

Royal Borough of Kingston  
Guildhall 2  
Kingston-Upon-Thames  
Surrey KT1 1EU



13th January 2021

Dear Mr Lomax

## PLANNING APPLICATION PUBLIC COMMENT

Application number: **20/02942/FUL**

Site Address: Cambridge Road Estate Regeneration

Proposal: Masterplan for regeneration of the Cambridge Road Estate and phase 1 implementation

On behalf of the Sunflower Streets Residents Association Alliance (SSRA Alliance) we wish to make a number of strong objections with regard to the above application to the Cambridge Road Estate Regeneration project. Aspects of the proposed development will have a serious negative impact on those living on the streets surrounding the regeneration area. We wish to object on the following grounds listed below.

### 1. Scale and dominance

Following our review of the submitted application, we object to the **scale and dominance of a number of specific buildings on the edge of the development**. These buildings are not appropriately scaled or positioned to respect or be sympathetic to the existing design, height or form of the adjacent homes and streets. On this basis we believe the application directly contravenes policies: 7.4 and 7.7 of the London Plan 2016; DM 10, Kingston Core Strategy 2012; and Paragraph 127 of the National Planning Policy Framework.

We specifically object to the scale and dominance of the following buildings:

**Building B:** Six storey building adjacent to Rowlls, Piper and Somerset Roads ;

**Building E1 E2 E3 E4:** Eight to twelve storey buildings adjacent to Piper Road;

**Building E5 E6:** Four storey buildings adjacent to Piper Road;

**Building F1 F2:** Ten and seven storey buildings behind Piper Road;

**Building F3 F4:** Three storey buildings behind Piper Road;

**Building A2:** Eight storey building on the corner of Somerset Road;

**Building L1 L2:** Six and eight storey buildings on Vincent Road;

**Building N1 N2:** Seven and ten storey buildings on Vincent Road.

The predominant characteristic of the streets surrounding the proposed development is one of traditional two storey houses with pitched roofs. In contrast, the above buildings do not respect local context and street pattern or, in particular, the scale and proportions of surrounding buildings. They would be entirely out of the character for the area and to the detriment of the local environment. **The proposed buildings explicitly ignore the form, proportion, composition, scale and character of surrounding low-rise streets and buildings. The effect will be to dwarf and dominate the surrounding streets, completely changing the character of the historic area and overbear the existing dwellings.**

While the height and context of the above buildings may be appropriate in Central London and various other highly urban areas, Norbiton is a clearly defined suburban location, and as such it cannot be considered in the same context as the whole of London.

Greater consideration should have been taken to ensure that the scale of the proposed buildings was staggered in an appropriate manner as opposed to the scale of the proposed scheme. The submitted Daylight and Sunlight Survey provided existing and proposed ridge levels of buildings on the Cambridge Road Estate. A number of the existing estate buildings located around the perimeter of the proposed development will in effect double in height or a tall building will be placed on an area of open space.

No analysis, as required by Policy 7.7 of the London Plan, appears to have been undertaken to clearly demonstrate that the height, scale, mass and form of the proposed building would be acceptable in this location and therefore the proposals are fundamentally flawed.

## **2. Loss of privacy and overlooking**

In addition to the above concerns, the application would also have **an adverse impact on the amenities of the existing occupiers**. The proposed development is a direct contravention of Policy 7.6 of the London Plan, 2016 and DM 10, Kingston Core Strategy, 2012.

The proposed development by reason of its size, height and massing would have an unacceptable and significant impact on the amenities of the properties immediately adjacent to the site and the surrounding area by reason of overlooking, loss of privacy and visually overbearing impact. The design of the proposed development does not afford adequate privacy for the occupants of the building or of adjacent residential properties, particularly with regard to their right to the quiet enjoyment of garden amenities.

### **Phase 1**

With regard to building B (6 storey), all of the above ground floor level flats located along the western elevation (facing Rowlls Road and Somerset Road) and on the southern elevation (facing Piper Road) will benefit from an outdoor terraced area. These areas will only be located approximately 17m from private rear gardens of the dwellings located directly to the west of the application site and approximately 20m from the private rear garden of the dwellinghouse located to the south of the application site. It is acknowledged that there is a degree of overlooking from neighbouring properties, however, all of the future occupiers of these proposed flats will have a clear view directly into these private amenity areas.

With regard to buildings E6, E5, E4, E3, E2 and E1, the tallest existing building on this site is four storeys in height, however the proposed replacements are 4, 4, 8, 11, 12, 12 storey buildings, respectively, and will place a considerable impact upon the views within the street scene. With regard to the proximity of these buildings, for example E3 and E4, the number of facing windows and the inclusion of balconies for these properties would introduce a new level of overlooking and loss of privacy for the private amenity areas of Piper Road residents which is not currently experienced. Similarly, building E1 will overlook the gardens and private amenity areas of Somerset Road.

As such, the proposals discussed above fail to comply with Policy 7.6 of the London Plan, 2016 and DM 10, Kingston Core Strategy, 2012 on privacy and overlooking.

### **Masterplan**

Whilst this element of the application is seeking outline planning permission, consideration should still be given to the likely impact that these later proposals will have upon the privacy of the existing occupiers of the neighbouring properties. It is unclear how the following proposed buildings will be laid out or their external appearance, so it is difficult to detail exactly how this will undoubtedly affect the privacy of neighbouring residents. Careful consideration will need to be taken to ensure that no loss of privacy is created upon the existing occupiers of the neighbouring properties.

With regards buildings F1 (10 storeys) and F2 (7 storeys), the existing buildings are two storeys in height, however these are to be replaced with a ten and seven storey building which will place a considerable impact upon the views within the street scene. It is unclear at this stage how the western elevation will appear, however, given the proximity to existing residential properties, careful consideration will need to be taken to ensure that no loss of privacy is created upon the existing occupiers of the neighbouring properties on Piper Road.

With regards to the proximity of buildings F3 and F4 (3 storeys), the gardens and rear elevation rooms of houses 11/13 and 15/17 Piper Road will suffer reduced privacy as a result of the extremely close proximity of the proposed buildings to the rear boundary of the gardens on Piper Road.

With regards to building A2 (8 storeys), the existing building is five storeys in height, however its replacement with an eight storey building will place a considerable impact upon the views within the street scene. It is unclear at this stage how the southern elevation will appear, however, given the proximity to existing residential properties, careful consideration will need to be taken to ensure that no loss of privacy is created upon the existing occupiers of the neighbouring properties on Somerset Road.

With regards to buildings L1 and L2 (8 storeys), and N1 and N2 (7 and 10 storeys), currently the views in a northerly direction from the properties on Vincent Road are of a row of bungalows and an unarticulated flank wall of a two storey pitched roof end of terraced property. Given the proximity of these designs to existing residential properties in conjunction with the length of the proposed building, there will have to be a number of single aspect flats which would overlook the properties on Vincent Road. The height of the proposed buildings would introduce a new level of overlooking and loss of privacy for the private garden amenity areas of Vincent Road residents.

### **3. Loss of light/sunlight**

The Daylight and Sunlight Survey identifies a number of windows that will be affected by the proposed development. In the majority of cases justification for such harm is based upon the reliance of housing need. Below is an extract upon the impact identified in relation to No. 13 Piper Road at para 5.179

*'In the context of the need for housing and greater density in London, it is our opinion that although there are daylight alterations in breach of the BRE Guidelines, these are appropriate given the site context, its location within the Kingston Opportunity Area of the Cambridge Road Estate and an area which is considered both locally and in the London Plan as subject to regeneration and high density housing.'*

Similar wording is applicable to a number of other properties that are located adjacent to the proposed development.

It is understood that there is a greater need for housing across the country, however, it should not be to the detriment of existing occupiers of neighbouring properties. The findings within the submitted Daylight and Sunlight Survey leads us to believe that the proposed development affects too many individual properties to be considered acceptable. As such it is considered that the proposed scheme represents an overdevelopment of the site that will adversely impact upon the living conditions of the occupiers of the neighbouring properties.

We have also been notified of inaccuracies in some of the daylight studies and have encouraged residents to notify the council in their individual letters. We believe that these inaccuracies should be reviewed in light of the updated information you receive regarding neighbouring properties.

### **4. Appearance and design**

In addition to the above concerns, the application by nature of its modern block design will also have an adverse impact on the local character of the area, contrary to policies 7.4 and 7.7 of the London Plan 2016, DM 10, Kingston Core Strategy, 2012, and Paragraph 127 of the National Planning Policy Framework.

The SSRA Alliance represents streets that have been assessed as areas of established high quality in the RBK Character study:

#### ***Royal Borough of Kingston Character Study, 2011***

*Characteristic of houses in a topography where they step down the hill or snake around curves as Linden Crescent/ Rowlls Road. High quality design of layout and houses of 2-storey, semi-detached, turn-of-the-century, with ground floor half bays with fluted columns, clay tiles, expressed party walls or slate with clay hips. Bonnerhill Road has some remaining mature London Plane street trees. Front boundaries are intact as half the street is effectively the cemetery, with some later infill housing. The hedge to the cemetery offers a green flank punctuated by stone piers. Piper Road is a street of variety in roofs – gabled to one side and hipped to the other - despite intact front boundaries and no street trees, an interesting townscape. Rowlls*

*Road has a double curve where the houses respond in ground floor bays, 2-storey fine villas— no1 weakened by no street trees and compromised by a dominant recent roof extension. Somerset, Linden, and Portman Roads have a tighter urban grain but a strong streetscape with some street trees. Good cornering but weaker character in Portman Road to Hawks Road where it becomes commercial.*

**Character area type: inner suburban (density 53 dph) (PTAL 1b-3)**

**Character area assessment: area of established high quality**

The proposed development would be at odds with the character and appearance of the surrounding area. The existing character is one that is varied in terms of housing style, however the overriding character is one of two storey dwellings with pitched roofs.

In this regard the proposed development when taken as a whole will result in numerous flat roofed tower blocks varying from 3-12 storeys in height. The houses that are located adjacent to the perimeter of the application site are predominantly two storeys in height. The proposal includes numerous 8-storey buildings that are located directly adjacent to the low rise perimeter of the site. Therefore, there is no continuity between the retained and the proposed and whilst it is accepted that there is a need for additional housing, this should be undertaken in a sensitive manner, that does not impact upon the existing character and appearance of the area.

The Character Area Assessment as set out within the Royal Borough of Kingston Character Study (2011) indicates that this area of the borough is an area of established high quality. It is recognised that the area has been allocated for large scale re-development, however, the proposed scheme in its current form is overtly dominant and will be detrimental to the existing character and appearance of the area. It should be noted that the SSRA Alliance represents streets that have been assessed as areas of established high quality in the Royal Borough of Kingston Character Study.

Outside of the neighbouring area, the proposed design due to its height will be visible from a considerable distance away and therefore the proposed design and appearance of the proposed buildings will harm the wider character of the borough.

## **5. Sustainability & Nature Conservation**

Surveys of our residents have raised concerns about the ecological impact of the proposals. These have focused on:

- the level of open space being provided for wildlife and the related impact of a massive increase of residents on the site;
- an unacceptable loss of mature trees and the threat to remaining trees of building on their roots, reductions in levels of nutrients and water;
- a lack of clarity about how existing rights of way will be retained;
- loss of existing plants species, invertebrates, and threats to colonies of bats and house sparrows as a result of the plans

If other aims of the development are given priority over guidance and regulations seeking to protect the existing nature on the site then the result is likely to be an ecological black hole in Norbiton.

## **6. Parking provision**

The proposed Phase 1 element of this proposal provides insufficient parking for the future occupiers and therefore will place a significant burden on the surrounding highway network.

On the basis that reliance on the use of a private car is relevant this should not mean that the scheme provides insufficient parking for the future occupiers. CrossRail 2 is not expected for at least 10 years (probably longer) and therefore in the short term this development will have a significant impact upon the highway network.

Phase 1 will provide 126 parking spaces for the 453 new dwellings. Based upon the evidence provided within the submitted Travel Plan this figure is woefully short of the estimated figures provided of 0.4/0.5 vehicles per dwelling

for the properties located in the north of the site and 0.8 vehicles per dwelling located in the southern part of the site based upon the 2011 Census. Even if this proposal was to provide parking provision based upon the lowest figures provided (0.4 vehicles per dwelling) this would equate to 180 spaces, some 54 more spaces than this proposal provides.

The inclusion of two Car Club spaces does not relate to this shortfall in parking.

This again only goes to show that the proposed scheme represents an over development of the site and fails to address the amenity and needs of the neighbouring residents and the future occupiers of the site.

## **7. Concerns regarding noise, dust and fumes**

Local residents have also raised concerns about the impact on them during the proposed development. This includes noise, dust and fumes associated with demolition and building over a 10 to 15-year period. Those affected will range from the large number of people working from home post-Covid through to families wishing to retain the Play Streets initiative on local roads. Residents are keen to ensure that the planning proposals meet the standards needed in terms of a detailed construction management plan which includes the required details of monitoring, reporting and engagement with local residents during construction.

To conclude, the Sunflower Streets Resident Association Alliance is opposed to the application on the grounds set out above. We would ask that these issues are fully taken into consideration when making your decision on this application.

The Sunflower Streets Residents Association Alliance represents residents living on the following streets: Piper Road, Rowlls Road, Bonner Hill Road, Somerset Road, Portman Road, Linden Crescent, Cambridge Grove Road, Gladstone Road, Vincent Road, Hampden Road

Yours sincerely

Tom Bucke

Chair

Sunflower Streets Residents Association Alliance

## **Policy Appendix**

### **Policy 7.4, London Plan, 2016**

**Strategic (A):** A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

**Planning decisions (B):** Buildings, streets and open spaces should provide a high quality design response that:

- a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- b) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
- d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- e) is informed by the surrounding historic environment.

### **Policy 7.6, London Plan, 2016**

**Strategic (A):** Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

**Planning decisions (B):** Buildings and structures should:

- a) be of the highest architectural quality
- b) be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c) comprise details and materials that complement, not necessarily replicate, the local architectural character
- d) not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

### **Policy 7.7, London Plan, 2016**

**Strategic (A):** Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.

**Planning decisions (B):** Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria below. This is particularly important if the site is not identified as a location for tall or large buildings in the borough's LDF.

**(C):** Tall and large buildings should:

- a) generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport
- b) only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building
- c) relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;

**(D): Tall buildings:**

**a) should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference**

**b) should not impact on local or strategic views adversely**

**Policy DM 10, Kingston Core Strategy (Local Development Framework), 2012**

**Design Requirements for New Developments (including House Extensions)**

**Development proposals will be required to incorporate principles of good design. The most essential elements identified as contributing to the character and local distinctiveness of a street or area which should be respected, maintained or enhanced include the following:**

**a. prevailing development typology, including housing types, sizes and occupancy**

**b. prevailing density of the surrounding area**

**c. scale, layout, height, form (including roof forms), massing**

**d. landscape setting and features**

**e. plot width and format which includes spaces between buildings**

**f. building line build up, set back and front boundary**

**g. typical details and key features such as roof forms, window format, building materials and design detailing of elevations, existence of grass verges etc.**

**Development proposals should also:**

**h. ensure adequate private and/or communal amenity space**

**i. incorporate sustainable design and construction requirements**

**j. incorporate the principles of safe design to reduce the risk and fear of crime, e.g. natural surveillance, appropriate levels of lighting**

**k. have regard to the amenities of occupants and neighbours, including in terms of privacy, outlook, sunlight/daylight, avoidance of visual intrusion and noise and disturbance**

**l. have regard to local traffic conditions and highway safety and ensure they are not adversely affected**

**m. protect the quality, character, scale and skylines of sensitive areas and safeguard strategic and local views**

**In addition to the above requirements, the Council will have particular regard to the significant contribution that existing private residential gardens make to:**

**v. the Borough's suburban character and distinctive local context**

**w. the provision of valuable private amenity space**

**x. biodiversity and the natural and green environment**

**y. reducing the impacts of flooding and climate change**

**Paragraph 127 of the National Planning Policy Framework:**

**127. Planning policies and decisions should ensure that developments:**

**a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;**

**b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;**

**c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);**

**d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;**

**e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and**

***f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.***