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Email: development.management@kingston.gov.uk

19/02323/FUL : Canbury Place Car Park 12-52 Kingsgate Road, 13-43 Richmond Road Kingston Upon Thames KT2 5AA

Dear Sir/ Madam

I am writing to object to the planning application above and ask you to reject it on several grounds.

I confirm that I hold the concerns expressed by the Kingston-upon-Thames Society regarding the proposed development in their letter to you of 14 November 2019 as my own. I will not re-iterate them here but ask that you consider them as separately expressed by me.

I would also like to add the following objections to the scheme and ask that it be refused on all these grounds:

1. In the July 2019 version of the new London Plan, in **Policy SD1 Point 2.1.23**, the Mayor acknowledged explicitly that there are heritage assets in the terms of **historic and heritage** assets and **nationally and internationally protected areas of natural environment** in Kingston by adding the phrase below about the Kingston "nascent opportunity area":

"Kingston town centre, with its ancient market is rich in heritage and forms an important part of the setting of Hampton Court Palace, its gardens, the Thames and surrounding Royal Parks."

This wording is now part of the Intend to Publish London Plan as Point 2.1.25 under Policy SD1

This is reinforced by **Policy SD1 B 3A** of the July 2019 London Plan which states explicitly that Boroughs, through their Development Plans and decisions, should **"3A) recognise the role of heritage in place-making"**.

This wording is now part of the Intend to Publish London Plan as Policy SD1 B5 and Boroughs have a legal obligation to abide by this Policy.

The Council would fail to meet this Policy if it approves the proposed development.

This proposal will cause significant harm to the heritage of Kingston and the area within which the development would sit, and to the settings of the above-mentioned Royal Palace, the Royal Parks and the Arcadian Thames. It also is sited opposite the Grade II listed Gala Bingo Hall which it will entirely dwarf by its massing and height.

Please note that Richmond Park is vastly affected by any development that takes place in Kingston as it forms the northern boundary to the Kingston side of the Richmond Park constituency and of Tudor and Coombe Hill Wards and is relied upon for recreational purposes by all Canbury residents (see 2 below)

2. There is already a severe lack of public open space for residents of Canbury Ward within the Borough. **Canbury Ward residents have NO NATURAL GREEN SPACE available to us and NO allotment provision**

The Kingston Open Space Assessment by Atkins in 2006 and ***based on a 2001 Kingston population*** drew the following conclusions:

- Both Norbiton and Canbury wards are below the quantitative standard of 1.11 ha of public parkland per 1,000 population. The Kingston Town neighbourhood as a whole is below the standard with only 1ha/1000.
- Overall access to children's play area in the neighbourhood is generally good, however areas to in south west of Grove, the east of Canbury and the north of Norbiton are deficient in terms of their access to children's play facilities.
- Canbury and Tudor wards, are below the quantitative minimum standard of 1 ha of natural greenspace per 1,000 population. Canbury has no natural greenspace per 1,000 population

3. I believe that the proposed densities may be highly elevated at densities seen in so-called "opportunity areas" throughout London. Whilst I acknowledge that it is proposed that much of the Royal Borough of Kingston-upon-Thames (Kingston") become a "nascent" opportunity area in the new London Plan, this plan is not yet finalised and is still open to legal challenge. I understand that the plan gains more weight as it goes through the planning process, but a successful legal challenge could affect what is finally agreed in terms of a development strategy for Kingston and particularly Kingston Town Centre spreading over to Canbury Ward and thus the type and scale of development allowed on this site

4. The Royal Borough of Kingston-upon-Thames is currently preparing a Local Plan. This is also at an early stage and therefore no scale or type of development strategy has yet been agreed for the Borough

5. A Views Strategy was agreed by the Council - with no consultation with residents - in 2018. This unfortunately sets a precedent for what the council considers to be an acceptable height for towers visible from protected sites in Richmond Park over Kingston at 16 storeys. The proposed development is way in excess even of this unacceptable height. The Views Strategy will become part of the new Local Plan which it is possible may also become subject to judicial review

6. The effect of this development on the rich and protected biodiversity of Richmond Park and Bushy Park and on the River Thames has not been assessed. The Richmond Park Management Plan 2019 - 2029 speaks of the adverse impact of light and noise pollution on the wildlife of the park from development and how the Royal Parks are often not consulted about developments that may affect them. Has a habitats screening assessment taken place to assess the impact of this development on its own and cumulatively with others planned for example on the Cambridge Road Estate, on biodiversity and the natural environment? I believe not. Any proposal without such an assessment, conducted properly, should be rejected.

In conclusion, there are many grounds on which the council should reject this proposal.

Yours sincerely

Caroline Shah