

Part Two of Response to Consultation on North Kingston Forum Consultation on draft Neighbourhood Plan (the “Plan”)

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Comments on the AECOM Sustainability Appraisal Report (the “SAR”)

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Comments on the AECOM Sustainability Appraisal Report (the “SAR”) of the North Kingston Forum Neighbourhood Plan (the “Plan”)

1. The SAR is in breach of the Environmental Assessment of Plans and Programmes Regulations 2004 in not having consulted with statutory consultees on a relevant Sustainability Appraisal Scoping Report

A SA Scoping Report for the Plan was completed in late 2019 and was consulted upon with Natural England, The Environment Agency and Historic England as statutory consultees. The comments received from Statutory Consultees were taken in to account when drafting the SAR in early 2020, when two drafts of the SAR were completed.

However, the SA Scoping Report was based on a Plan which proceeded to change significantly after the second draft of the SA had been completed on 17 April 2020.

This is acknowledged in the SAR (See: “What has plan making involved to this point?”), with AECOM stating that:

“work on the North Kingston Neighbourhood Plan and its evidence continued to progress in response to an evolving strategic context”.

Indeed, a third version of the SAR was signed off by AECOM on the 10 March 2021, a version which comments on the revised Plan. However, **no** Sustainability Scoping Report was completed for the revised Plan and no further consultation therefore took place with statutory consultees on the proposals and policies in the Plan now being put before residents.

2. AECOM’s appraisal does not provide rational or reasonable justification for its acceptance of the North Kingston Neighbourhood Forum (“the Forum”)’s decision not to provide any “reasonable alternative” to its plans and its policies. The Plan is in breach of statutory requirements in relation to this requirement

The SEA Regulations require that a report that identifies “reasonable alternatives” to the policies and proposals being presented for consultation must be published alongside the draft Plan, that the likely significant effect of such reasonable alternatives are assessed and that reasons are given for the preferred option.

AECOM asserts that the North Kingston Neighbourhood Forum is “limited in terms of the potential alternatives” and that there are “no reasonable alternatives” (Point 4.32 of AECOM report) that can be considered because:

- i. The Plan must conform with the London Plan and Kingston’s Core Strategy 2012 and the emerging new Local Plan
- ii. There are not yet any housing targets for the Borough as a whole
- iii. The Plan does not have an agreed housing target to deliver within North Kingston and that it is not necessary therefore for the plan to allocate sites for development

AECOM goes on to assert that:

“In the absence of proposed site allocations and the absence of a housing target, it is challenging to derive meaningful alternatives to the draft Neighbourhood Plan in terms of alternative spatial strategies”.

It is clear that no housing targets have yet been agreed for North Kingston as the council has not yet done its new Local Plan and no sites outside of the area identified as the Kingston Station Area in the Development Scenario Testing documents, and which formed the basis of Kingston’s SHLAA calculation, have been identified for development.

This exposes a fatal flaw in AECOM’s conclusion that it is not possible to consider any "reasonable alternatives" to the proposals upon which the North Kingston Forum is consulting.

If no housing targets or sites for development have been agreed in the North Kingston Forum area, how can the Forum **arbitrarily** have decided that **certain sites and roads** should suffer development that may happen in the area, and have decided on the **density and height and form** that each such site and area can bear, but then simultaneously have decided that there are "**no reasonable alternatives**" to that strategy?

If one set of places can be earmarked for development or earmarked for a certain density, height and form of development, so can another set be.

There can be no logical argument that supports the conclusion that there are no reasonable alternatives to the policies being put forward by the Forum.

3. Possible Reasonable Alternatives – Sury Basin and St George’s Industrial Estate

A reasonable alternative scenario exists, which I believe should have been the preferred option, in which the Sury Basin site and St George’s Industrial Estate bear a significant amount of the development endorsed by the Forum in the area, thus reducing development pressure on other sites and places less suited to the development the Forum supports in its policies. Taking the AECOM statement that a few sites alone are already promoted to deliver 1,200 units in to account, these two sites would between them only have to deliver 300 more units for ALL of the 1,500 residential units that the Forum supports being developed in North Kingston.

- 5.7 It is therefore notable that policies **NK19** (Sury Basin), **NK20** (Canbury Car Park/Kingsgate Road), **NK21** (Canbury Business Park), **NK22** (Cowleaze Road), **NK27** (Seven Kings Car Park), **NK30** (Elm Grove) and **NK33** (St Luke’s Primary School) all support the principle of development at sites within the Kingston Town Centre AQFA. The policies collectively identify capacity for at least 1,200 new dwellings across these sites, meaning development to the sites’ full indicative capacity could locate a significant number of new residents within an area of notably poor air quality. This would be in conflict with the SA air quality objective.

i. Sury Basin

AECOM has failed to expose that the Forum has gone against the assessments that form the basis of London Plan housing target policies for Kingston in the new London Plan by advocating only a replacement supermarket and low level housing on the site.

The Development Scenario Testing Document 1a – one of the documents that formed the basis of Kingston’s housing and commercial targets in the new London Plan - shows that the council and the Mayor of London agreed that the Sury Basin site can bear significant development on with heights of between 2 and 5 storeys at the back and 9 to 16 storeys at the front¹. The DSTs assumed vast commercial-led development² on the site with residential units, which is the main factor restricting the number of residential units planned on the site to 230. The site is labelled OA49 in the DST 1a.

Site	Land use	Low		Medium		High		Planning application	
		Homes	Commercial (sqm)	Homes	Commercial (sqm)	Homes	Commercial (sqm)	Homes	Commercial (sqm)
KINGSTON STATION AREA									
OA49	Commercial-led mixed-use	173	34,984	230	55,688	288	89,244		

The Forum has no reasonable justification for going against the DST figures agreed by the Mayor of London with Kingston Council and *attempting to restrict the height of development on this site, with the result that residential or commercial development is pushed to less suitable sites in the area, particularly across Canbury Ward.*

A reasonable alternative scenario would be that the Forum supports a policy in which the Sury Basin site provides many more residential units at a greater development height on the site as has already been judged acceptable by the Council of between 2 and 16 storeys.

In point 5.10 of the AECOM report, AECOM stresses how the Sury Basin site has “existing pedestrian access to Kingston Station” and is in “close proximity of most key services in the centre”.

Air quality is considered by AECOM to be a limiting factor for development on the site. However, the London Plan makes clear that air quality in residential development can be managed through design – by providing air conditioning systems, assuming windows are opened only when rooms are inhabited, using green infrastructure, the placement of buildings and so on and so forth, and poor air quality around the site can not be used as an argument to reduce the height of the development or the amount of residential, commercial or community space the site can deliver. Proposals for large scale high rise development on the Cambridge Road Estate, and area of high pollution provide excellent example of how a developer proposes to mitigate for pollution and poor air quality through design.

Given the size of the site and its sustainable location, there is every reason for this site to be considered as part of a “reasonable alternative” to the Forum’s policies.

ii. St George’s Industrial Estate – second largest site apart from The Keep

It is not justified that the density of development that the NKForum endorses on this site is so LOW at between **15 and 30 units per acre**. The PTAL at the Industrial Estate is higher than some of the Park Road “**KEY CORRIDOR**” on which high rise, high density development of a massive

¹ The Forum asserts that Sury Basin has a PTAL of 4 when it has an excellent public transport accessibility rating of 6a. This incorrect information may have wrongly influenced people’s response to policy NK19 as not being able to bear greater development and be compounded by AECOM’s assessment that air quality is a limiting factor in terms of the development that takes place on this site, when it clearly can not be considered to be so in the context in which the assessment is being made as is discussed below.

² The commercial development that the DSTs showed that the site could bear is equivalent to 1230 additional one bedroom flats at 45.26m² per flat.

121 units per acre is supported. There is not a reasonable or rational explanation for the difference in these policies.

This site should bear a much higher level of development given its size, access to schools and healthcare and to vast areas of open green space all around

This is the **LARGEST site in the North Kingston Forum area, excluding the KEEP**. The site has a PTAL of 2, not 1b as stated by AECOM in the Sustainability Appraisal

AECOM argues is “reasonably placed” to access the Green Infrastructure network. However, the site is actually only 4 minutes walk to the River at the Hawker Centre and 6 minutes on foot to Ham Common.



The site is very large and could accommodate significant development unlike the low density development advocated on the site.

St George’s Industrial Estate is adjacent to the Tudor Ward Local Area of Special Character which appears to be being used as justification for low density development and low height on the site. This is irrational and inconsistent given that the Park Road “Key corridor”, and Manorgate Road and Park Road roundabout sites where the Forum supports high density, tall redevelopment are IN the Park Road Conservation Area and should enjoy greater protection than a LASC.

St George’s Industrial Estate’s public transport accessibility ranking of 2 is HIGHER than that for the Park Road Scout Hut which has the lowest PTAL of 1b but for which a similar density of development of 15 units per acre is endorsed. AECOM wrongly states in 5.15 that the PTAL in this area is 1b.

The site responds to the SAR objective of supporting a reduction in the need for travel, especially given the likely future increase in home working and easy access to local services.

Ham Parade with its wide variety of shops is a minute’s walk away. There are doctors and dentists nearby in Richmond and Kingston. Kingston Academy, Fernhill School and Tiffin Girls’ School are minutes away on foot and the 371 bus goes regularly to Grey Court and The German School in one direction and Kingston Grammar School, St Agatha’s School, Latchmere School and St Paul’s and Alexandra School in the other direction. The site has access to both Richmond and Kingston by 371 and 65 buses, the latter running 24 hours a day and the 371 running from 5am to past 1am. The SAR does not properly identify, describe and evaluate the likely significant effects of implementing the consultation Plan

4. SAR acceptance of the Forum’s growth objective, policies and housing targets are not justified by current regional or local planning policy and are unsound

In point 2.7 of the SAR, AECOM acknowledges that neither the Core Strategy or the new London Plan “specifies any development in the North Kingston Neighbourhood Plan area over the Plan period” and yet the Forum is seeking to endorse the development of 1,500 medium to high rise, densely configured residential units, together with additional commercial development, mainly in Canbury Ward.

London Plan targets differentiate between small, ad hoc development and development that will take place on large sites, with a large site being 0.25 hectares. All the sites for which the Forum has

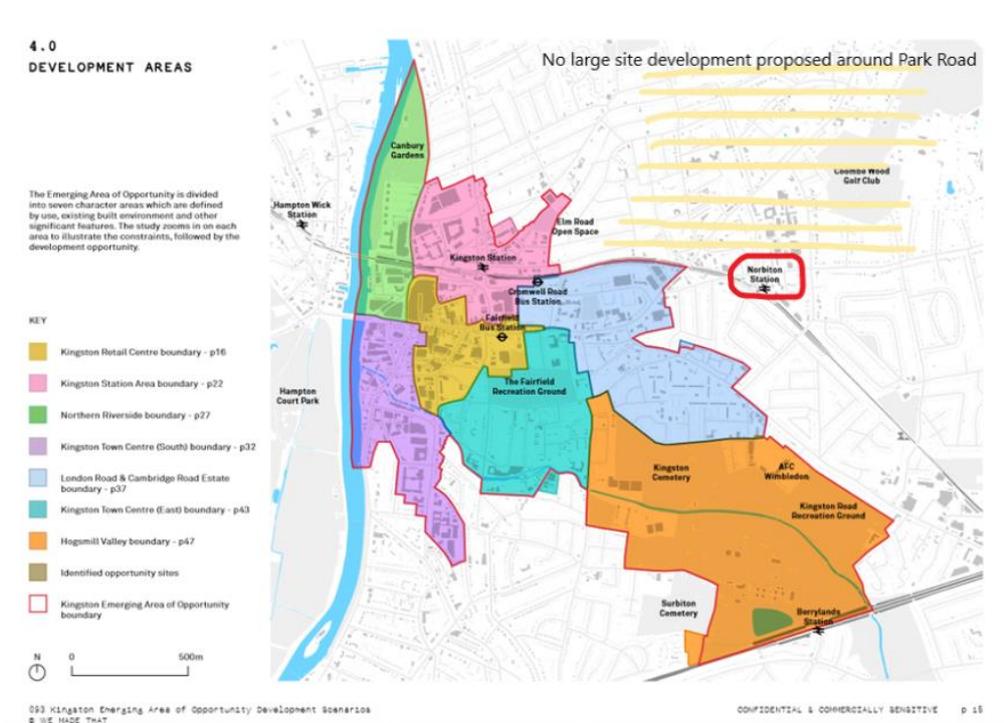
development policies are large sites, and development policies for “key corridors” and “transition zones” assumes large site development.

It is unacceptable that AECOM accepts the Forum’s plan to endorse development on large sites over 0.25 hectares, especially in Canbury Ward, rather than seeking to protect the area from such harmful and inappropriate change, when not even the London Plan has suggested it should suffer development on that scale.

In Point 2.4 of the SAR, AECOM states that:

“a very high level site assessment exercise was undertaken by the Royal Borough of Kingston upon Thames Council in May 2019 to assess indicative capacity”.

The assessments contained in the Development Scenario Testing documents show that **NO** large sites are designated for development around Norbiton Station or along Park Road.



3. AECOM accepts the arbitrary growth figure supported by the Forum without proper assessment of its effects and demands to which it gives rise

The Forum has arbitrarily decided that the area it covers can support development of 1500 units by applying inconsistent criteria to sites and based often on erroneous and misleading data. It also appears that the actual development supported on sites, key corridors and transition and intensification zones **will surpass 1500 units** given that AECOM states that a few key sites are supported to deliver 1200 units alone:

5.7 It is therefore notable that policies **NK19** (Sury Basin), **NK20** (Canbury Car Park/Kingsgate Road), **NK21** (Canbury Business Park), **NK22** (Cowleaze Road), **NK27** (Seven Kings Car Park), **NK30** (Elm Grove) and **NK33** (St Luke's Primary School) all support the principle of development at sites within the Kingston Town Centre AQFA. **The policies collectively identify capacity for at least 1,200 new dwellings across these sites,** meaning development to the sites' full indicative capacity could locate a significant number of new residents within an area of notably poor air quality. This would be in conflict with the SA air quality objective.

There is no assessment of the ability to meet demand for nursery and school places, GP services and other necessary social infrastructure or of the adequacy of green space for the desired increase in the population across the Forum Area, Norbiton and Kingston Town and beyond.

AECOM does not assess the **recreational pressure on protected habitats and species** that will arise from all of the additional 3800 residents (at 2.54 people per unit) that the Plan supports. The Forum wrongly relinquishes responsibility for assessing the impact of the Plan alone and in combination with the effect of other developments that may come forward to "higher-tier plans" and has no idea itself of the impact of its policies.

3800 new residents visiting Richmond Park only two times a week will mean **395,000 extra visits to the park from supported development in North Kingston alone.**

5.12 However, as the draft Plan does not allocate sites and therefore does not directly bring forward development, its potential for direct effects on these neighbouring sensitive features is limited. It is noted that Policy **NK26** (Park Road Scout Hall) and Policy **NK29** (The Keep) support the principle of development at sites in relatively close proximity to the Richmond Park Site of Special Scientific Interest, Special Area of Conservation and National Nature Reserve, though it is considered that protections in higher-tier plans will likely be effective in seeking any necessary mitigation for the additional recreational pressure that could result from new development at these locations.

There is no other decent green space in North Kingston for the majority of new residents on the supported development sites to visit within a reasonable walking distance of their homes, and thousands of other new residential units are simultaneously being built in Norbiton on the Cambridge Road Estate and in Kingston Town Centre

4. AECOM's justification of development supported by the Forum in Canbury Ward is irrational and is not guided by sites put forward in the SHLAA for the new London Plan

The majority of the development supported by the Forum is in Canbury Ward.

Canbury Ward is already the Ward with the highest population in the Borough and with some of the greatest deficiency to green space within the Borough. There is no evidence provided by AECOM that Canbury Ward can support the residential, commercial and community development that the Forum says it will support across the area.

AECOM supports the Forum's decision to endorse large-scale development in Canbury Ward in 4.19 of its report by stating that there are 881 consented dwellings in the area, which **"rises to 1734 if indicative capacity of the Strategic Housing Land Availability Assessment sites without consent is factored in as well"** and that the "vast majority" of these are in Canbury Ward.

However, the allocated, approved or potential development sites used to establish Kingston's housing target in the SHLAA **did NOT include many of the large sites in Canbury Ward that the**

Forum is now proposing can withstand large-scale development. The policies of the Neighbourhood Plan are not therefore consistent with regional policy and appear arbitrary. This is confirmed by AECOM in point 4.22 of its report which goes on to state that the site-specific policies are:

“intended to ensure that future development proposals on sites with potential to come forward as windfall sites contribute to achieving the objectives of the Neighbourhood Plan...”

It also means that the conclusions of the environmental assessments, equalities and health impact assessments and habitats assessments that took place for the London Plan can not have considered in any way the effect of developing on many of the sites being proposed as policies in the Neighbourhood Plan.

Indicative capacity of SHLAA sites includes Sury Basin

It is irrational and inconsistent with higher level policy that the Forum supports lower level development – at between 3 and 6 storeys – on the Sury Basin site than was agreed in the Development Scenario Testing documents that formed the basis of Kingston’s housing and commercial targets in the new London Plan. The DSTs assumed development of up to 16 storeys on the site with a mix of residential units and vast commercial space.

If the Neighbourhood Plan’s policy for Sury Basin restricts the height of development on the site to 3 to 6 storeys, this will mean that development that was agreed by Kingston Council and the Mayor of London as possible on the site - whether commercial or community or residential in nature - will have to be provided elsewhere. It must be noted that the DSTs determined that

In terms of the Sury Basin site, the Forum has argued that the site does not appear in the SHLAA 2017.

5.106 Although not included in the 2019 Kingston Strategic Housing Land Availability Assessment (SHLAA), the site lies within an existing public transport access level (PTALs) of 4.’

However, this is not true. The Sury Basin site was included in the Development Scenario Testing documents as a “potential development site” and contributed to Kingston’s Borough targets in the SHLAA 2019.

4.7 Table 4.2 shows the number of sites uploaded into the SHLAA system by initial status (triggered by system defaults assumptions and GIS layers).

Table 4.2 – initial site status of large sites based on SHLAA system defaults and GIS layers

Initial system status	sites	percentage
approvals	782	7%
allocations	1,198	10%
potential development	7,181	62%
unsuitable	2,510	22%
Total	11,671	100%

4.8 Following the initial classification by the system local planning authorities were able to log into the system and make amendments to the assumptions using local knowledge as set out in the methodology. Through this process, the status, probability, density and constraints for each site could be edited where appropriate. Figure 4.1 compares the initial site status derived from GIS layers and system default assumptions with the final site status following the site assessment by local planning authorities.



Table 4.5 – capacity by site status in the 2017 SHLAA (all phases) compared to the 2013 SHLAA (all phases)

status	2017 SHLAA capacity findings		2013 SHLAA capacity findings		Comparison
	capacity	percentage	capacity	percentage	change
Approvals	244,853	36%	173,177	37%	+71,676
Allocations	209,751	31%	136,487	29%	+73,264
Potential development	199,583	30%	133,695	29%	+65,888
Low Probability	20,500	3%	25,632	5%	-5,132
Excluded	0	0%	0	0%	0
Unsuitable	0	0%	0	0%	0
Total	674,687	100%	468,991	100%	205,696

In addition, the DST documents – as I have showed – assumed development on part of the Sury Basin site at 9 to 16 storeys

5. AECOM has not conducted any cumulative impact assessment of policies endorsed by the Forum

The AECOM report does not include a cumulative impact assessment of the impact of development that is supported by the Forum on all the sites and “corridors” laid out in the Plan. There is also no cumulative impact assessment of the combined effects of other nearby large-scale development such as the redevelopment of the Cambridge Road Estate, the completion of The Old Post Office development, the Eden Walk redevelopment and the Unilever and CUBE development.

There is no assessment of the air quality implications of the construction phase of developing on the chosen large sites and “key corridors” and in the Intensification and Transition Zone and how Park Road and Tudor Drive and Richmond Road will manage increases in HGV and LGV traffic and the impacts of such increases.

6. AECOM has failed to carry out any appraisal of the Forum’s development proposals for proposed Intensification and Transition Zones and Key Corridors

Large sites near The Thames and in proximity to Richmond Park SAC, a huge swathe of Park Road in close proximity to Richmond Park SAC and a large area of Richmond Road in close proximity to The Thames, Bushy Park and Home Park are supported for large scale development in Forum policies but AECOM has not assessed the environmental impact of these policies. This is a significant failing as the highest density of development is promoted in these areas.

7. AECOM has assumed that the area is related to an “Opportunity Area” that does not exist

The AECOM report incorrectly refers to the “perimeter of the Opportunity Area” and the “Kingston Opportunity Area at Kingston Town Centre” in Points 4.9 and 5.49. These references are incorrect as there is not currently an “opportunity area” in Kingston and no boundary for such an area has been agreed. The implication is that AECOM has accepted the Forum’s objectives to apply to a form and

The choice of which site gets more or less specific policy protection appears arbitrary. The Keep is the largest site in the Forum area and yet the Forum offers it no protection in terms of establishing height and density limits or defining the type of development that it would accept here despite the fact that the site has the LOWEST public transport accessibility, is in an established residential neighbourhood and is fronted by a Grade II listed building and in close proximity to Grade II listed St Agatha's Church. AECOM states in point 5.134 that The Keep site is "*clearly and opportunity for redevelopment to significantly increase the effective use of the land*". In contrast, the Forum offers the Sury Basin supermarket site specific height protection:

Policy NK29: The Keep

Should proposals come forward for the comprehensive or partial redevelopment of land at The Keep, as shown on the Policies Map, they will be supported, provided the opportunity is taken to improve its pedestrian and cycling connectivity with the surrounding area. Proposals should also consider how land may be made available to enable the expansion of the adjoining primary schools.

Proposals for the future development of this site should include the provision of community services, including where appropriate arts and cultural facilities, commensurate with the size of the planned development. Consideration should be given to the need for additional healthcare and educational facilities to support the population growth in North Kingston.

Redevelopment will be expected to demonstrate a significant net gain in the biodiversity of the site, commensurate with its size.

Policy NK19: Sury basin

Proposals to redevelop land at Sury Basin, as shown on the Policies Map, for a mix of residential uses, including a proportion of specialist older persons housing, and retail uses will be supported, provided there is no significant decrease in the existing extent of convenience or comparison goods retail floorspace and that the design of the development accords with the provisions of [Policy NK1](#). As part of the design strategy:

1. It is recommended that in order to protect local amenity buildings should be no taller than six stories on the Sury Basin frontage, five stories in the vicinity of properties in Skerne Walk and Richmond Road and three stories in the vicinity of properties in Lower Kings Road; and
2. In recognition of the context of the site buildings should be located and articulated to respond to the prominence of the site frontages in long views from Henry Macauley Avenue, Seven Kings Way, Richmond Road and Gibbon Road.

Similarly, despite the fact that the Forum has as an objective to "protect important green spaces from development" and to protect and enhance biodiversity and despite the deficiency of green space for its existing population, the Forum advocates development of the Scout Hut and its grounds as a potential Windfall Site whilst choosing not to put forward a policy in support of development of Tudor Hall and Library on Tudor Drive which are on brownfield sites.

9. Historic and Social Environmental Value of buildings and sites in Canbury Ward is undermined with no justification

i. AECOM makes conclusions about the effect of dense high rise developments on Key Views without evidence or justification

AECOM states repeatedly without justification that policies supporting development on sites in Canbury Ward, including on The Keep, Canbury Place Car Park, Murray House and Canbury Business Park will not affect key view corridors because "sensitivity is low".

There is no evidence that this is the case and AECOM has not conducted a cumulative assessment of supported development on the relevant sites.

ii. No Historic Value is attributed to the Scout Hut and grounds

The scout hut on Park Road is nearly 100 years old but AECOM does not attribute to it any historical value. This is wrong. The scout hut and the land surrounding it should be protected for its historic and community value. In contrast, AECOM does not dispute the Forum's intention to protect the Tudor Drive shopping parade and Cardinal Pub which arguably have a much lower historic value than the Scout Hut.

iii. AECOM and the Forum attribute no historic or social value to The Keep and the houses and flats on its grounds and no environmental value to the greenfield land on the site. This is an environmental scandal

The Keep site contains the Old Barrack building built in 1874 which is of great historical and social value. The whole site is of massive social value in that it has provided housing for soldiers and now soldiers and their families since the nineteenth century.⁴ AECOM instead simply make this statement which is rather ignorant from an environmental point of view:

"The site already supports a large residential development, though redevelopment would be likely to intensify this to deliver a net increase in housing."

iv. AECOM mentions protection to "sight lines" that does not exist

In point 5.38 of its report, AECOM mentions the **protection to sight lines** in reference to policies NK24 and NK25 – development supported on London Road/Kingston Hill Roundabout at Park Road and Manorgate Road of the Plan. However, no mention is made by the Forum of any such protection

v. AECOM does not assess properly the effect of the Plan's policies on Richmond Park

AECOM states that development may fall partly within Richmond Park's setting but does not assess the impact of development or provide evidence or analysis of the individual and cumulative impact of development on the park's setting.

10. AECOM fails to ensure SAR objectives reflect and support what the Neighbourhood Forum wishes to achieve

AECOM concludes in the SAR that the Plan has a **significantly positive effect** on the Forum's SAR objective to ensure the **"effective and efficient use of land"** by "robust support" for a

⁴ Source: www.QueensRoyalSurreys.org.uk In 1782 county titles were introduced for Regiments of Infantry, ostensibly to foster a connection with a particular county, but primarily to establish a base for the ever present problem of raising recruits. In April 1873, eight years before their final amalgamation, the 31st and 70th were linked together into 47 Sub-District Brigade. The Brigade Depot was established at Kingston and it was here that recruits for the two Regiments were trained. The barracks were designed by the Royal Engineers as a 'Brigade Depot Centre', and recruits for the 70th Foot, then in India were trained there. The barracks were built in 1874/75 and according to the Surrey Comet, 'it was the last word in barracks building for its time'. Its designer was a Major Siddon RE. In 1962 all buildings in Kingston Barracks were demolished with the exception of The Keep.

“significant number of new homes” totalling 1,500 units. The word “effective” is not defined by AECOM but its dictionary definition is “**successful in producing a desired or intended result**”.

It appears that AECOM has mistakenly focused its assessment only on the “efficient” use of land. Even that, however, would imply that large brownfield sites such as Sury Basin and St George’s Industrial Estate should bear significantly greater amounts of development than the Forum and AECOM support. It appears that the term “efficient” has been applied arbitrarily so that some places are expected without reasonable justification to bear greater amounts of development than others.

AECOM’s conclusion is in direct conflict with one of the Neighbourhood Plan’s main objectives which is not to support the delivery of a large number of homes for its own sake as AECOM suggests but:

“To ensure North Kingston ***remains a desirable place to live by maintaining its essential suburban character*** and by successfully managing the transition between the growing town centre and the surrounding suburban area”.

It should be noted that the Plan does not mention that it is seeking to support development of 1,500 residential units. This figure only appears in the AECOM SAR. This undermines the ability of people to give informed and intelligent responses to the consultation on the Plan. The only reference to the overall growth advocated by the Forum is vague and appears in one of the objectives:

“To help meet local housing needs by managing new housing development along two key transportation corridors and a small number of key sites.”

“Housing needs” is also not defined.

11. AECOM fails to properly assess biodiversity impact of Forum’s policies

No habitats impact assessment has been presented for consideration alongside the Plan. This undermines the validity of the consultation. The statement that there is “*potential for Richmond Park to have some sensitivity to development in the plan area*” is meaningless and totally inadequate from a company that is specialist in habitats impact assessments and conducts such assessments for local authorities across London.

AECOM concludes without evidence or justification that “*5.19 Minor positive effects are predicted in relation to biodiversity given the potential for habitat enhancement at all proposed site allocations, as well as the avoidance of harm to designated sites both within the plan area and beyond*”

This statement is undermined simply by policies that support development of The Keep and the Scout Hut and land as well as policies to support development along the vast Park Road and Richmond Road “key corridors” that are rich in biodiversity in the large, ancient areas of garden space that they contain.

AECOM has failed to recognise that the whole of North Kingston is a stronghold for the legally- protected Red List vulnerable stag beetle and has not assessed the Forum’s policies in the context of the need to protect this or other species protected by environmental laws.

One of the proposed development sites has the largest soprano pipistrelle roost in the borough. There is badger interest at another site which is also a stag beetle stronghold. The Mayor’s priority species feature on at least 3 sites.

AECOM should have stated how they arrived at their conclusions and if they have cross referenced with the London Biological records centre. There is thus no evidence supporting their conclusions that the Plan will have **minor positive effects** from a biodiversity point of view

AECOM has not elaborated on important ecological processes such as water attenuation, nutrient cycling, cooling, strategic flyways to and from foraging grounds such as the Thames and Richmond Park. This is a major oversight that undermines the SAR and the Plan.

In 2012, the hearing for the Strategic Environmental Assessment for the Kingston Core Strategy concluded that these areas should be protected from development.

It appears that a political imperative is driving the Forum to push to develop the area and that there is an acute lack of evidence supporting development.

i. The Scout Hut

AECOM’s evaluation of the site is not evidence-based and its conclusion that “effects in relation to biodiversity” are “uncertain” because they will be informed by “design and layout” has no credibility. The conclusion is thus irrational and unjustified.

Despite the Forum’s objective to protect its important green spaces from development and to deliver net biodiversity gain from new development, the Forum is seeking to support development of the Scout Hut and its grounds. This policy is contradictory to the objective and there is no way that the biodiversity value of the site can be increased if 15 housing units are built upon it and the green space is sacrificed to the development.

Biodiversity The site has some potential to support wildlife habitats and to contribute to local wildlife corridors by virtue of being largely open and undeveloped (aside from the existing structure at the east of the site) and via a series of established trees around its perimeter. It is unlikely that this open space could be retained in its entirety through the development process, though the perimeter trees could be incorporated into the final design and layout of a future scheme. Effects in relation to biodiversity are considered to be uncertain as they are likely to be informed by matters of design and layout.

In addition, building on a green space is against the Plan’s biodiversity objective which is:

“To protect and enhance all biodiversity and geological features”

The statement that the Scout Hall “supports access to Richmond Park” has no meaning but is used to justify the building of residential units on a greenfield site against the Plan’s objectives. Richmond Park is an 8 minute walk from the site. This is double the time that it

takes to walk from the St George's Industrial Estate to the River Thames at the Hawker Centre and less than the time it takes to walk from the Industrial Estate to Ham Common.

This site has the lowest transport accessibility possible, with a PTAL rating of 1b.

The value of the Scout Hut site as a greenfield site with extremely high social value and interest and upon which a heritage building sits has not stopped the NK Forum from proposing endorsement of this site for development.

I believe that the effects in relation to biodiversity of developing this largely greenfield site as housing would be incredibly HARMFUL. The loss of a valuable piece of green space for community use, including use by the First Kingston Hill Scout Group who have used the location for nearly 100 years is not considered important from a health and wellbeing point of view. This piece of green space is completely different and offers safe community use which is not available in Richmond Park which is also a Special Area of Conservation with wild animals. AECOM and the NK Forum fail to recognise the scout hut and land as a recognisable heritage and community asset with high biodiversity value in their own right

The proposals, analysis and conclusions made are shown to be flawed.

ii. The Keep

AECOM's assertion that there is "no notable potential biodiversity sensitivity" on The Keep site is unevidenced and therefore irrational. AECOM states that the site "could have some value as part of a local habitat network" which vastly underestimates the likely value of the site given its proximity to Richmond Park and position between Richmond Park and the Thames. The site has significant areas of open green space and many trees. The statement is banal and useless. AECOM goes on to state that "the development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of the wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective" .

However, the **biodiversity objective** is:

"To protect and enhance all biodiversity and geological features"

How can building at much greater density on green space and designating a portion of that green space for a school "protect and enhance all biodiversity" on that site. It cannot. This is unacceptable and a significant flaw in the SAR process.

As authors of many habitats regulations assessments for Boroughs across London and indeed as authors of the habitat regulations assessment for the new London plan, AECOM are well aware of the biodiversity sensitivity of the area that the Plan covers.

The omission of factual information and analysis in the SAR completely undermines all conclusions reached by AECOM.

12. AECOM's conclusions that the Plan has "broadly positive effects" is not evidence-based, rational or justified.

AECOM's conclusions are not evidence-based or rational and do not link a thorough and consistent analysis of the Forum's proposed policies with the Forum's objectives and the individual SAR objectives. The conclusions that the Plan has broadly positive effects are therefore not justified

Appendix Two provides a comparison chart of some of the sites that the North Kingston Forum supports for development across the Area

Appendix One

SA framework

- 3.5 The issues identified through the Scoping process were translated into an 'SA Framework'. This SA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SA framework for the North Kingston Neighbourhood Plan is presented in **Table 3.1** below.

Table 3.1 The SA framework for the North Kingston Neighbourhood Plan

SA theme	Objective(s)
Air quality	Locate and design development so that current and future residents will not regularly be exposed to poor air quality.
Biodiversity	Protect and enhance all biodiversity and geological features.
Climate change	<p>Continue to drive down CO₂ emissions from all sources by achieving high standards of energy efficiency in new development, providing opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation.</p> <p>Adapt to current and future flood risk by directing development away from the areas at highest risk of flooding and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.</p>

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SA theme	Objective(s)
	Support the resilience of the borough to the potential effects of climate change, including water scarcity, flooding and sea level rise, through innovative planning, including the extension and enhancement of green infrastructure as a natural measure to increase resilience.
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Historic environment	Protect, maintain and enhance the rich variety of cultural and built heritage within the Neighbourhood Plan area
Land, soil and water resources	<p>Ensure the efficient and effective use of land</p> <p>Use and manage water resources in a sustainable manner</p>
Landscape and townscape	Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area
Population and communities	<p>Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.</p> <p>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.</p>
Transport and movement	Promote sustainable transport use and reduce the need to travel

<u>NKForum</u> KEY COMPARISONS	Where?	Density supported by NK Forum	Height	Public Transport Access Level
NK1 Intensification Zones	400 metres around Kingston Station (excludes Sainsbury's)	Not given	6-12 storeys	6a (very high)
NK2 Transition Zone	Most of Canbury Ward None of Tudor Ward	200-300 units per hectare 494 units to 741 units per acre	4 storeys upwards (will have to be very high to incorporate massive density)	1a (very low) to 5 (high) on Park Road and 6a (very high) on Richmond Road
NK2 Suburban Area	Tudor Ward A small proportion of Canbury	Not given	Up to 3 storeys	1b (lowest at Scout Hut on Park Road) to 4
NK3 Key Corridors	Park Road and Richmond Road <i>NKF supports development on Park Road over Richmond Road: 5.16 "existing character" is less well-defined for the Park Road Corridor than at Richmond Road"</i>	300 units per hectare 741 units per acre	"medium rise blocks or larger buildings"	Park Road: 1b (lowest) to 5 Richmond Road: 2 to 6a (very high)
Comparisons				
The Keep	off King's Road <i>NKF suggested policy creates NO limits on development on this huge site</i>	NO max density	NO max height	1a (very low)
NK 19 - Sainsbury's site	Sury Basin	60 units per acre	3-6 storeys	6a (very high)
NK23 - St George's Industrial Estate	Richmond Road	15 to 30	3-4 storeys	2 (low)