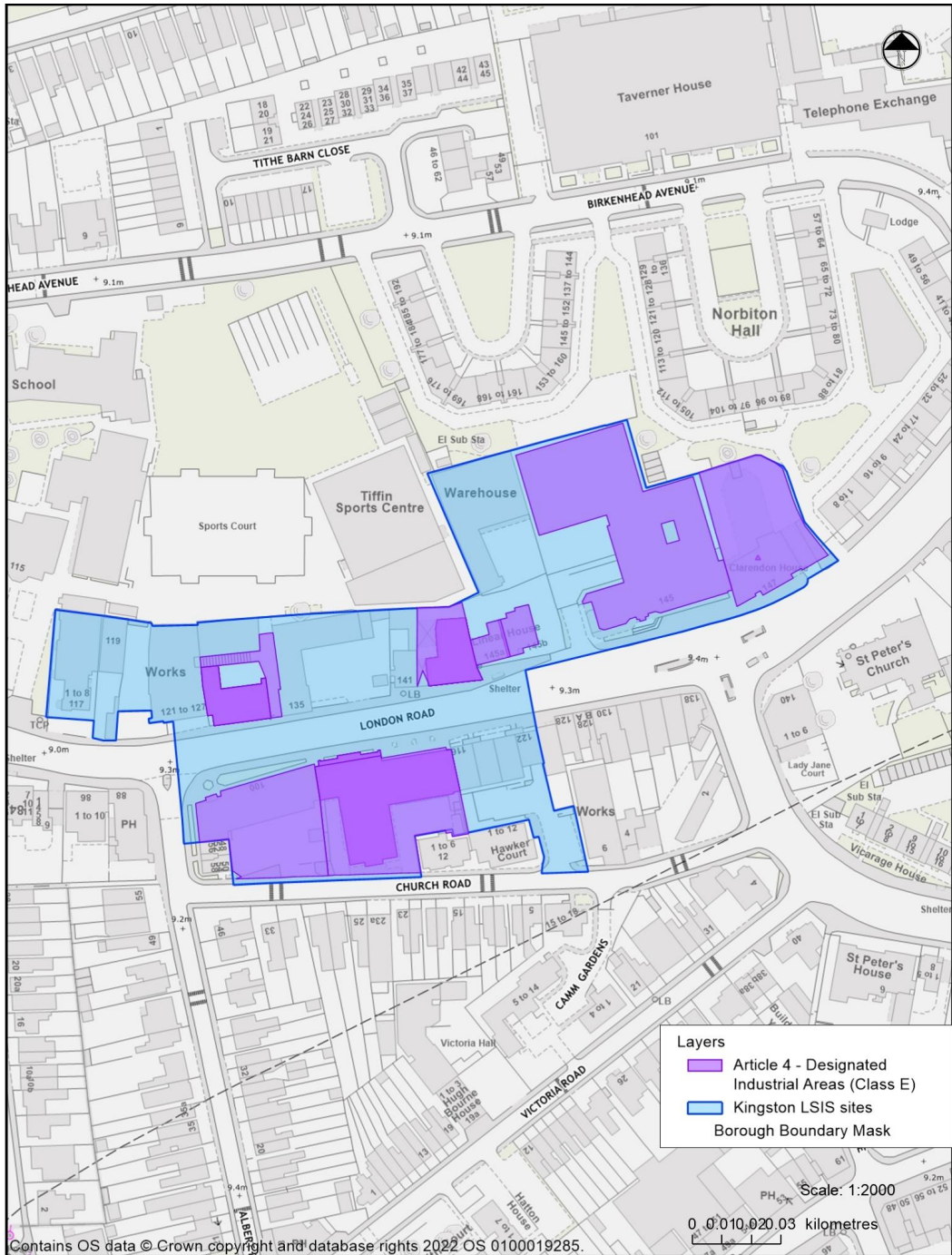


Figure 8.5: Map showing buildings in Class E use in London Road LSIS.

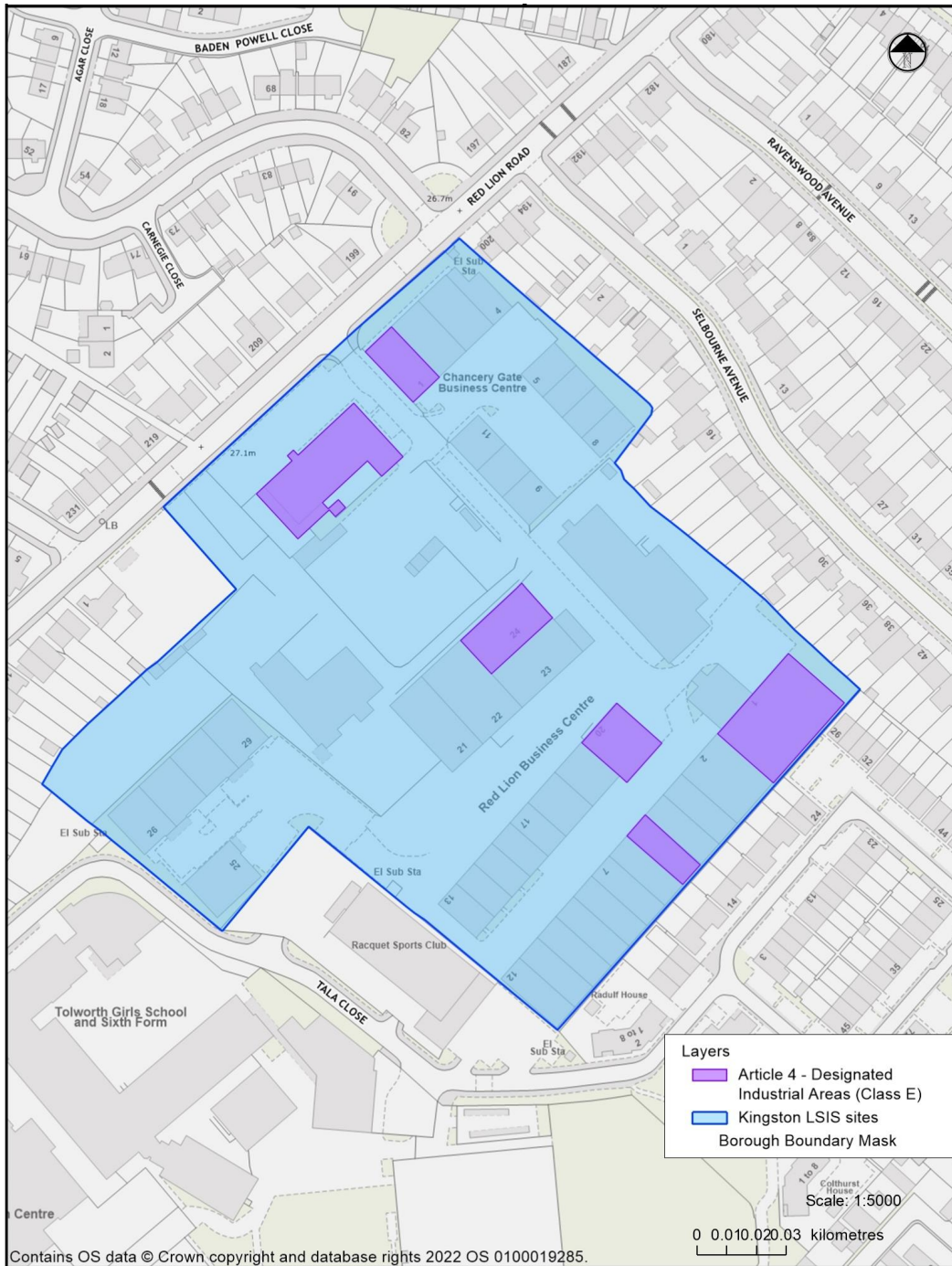


Figure 8.6: Map showing buildings in Class E use in Red Lion Road LSIS.

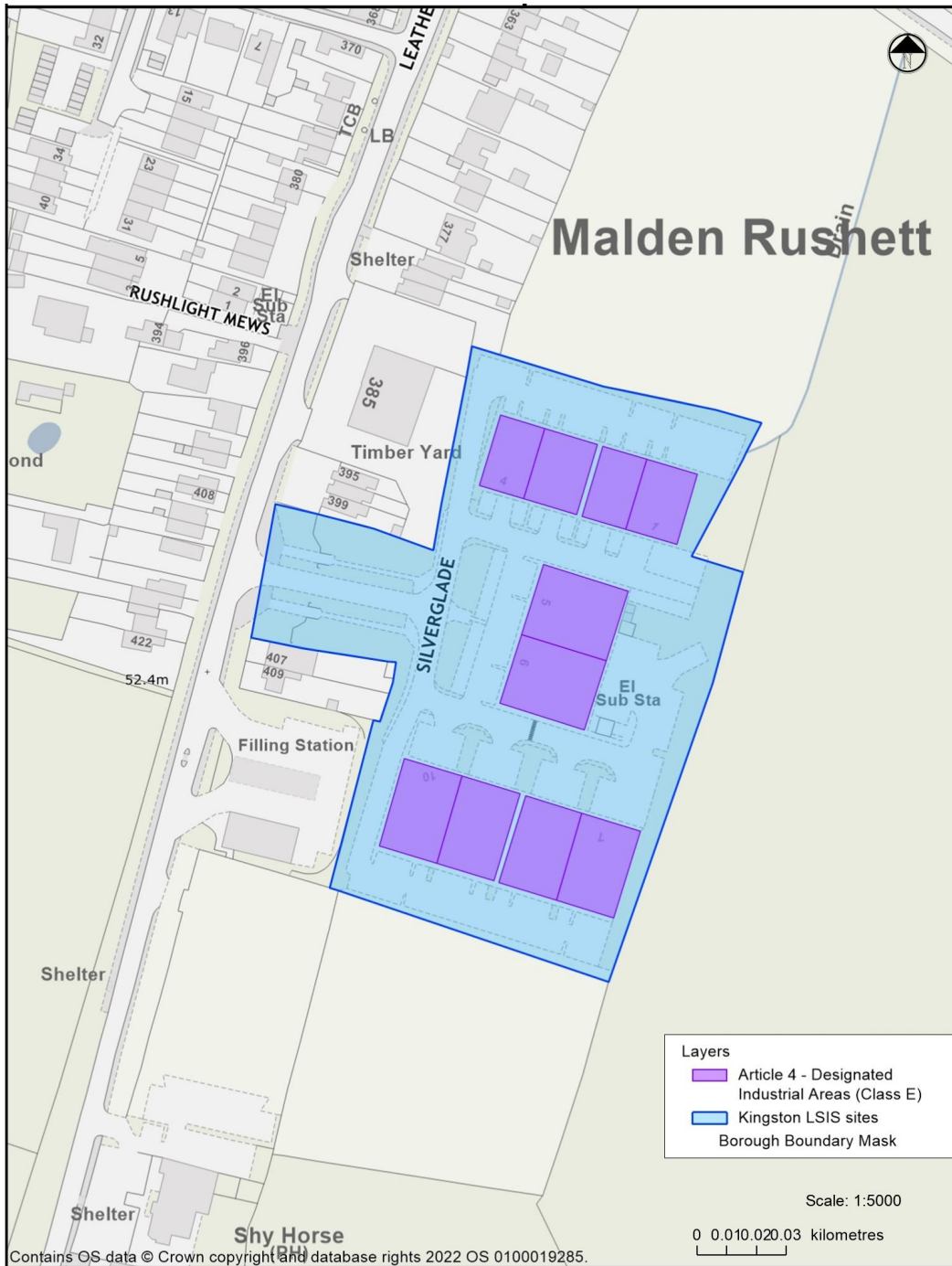


Figure 8.7: Map showing buildings in Class E use in Silverglade LSIS.

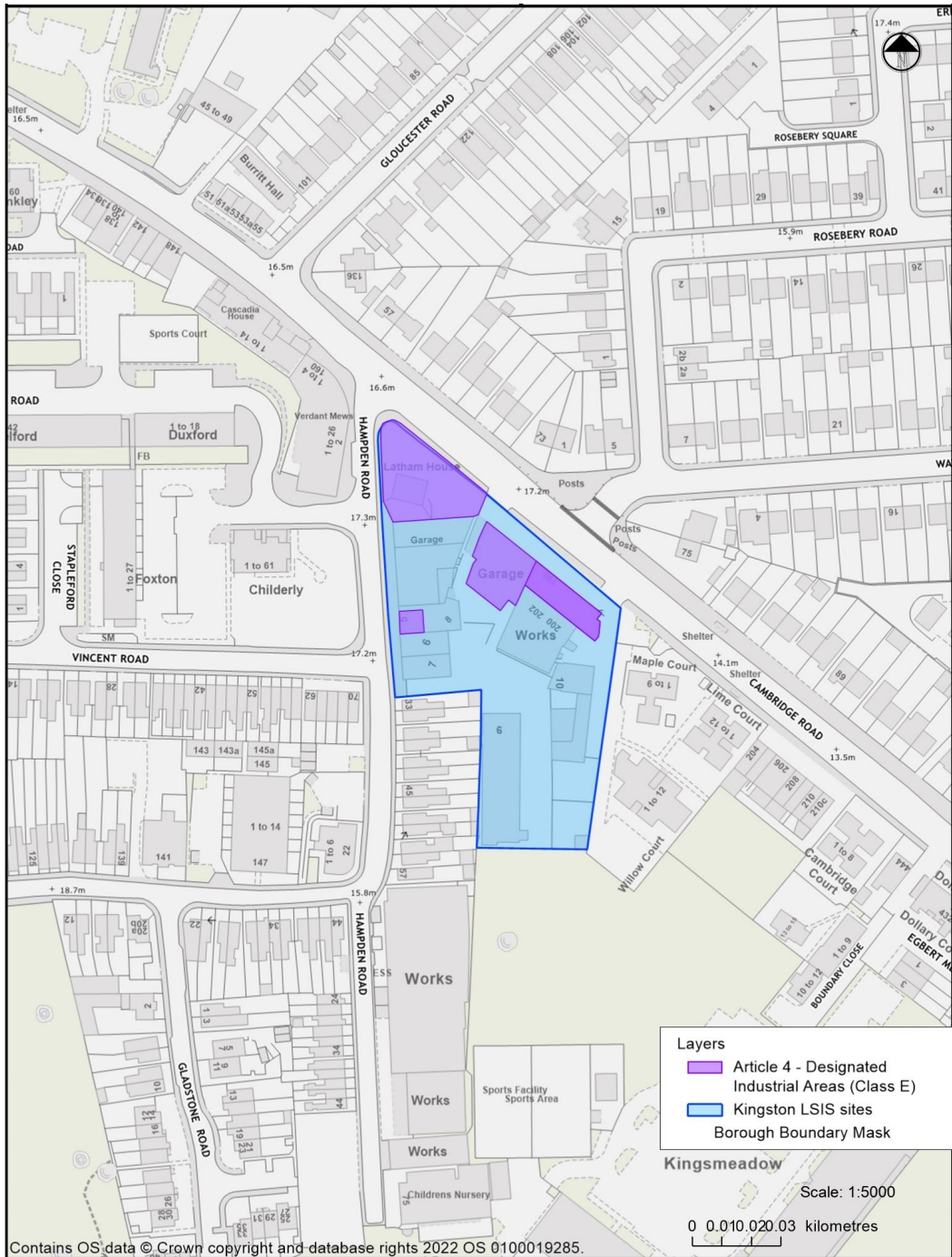


Figure 8.8: Map showing buildings in Class E use in Cambridge Road and Hampden Road ad LSIS.

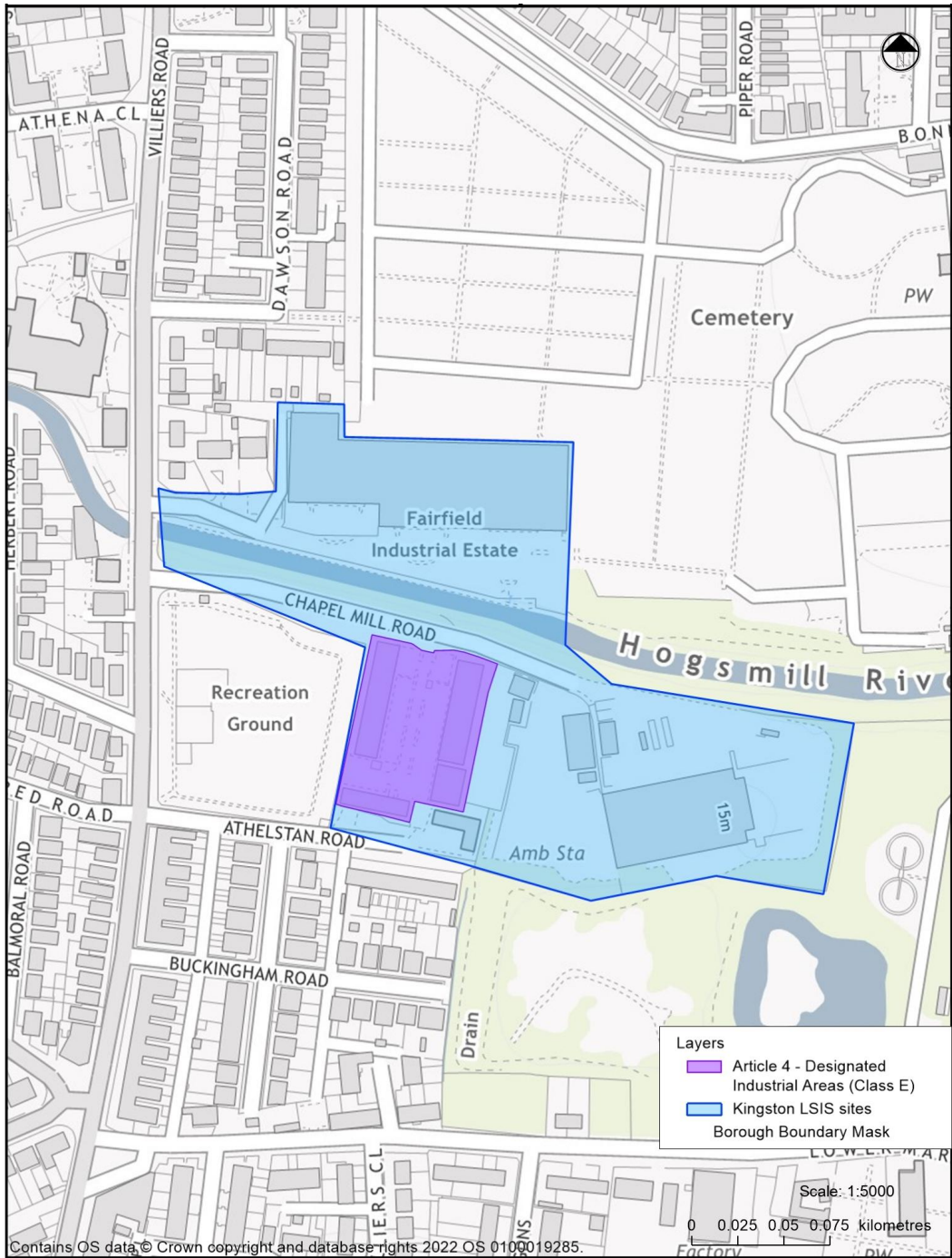


Figure 8.9: Map showing buildings in Class E use in Fairfield Trade Park, Kingsmill Business Park and Villiers Waste Transfer Facility LSIS.

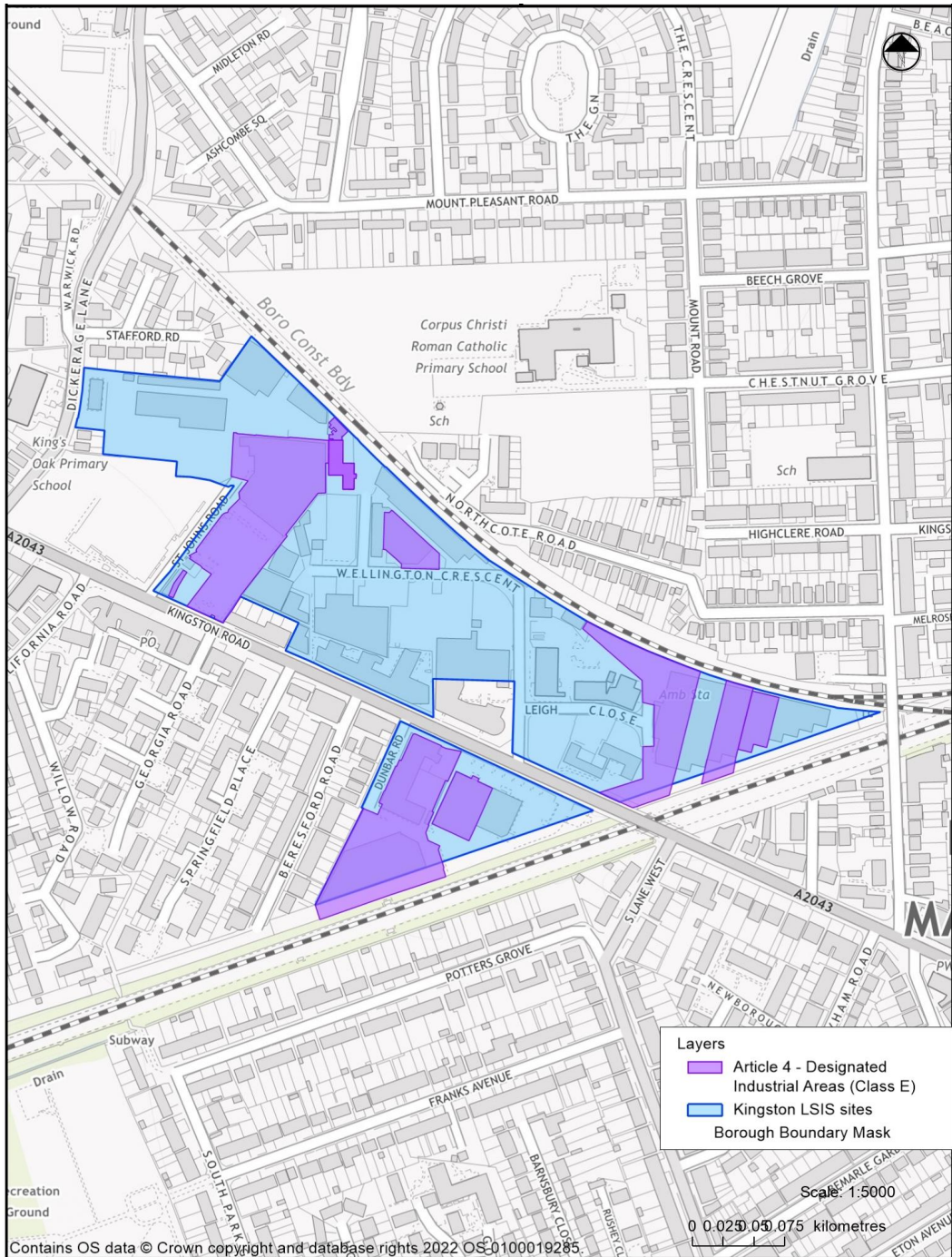


Figure 8.10: Map showing buildings in Class E use in St John's Industrial Area LSIS.

Table 8.1: Assessment of the industrial areas

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---------------------------------|--|--------------------------|-------------------------------|--|---|--|
| Chessington Industrial Area SIL | <p>Chessington Industrial Area stands out as a cluster of large distribution and industrial units compared to the rest of the Borough's capacity. The total employment floorspace is around 137,900 sq.m of which 5,010 sq.m is vacant (3.6%). This relates to seven vacant units of small size ranging between 200 sq.m and 700 sq.m and two partially vacant larger units. IDBR data indicates 222 businesses are located within this industrial area, supporting 4,620 jobs or 6% of the total jobs recorded across RBK (as of 2019). Of these jobs 1,308 jobs (28%) relate to office sector uses, 900 jobs (20%) relate to industrial/light industrial uses and 1,490 jobs (32%) relate to distribution. In addition, a fifth of the site's employment (i.e. 925 jobs) relate to</p> | High | Low | Low - Majority of units unsuitable and/or undesirable for conversion | <p>The introduction of residential uses to this industrial location (that is recognised for its wider strategic importance) could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. The buildings in Class E use identified to be retained within the modified boundaries are either in office, light industrial, research and development, retail (Tesco) or a nursery. They have been assessed and contain elements necessary for habitation, including windows to allow natural daylight inside.</p> | <p>The boundaries have been modified significantly to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction.</p> |

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---------------------------|--|--------------------------|-------------------------------|--|---|--|
| | non-employment sectors. | | | | | |
| Barwell Business Park SIL | <p>A total of 83 units across a combined area of 56,400 sq.m is provided on-site. The business park offers a mix of manufacturing, logistics, high-tech and office accommodation in various unit sizes up to 2,500 sq.m. The occupancy rate is high at 92%. There are currently six vacant units on-site that total 4,230 sq.m of immediately available floorspace which indicates a vacancy rate of 8%. The IDBR data indicates a total of 42 businesses with 1,160 jobs on-site representing 1% of the overall employment provision across RBK. These jobs are broadly distributed 15% within offices, 27% in industrial and 39% in distribution-based sectors. In addition, 19% relate to other sectors. Barwell Business Park has two Class E units that are not mixed use with B2</p> | High | Low | Low - Majority of units unsuitable and/or undesirable for conversion | <p>The introduction of residential uses to this industrial location (that is recognised for its wider strategic importance) could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. The buildings in Class E use identified to be retained within the modified boundaries are either in office, light industrial, gym or cafe use. They have been assessed and contain elements necessary for habitation, including windows to allow natural daylight inside.</p> | <p>The boundaries have been modified significantly to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction.</p> |

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|------------------------------------|---|--------------------------|-------------------------------|--|---|---|
| | and B8 uses and these have low risk of being developed for residential as they are not clustered and are intertwined with larger warehouse uses. | | | | | |
| St George's Industrial Estate LSIS | St George's Industrial Estate is a LSIS of 2.0 ha located at the north of the Borough across A307 Richmond Road and it is surrounded by residential uses. There are 29 units provided with a combined footprint of 9,430 sq.m. The site is mainly characterised by distribution activity with a variety of mixed wholesale retailers and merchants dominating on site's activity. The IDBR indicates a total of 13 businesses on site of which almost half relate to distribution-based sectors, 12% to office and 7% to industrial. The remaining 32% are within retail and wholesale. | Medium | Low | Low - Majority of units unsuitable and/or undesirable for conversion | The introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. The buildings in Class E use identified to be retained within the modified boundaries are in retail use. They have been assessed and contain elements necessary for habitation, including windows to allow natural daylight inside. | The boundaries have been modified significantly to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction. |

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|-------------------|--|--------------------------|-------------------------------|-----------------------------|--|---|
| Canbury Park LSIS | Canbury Park lies across 1.8 ha in the heart of Kingston Town Centre, north of the train station. There are three main office and business clusters across the site, namely the Parc House office and studios (offering flexible and creative office and workspace), the Ashway Centre and Canbury Business Park (both offering light industrial flexible space for small business). There are a total of 46 units across the site with a combined footprint of 9,540 sq.m. The area is characterised by the provision of primarily office buildings and smaller industrial units providing small flexible office and workspace. This is reflected also within the IDBR register with 87% of the 36 businesses recorded relating to office activities. | Medium | High | Medium | The introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. The buildings in Class E use identified to be retained within the modified boundaries are either in office or light industrial use. They have been assessed and contain elements necessary for habitation, including windows to allow natural daylight inside. | The boundaries have been modified to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction. |

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|------------------|--|--------------------------|-------------------------------|-----------------------------|---|--|
| London Road LSIS | <p>London Road is an office area adjacent to Kingston Town Centre which is identified as an LSIS. Due to its location and context this employment area is dominated by office activity and with some light industrial and retail uses. There is also some residential accommodation at upper floor level. There are 46 employment units across the area with a combined footprint of 9,450 sq.m. The IDBR data records a total of 30 businesses supporting a total of 1,272 jobs (2% of RBK's employment). The vast majority (67%) of these jobs relate to office activity, with 11% to light industrial and small distribution business activity. The remaining relate to retail, residential care and education sectors.</p> | Medium | High | High | <p>The introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. The buildings in Class E use identified to be retained within the modified boundaries are either in office or other Class E uses. They have been assessed and contain elements necessary for habitation, including windows to allow natural daylight inside.</p> | <p>The boundaries have been modified to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction.</p> |

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--------------------|---|--------------------------|-------------------------------|--|--|---|
| Red Lion Road LSIS | Red Lion Road LSIS is a light industrial cluster of small business parks which lies north of the A3 Kingston Bypass with access across Red Lion/Fullers Way. The area totals 3.8 ha and provides a total of 60 small units with a combined footprint of 14,240 sq.m. A total of 500 jobs relating to 44 registered businesses are recorded by the IDBR data across the site. The majority of the activity relates to light industrial and trade activities. | Medium | Low | Low - Majority of units unsuitable and/or undesirable for conversion | The introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. The buildings in Class E use identified to be retained within the modified boundaries are either in office or light industrial use. They have been assessed and contain elements necessary for habitation, including windows to allow natural daylight inside. | The boundaries have been modified significantly to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction. |

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|------------------|--|--------------------------|-------------------------------|--|--|--|
| Silverglade LSIS | Silverglade LSIS is a small, modern purpose-built business park across Leatherhead Road towards the southern edge of the Borough. The site extends to 2.2 ha in total and accommodates ten small industrial units with a combined floorspace of 7,280 sq.m. Merlin Entertainments occupies around a third of the site, with other occupiers relating mainly to digital and advanced engineering companies. | Medium | Low | Low - Majority of units unsuitable and/or undesirable for conversion | The introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. The buildings in Class E use identified to be retained within the modified boundaries are either in office or light industrial use. They have been assessed and contain elements necessary for habitation, including windows to allow natural daylight inside. | The boundaries have been modified slightly to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction. |

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|--------------------------------------|--|--------------------------|-------------------------------|--|---|---|
| Cambridge Road and Hampden Road LSIS | Cambridge Road and Hampden Road is a small designated employment site (i.e. LSIS) of 0.7 ha located across Kingston Road about 1km south east of Kingston Town Centre. The site mainly accommodates light industrial and car maintenance activity, and a microbrewery and taste centre. A total of 11 businesses were registered on-site with a combined employment provision of 52 jobs based on the IDBR data. | Medium | Low | Low - Majority of units unsuitable and/or undesirable for conversion | The introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. | The boundaries have been modified significantly to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction. |

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|---|---|--------------------------|-------------------------------|--|--|---|
| Fairfield Trade Park, Kingsmill Business Park and Villiers Waste Transfer Facility LSIS | This employment location is comprised of three different clusters of businesses including the Royal Mail depot cluster, Kingsmill Business Park and Villiers Waste Transfer Facility. The site lies across 5.1 ha of land on the banks of Hogsmill River and accommodates a total of 30 units with a combined footprint of 13,300 sq.m. The centre offers small and flexible office and light industrial space through 20 units. The Royal Mail depot cluster comprises four large warehouses, one occupied by Royal Mail and the other three by construction engineers/wholesalers. Finally, the waste facility occupies almost half of the site comprising a large industrial unit and two smaller premises with a combined building footprint of c.3,500 sq.m. | Medium | Medium | Low - Majority of units unsuitable and/or undesirable for conversion | The introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. The buildings in Class E use identified to be retained within the modified boundaries are either in office or retail use. They have been assessed and contain elements necessary for habitation, including windows to allow natural daylight inside. | The boundaries have been modified significantly to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction. |

| Industrial Area | Description of the area | Significance of the area | Concentration of Class E uses | Vulnerability to conversion | Wholly unacceptable adverse impacts from potential loss of Class E uses | Assessment |
|-----------------------------------|--|--------------------------|-------------------------------|-----------------------------|--|---|
| St John's industrial area LSIS | St John's industrial area (LSIS) extends to 9.1 ha along the A2043 west of the rail line. There are a total of 102 units within the site with a combined footprint of 36,875 sq.m. According to the IDBR data, a total of 117 businesses are registered across the site with combined employment of 1,150 jobs. However, 60% of these jobs relate to non-employment sectors reflecting on the current pressures from other uses across the site. As a result, it is estimated that at least 40% of the site's area relates to non-employment uses. | Medium | Low | Medium | The introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy. The buildings in Class E use identified to be retained within the modified boundaries are either in office, light industrial or retail use. They have been assessed and contain elements necessary for habitation, including windows to allow natural daylight inside. | The boundaries have been modified significantly to ensure that only buildings in Class E use or with the potential to be used as a Class E use are included within the area covered by the Direction. |

9. Areas not covered by the Article 4 Direction

Any buildings in Class E use which are located outside of designated town centres and industrial areas have been excluded from the Article 4 Direction, therefore Class MA permitted development rights are still available to use for these buildings.

Notable locations that are not covered by the Article 4 Direction include the following parades or clusters of buildings in Class E use:

- 43 to 55 Kingston Hill;
- North side of Norbiton Railway Station (including Hanover House);
- Various buildings along Hawks Road;
- 204 to 210 Cambridge Road
- 432 to 442 Kingston Road;
- 71 to 101 Maple Road;
- 153 to 159 Surbiton Hill Road;
- 14 to 36 Tolworth Rise South;
- 322 to 342 Hook Rise North;
- 165 to 177 Red Lion Road;
- West side of Worcester Park Railway Station (including on Park Terrace); and
- 69 to 115 Robin Hood Way.

The locations above contain at least 70 buildings in Class E use that are not covered by the Article 4 Direction. This includes buildings with a total floor area of up to 1,200 square metres (in the case of the Hanover House office building).

In addition, there are individual buildings in Class E use throughout the borough. Therefore, opportunities exist for Class MA permitted development rights to be implemented.

10. Summary of proposed modifications

This section provides a summary of the recommended modifications to the boundaries of the areas covered by the Article 4 Direction. Maps showing both the existing and proposed modifications to the boundaries of the areas covered by the Article 4 Direction are included in Appendix B.

It is important to note that all sub-areas of Kingston Town Centre and the District Centres that have been assessed as having either 'medium' or 'low' significance or 'medium' or 'low' concentration of Class E uses are proposed to have modifications to the boundaries in some form.

There is a condition in the legislation for Class MA permitted development rights to assess the impact of that change of use on the character or sustainability of the conservation area. The condition may not provide enough protection to resist individual units or buildings from conversion, but over time the gradual loss of commercial space at ground floor level would have a significantly detrimental impact on the sustainability of the conservation area. It has therefore been concluded that this condition is not robust enough to consider excluding conservation areas that fall within the town centres.

Size of the areas covered by the Article 4 Direction following proposed modifications

As shown in Appendix A, the existing areas covered by the Article 4 Direction across the borough cover approximately 179 hectares, which equates to about 5% of the total borough area. The areas that would result following the proposed modifications to the boundaries would cover approximately 79 hectares, which equates to only 2% of the total borough area.

The proposed modifications to the boundaries would therefore result in a significant reduction of 56% in the size of the areas covered by the Article 4 Direction.

Kingston Town Centre

The proposed modifications to the boundaries for Kingston Town Centre include removing significant areas in the north-western and south-eastern parts of the town centre. This will ensure that the core retail, leisure and office locations continue to be protected, whilst allowing flexibility for potential conversion in the remaining more peripheral areas.

Within the sub-areas which have been assessed as having 'medium' or 'low' significance and a 'medium' or 'low' concentration of Class E uses, there are clusters of class E uses which are considered to be important for the sustainability of the town centre. The boundaries for these sub-areas are proposed to be modified in a manner which retains these important class E uses.

New Malden District Centre

The proposed modifications to the boundaries for New Malden District Centre include significantly reducing the area to the north of the railway line in Coombe Road sub-area and the Cocks Crescent sub-area appear.

It should be noted that the railway line should not be treated as a *de facto* edge of the core of the high street as it contains many main town centre uses. Furthermore, the vacant site immediately adjacent to New Malden Railway Station is under construction for a new development that will bring higher footfall and create brand new Class E uses that will improve the vitality of this town centre.

A significant part of the area adjacent to the Fountain Roundabout (at the southern end of the high street) has been removed as the buildings are not in Class E use. The building at 2 Kingston Road has been identified as part of a larger site for having for redevelopment in the First Draft of the new Local Plan for the Borough (currently out for consultation), therefore it has the potential to increase footfall for the high street in future.

Surbiton District Centre

As with Kinston Town Centre, the proposed modifications to the boundaries for Surbiton Malden District Centre will result in a significant reduction in the amount of area covered by the Article 4 Direction. This includes significantly reducing the Brighton Road sub-area so that only the area up to the junction with Maple Road and Balaclava Road is covered by Direction.

The proposed modifications in the other sub-areas will result in only keeping buildings that front onto Victoria Road. Listed buildings have been excluded, as have the large Waitrose supermarket and buildings not in Class E use on St Mark's Hill.

Tolworth District Centre

The existing boundaries for Tolworth District Centre are mainly in conformity with the concentration of Class E uses that predominate throughout most of this town centre.

Nonetheless, there are proposed modifications to exclude the buildings that do not form part of the retail core along the eastern end of Ewell Road, along with other small amendments across the District Centre.

Local Centres

No Local Centres have been entirely removed from the Article 4 Direction, even when assessed as 'medium' or 'low' significance and a 'medium' or 'low' concentration of Class E uses. This is because even when a Local Centre is of medium significance in the context of the borough, they are of high significance to the local communities they serve. They have an

important role in providing day-to-day goods and services and reducing the need for residents to travel for staple purchases.

Nonetheless, the proposed modifications seek to ensure that the areas covered by the Article 4 Direction are the smallest geographical area possible, with significant reductions at Kingston Road East, Cambridge Road and Kingston Vale Local Centres.

Industrial Areas

The proposed modifications to the boundaries will result in a significant reduction in the areas covered by the Article 4 Direction across the industrial areas.

The two Strategic Industrial Locations at Chessington and Barwell are proposed to have significant reductions to the areas covered by the Article 4 Direction. Only buildings in Class E use or with the potential to be used as Class E use have been retained.

The only Locally Significant Industrial Sites with relatively small proposed modifications are at Canbury Business Park and London Road, but this reflects the high concentration of buildings in Class E use within these locations. These locations are immediately adjacent the existing Kingston Town Centre boundary and they have more of a town centre character than industrial. This is reflected in the proposal to include them within an amended Kingston Town Centre boundary in the First Draft of the new Local Plan (currently out for consultation).

Future review of boundaries

It should also be noted that Kingston Council is committed to reviewing the boundaries of the town centres and industrial designations as part of the preparation of the new Local Plan. Should any boundaries change following the adoption of the Local Plan, the Council will review whether there is a need to update the Article 4 Direction accordingly.

Appendix A: Article 4 Direction statistics proforma

| Area | | | |
|---|---------------------------|---------------------------|---------------------------|
| Area of the authority (ha) | 3,720 | | |
| Coverage of Article 4 Directions | As made | As per amended proposal | Reduction |
| Area of the authority covered by the Article 4 Direction (ha) | 179.16 | 78.67 | -56% |
| Percentage of the authority covered by the Article 4 Direction (%) | 5% | 2% | -3% |
| Class E Floorspace | As made | As per amended proposal | Reduction |
| Amount of Class E floorspace included in the Direction, including % reduction | Data not available | Data not available | Data not available |
| Amount of Class E floorspace in borough where the PDR can still apply | Data not available | Data not available | Data not available |

Appendix B: Maps showing proposed modifications to boundaries