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### **Kingsgate Planning Application 19/02323**

The following comments are made on behalf of the Committee of the Canbury and Riverside Association (CARA), a non-political voluntary organization whose aims are the conservation and improvement of the Canbury riverside area, for residents and visitors alike.

Whilst we recognize that the area for which planning consent is sought is currently unsightly and under-used, we object to the above application for its development as we do not believe it meets the aims and requirements of The Core Strategy for Kingston, nor the North Kingston Development Brief. Specifically:

1. Policy DM10 of the Core Strategy states that development proposals will be required to respect maintain or enhance 'prevailing development typology, including housing types, sizes and occupancy' and 'scale, layout height, form, massing'. In our view this application does none of these.
2. The North Kingston Development Brief includes a Heights Plan which clearly shows the tallest building having 'a maximum of 12 storeys'. This application, which includes a building of 25 storeys, far exceeds this. It does not meet the requirement that it must 'knit into rather than compete with the surrounding areas' and that building heights 'must respond to surrounding areas and not negatively impact on neighbouring properties and spaces'.
3. The application does not demonstrate how it meets the requirement in the NKDB 'to celebrate existing local buildings of special quality including Kingston College's main building and the Gala Bingo Hall'. It states a view that it will have minimal impact on them, but does not celebrate them.
4. The Internal Daylight and Overshadowing Report considers the impact of the buildings on the public spaces within the proposed development, but not on the surrounding area (although not all parts of the report were available for viewing at time of writing).
5. The NKDB states that 'New development must understand and respond to the character of Richmond Road particularly further north where the scale, rhythm, use and detail reflect the historic importance and character of this site'. It is our view that this application fails to meet this requirement due to its height and design. The NKDB further states that the 'determining factor of height in this environment will be its role in supporting the street' and

again, we do not see how the height of this development meets this requirement.

6. The Ecological Assessment makes a number of recommended mitigation measures during both construction and operation. There is no indication that these measures will be adopted.

With regard to traffic impact, we ask whether council traffic engineers are satisfied with the traffic assessment report. It is our experience that traffic flow in the area is already very finely balanced. When there is disruption to this, such as roadworks in the area, or demand increases, such as over the Christmas period, traffic flow is very seriously impacted.

We are aware that another recent development in the area is experiencing problems with sewage discharge. With regard to this application, Geoff Nokes of Thames Water has asked for an assessment of just the predicted foul discharge (we understand this to mean excluding surface water). Has this assessment been made? Furthermore, he requests that surface water be directed only to the surface water network. Has the impact of this been assessed?

For information, we note that a Freedom of Information request informed us that there are currently 1,636 existing dwellings in the borough that are unoccupied (as at 11 October 2019), excluding second homes. Furthermore, permission has been granted for an additional 767 residential units on the Old Post Office, Eden Walk, Eden Centre and Gala Bingo sites.

We note that paragraph 12 of the NPPF states that 'where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan) permission should not usually be granted'. We believe that we have demonstrated a number of areas where this application conflicts with the North Kingston Development Brief.

Paragraph 14 of the NPPF states the 'the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits'. We believe that that this is the case with this application.

We therefore urge the council to refuse consent.

Thank you for your consideration of these comments.

Yours sincerely,

Penny D'Souza  
For the Canbury and Riverside Association (CARA) Committee