

## Comments on Cambridge Road Estate Planning Application 20/02942/FUL

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I object to the proposal on the following grounds:

### 1 Air Quality

The proposal does not provide evidence as required by legislation that it will meet requirements for air quality. The Cambridge Road Estate is in an AQMA and an area that has existing exceedances of NO<sub>x</sub> pollutants according to Kingston's 2019 Annual Status Report. The applicant's report also refers to exceedances at Cromwell Road (46.8) and Cambridge Road (42.3) near the site. There appears to be no Air Quality Neutral assessment of the site that will mean that the proposal breaches the Air Quality Policies SD1 B2 a. The analysis of pollution to be generated by the new estate when operational has not been subject to rigorous sensitivity analysis and does not take in to account the increasing use of cars in outer London in recent years and the huge increase in pollution that will be generated cumulatively from HGVs and LGVs accessing the many building sites across Kingston that will be developed at the same time as this site. We are talking about pollution generated by vehicles accessing this site alone for over 12 years. No cumulative assessment of the effects of vehicular traffic on all demolition and construction sites coming forward has taken place.

The applicant's own figures show in 7.83 of the environmental report that Block C will exceed maximum acceptable levels of NO<sub>x</sub> pollution during the operational phase( at 43.06) even with in their own unstressed scenario. The report also states that in the operational phase there is "uncertainty in the dispersion modelling predictions." This breaches NPPF 2019 170 d) and e) and policy 181 as well as London Plan 2019 Policy SD1 1 a and b. These are serious breaches.

The proposal breaches DEFRA guidance for predicting NO<sub>x</sub> concentrations. In point 7.88 of the Environmental Report, the applicant states that *"predictions of 1 hour Nox concentrations were not produced as part of the dispersion modelling assessment for Block C or K. However, as stated in LAQM (TG16), if annual mean NO<sub>2</sub> concentrations are below 60µg/m<sup>3</sup> then it is unlikely that the 1-hour AQO will be exceeded. As such, based on the results in Table 7.14 it is not predicted that concentrations will exceed the 1 hour mean AQO across the Site."*

However, this statement breaches the relevant part of the DEFRA guidance in this point which notes that *"if an AQMA is already declared for NO<sub>2</sub> annual mean, only amend AQMA and AQAP to include 1-hour mean"*.

There is no assessment of the level, type and concentrations of pollution that will be generated during the **construction phase** of the development. This contravenes Part 170 e of the National Planning Policy Framework 2019 which states that planning decisions should contribute to and enhance the natural environment by:

*"e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;"*

It also contravenes policy 181 of the NPPF 2019 which states that:

*“planning decisions should sustain and contribute towards compliance with relevant limit values...for pollutants, taking in to account AQMAs and cumulative impacts from individual sites in local areas”*

***There is no assessment of the effect of demolition and construction activities over 12 years on the health of the construction workers.***

This is despite the recognition that major levels of air and particulate pollution will be generated by demolition and construction works. There is no evidence that workers' health on the site will not be affected by works. The environmental report states that the effects of dust emissions and dust soiling on site will be MAJOR. This situation alone is a reason to refuse this application.

In addition, government guidance on Control of Dust and Emissions from Construction and Demolition and on use of Non-Road Mobile Machinery do not lay down minimum requirements that must be met, but rather encourage developers to adhere to best practice. The system is based on self-certification with auditing by over-stretched local authorities who are often failing to ensure any kind of compliance.

It is not legally right that a development that will provide 70% of its dwellings that will be for the private market at exorbitant prices should be built at the expense of poorer workers' health and even their lives.

**I draw your attention to the landmark and recent ruling at Southwark Coroner's Court that pollution was one of the causes of a child's death in 2013. Workers on the Cambridge Road Estate site will be exposed to high levels of pollution on site for over 12 years.**

The assessment of the number of HGVs and LGVs accessing the site during demolition and construction is hugely under-estimated, and with it the pollution that such movements will generate. Again, these figures also need to be considered cumulatively with traffic generated from the many other large site developments happening all over the area.

A planning application for Jersey Future Hospital , a site of 20,000 square metres predicted average monthly movements during different phases of the project varying from 1669 a month to 5544 a month. The peak day, when ready-mix concrete was being delivered, was assumed to have 84 movements.

How then can CRE, a site that is 89,000 square metres in size or nearly 5 times that of Jersey Future Hospital, only predict average HGV movements over 12 years of fewer than 25 vehicles

## **2. Noise pollution**

There is no noise assessment of the project and the effect of the demolition, construction and operational phases of the project are not therefore known. This contravenes policy 170 e of the NPPF 2019 and the relevant policies of the London Plan 2016 and draft new London Plan 2019 regarding controlling noise pollution.

## **3. Biodiversity**

The distance of the estate to Richmond Park is stated incorrectly in the application. It is assumed that – because Richmond Park SAC covers a large area – it can accommodate the new residents from this estate. This will be about 5000 people. As Richmond Park is only 1.2 km from the site, these people are likely to go to the park on average 2 times a week. This will result in over **half a million extra visitors to the park from this development alone**. On the same basis, I calculated that the redevelopment of the Alton Estate would result in an additional 2 million visits to the park each year. Then there is Canbury Place Car Park and The Old Post Office and Eden Walk, and Unilever, and Kingfisher and Surrey County Council. Where is the assessment of how many more people the fragile ecosystems in Richmond Park can cater for and survive? Recreational pressure from this development on the stag beetle and its woodland habitats as well as on Richmond Park's precious grasslands and biodiversity have been ignored. This is in contravention of the Conservation of Species and Habitats Regulations 2017.

No survey has been conducted to check the presence of stag beetle larvae so that effective mitigation can be put in place for any existing presence. **How does the council intend to ensure that the developer deals with any stag beetle larvae on site?** This is in contravention of the 2006 Natural Environment and Rural Communities Act. The stag beetle should be a material consideration in the council's deliberations on this planning application.

#### **4. Secondary Schools**

The proposal breaches the requirement at national, regional and local level to ensure there is sufficient provision of schools for children. The development is projected to increase the deficit of school places at secondary level by over 20%. A cumulative assessment with other developments coming forward has not taken place.

#### **5. Cumulative assessments with other developments**

Cumulative assessments are inadequate and lacking any meaningful analysis. The conclusions rely on everybody else coming to similar conclusions about their development. No scrutiny is taking place. Also, two major developments have been omitted from the calculations; The Unilver/ Cube proposal and proposals at Surrey County Council's building, both of which are major residential and commercial development for thousands of new residents and thousands of workers. The Environmental Assessment fails statutory requirements under the Environmental Assessment of Programmes and Projects Regulations 2017 in this regard as well as in all the other regards mentioned above.

The Cambridge Road Estate is an area with very low PTALs. The density of the proposed development is way above that specified by policy in the current London Plan 2016, and is not suitable by design according to the new London Plan 2019, about to be published. Transport accessibility is poor and the applicant's assumptions for its transport strategy are not proven. The provision of car parking at 0.4 car parking places per flat is under that laid out in the London Plan 2016 or 2019 for an area of such low PTALs and therefore breaches policy.