

CRE Planning Permission Application

Representation on application for permission for proposed development at CAMBRIDGE ROAD ESTATE, CAMBRIDGE ROAD, KINGSTON-UPON-THAMES, LONDON, KT1
“Hybrid Planning Application for a mixed used development, including demolition of existing buildings and erection of up to 2,170 residential units ...” by Cambridge Road (RBK) LLP.

Date: 2020-11-29

From: Damon Hart-Davis, Willingham Way

To: ROYAL BOROUGH OF KINGSTON-UPON-THAMES Planning Department, Guildhall 2

This is in response to the letter (ref 26902/A3/GP) and notice from Barton Willmore dated 2020-11-12 on behalf of Cambridge Road (RBK) LLP.

I wish to raise a number of objections on environmental and sustainability issues.

I also wish to put on record the enormous conflict of interest for RBK in benefitting from awarding planning permission to the applicant that RBK jointly owns on land that RBK intends to coerce freeholders into handing over under CPO if necessary, depriving the current owners of the inherent development and amenity value. RBK would not have awarded existing freeholders permission for a similar level of densification. Current compensation being discussed does not begin to allow freeholders to find themselves an unencumbered property in an equivalent situation, so this amounts to a clear intention to permanently deprive freeholders of their assets and the value of their assets.

I note that there are several fairly important natural resources, all at the appropriate time visible from where I sit as I write this, that will be harmed almost inevitably in densification. That may be considered acceptable overall in balance with societal gain from more housing provision, but I note the following, some of which should not be acceptable given my understanding of the plans so far. And all in the face of an Environment-Bill-stipulated minimum 10% net gain for biodiversity as I understand to be coming.

1. Sparrows

- a. A recent pleasure has been observing large numbers of house sparrows in the hedge outside my window, in numbers that I have not seen since childhood. What steps will the developers take to credibly preserve, “reprovide” or improve their habitat in line with the Mayor’s Biodiversity Strategy policy 7.19, NERC Act Section 41, BAP Priority National, BAP Priority London, local species of conservation concern, and given their inclusion on the red list also? House sparrows, so far as I understand, do not nest in high-rise buildings.

2. Trees

- a. My understanding is that none of the trees in private gardens in the estate that will be lost during development, eg those in my garden too, are being counted in the evaluation of the development. That is many tens.
- b. This would be an ugly sleight of hand since reality doesn’t much care if the accountants pretend the trees don’t exist: they currently do and will not afterwards, and the current habitat and green services they provide will

disappear with them. And all at a time when planting more trees is considered helpful to fight climate change.

- c. As one example, loss of trees is likely to increase the urban heat-island effect, bringing a real danger of heat stress to vulnerable residents, sometimes fatal.

3. Bats

- a. I understand that the developers and RBK may be of the opinion that there is no significant bat activity on the estate. (I observed the monitoring being done one evening, which I didn't feel at the time was necessarily being conducted in good faith.) To the contrary, I have observed a huge amount of activity even from my desk last night through my open window. Please read my log at <https://www.earth.org.uk/bats-at-16WW.html> and note the other recorded activity in the vicinity. For all I know there are bats living under the hanging tiles common around the estate.

4. Energy efficiency of proposed new stock vs climate change and fuel poverty

- a. Though I have brought up the issue multiple times in public meetings and private discussions with councillors and officials, I have not seen detailed indications that the proposed development would be sustainable from an energy efficiency point of view.
- b. I am personally and professionally engaged with energy efficiency and improving domestic space-heat (and cooling) efficiency to minimise climate damage and fuel poverty.
- c. In particular as a minimum, homes in any new development should be:
 - i. Compliant with the Local Plan, including carbon/climate aspects.
 - ii. Compliant with building regulations and exceed them, and be tested to do so in every unit (since compliance of untested units is known to be poor in practice). The operational energy consumed should not exceed 35kWh/m²/year which is the current RIBA Climate Challenge Target Metric for domestic buildings. This should be a condition if planning permission is granted and the discharge of the condition should be reliant on testing of the homes once occupied to confirm the Heat Loss Parameter is below 1.
 - iii. Good enough to avoid space-heat fuel poverty for the occupants, and to avoid overheating as the climate warms.
 - iv. Good enough not to need expensive retrofit a few years hence to meet the above points and the UK's legally-binding carbon targets and net-zero targets.
 - v. Significantly better than cost-engineered bare-minimum compliance with current building regulations since that would NOT satisfy the climate and fuel-poverty aspects above.

5. Densification of development in a green-deprived area

- a. My understanding is that though this development is being in effect forced by the GLA, the proposed densification is of an area that is already "green deprived", ie an "Area of Deficiency" as defined by the Mayor, and will be made more so by removal of trees, wildlife etc as above, thus against GLA and Mayoral policies, and should not be permitted, nor facilitated with GLA money.

Regards

Damon Hart-Davis, owner, Willingham Way