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Sent via email to: harsha.bhundia@rbk.kingston.gov.uk

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Dear Ms Bhundia,

Re: Cambridge Road Estate, Cambridge Road, Kingston Upon Thames KT1 3JJ, Ref 20/02942/FUL (and associated applications)

Constituents from Kingston have contacted me to raise their many concerns about this application. In particular, they highlight the following issues:

1. Areas of Deficiency of Access to Open Space and Access to Nature

The London Plan states in Policy G4 Open Space, part B: Development proposals should: 1) not result in the loss of protected open space; 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency."

According to mapping from the [Greenspace Information for Greater London CIC](#), Cambridge Road Estate is an Area of Deficiency of Access to Open Space and Access to Nature. Residents do not consider the nearby Kingston Cemetery and Crematorium, despite being a Site of Nature Conservation Importance, as Public Open Space.

In response to the Stage 1 referral to the Mayor, the Deputy Mayor Jules Pipe considered that this application does not yet comply with the London Plan, saying:¹

"Green infrastructure and urban greening: Given the size of the site, the proposed development represents an opportunity for further greening, particularly in

¹ GLA 6860 Stage 1 Report (28.02.21), accessed 23/9/21, <https://gla.force.com/pr/s/planning-application/a0i4J000002UOhYQAG/20206860?tabset-c2f3b=2>



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complementing the adjacent SINC. The Urban Greening Factor policy target should therefore be seen as a 'minimum' and the applicant is encouraged to seek to deliver an exemplar greening scheme. Given that this is a hybrid application, delivery of the UGF at reserved matters should be secured by condition for subsequent phases of the proposed development."

The current proposals for redevelopment of the Cambridge Road Estate do not meet the London Plan.

2. Public Rights of Way

Residents informed me that Cambridge Road Estate contains two kilometres of Public Rights of Ways (PROWs). These were the subject of a referral to the Ombudsman for Local Government & Social Care, which found in the complainant's favour.² These PROWs have now been mapped but are not being compensated for in the new scheme as there appear to be no dedicated walking routes through the estate. This loss of PROWs could lead to increased car usage as the proposed estate design does not appear to support walking in the same way as the current landscaping.

3. Biodiversity

The plans for the demolition of the Cambridge Road Estate include the destruction of 61 mature trees, out of some 180 trees comprising over 30 different species. Many of the trees to be felled are over 50 years old, and the amount of CO2 they soak up and air pollution they minimise will be substantial, along with benefits they provide in flood protection.

I am also told by residents that four bat species have been recorded on Cambridge Road Estate, many of which apparently roost in the cemetery and have 'commuting routes' through the estate. The loss of trees and the change in estate design could prove catastrophic to these bat communities.

House Sparrows are protected by the Wildlife and Countryside Act 1981, are on the 'Red List for Birds' since and are one of only two urban species on the list.³ Again, residents tell me that there are around 30 territories of sparrows (some 60 birds) on Cambridge Road Estate, which could be permanently lost to the area.

4. Lack of Affordable homes

² Royal Borough of Kingston upon Thames (20 005 803), accessed 23/9/21, <https://www.lgo.org.uk/decisions/transport-and-highways/rights-of-way/20-005-803>

³ British Trust for Ornithology, Red List for Birds 2016, accessed, 23/9/21, https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf



In the 2020 Affordable Housing Monitor, it shows that in the period 2016-20, Kingston borough had the lowest level of affordable housing completions across London of just 244.⁴ Kingston borough also had the lowest percentage of affordable starts of Social Rent/London Affordable Rent tenure of just one per cent.

Yet, the proposed tenure mix of homes for Cambridge Road Estate does not provide any uplift for the shortfall of provision over the last five years. As the Mayor's Stage 1 response to this application says: "the provision of affordable housing represents 0.4% of the uplift of residential accommodation, by habitable rooms. Overall, this equates to 36% affordable housing by habitable room."

Furthermore, the additional homes being provided by the demolition and rebuild comprise 100 shared equity and 1,145 for private purchase. Shared equity homes are not a formally recognised affordable housing product and this tenure mix does not meet London Plan Policy H6 Affordable Housing Tenure, which requires: "a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent" and "a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership".

For all the reasons outlined above, I urge you to not approve this application, along with those applications linked to it.

Yours sincerely,



Sian Berry
Green Party Member of the London Assembly

cc: Cllr Roy Arora, Chair, Planning Committee, Kingston
Cllr Kim Baily, Vice Chair, Planning Committee, Kingston
Cllr Mark Beynon, Member, Planning Committee, Kingston
Cllr David Cunningham, Member, Planning Committee, Kingston
Cllr Lorraine Dunstone, Member, Planning Committee, Kingston
Cllr Simon Edwards, Member, Planning Committee, Kingston
Cllr Lesley Heap, Member, Planning Committee, Kingston
Cllr Malcolm Self, Member, Planning Committee, Kingston
Cllr Stephanie Archer, Member, Planning Committee, Kingston
Cllr Dave Ryder-Mills, Member, Planning Committee, Kingston
Cllr Olly Wehring, Member, Planning Committee, Kingston

⁴ Affordable Housing Monitor 2019/20, accessed 23/9/21,
https://www.london.gov.uk/sites/default/files/affordable_housing_monitor.pdf

