**Development in Kingston – a Kingston Environment Forum (KEF) perspective**

**Can development be environmentally sustainable? Development issues for KEF** include: energy efficiency, renewability and carbon emissions; flood prevention; green spaces, biodiversity and wildlife habitats; air quality; sustainable transport…

1. **The context: Kingston growth, urban density and high rise**
   1. The **Kingston Plan** is based on the **London Plan [[1]](#footnote-1)** which foresees rises in the Greater London population from 3.28 million households in 2011 to 3.74 million households by 2021, 3.93 million by 2026, 4.10 million by 2031; and 4.26 million by 2036.
   2. Since 2001, **Kingston’s population** has grown by over 11% from 149,000 to 166,000, and is predicted to grow by a further 8% to 179,000 by 2025, and by a further 3% to

184,000 by 2035. The number of households in Kingston is predicted to rise 15% from 65,500 to 75,300 by 2035 (according to RBK’s “Destination Kingston”[[2]](#footnote-2)).

As environmentalists/residents we don’t necessarily accept the basic premise of inevitable population and economic growth, or that it has to happen in Greater London (to the possible detriment of and lack of investment in other regions in the UK).

On the other hand, if population growth is indeed inevitable, the Council does seem to have a point in that it is better to have a development strategy than to let developers build whatever and wherever they like – with a well worked out development plan making planning appeals against Council decisions less likely to succeed. Kingston will need a new borough Plan in response to the London Plan which is the main driver of growth. The choice may be between building "up or out".

* 1. There are **differing views within KEF** on development, and it is also clear that these are mirrored in the population as a whole; e.g. many Kingston residents dislike tall buildings which intrude upon their views and could put pressure on local services. Neither, of course, do residents like “garden grabbing”, i.e., building another house in a back garden or building several dwellings where one used to be; and neither do they want building on green spaces or the Green Belt on the southern edge of Kingston. Like most residents, we would prefer development on brown-field sites.
  2. **From an environmentalist’s perspective,** due consideration should be given to: minimising the footprint of the urban area; minimising encroachment on neighbours’ sky views and sunlight (which will be increasingly valued, once again, for energy and food in the post-carbon era); minimising energy and other servicing impacts; safeguarding ‘quality of life’ factors such as community space and interaction; safeguarding biodiversity.   
      On the other hand, there are environmental arguments in favour of high density cities, which, because they are walkable or cyclable and can have efficient public transport systems, may produce far less CO2 than more spread-out cities, as in the famous contrast between Atlanta and Barcelona.[[3]](#footnote-3) [[4]](#footnote-4)
  3. For **further reading** on urban density, desirable levels of density, etc, see footnote.[[5]](#footnote-5)

1. **Energy efficiency and generation**
   1. KEF would welcome new developments that are even more energy-efficient than current building regulations require, that use natural light and ventilation as far as possible, and that include renewable energy sources such as district heating (as called for under current planning guidelines), heat pumps and solar panels.[[6]](#footnote-6)
   2. We note that some building designs, e.g. terraces, town houses and apartments, are more compact and energy-efficient than detached houses, can provide homes (including affordable homes) of the right size for most families, and use land more efficiently.
   3. In possible conflict with this is the desirability of safeguarding the sunlight received by properties – whether for growing plants, generating electricity or minimising the need for artificial lighting. Careful planning and design should optimise such trade-offs.
2. **Flood prevention** [[7]](#footnote-7)
   1. SUDS and green roofs can help to prevent water getting into drainage systems and we support these when they are part of planning applications.
   2. We would welcome better enforcement of regulations on permeable paving in front gardens
   3. We support Environment Agency projects to prevent flooding, for example, by “making space for water” in water-meadows and man-made rivers and lakes (even when they inconvenience dog-walkers etc.), as flooding areas of Kingston and Greater London would cause huge environmental damage (destruction of property, destruction of wildlife habitats, sewage in streets and rivers…) and even loss of life, for example if the Underground was flooded.
   4. It goes almost without saying that no new developments (unless they can float?) should take place in flood plains or other areas subject to flooding, or that may become subject to flooding owing to Environment Agency flood alleviation schemes elsewhere or to extreme weather events which are becoming more frequent because of climate change.
3. **Water** – can grey water usage be included in developments (e g in apartments, public toilets…)?

1. **Green spaces, biodiversity and wildlife habitat[[8]](#footnote-8) [[9]](#footnote-9)**
   1. The "quality public space" that is part of Kingston’s vision for the future should entail no loss of green space, and instead should protect and enhance existing green spaces and trees.
   2. We welcome developments that include trees, green spaces, and green walls and roofs, where they are low-maintenance, wild-life-friendly and sustainable.
   3. There is considerable evidence of the benefits of green spaces to public health and well-being.[[10]](#footnote-10) [[11]](#footnote-11)
   4. Developments should not encroach on existing green spaces, and offers of "biodiversity offsetting" should be carefully and critically scrutinised by experts; wildlife cannot always be easily resettled, and an inaccessible wildlife habitat will be no compensation to local people that enjoyed an accessible one.
   5. Kingston’s biodiversity should be properly recorded before developments are permitted, in order to facilitate conservation and protection.
   6. Existing green spaces should be sensitively and carefully managed, using the criteria and standards set out in RBK’s *Good Practice Guide: Biodiversity & the Development Process in Kingston upon Thames* (web-link in footnote 6)
2. **Air quality**
   1. London’s air quality is poor, as is the air quality in parts of the borough of Kingston (e g, Cromwell Road, the A3…): “Nearly 9,500 people die early each year in London due to long-term exposure to air pollution… The premature deaths are due to two key pollutants, fine particulates known as PM2.5s and the toxic gas nitrogen dioxide (NO2), according to a study carried out by researchers at King’s College London... The gas is largely created by diesel cars, lorries and buses, and affects lung capacity and growth.”[[12]](#footnote-12) [[13]](#footnote-13)
   2. The Council has a Low Carbon Management Plan[[14]](#footnote-14) and last reported on its own Greenhouse Gas Emissions in July 2011[[15]](#footnote-15). We welcome the current (late 2015) consultation on local air quality and measures to improve it, and hope that relevant actions, particularly to reduce traffic, will be undertaken.
   3. Developments that discourage car use by being close to amenities and public transport should be favoured – see also 1.5 and 7.
3. **Sustainable transport**
   1. We would tend to support developments close to amenities and public transport for their potential to reduce car ownership and use. Some new developments in town centres assume that residents will not need or want cars and so propose little parking, but this would need to be accompanied by local CPZs to prevent new residents parking their cars on nearby streets.
   2. KEF supports all local infrastructure projects aimed at making cycling and walking safer and pleasanter and will push for the kinds of segregation and traffic management that will achieve this (including public education), with reservations and questions only about impacts on local biodiversity.
   3. KEF supports improvements in public transport (better coverage, greater frequency, lower fares) that will encourage its use in preference to cars.
   4. KEF supports 20mph zones in residential areas which will help to make streets safer for all users and boost cycling and walking.
   5. KEF supports initiatives to encourage walking, such as Living Streets[[16]](#footnote-16) and “Walking School Buses”[[17]](#footnote-17) and the environments that would enable these to flourish.
4. **Pressure on local service**s, e g, waste and recycling
   1. We assume that more residents = more Council Tax and that the Council should therefore be able to keep pace with increased demand for, e g rubbish collection, social care, arts and culture, library services…
   2. Will increased council and business taxes, and Section 106/CIL funds be used to alleviate some of the problems identified above?
5. **General questions/issues**
   1. **Public health**: from Section 2.4 of Kingston’s Annual Public Health Report 2014[[18]](#footnote-18), on planning   
      “Key messages   
      - Healthy urban planning incorporates a number of policies and plans which promote mental health and wellbeing, including sustainable travel, better quality housing and enhanced green spaces   
      - The health implications of local plans and major planning applications need to be consistently taken into account and regulated to help enable a built and natural environment that is positive for enhanced wellbeing”
   2. **Population growth** – will any improvements in, e g, public transport, Crossrail 2, be cancelled out by growth in population and demand, so that in future decades residents are no better off?
   3. **Reuse and recycling**: what steps are taken by developers to recycle rubble etc from development sites? Does it just go to landfill or can it be reused, preferably on the site?
   4. **Retrofitting older properties**: Kingston’s housing stock is largely old and very energy-inefficient. Apart from listed properties or those in conservation areas, there should be a presumption in favour of energy-efficiency measures such as solar panels, heat pumps, external insulation… even when they affect the appearance of the property, and planning permission should be automatic.

**Notes**

Further useful resources and information are available from:  
- The UK Green Building Council <http://www.ukgbc.org/resources>

- BREEAM – “The world's leading design and assessment method for sustainable buildings” <http://www.breeam.org/> and <http://www.breeam.org/resources>

- The New Climate Economy report: *Better Growth Better Climate,*  <http://2014.newclimateeconomy.report/> - *London Essays – Green* at <http://essays.centreforlondon.org/issues/green/>: “Cities have always been great engines of pollution…It doesn’t have to be this way…”

1. London Plan, March 2015 <http://www.london.gov.uk/sites/default/files/London%20Plan%20March%202015%20(FALP).pdf)> [↑](#footnote-ref-1)
2. For more detail, see  
    <http://www.kingston.gov.uk/downloads/file/1252/destination_kingston_2015-2019>

   <http://www.kingstonfutures.org.uk/>   
   <http://kingstonfutures.org.uk/cms/userfiles/Docs/file726001092.pdf> [↑](#footnote-ref-2)
3. The New Climate Economy report: *Better Growth Better Climate,*  <http://2014.newclimateeconomy.report/> [↑](#footnote-ref-3)
4. Suburban sprawl makes you fat - <http://www.treehugger.com/urban-design/new-study-confirms-suburbs-make-you-fat.html> [↑](#footnote-ref-4)
5. There are many statistics and articles by journalists, architects and town planners about urban density, desirable levels of density, etc, for example:  
   BBC news series on Crowded London at <http://www.bbc.co.uk/news/uk-england-london-31056626>

   <https://lsecities.net/publications/reports/density-and-urban-neighbourhoods-in-london/>

   <http://www.superdensity.co.uk/> [↑](#footnote-ref-5)
6. Energy efficiency more effective than CHP, DHNs? <http://www.independent.co.uk/news/uk/home-news/adopting-passivhaus-building-standards-could-allow-people-to-heat-their-homes-using-power-emitted-by-a6707656.html> [↑](#footnote-ref-6)
7. See EA Flood Map for Planning (from Rivers and Sea) <http://apps.environment-agency.gov.uk/wiyby/37837.aspx> [↑](#footnote-ref-7)
8. See: RBK’s *Good Practice Guide: Biodiversity & the Development Process in Kingston upon Thames* <http://www.kingston.gov.uk/download/downloads/id/1351/annex_3_good_practice_guide_-_biodiversity.pdf>;   
   [The London iTree urban forest report, published in December 2015](http://www.forestry.gov.uk/london-itree), which demonstrates the enormous value attributed to the benefits that London’s trees provide. A pdf [copy of the report](http://www.forestry.gov.uk/pdf/2890-Forest_Report_Pages.pdf/$FILE/2890-Forest_Report_Pages.pdf) (6MB) can be downloaded.

   The Green Infrastructure Task Force report, published 9 December 2015 - see <https://www.london.gov.uk/what-we-do/environment/environment-publications/green-infrastructure-task-force-report> [↑](#footnote-ref-8)
9. Natural England offers services to “help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment”: the Discretionary Advice Service ([DAS](https://www.gov.uk/discretionary-advice-service-get-advice-on-planning-proposals-affecting-the-natural-environment-in-england)) and Pre-submission Screening Service ([PSS](https://www.gov.uk/pre-submission-screening-service-advice-on-planning-proposals-affecting-protected-species)) help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.  [↑](#footnote-ref-9)
10. See Section 2 of Kingston’s *Annual Public Health Report 2014*, <http://data.kingston.gov.uk/resource/view?resourceId=215>, especially 2.3 on green spaces [↑](#footnote-ref-10)
11. Study shows planting street trees can make residents feel up to 7 years younger - <http://inhabitat.com/study-shows-planting-street-trees-can-make-residents-feel-up-to-7-years-younger/> [↑](#footnote-ref-11)
12. See for example <http://www.theguardian.com/environment/2015/jul/15/nearly-9500-people-die-each-year-in-london-because-of-air-pollution-study> [↑](#footnote-ref-12)
13. <http://cleanair.london/sources/defra-buries-consultation-on-diesel-ban-in-cities-minutes-before-corbyn-announcement/> [↑](#footnote-ref-13)
14. See <http://www.kingston.gov.uk/info/200284/energy_climate_change_and_sustainability/799/our_energy_strategy/2> [↑](#footnote-ref-14)
15. See <http://www.kingston.gov.uk/downloads/file/377/greenhouse_gas_emissions_report> [↑](#footnote-ref-15)
16. <http://www.livingstreets.co.uk/> [↑](#footnote-ref-16)
17. <http://www.walkingschoolbus.org/> [↑](#footnote-ref-17)
18. [http:// data.kingston.gov.uk/resource/view?resourceId=215](http://data.kingston.gov.uk/resource/view?resourceId=215) [↑](#footnote-ref-18)