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The Royal Borough of Kingston upon Thames
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By email to localplan@kingston.gov.uk

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Dear Sirs

Local Plan Early Engagement - consultation response

Thank you for the opportunity to respond to this important consultation. CPRE London is a membership-based charity with 2,500 members across London concerned with the protection of the countryside, Green Belt, Metropolitan Open Land and the protection and enhancement of London's green spaces.

Q.1 Opportunity Area boundary

The Opportunity Areas should not include Metropolitan Open Land (MOL) or Green Belt. These should be excluded from the boundaries of the area/s. By including them it puts these spaces at risk of development. MOL and Green Belt are critical assets for all Londoners, not just residents of the borough. They ensure London does not sprawl into countryside and that Londoners do not have to suffer the devastating social and environmental consequences of urban sprawl, which include isolation, transport poverty, congestion and pollution. Also, in terms of MOL, these assets provide critical eco-system services for all of London including flood and water management, urban cooling and providing habitat for biodiversity.

Site Assessments Early Engagement (Regulation 18) May 2019

No specific question is asked about sites, however, there are a very large number of sites listed where the strategic constraints box states that "Green Belt" or "Metropolitan Open Land" (MOL).

We strongly object to any Green Belt or MOL sites being allocated for development. Green Belt and MOL are meant to have the 'strongest protection' for the good reasons stated in Q.1 above. Moreover, even giving the slightest indication that protected land might be released gives rise to speculation and opportunism, land starts to change hands and new owners apply further pressure

to councils and communities to release it. So it is vital that the council indicates as early as possible that protected land will not be released for development.

There is plenty of Previously Developed Land in the borough which can and should be redeployed or intensified for housing and commercial development. As such none of the following sites (listed in the Site Assessments) should be allocated for development. They should be ruled out as being sites which could be developed and removed from the next stage consultation.

Green Belt and MOL Sites are designated with the strongest protection in planning policy and should not be allocated for development. As such, none of the following sites which appear in the Site Allocations document should be allocated for development:

1. SA023 - Land to west of 41 Lower Marsh Lane (Thames Water) MOL
2. SA042 - Hogsmill treatment works MOL
3. SA043 - Hogsmill treatment works MOL
4. SA048 - Fairfield Industrial Estate MOL/GB
5. SA053 - football stadium adjacent to treatment works MOL
6. SA056 - Hogsmill treatment works MOL
7. SA069 - Robin Hood Farm MOL
8. SA082 - Gasholder, West Barnes Lane MOL
9. SA090 - Land at Clayton road - GB
10. SA091 - Land adjacent to Rushett Lane - GB
11. SA092 - Mellow Stock - GB
12. SA093 - Chessington World of Adventures - GB
13. SA094 - 1 Virginia Cottage - GB
14. SA095 - Chessington Gold Court - GB
15. SA096 - Barwell Court - GB
16. SA097 - Land at 449 Leatherhead Rd - GB
17. SA098 - Rushett Stables - GB
18. SA100 - Fairoak Lane GB
19. SA101 - Green Lane Nurseries GB
20. SA102 - Green Lane Farm Kennels GB
21. SA103 - Glanmire Farm GB
22. SA104 - Kingscourt Coachworks GB
23. SA105 - Chessington Garden Centre GB
24. SA106 - Byhurst Farm GB
25. SA107 - The Shy Horse Pub GB
26. SA108 - 385-399 Leatherhead Road GB
27. SA109 - Silverglade Business Park GB
28. SA111 - Southborough High School Playfield Fields GB

29. SA115 - 419 Leatherhead Road GB
30. SA117 - King George's Field MOL
31. SA120 - Worcester Park Nursery MOL
32. SA121 - The River Club, Old Malden Lane MOL
33. SA122 - Stables, Old Malden Lane MOL
34. SA123 - Barrow Hill Nursery MOL
35. SA124 - Central Nursery MOL
36. SA128 - Land adjacent to 6 Old Kingston Road MOL
37. SA130 - Tolworth Court MOL
38. SA131 - Goals Tolworth MOL
39. SA146 - Hogsmill treatment works MOL
40. SA147 - Seething Wells Filter Beds MOL

(NOTE: SA013 Ashdown Road Car Park is listed as Green BeltB/MOL but it is not clear why: **the map of GB/MOL in the consultation does not show this site as having either designation. This is surface car park and should be developed as mixed use and or residential**])

Q.2 Vision for the future of the borough. Change for the better.

There are many reasons why adding in more housing (while removing car parking) to Kingston will create a change for the better, not least because there will be more demand for goods and attractions so a greater diversity of shopping and cultural services can be supported. It can also reduce car-dominance and make a really pleasant town centre, reachable by walking and cycling or public transport. All of this will make Kingston a more pleasant borough to live in.

The borough could be more effective at selling the benefits of densification while at the same time using densification to avoid the (likely to be unpopular) release of protected land.

Kingston will need to enable both high density development and the redevelopment of small sites. ***A key aspect missing from both visions is that transport will need to change so that fewer people own cars and less space is taken up in new developments for car parking;*** and space currently set aside for car parking must be more usefully deployed for residential and/or commercial development.

Q.3 Housing targets and Green Belt/MOL

No, Green Belt and MOL should not be built on to deliver housing targets. Green Belt is vital to ensure London does not sprawl into open countryside and so Londoners do not have to live with the devastating impact of urban sprawl i.e. high

transport and energy costs, congestion and pollution. MOL is a strategic asset for all of London, not just Kingston residents. It is vital to ensure Londoners have access to open space and as an ecological asset delivering ecosystem services like urban cooling and water management; as well as providing vital habitat for diverse species.

Housing targets need to be realistic so that land is not allocated when it is very unlikely to be used for new housing: table 253

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790093/LiveTable253.xlsx shows exceptionally low *actual* build rates (completions) in Kingston for the past few years. The exceptionally high targets proposed are hugely unrealistic from this point of view. We cannot support over-allocation of sites for housing to the extent that is proposed. We support the need for more housing and for ambitious targets but there are serious negative consequences of over-allocating land, specifically that protected land is allocated unnecessarily, with the likelihood that it will be built out before the PDL sites (previously developed land); also allocating land which is unlikely to be needed means it cannot be used for other more useful purposes.

Instead, the council should allocate land which is currently inefficiently used and where new arrangements could support transport targets, i.e. notably - but not solely - surface and multi storey car parks should be converted to housing or mixed residential and commercial developments to discourage ‘switchable’ car trips. Inefficiently used commercial /industrial sites can be redeployed to mixed use (commercial with residential) to reinvigorate town centres, bringing new markets, retaining commercial space while adding in residential. **25% of Kingston households do not have a car** (2011 census data) and there is no need to cater for car parking space in current developments. Kingston cannot afford to add more cars into the borough for 2 key reasons: (a) it needs to discourage, not encourage further car trips (and must support the Mayor's target of moving from the current level of 54% of trips by sustainable mode of transport i.e. walking, cycling and public transport, to 75% by 2041); (b) parking is a major waste of valuable space with cars parked 95% of the time.

Alternative sites which can be allocated for mixed use development and which would provide a sustainable alternative to building on Green Belt and MOL are listed at Q.20 (page 8).

Q.4 / Q.5 Key pressures

This is not a question of prioritising: all of these needs should be planned appropriately. Note that there are also critical inter-relationships between the

different issues raised. For example, traffic can be reduced by building car-free developments. And housing for older people, who may be less able or willing to drive a car, could be built car-free and located within walking distance to amenities so people can walk to them, stay fit and be at reduced risk of isolation.

Q.6 Density examples

The borough could look at the Donnybrook Quarter or Dujardin Mews in Enfield: both examples of low rise (3-4 storeys maximum) developments which need to fit appropriately with surrounding suburban buildings. See Karakusevic Carson or Peter Barber Architects.

For higher density developments, consider Camden Courtyards or many recent developments in Hackney.

Q.7 High rise

High rise is unlikely to be able to provide appropriate housing for families or older people. It makes more sense to consider mid-rise (car-free) blocks with courtyards with either private enclosed (safe) play spaces for children or open outdoor courtyards for through-routes or out-door relaxation for residents. High rise is rarely 'human scale'. It is also unnecessary: it is possible to achieve high densities with mid-rise blocks. We do not support high rise for these reasons generally but also, in the Borough of Kingston-upon-Thames, because of the impact on surrounding views and vistas.

Q.8 Master plans and design codes

It makes sense to Masterplan larger sites because this ensures infrastructure is delivered as part of the development, that it responds to local needs and because Masterplans help secure the investment needed to make sure the site is actually developed because they give clarity and security to developers. Masterplans can take a long time, however, so it may be useful to consider how this can be resourced, for example through Mayoral funds.

Design codes are also useful in reducing costs all round because applications for planning permission are more likely to fit with what the borough wants and needs so fewer problems will arise with inappropriate or unattractive developments which may give rise to objections.

Q.9 Importance of various amenities etc

This question is impossible to answer because some of the things listed will be of importance to some people and others to others.

Furthermore, the extent to which people would be looking to buy or rent is a matter for the strategic housing market assessment and not something which (we would have thought) could be determined by asking a non-representative group of residents / Londoners via this consultation.

Q.10-13 Affordability

The borough should consider Build To Rent. These tend to bring higher quality developments and attract development partnerships which invest longer-term in the borough.

Q.14 Housing for older people

Bear in mind that older people may not be able or willing to drive and are more likely to be isolated if they live in a car-dependent area so it makes sense to develop a strategy which allows older people to live in or near to town centres. It also makes sense to try to enable older people to downsize.

Q.19 Strategic Industrial Land

SIL needs to be protected BUT it is often, as in the case of Tolworth, not an efficient use of space. Consideration should be given to a master plan for SIL and other industrial sites, moving any non-industrial usages i.e. retail or services closer to town centres and intensifying the sites to provide more floor space per hectare for appropriate uses.

Q.20 Mixed use

We support mixed use development in town centres particularly where it can help to regenerate town centres, creating new car-free neighbourhoods with cafes and retail, close to services etc. LISTED BELOW are a number of sites we feel could be intensified and developed as mixed use and provide an appropriate and sustainable alternative to building on protected green space, along with our assessment of suitability for development of sites listed in the consultation.

Strategic Industrial Locations (as listed in the consultation)

- **Barwell Business Park (Chessington)** More efficient use could be made of this space HOWEVER it is not close to a town centre and it is not clear how a large (re) development could be brought forward without introducing a lot of cars, whether increasing commercial space or creating a new mixed use development. Any masterplan for this area must ensure that a new town centre can be developed to reduce trips by car to services and amenities, shops, cafes etc., and must enable people to live or work with no extra car trips added in.
- **Chessington Industrial Estate (Tolworth)** This is currently low-rise, relatively low-density development and could be considered for mixed use or intensified

commercial use. However, again the Masterplan would need to consider where the 'town' / 'district' centre would be to ensure people can enjoy services / amenities etc without a car trip and so that the development can be car-free and reduce the space currently given over to parking, particularly surface parking.

Local Industrial Locations (as listed in the consultation)

- **Canbury Park** This area is already under development and there look to be considerable opportunities to continue to develop the neighbourhood further to create a more attractive place, not least by considering reclaiming space from roads which seem to be over-allocated and also eliminating car parking to discourage unnecessary car trips. It feels like the area needs an overarching masterplan to ensure the transport issues are tackled alongside new housing, commercial development. There looks also to be an opportunity nearby to build over the bus station.
- **Fairfield Trade Park / Kingsmill Business Park/Villiers Road Waste Transfer Facility.** This is within MOL and the Hogsmill Valley and **should not be developed** for housing or intensified. There is also a need to retain the waste management facility.
- **St. George's Industrial Estate** - low rise, lots of surface car parking. Could be redeveloped to make better use of space. This 1.6 hectare site could accommodate 640 homes @400 dwellings per hectare or additional commercial space. Transport links are not good however so these need to be improved to ensure the site can be developed car free (car clubs / Drive Now type schemes could support households which need a car).
- **London Road (Nos. 117-147 and 100-122)** - there does not appear to be a lot of space BUT the Asda site on London Road could be redeveloped to eliminate surface car parking and build residential on top of a new supermarket or other commercial space.
- **Cambridge Road/Hampden Road** - the side of the site facing onto Cambridge Road could be redeveloped, incorporating the curtilage which takes up a large amount of space, with mid-rise (up to 8 storeys) mixed-use development. Any development close to housing on Hampden Road would need to be sympathetic and not encroach on light.
- St. John's Industrial Area [cannot locate this]
- **Silverglade Business Park.** This is too isolated to merit development or intensification because it would add in car dependent development
- **Red Lion Road** - this looks to be already under development for housing. Consideration could be given to extending development in this area into the industrial estate which is classic low-rise with large areas of surface car parking.

OTHER LOCATIONS which should be considered for development or intensification (mixed-use or residential)

- Commercial site on A2043, currently Homebase, Aldi, H Mart + others plus extensive surface car parking, short walk from New Malden station. Car-free, high density development of this 7.5 hectare (estimate) site could accommodate 3,000 homes @ density of 400 dwellings per hectare and/or could increase commercial space, while reducing car trips and car dependency in the borough
- Similar style site (low rise commercial) + surface car park at Portsmouth Rd/Prospect Road, currently home to Brewers Decorators etc., as above could be redeveloped as mixed use and making better use of space. Approx 2.25 hectares or 900 homes at 400 dwellings per hectare
- Sainsburys + surface car park on Sury Basin / Saxon Road, similarly could be redeveloped as mixed use
- Commercial/industrial sites near to Tolworth station could also be considered for mixed use (they are low-rise, relatively low density)

Other sites in Surbiton.

- Waitrose + surface car park
- St Philip's Road Car Park
- Hardstanding/ surface car park behind Glenmore House (SA142)
- Station car park plus adjacent surface car parking at Saxon Close and behind blocks at Glenbuck Road
- Sainsburys on Victoria Road (remove car parking above and create residential instead)
- Large surface car park at Simpson Way

Other sites in Kingston

- Ashdown Road car park and NCP multi storey car park on Lady Booth Road
- Walter Street surface car park in Kingston
- Asda + surface car park on A308 (near Birkenhead Ave)
- Consideration can be given to reclaiming road space where over allocated or where 2 lane road could be returned to one lane; gyratory systems can be re-thought to release land.
- Steadfast Road multi-storey car parks - a prime site close to the river which could be used for a mixed use area with cafes/shops and residential on top to help bring more people to the town. Nearby roads can be reduced in scale to create a more pleasant environment too (A308/Horsefair) by reducing car dominance

Q.22 - industrial space

Protections for industrial space are extremely important and no changes should be made unless justified by either relocation or an increase in protected, designated space elsewhere, which is (a) rarely easy and (b) may not have appropriate transport access. However, we support mixed-use development where appropriate and where it can be done without losing designated SIL or *overall* Locally Significant Industrial Sites space. This could be achieved by intensifying some industrial locations so that they have more commercial floor space overall, building higher for instance. This will not work for all types of industrial business and on the whole there need to be safeguards in place to retain enough commercial and industrial space within the borough.

Q.23 /Q.24 /Q.25 - visitor economy

Whether or not there is a need for further protection, there is a major opportunity to develop the visitor economy by making the town centre more attractive by reducing car dominance. See more below (q.26).

Q.26 to Q.29 Town Centres

Town centre regeneration must focus on transport issues. Kingston must recognise that London is moving towards having many smaller district centres which are not car dependent so people can enjoy do their weekly shop, and enjoy other shops, cafes etc without needing to get in a car.

For big centres like Kingston, it is vital that they become less car dependent and less car dominant - and more pleasant - to encourage people to come and stay for longer (many studies have shown that removing cars and making towns more pleasant in this way has a positive impact on town centre business). One way to do this is to reallocate space given to parking. If it is allocated for mixed use (commercial + residential) then an increase in population creates an immediate increase in demand for local shops.

Kingston must ensure that, at the same time, it does everything it can to make walking and cycling more attractive and create space for public transport.

Q.30 - transport

It is not just roads and rail networks but Parking which must be brought under control to reduce car trips. We support improvements to public transport but strongly oppose any new road schemes as these simply create more traffic (evidence shows that new roads create more, not less, traffic).

Kingston has high rate of car ownership and should seek to reduce this by building only car free development and not allowing building in areas where new dwellings would be dependent on a car and need a car parking space.

Q.31 - encouraging walking and cycling

At a minimum, Kingston needs to introduce 20mph speed limits on all roads; increase the areas covered by Controlled Parking Zones (and reduce access to parking more generally); create 'Low Traffic Neighbourhoods' where through traffic is filtered to it is more pleasant and less dangerous for walking and cycling; and it should develop a network of protected cycle track; it should also seek to change road layouts in masterplans, reclaim road and curtilage space wherever possible and ensure all crossings and junctions prioritise pedestrians and cyclists.

Q. 32 - reducing congestion

It is vital that all new housing development in Kingston is 'car free'. It also needs to take a 'town centre' approach to development in the borough so that people can get to amenities / services by bike or walking, so cutting out a huge number of car trips. Town centre and destination / commuter parking (e.g. near to train stations) must also be reduced, eliminated and/or brought under control.

Q.33 - other parking policies

The Local Plan should seek to reduce the availability of parking in town centres and elsewhere and should ensure new development is 'car-free'. The 2011 Census shows that a quarter of household in the Borough already do not own a car and this is likely to increase and needs to increase. There are many other ways to encourage use of more sustainable modes of transport and, more generally, the Local Plan needs to reflect the local transport strategy and targets to reduce car trips.

Q.34 - how to reduce car trips

Building amenities near to housing, creating small neighbourhood centres, and enabling people to pick up deliveries at key points like train stations, bus stations, supermarkets or local shops, can all reduce the scale of deliveries.

Q.35 - accessibility

Accessibility is partly about making public transport easy to use for all. But being near to amenities is key so that people can easily walk where they need to go. However the really important issue to tackle for older and younger people is to reduce road danger and perception of road danger. To tackle this, more controlled parking can help create visibility lines; 20mph limits make roads much safer; Low Traffic Neighbourhoods eliminate rat running and make residential

areas much quieter and more pleasant. These can be combined with efforts to reduce car dominance, allocate more space for pedestrians and less for car parking, and make streets greener and more pleasant which less clutter, for example.

Q.37 - priorities

The main priorities for the Local Plan should be:

- Links to transport, in particular reducing car parking provision and enabling car-free development, so space can be more usefully deployed; and
- Taking an approach where neighbourhood and district/town centres are intensified so population increases mean local shops are better supported and so people (particularly those without cars) are within walking or cycling distance to amenities.

Yours sincerely

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