

Agenda

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THE ROYAL BOROUGH OF
KINGSTON
UPON THAMES

Development Control Committee

Date: Thursday 5 November 2015

Time: 7:30 pm

Place: Guildhall, Kingston upon Thames

Members of the Committee

Councillor Richard Hudson	(Chair)
Councillor Hugh Scantlebury	(Vice Chair)
Councillor Bill Brisbane	
Councillor Mike Head	
Councillor Malcolm Self	
Councillor Jack Cheetham	
Councillor Lorraine Rolfe	
Councillor Geoff Austin	
Councillor Paul Bedforth	
Councillor Rebekah Moll	
Councillor Gaj Wallooppillai	

Everyone is welcome to attend the meeting

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Agenda

1. **APOLOGIES FOR ABSENCE AND ATTENDANCE OF SUBSTITUTE MEMBERS**
2. **MINUTES**
To confirm the minutes of the meeting held on Thursday 22 October 2015.
3. **DECLARATIONS OF INTEREST**
Members are asked to declare any disclosable pecuniary interests and any other non-pecuniary interests (personal interests) relevant to items on this agenda.
4. **PLANNING APPLICATIONS** **Appendix A**
5. **URGENT ITEMS AUTHORISED BY THE CHAIR**
To consider any urgent items authorised by the Chair.

Welcome to this meeting.

A large print copy of the agenda can be requested in advance.

Recording of the meeting - This meeting will be recorded and the recording will be available on the web site (www.kingston.gov.uk) with the agenda and minutes.

Filming - Residents and journalists/media wishing to film meetings are permitted to do so but are asked to give advance notice of this and respect any concerns expressed by people on being filmed.

Running order - Items may be taken in a different order depending on the interests of the members of the public present at the meeting. Please fill out a green form, available at the start of the meeting, if you would like to request that a particular item is heard earlier.

Contact for further information - For further about Council Committees and meetings please contact: **James Geach 020 8547 5062, e-mail: james.geach@kingston.gov.uk**

Speaking on Planning Applications, Enforcement, or Tree Preservation Orders

There is a registration scheme for residents wishing to speak on planning applications, tree preservation orders or enforcement cases to be determined by the Committee.

(For other items on the agenda, including planning applications on which the Neighbourhood is being consulted before the application is considered by the Development Control Committee, residents may ask questions and give their views at the discretion of the Chair.)

The arrangements for speaking on applications are based on both sides having equal time to make their points to Councillors. To make sure that the meeting runs in a way which is fair to everyone, these arrangements will be followed without any exceptions being made. The full scheme is on the Council website at the 'Council and Decision making' webpages.

Everyone wishing to speak on an application, Enforcement Action or Tree Preservation Order must have registered **THREE** days before the meeting. **Objectors must have responded to the consultation on an application**

Registration deadline: **10:00am, Tuesday 3 November 2015**

To register please contact: **James Geach 020 8547 5062, e-mail: james.geach@kingston.gov.uk**

Time for speaking - FIVE minutes is allowed for **each side** on each application. This time has to be shared by however many there are on each side. If there are a large number of speakers people must decide amongst themselves on a spokesperson or some other arrangement.

The Chair of the meeting has **no discretion** to extend the time limit.

Speakers may find it helpful to have made some notes on what they want to say, so that they make the most of the speaking time. The notes attached to the original consultation letter from the Planning Officer will have explained the things that the Committee can't take account of - loss of view, property values etc.

The order of speaking is:

	Planning applications	Enforcement/Tree Preservation Orders
1.	Planning Officer to present item	Planning Officer to present item
2.	Objector(s) (5 minutes)	Land/property owner (5 minutes)
3.	Applicant (5 minutes)	The Council as applicant and/or supporters of the action proposed (5 minutes)
4.	Questions from Committee:	Questions from Committee
5.	Objector(s) (5 minutes) Applicant (5 minutes)	Land/property owner (5 minutes) The Council as applicant and/or supporters of the action proposed (5 minutes)
6.	Sweep up by Planning Officer	
7.	Questions from Committee to Officers	
8.	Debate and decision by Committee	

DEVELOPMENT CONTROL COMMITTEE

THURSDAY 05 NOVEMBER 2015
REPORT BY
HEAD OF PLANNING & TRANSPORT
PLANNING APPLICATIONS

INDEX

ITEM NO	REGISTER NO	ADDRESS	DESCRIPTION	RECOMMENDATION	PAGE NO
A1	14/13247	Development Site At Former Post Office, Ashdown Road, Kingston Upon Thames	Erection of new buildings of 4 to 16 storeys in height and part demolition, alterations and change of use of Former Post Office and Former Telephone Exchange listed buildings to provide 2,136sqm of retail/ cafe/ restaurant uses (A1-A5 use), and 638 sqm of flexible floorspace to be used for either retail/café/restaurant uses (A1-A5) or Office (B1), 931sqm of offices (B1) and 253sqm of community/leisure (D1/D2 use) and 338 residential units. 132 car parking spaces proposed with access from Ashdown Road and 636 cycle parking spaces.	PERMIT	A5

DEVELOPMENT CONTROL COMMITTEE

THURSDAY 05 NOVEMBER 2015
REPORT BY
HEAD OF PLANNING & TRANSPORT
PLANNING APPLICATIONS

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ITEM NO	REGISTER NO	ADDRESS	DESCRIPTION	RECOMMENDATION	PAGE NO
A2	14/13248	Development Site At Former Post Office, Ashdown Road, Kingston Upon Thames	Alterations, reconfiguration, to facilitate change of use of Old Post Office to provide retail/ cafe/ restaurant uses (use class A1-A5), community/ leisure (use class D1/ D2) uses. Works include demolition of infill additions to courtyard, internal partitions, creation of new/ restored openings, new lift shaft, repair including re-roofing of front range, internal alterations, associated works, including addition of finials.	PERMIT	A103

DEVELOPMENT CONTROL COMMITTEE

THURSDAY 05 NOVEMBER 2015
REPORT BY
HEAD OF PLANNING & TRANSPORT
PLANNING APPLICATIONS

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ITEM NO	REGISTER NO	ADDRESS	DESCRIPTION	RECOMMENDATION	PAGE NO
A3	14/13250	Development Site At Former Post Office, Ashdown Road, Kingston Upon Thames	Alterations, reconfiguration, to facilitate change of use of Telephone Exchange to offices (B1)/ residential cycle storage including demolition of outbuildings/boundary walls to east courtyard, west light-well walls, internal partitions/modifications to external stairs, fenestration, creation of new/restored openings, re-roofing of front range, installation of lift.	PERMIT	A105

A4

DEVELOPMENT CONTROL COMMITTEE

5TH NOVEMBER 2015

REPORT BY THE

Head of Planning & Transport

PLANNING APPLICATIONS

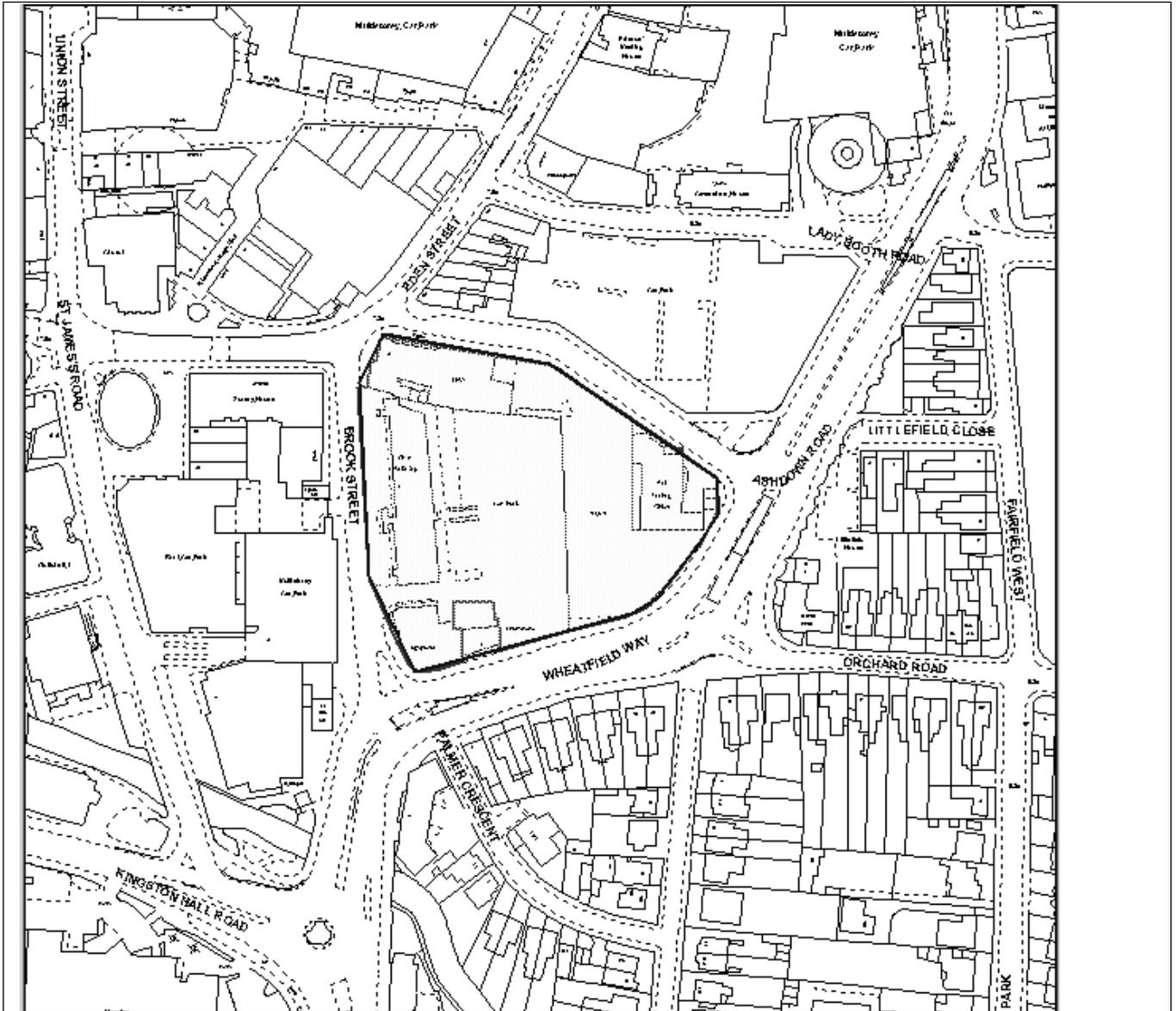
The policies listed are those from the Royal Borough of Kingston upon Thames the Local Development Framework Core Strategy, Adopted April 2012.

DEVELOPMENT CONTROL COMMITTEE

Date of Meeting: 5TH NOVEMBER 2015

A1 Register Nos: 14/13247/FUL, 14/13248/LBC, 14/13250/LBC

Address: DEVELOPMENT SITE AT FORMER POST OFFICE,
ASHDOWN ROAD, KINGSTON UPON THAMES



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[Please note that this plan is intended to assist in locating the development it is not the site plan of the proposed development which may have different boundaries. Please refer to the application documents for the proposed site boundaries.]

A6

<u>Ward:</u>	Grove
<u>Description of Proposals:</u>	1) 14/13247/FUL: Erection of new buildings of 4 to 16 storeys in height and part demolition, alterations and change of use of Former Post Office and Former Telephone Exchange listed buildings to provide 2,136sqm of retail/ cafe/ restaurant uses (A1-A5 use), and 638 sqm of flexible floorspace to be used for either retail/café/restaurant uses (A1-A5) or Office (B1), 931sqm of offices (B1) and 253sqm of community/leisure (D1/D2 use) and 338 residential units. 132 car parking spaces proposed with access from Ashdown Road and 636 cycle parking spaces.
<u>Plan Type:</u>	Full Application 2) 14/13248/LBC: Alterations, reconfiguration, to facilitate change of use of Old Post Office to provide retail/ cafe/ restaurant (use class A1-A5), community/ leisure (use class D1/ D2) uses. Works include demolition of infill additions to courtyard, internal partitions, creation of new/ restored openings, new lift shaft, repair including re-roofing of front range, internal alterations, associated works, including addition of finials.
<u>Plan Type:</u>	Listed Building Consent 3) 14/13250/LBC: Alterations, reconfiguration, to facilitate change of use of Telephone Exchange to offices (B1)/ residential cycle storage (partitions added) including demolition of outbuildings/boundary walls to east courtyard, west light-well walls, internal partitions/modifications to external stairs, fenestration, creation of new/restored openings, re-roofing of front range, installation of lift.
<u>Plan Type:</u>	Listed Building Consent
<u>Expiry Date:</u>	17/03/2015

Applicant's Plan Nos:

00852_JTP_P1_004 P05 Proposed Demolition plan	Received	04/09/2015
00852_JTP_P1_005 P05 Proposed site plan	Received	04/09/2015
00852_JTP_P1_006 P05 Existing basement plan	Received	04/09/2015
00852_JTP_P1_010 P05 Proposed basement plan	Received	04/09/2015
00852_JTP_P1_100 P05 Proposed ground floor plan	Received	04/09/2015
00852_JTP_P1_101 P06 Proposed mezzanine floor	Received	23/09/2015
00852_JTP_P1_102 P05 Proposed level 01 plan	Received	04/09/2015
00852_JTP_P1_103 P05 Proposed level 02 plan	Received	04/09/2015
00852_JTP_P1_104 P05 Proposed level 03 plan	Received	04/09/2015

A7

00852_JTP_P1_105 P05 Proposed level 04 plan	Received	04/09/2015
00852_JTP_P1_106 P05 Proposed level 05 plan	Received	04/09/2015
00852_JTP_P1_107 P05 Proposed level 06 plan	Received	04/09/2015
00852_JTP_P1_108 P05 Proposed level 07 plan	Received	04/09/2015
00852_JTP_P1_109 P05 Proposed level 08 plan	Received	04/09/2015
00852_JTP_P1_110 P05 Proposed level 09 plan	Received	04/09/2015
00852_JTP_P1_111 P05 Proposed level 10 plan	Received	04/09/2015
00852_JTP_P1_112 P05 Proposed level 11 plan	Received	04/09/2015
00852_JTP_P1_113 P05 Proposed level 12 plan	Received	04/09/2015
00852_JTP_P1_114 P05 Proposed level 13 plan	Received	04/09/2015
00852_JTP_P1_115 P05 Proposed level 14 plan	Received	04/09/2015
00852_JTP_P1_116 P05 Proposed roof plan	Received	04/09/2015
00852_JTP_P1_120 P05 Proposed roof plan, green & brown roofs and PV locations	Received	04/09/2015
00852_JTP_P1_200 P05 Proposed North elevation AA	Received	04/09/2015
00852_JTP_P1_201 P05 Proposed North elevation BB	Received	04/09/2015
00852_JTP_P1_202 P05 Proposed East elevation CC	Received	04/09/2015
00852_JTP_P1_203 P05 Proposed East elevation DD	Received	04/09/2015
00852_JTP_P1_204 P05 Proposed South elevation EE	Received	04/09/2015
00852_JTP_P1_001 P05 Red line plan	Received	04/09/2015
00852_JTP_P1_002 P05 Existing Topo Survey	Received	04/09/2015
00852_JTP_P1_003 P05 Existing site plan	Received	04/09/2015
00852_JTP_P1_206 P05 Proposed North Elevation GG	Received	04/09/2015
00852_JTP_P1_207 Proposed South elevation HH	Received	04/09/2015
00852_JTP_P1_300 P05 Proposed Section AA	Received	04/09/2015
00852_JTP_P1_301 P05 Proposed Section BB	Received	04/09/2015
00852_JTP_P1_302 P05 Proposed Section CC	Received	04/09/2015
00852_JTP_P1_303 P05 Proposed Section DD	Received	04/09/2015
00852_JTP_P1_304 P05 Proposed Section EE	Received	04/09/2015
00852_JTP_P1_305 P05 Proposed Section FF	Received	04/09/2015
00852_JTP_P1_306 P05 Proposed Section GG	Received	04/09/2015
00852_JTP_P2_205 rev P06 Proposed West elevation FF	Received	23/09/2015

Affordable Housing Statement	Received	11/12/2014
Affordable Housing Statement - Sept 2015 Addendum	Received	04/09/2015
Appendix A Tree Survey Plan	Received	11/12/2014
Appendix B Materials Reference Plan	Received	11/12/2014
Appendix C Tree Protection Plan	Received	11/12/2014
Car Parking Management Plan	Received	15/09/2015
Community Engagement Report	Received	11/12/2014
Community Engagement Report Addendum	Received	09/04/2015
Community Engagement Report Addendum Sep 2015	Received	04/09/2015
DAS Sept 2015	Received	04/09/2015
Delivery Service Plan- FINAL/FULL	Received	09/04/2015
DSP Figures & Appendix FINAL/FULL	Received	09/04/2015
Energy & Sustainability Strategy - Sept 2015 Addendum	Received	04/09/2015
Energy & Sustainability Statement	Received	11/12/2014
ES Non Technical Summary	Received	04/09/2015
ES Volume 2 Townscape, Visual Impact and Built Heritage	Received	04/09/2015
ES Volume 3 Technical Appendices	Received	04/09/2015
Health Impact Assessment - September 2015	Received	04/09/2015
Heritage Statement	Received	11/12/2014
Heritage Statement - Sept 2015 Addendum	Received	04/09/2015
Indicative Location of Residential	Received	11/12/2014
L-100 Materials Reference Plan Scenario A	Received	11/12/2014
L-200 Landscape Plan - Old Post Office Courtyard Scenario A	Received	11/12/2014
L-201 Landscape Plan - streetscapes Scenario A	Received	11/12/2014
L-202 Landscape Plan - podium garden Scenario A	Received	11/12/2014
L-203 Hard Landscape Plan - private roof terrace Scenario A	Received	11/12/2014
Light Within Report - Sept 2015 Addendum Part 1	Received	04/09/2015
Light Within Report - Sept 2015 Addendum Part 2	Received	04/09/2015
Photographs of Street View	Received	23/09/2015
Planning Statement	Received	11/12/2014
Planning Statement with Regeneration Statement - Sept 2015 Addendum.	Received	04/09/2015
Regeneration Statement	Received	11/12/2014

Retail vision	Received	11/12/2014
TOPO ES Addendum September 2015	Received	04/09/2015
TP - Appendix A	Received	09/04/2015
TP - Figures	Received	09/04/2015
Transport Assessment	Received	11/12/2014
Transport Assessment Addendum - Sept 2015 Addendum	Received	04/09/2015
Transport Framework Travel Plan - FINAL/FULL	Received	09/04/2015
Tree Survey Report	Received	11/12/2014

14/13248/LBC

PD/02 rev 01 Floor plans and roof plans proposed	09/04/2015
PD/04 rev 01 elevations as proposed 1	09/04/2015
PD/05 rev 01 elevations as proposed 2	09/04/2015
Old Post Office Application Form - December 2014	18/12/2014
Old Post Office Method Statement - December 2014	18/12/2014
Old Post Office Structural Survey - December 2014	18/12/2014
POD/03 Sections as proposed	11/12/2014
POD/06 Sections as proposed	11/12/2014
PODM/01 Demolition plans - Ground and first floor	11/12/2014
PODM/02 Demolition plans first, second and roof levels	11/12/2014
POEX/01 Plans as existing	11/12/2014
POEX/02 Plans as existing	11/12/2014
POEX/03 Sections as existing	11/12/2014
POEX/04 Elevations as existing	11/12/2014
POEX/05 Elevations as existing	11/12/2014
POLOC/01 Location Plan	11/12/2014
POSP/01 Site plan as existing	11/12/2014
POSP/02 Site plan as proposed	11/12/2014

14/13250/LBC

TED/01 rev 01 Floor plans as proposed	09/04/2015
TED/04 rev 01 elevations as proposed 1	09/04/2015
TED/05 rev 01 elevations proposed 2	05/04/2015
Planning Statement APPENDIX 4 - Regeneration Statement	18/12/2014
Telephone Exchange Application Form - December 2014	18/12/2014
Telephone Exchange Method Statement - December 2014	18/12/2014
Telephone Exchange Structural Survey - December 2014	18/12/2014
TOPO Planning Statement 10.12.14	18/12/2014
TE EX/03 Section as existing	11/12/2014
TED/02 Plans as proposed	11/12/2014
TED/03 Sections as proposed	11/12/2014
TED06 Interior elevations as proposed	11/12/2014
TEDM/01 Demolition plans - basement and ground	11/12/2014
TEDM/02 Demolition area - plans as existing	11/12/2014

TEEX/01 Plans as existing	11/12/2014
TEEX/02 Plans as existing	11/12/2014
TEEX/03 Section as existing	11/12/2014
TEEX/04 Elevations as existing	11/12/2014
TEEX/05 Elevations as existing	11/12/2014
TEEX/06 Interior elevations as existing	11/12/2014
TELCO/01 Location plan	11/12/2014
TESP/01 Site plan as existing	11/12/2014
TESP/02 Site plan as proposed	11/12/2014

BASIC INFORMATION

The Development Plan for Kingston comprises the London Plan (Further Alterations adopted March 2015), the Kingston Core Strategy that was adopted in 2012 and the 2008 Kingston Town Centre Area Action Plan. The Core Strategy is in general conformity with the National Planning Policy Framework when this was published in early 2012. National guidance directs that where there are inconsistencies or conflicting approaches between Development Plan policies, the most recent policies take precedence over other existing policies. The March 2015 Eden Quarter Development Brief SPD provides guidance on how the relevant Development Plan policies for the Old Post Office area should be interpreted and implemented.

POLICIES

National Planning Policy Framework (NPPF) 2012

Development Plan:

Mayor for London - London Plan Consolidated with Alterations since 2011 (March 2015)
Core Strategy (April 2012)
Kingston Town Centre Area Action Plan (2008)
Eden Quarter Development Brief SPD (March 2015)
Affordable Housing SPD (May 2013)
Residential Design SPD (July 2013)
Sustainable Transport SPD (May 2013)
Access for All SPD (2005)
The Council's Policy Programme 2015-2016

GUIDANCE

Historic England: The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3 (July 2015)
CABE/English Heritage: Guidance on tall buildings (July 2007)

The 2007 CABE/English Heritage Tall Buildings Guidance is currently being reviewed. English Heritage and the Design Council consulted on a draft revised document in the autumn of 2014. However, the revised guidance has not yet been published, and the 2007 Guidance remains the current guidance for the consideration of tall buildings.

LONDON PLAN

- LP 2.15 Town centres
 - LP 3.10 Definition of affordable housing
 - LP 3.11 Affordable housing targets
 - LP 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
 - LP 3.13 Affordable housing thresholds
 - LP 3.3 Increasing housing supply
 - LP 3.4 Optimising housing potential
 - LP 3.5 Quality and design of housing developments
 - LP 3.7 Large residential developments
 - LP 3.8 Housing choice
 - LP 3.9 Mixed and balanced communities
 - LP 4.3 Mixed use development and offices
 - LP 4.7 Retail and town centre development
 - LP 5.11 Green roofs and development site environs
 - LP 5.12 Flood risk management
 - LP 5.13 Sustainable drainage
 - LP 5.2 Minimising carbon dioxide emissions
 - LP 5.3 Sustainable design and construction
 - LP 5.5 Decentralised energy networks
 - LP 5.6 Decentralised energy in development proposals
 - LP 5.7 Renewable energy
 - LP 6.10 Walking
 - LP 6.13 Parking
 - LP 6.3 Assessing effects of development on transport capacity
 - LP 6.9 Cycling
 - LP 7.2 An Inclusive environment
 - LP 7.3 Designing out crime
 - LP 7.4 Local character
 - LP 7.5 Public realm
 - LP 7.6 Architecture
 - LP 7.7 Location and design of tall and large buildings
 - LP 7.8 Heritage assets and archaeology
 - LP 7.9 Heritage-led regeneration
- LDF CORE STRATEGY CORE POLICIES
- CS 01 Climate Change Mitigation
 - CS 02 Climate Change Adaptation

CS 03	The Natural and Green Environment
CS 04	Thames Policy Area
CS 05	Reducing the Need to Travel
CS 06	Sustainable Travel
CS 07	Managing Vehicle Use
CS 08	Character, Heritage and Design
CS 10	Housing Delivery
CS 11	Economy and Employment
CS 12	Retail and Town Centres
CS 13	Community Health Services
CS 14	Safer Communities
CS 16	Community Facilities
	LDF CORE STRATEGY DEVELOPMENT MANAGEMENT
DM01	Sustainable Design and Construction Standards
DM02	Low Carbon Development
DM03	Designing for Changing Climate
DM04	Water Management and Flood Risk
DM06	Biodiversity
DM08	Sustainable Transport for new Development
DM09	Managing Vehicle Use for New Development
DM10	Design Requirements for New Developments
DM11	Design Approach
DM12	Development in Conservation Areas and Affecting Heritage Assets
DM13	Housing Quality and Mix
DM15	Affordable Housing
DM17	Protecting Existing Employment Land and Premises
DM20	New Retail Development
DM22	Design for Safety
	LDF CORE STRATEGY IMPLEMENT POLICIES
IMP1	Partnership Working in Kingston
IMP2	Sewerage and Water Infrastructure
IMP3	Securing Infrastructure
IMP4	Facilitating Delivery
	K+20 AREA ACTION PLAN
K+ K01	New and Enhanced Shopping Facilities
K+ K04	Employment Development within the Town Centre

- K+ K06 Provision of Facilities for Arts etc
- K+ K07 Housing
- K+ K09 Design Quality in the Town Centre
- K+ K10 Town Centre Public Realm
- K+ K14 The Hogsmill River
- K+ K15 Town Centre Road Network
- K+ K16 Public Transport
- K+ K17 Pedestrian Environment
- K+ K18 Cycling
- K+ K19 Other Measures to Improve Accessibility
- K+ K20 Town Centre Parking
- K+ K21 Managing the Town Centre
- K+ K22 Town Centre Infrastructure
- K+ K23 S106 Planning Obligations and Developer Contributions
- K+ K24 Flood Risk Management
- K+ P3 Eden Quarter - East of Eden Street and The Ashdown Road Sites: Eden Quarter

EDEN QUARTER DEVELOPMENT BRIEF

- 2 Development Principles
 - 3.1 The Urban Design Framework
 - 3.2 Routes and Movement
 - 3.3 Public Realm Strategy for The Eden Quarter
 - 3.4 Land Uses- Ground Floor
 - 3.5 Heights, Scale and Massing
- 4. Site Guidance: 4. The Old Post Office Delivery

Previous Relevant History

01/03098/LBC	Demolition and removal of outbuildings, extensions, flue and trunking added to original telephone exchange building	Grant LBC with Conditions 11/06/2001
02/03016/LBC	Demolition of single storey outhouse building	Grant LBC with Conditions 22/05/2002
02/12352/FUL	Use as a temporary public car park, with access from Ashdown Road	Subject to Legal Agreement Permit 24/02/2003
03/12322/FUL	Change of use of ground floor to A3 use	Refused

A14

	with ancillary staff accommodation on first floor. Internal and external alterations to accommodate emergency exits	05/11/2003
05/12139/LBC	Proposed internal and external alteration works associated with the change of use of the ground floor former sorting offices to D1 use	Grant Listed Building Consent 22/04/2005
05/12140/FUL	Proposed change of use of single storey ground floor former sorting offices and delivery area at rear of PO building to Class D1 (exhibition and meeting room space) with entrance off Ashdown Road for a temporary period of 5 years, together with minor elevational alterations	Permit Conditions 22/04/2005
05/12145/FUL	Formation of entrance ramp and door to facilitate disabled access	Permit 5 Year Condition and Conditions 27/04/2005
05/12560/FUL	Installation of 3 x air conditioning units in place of unused bike shed	Permit 5 Year Condition 01/09/2005
07/12696/LBC	Repositioning of escape door, replacement of window, internal works including plaster repairs	Grant LBC with Conditions 27/11/2007
23313	Use of land at rear for car parking	Conditional permission to 26.9.81 06/10/1980
25861	Use for parking purposes (19/21)	Conditional permission to 28.7.84 28/07/1982
26595	Retention of part existing facades and part existing roof and development to provide post office accommodation	Application lapsed 12/12/1983
28190	Redevelopment to provide offices and six one bed flats (Outline)	Conditional permission 19/10/1984
28246	Redevelopment to provide offices and six one bed flats (Outline)	Conditional permission 19/10/1984
29210	Change of use from sorting offices to light industrial with 7 car parking spaces and communal service area	Refuse 09/07/1985
29211	Change of use from sorting offices to offices and 10 car parking spaces and communal service area	Refuse 04/07/1985

31688	Alterations to building in connection with relief road works	Deemed consent 02/09/1986
32506	Demolition of single storey buildings in Ashdown Road, retention with alterations to facade of building in Ashdown Road, and rebuilding of single storey building at rear	Grant listed building consent 30/07/1987

Consultations

1. CONSULTATION ON INITIAL SCHEME (SUBMITTED DECEMBER 2014)
2. Neighbouring occupiers: 6056 neighbours consulted, Site and Press Notice displayed/ published.
3. 2 letters of support: good solution to shortage of homes in Kingston; Brings back into use historic buildings with community use, high end restaurants and specialist retailing; Tall building looks fantastic.
4. 7 letters of support: Support regeneration of this area, including new homes, retail and restaurant, re-use of Listed Buildings and provision of public space in currently derelict area, subject to certain concerns.
5. 201 letters of objection:
 - (1) Poor quality of building's design and materials.
 - (2) Scale/ height is excessive and impacts on setting of preserved Listed Buildings, surrounding conservation areas and on view from Kingston Bridge and sunlight to Fairfield Park, town centre, Market Place and on the skyline of this historic market town. Tall buildings would set unfortunate precedent for Ashdown Road car park site. Some support for proposed low rise buildings. Kingston Riverside development which was won on appeal should not be used as justification for this development. Solid wall proposed with lack of gaps in development in Wheatfield Way. Rather than providing a gateway, the tall buildings will provide a visual and physical barrier to the town. Detrimental psychological impact of tall buildings, which are not of a human scale and detrimentally impact on community and would result in increased crime and fear of crime.
 - (3) Out of keeping with Eden Quarter and Kingston Futures. The applicants claim that the proposal for a 21 storey tower is justified by this brief, whereas the brief says 9+. The Kingston Town Centre Area Action Plan calls for a multi-storey car park rather than residential parking.
 - (4) No phone masts or similar shall be allowed to be added to the tower/development.
 - (5) Images taken with wide angle lenses and sometimes just away from location that would have shown greatest visual impact. Images should be rendered instead of wireline to give truer estimate of impact. The applicant's images are misleading, showing in some instances the sun shining from the north. The impacts stated on the images taken from Fairfield and Market Place (neutral) should be major or devastating. Detrimental impact from Richmond Park and Hampton Court Palace. Concern at

accuracy of photomontages. Insufficient consideration of impact on townscape merit houses opposite. The impact on views/skyline would be significant when viewed from open spaces, river, Home Park and Bushy Park.

- (6) Public space is of insufficient quality and does not compare favourably to existing spaces within Kingston Town Centre. Lack of permanent seating/ feature lighting within Post Office square and uninspiring paving. Concern at planting beds along Brook Street. Raised beds will become a maintenance issue. Lack of public pedestrian through routes and public open or green space and lack of joined up pedestrian routes/ space. Concern at potential for increased crime. Cycle route will lead to Wheatfield Way being a further barrier between the Fairfield, Library, Museum, Leisure Centre, Monday Market and the rest of the town centre. Not clear how the development will incorporate the mini-Holland cycle route. Lack of trees along Wheatfield Way. New crossings in Ashdown Road and Wheatfield Way and the Fairfield should be provided.
 - (7) Impact on light, overbearing, impact on privacy, light pollution, increased wind to Eden Street and Brook Street, glare, aviation, telecoms interference, flooding/ drainage/ sewage/ electrical power systems and waste disposal, schools, doctor's surgeries, dentists, hospitals, utilities, playgrounds, public toilets, police.
 - (8) Section 106 agreement should provide for required facilities. Concern that the planning obligations received will not compensate the community or Council for the increased impacts. Lack of larger family housing and light into proposed residential units. Insufficient affordable housing. Residential should not be buy to let.
 - (9) Loss of existing parking facilities will add to traffic congestion and result in a loss for shopping in the town centre. Lack of car parking/ excessive parking. Motorists should be incentivised to use public transport. Impact of proposal on traffic in area, transport, parking and congestion. Lack of cycle parking security. Servicing/deliveries on busy roads.
 - (10) Residential use should not be proposed in this location. Support for demolition of Frances House. Insufficient retail and business use for this town centre site, which should include low rent retail, offices, studios, theatre or a children's library should be provided instead of shops, drinking establishments or clubs. Arrangements should be made to ensure that the community space is affordable to community groups and available for a variety of community groups, including arts, crafts and dance particularly if Eden Walk is redeveloped and Fusion Arts are displaced. Must ensure that bars instead of restaurants are not created. Vacant shops in town centres therefore this retail space is not required.
 - (11) Insufficient sustainability standards.
 - (12) Noise, pollution and dust from construction.
6. Petition (286 signatures) Change.org/Save Our Fairfield: Support a well-balanced and sustainable approach to urban growth, but do not accept high rise buildings, which undermine a sense of place, overshadow the

town's more human scale and degrade the historic fabric that makes it such a beautiful and unique place. The 21 storey tower would drastically impact on the town centre and set a precedent for tall buildings that will change the character forever. We seek mixed use buildings of a human scale that fit with surroundings, more pedestrian friendly walkways that allow sunlight and open views of the sky, high quality materials, sustainability, greening and the animating of urban spaces by providing a range of cultural, recreational and community spaces.

7. Petition created by Rebekah Moll (Liberal Democrat Party Candidate for Grove ward): "I oppose the proposal to build a 21 storey skyscraper at the corner of Wheatfield Way and Brook St on the old Post Office site in Kingston." The petition has 284 signatures.
8. Petition (770 signatures- as per website on 28/4/15): Kingston Residents Alliance/ Save Kingston's Skyline: Object to the overdevelopment of the Old Post Office site, in particular the proposed high rise buildings and 21 storey block which is much higher than surrounding buildings. It is totally out of keeping with Kingston's historic centre and would loom over many historic views, as well as compromising the nearby Grove Conservation Area and ruining residents' privacy.
9. Kingston Upon Thames Society petition: 400 signature petition opposing vehemently the proposal to build a Tower Block on the Old Post Office site, Ashdown Road.
10. Petition (48 signatures): Object to the overdevelopment of the site, in particular the proposed high rise buildings and 21 storey block which is much higher than all surrounding buildings. It is totally out of keeping with Kingston's historic centre and would loom over many historic views, as well as compromising the nearby Grove Conservation Area and ruining residents' privacy and space.
11. Petition (19 signatures): Object to more restaurants and cafes in central Kingston.
12. Greater London Authority: The Mayor strongly supports the scheme and commends the retention and refurbishment of the two listed buildings. However, in order to ensure full compliance the following should be addressed before the scheme is referred back to the Mayor at Stage 2: 1) The applicant's viability appraisal needs to be independently verified and the findings supplied to the GLA to verify that the maximum reasonable amount of affordable housing is being delivered; 2) The carbon emissions associated with the existing buildings should be quantified and the comments addressed before compliance with London Plan energy policy can be verified; 3) The site is within flood zones 3a and 3b: Whilst the flood risk assessment submitted indicates appropriate design and management of this level of flood risk and proposes the implementation of a surface water drainage system, there is currently a lack of specific detail to ensure that this will be achieved; 4) TfL requests contributions

towards the planned improvements for the town centre, surrounding roads and signage; 5) Car parking provision and lack of blue badge parking should be revisited together with proposals for managing the spaces. Permit restrictions, car club space and membership should be secured through the Section 106 agreement, which should also include the final travel plan with a Delivery and Servicing Plan and Construction Logistics Plan. Detailed cycle parking should be secured through condition.

13. Historic England: In the view study, the blue outline of the proposed development seems to be absent in some of the images. View of Fountain in Bushy Park looking east is not there.
14. Kingston Residents Alliance: Welcome development including revitalisation of Old Post Office and Telephone Exchange buildings providing a great asset and centre of interest for local business, niche shops and the promotion of cultural activities. Despite this, we object on the following grounds: lack of design quality, excessive height, scale, impact on historical context, such as Ancient Market, Victorian properties on Wheatfield Way, Fairfield Park, All Saints Church, Richmond Park and Hampton Court contrary to the Protection of Key Views in the Area Action Plan. Insufficient affordable housing. Impact on schools, GPs, hospital provision and other local infrastructure. Development fails to achieve high standards for sustainability and improve ecology and the environment. Kingston Council have not provided a framework for tall buildings for this site or the wider town centre. St George exhibitions do not show tall buildings and therefore their engagement with the community has been misleading.
15. Knights Park Residents Association: Object: inappropriate scale in proximity to two storey conservation areas of Victorian Villas and other nearby buildings. Impact on infrastructure and services. Excessive density. Impact on views/ skyline from Fairfield, the Market Place, Bushy Park and setting of All Saints Church (Kingston's only Grade 1 building) and impact on wind. Impact on privacy.
16. Riverside Residents' Association: Object to 21 storey tower
17. London Borough of Richmond Upon Thames: The overall size, height and position of the proposed development is considered to be excessive as the extent and prominence of the projection above the skyline would appear visually intrusive and fail to preserve the context of the historic assets of this Borough, including Listed Buildings and Grade 1 Historic Parks.
18. Elmbridge Borough Council: raise no objection on the basis that Kingston Council are satisfied that this development would not unduly compromise the quality of life of Elmbridge residents or the borough's environment.
19. National Planning Casework Unit: No comments

20. National Air Traffic Services: This proposal does not conflict with our safeguarding criteria.
21. Sport England: object: new developments should be required to contribute towards meeting the demand they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facility Strategy, Playing Pitch Strategy or other relevant needs assessment. If demand for additional sports facilities is not met, it may place additional pressure on existing sports facilities thereby creating deficiencies. Sport England are seeking clarification regarding identification of sports facility provision.
22. Network Rail: No objection.
23. Natural England: No likely or significant risk to those features of the natural environment for which we would otherwise provide a more detailed response, therefore no comment.
24. The Victorian Society: Object due to harm to setting of two listed buildings on site and the setting and character of Kingston Old Town and Fairfield/ Knights Park Conservation Areas. The restoration of the two listed building's fabric and re-use is welcomed.
25. Historic Royal Palaces: As the tower will be above the general skyline, winter time views and dusk/ night-time views from the Queen's apartments should be provided to enable final comments to be provided.
26. Friends of Richmond Park: The impact from Thatched House Lodge would be adverse (not beneficial) and would intrude greatly above the horizon. Lights at night from the taller elements could be intrusive.
27. English Heritage (Archaeology): The application lies within an Archaeological Priority Area for Kingston Town Centre and there is good potential for archaeological remains within the development site. The archaeological interest should therefore be conserved by attaching two conditions in relation to recording of the standing historic buildings and a programme of archaeological fieldwork.
28. London and Middlesex Archaeological Society: Object to 21 storey tower due to intrusion into views from Market Square, the settings of the adjacent conservation areas and the two on-site listed buildings. Welcome conservation/conversion of the listed buildings but this is undermined by the new development which is out of scale with these and which would harm the character and appearance of the Old Town Conservation Area.
29. Design Review Panel (Design South East): An independent review was undertaken. The design principles are generally sound, the mix of uses is appropriate for the location, and the re-use of the two listed buildings is welcomed. Support the argument for a taller building that could herald the

town centre in the approach from the south. Regarding the tower, concern that the architectural quality is not sufficient to justify its very considerable prominence in the local and wider townscape: it should be kept simple, upper projecting balconies should be removed. Concern was raised that it was slab like from the east and west. The 13 storey building is considered to be bulky and ungainly, has an uncomfortable relationship with the adjoining Listed Buildings whilst not offering enough to Ashdown Road. Concern about residential quality of the units which are indicative of too much development on site. Concern about the orientation and light to the public space to be created adjacent to the former post office building. Would like to see the scheme go further in anticipating or leading change elsewhere in the Eden Quarter. The Wheatfield Way frontage is not yet convincing. It should anticipate or even stimulate the prospect of a much calmer thoroughfare than the present relief road. Would like to see the public areas brought forward early in the development as declaration of intent about the intended quality of the scheme as a whole.

30. Council's Flood Risk Officer: Concern regarding managing/attenuating flooding for the fluvial zone 2 risks. This would need to be approached within any Flood Risk Assessment as the site falls within this zone as well as zones 3a and 3b.

31. Thames Water: The existing water supply and waste water infrastructure cannot accommodate the needs of this application. Conditions should be attached to ensure that development shall not commence until approval of an impact study on water supply infrastructure to determine the additional capacity required and a waste/drainage strategy including on and/or off site drainage works, which shall be completed prior to use of site and discharge of foul or surface water from the site. Conditions also required regarding surface water drainage and impact piling.

32. St John's C of E Primary and Nursery School: As the nearest primary school to the site, there is concern regarding the provision that Kingston Council intend to make for children living in these properties, given that applications for primary schools in the Borough exceed places available. The cost implications should be factored into the project.

33. Kingston Upon Thames Society: Welcome the proposed restoration of the Old Post Office and the Telephone Exchange, creation of a new public space, the intention to attract boutique shops adding to range of retail outlets in Kingston and use of bricks to match the predominant style of the town, the accommodation of the mini-Hollands scheme, the varied appearance to Wheatfield Way and the increased space around the listed buildings. Concern about the Telephone Exchange which appears hemmed in, excessive density and insufficient affordable housing at 15%. 21 storey tower is unacceptable being considerably taller than anything else and having an unacceptable impact on views from Richmond Park, the Fairfield and Hampton Court which would set a dangerous precedent for other locations in the town centre, such as Eden Walk.

34. TOPO (The Old Post Office): Welcome plans to conserve and bring into use the two Grade 2 listed buildings and the offer of two upper floors in the former main post office building, including one large room, to the community for community use. Much will depend on the building being brought up to a useable state, access, affordability, promotion and the relationship with the ground floor tenant which should be secured as far as possible through the application.
35. Salmon (SHP Opportunity Fund Ltd): Owner of Surrey House/ BoConcept/Hippodrome Nightclub/NCP Car Park/Lever House): Support principle, mix of uses and height, although the tall elements should not prejudice the future development/ regeneration of adjacent sites or impact on daylight, sunlight and over-shadowing. Increased density in a sustainable town centre location is to be encouraged, but should ensure appropriate private amenity space, residential amenity and correct balance of commercial and residential floorspace. Object to loss of town centre parking.
36. Luminar Group (owner of the Hippodrome on St James Road): Objection: potential for noise and disturbance to potential occupiers from visitors walking to or leaving the Hippodrome late at night which has existed for over 20 years and currently opens from 10pm to 3am Monday, Thursday, Friday and Saturday, although the existing license permits opening until 4am. The Hippodrome provides an important recreational facility for the community. The new residents may start to complain about late night drinking, noise and disturbance from visitors to the premises and lead to restrictions on the business thereby impacting on viability. If the Council is minded to grant planning permission, noise attenuation measures should be provided to the residential units to the highest standard with the consideration of mechanical ventilation to avoid the need to open windows during the evening in the summer months.
37. CQRA (Landlord for Charter Quay): Welcome redevelopment of site and listed buildings to be restored to active use. Concern re: impact on character of Kingston from intensity of development and scale of the tower. Balance required between residential environment for occupiers and for businesses to attract customers.
38. Carbon Reduction and Sustainability Officer: Energy Statement: The provided energy statement demonstrates how the development will meet an overall 35% CO2 emission reduction from building regulations part L 2013, which meets London Plan requirements and is in line with the energy performance needed for BREEAM Outstanding, meeting RBK Core Strategy Policy DM1 with regards to energy performance and emissions reduction. BREEAM and Code for Sustainable Homes: As CfSH can no longer be a requirement, a suitable level of energy efficiency should be met through the details as above. Water efficiency should be the subject of condition in accordance with Code level 4 equivalent. This should already be planned based on the submitted CfSH pre-assessment report which targeted code level 4. The application proposes to target BREEAM Excellent. Considering the refurbishment and listed building barriers encountered by the majority of retail and office development, the proposed Excellent rating seems reasonable. This

should be secured through the conditions below. District Heating: Core Strategy Policy DM2 requirements are met; the energy statement explains that there are no existing heat networks which to connect, and the scheme will use a local CHP powered communal heating arrangement. The developer has provided information to our team working on District Heating feasibility, which is greatly appreciated, and should ensure future connection is possible should a DHN come on-line in the future. Regarding RBK's ongoing district heat network feasibility work, we should have the results of the study shortly so will be able to fully evaluate the suitability of future connection to a network at a later date.

39. Environmental Health: The amenities of the new occupants will need to be protected against noise from road traffic movements along Wheatfield Way, Ashdown Road and Brook Street. An acoustic survey will need to be submitted quantifying the noise climate across the site. Kingston Town Centre has a vibrant night life with a number of nightclubs having licences which permit opening until 4am and large numbers of patrons leave the town via Ashdown Road and Brook Street. The noise assessment should include the potential impact of this upon the residential amenity of the proposed units and suggest mitigation measures in the form of sound insulation when necessary. Conditions are required regarding sound insulation, working hours, plant noise, opening hours and servicing of commercial units, a Construction Environment Management Plan, Construction in accordance with the Energy Statement, no burning on site, submission and implementation of contamination remediation scheme and reporting of unexpected contamination.
40. Neighbourhood Engineer: 132 car parking spaces are proposed, which would result in a shortfall of 233 spaces for the site in an area which is heavily subscribed. The lack of parking would lead to added pressure for residents parking provision in the area and therefore on the basis that residents are not eligible to apply for parking permits in the Controlled Parking Zone or car parks they raise no highway objections. 152 public car parking spaces would be lost which contradicts the vision of having a larger car park at the edge of the town centre to intercept traffic on the approach roads. Object to on-street servicing. Further information required regarding cycle parking provision to ensure that it is secured, covered and practical. A travel plan, car club space and 20% active/ 20% passive Electric Vehicle Charging Points. The drop off/ pick up area is not long enough to accommodate HGVs. Need to understand how the drop off/ pick up area will be controlled/ enforced to ensure no illegal parking takes place. A Section 278 agreement will be required for the new crossover, the layby, the footway and the removal of existing crossovers at the applicant's expense. The height of the car park/access to it should be 4.65m in height to allow fire brigade access. Development should take place in accordance with a construction management plan to be approved by the local planning authority.
41. Mini-hollands Team: The mini-Holland team does not object to the principle of development on the application site; however it does object to the failure of the applicant to specify a 4.0m strip of land running along its Wheatfield Way frontage to be dedicated as Highway to enable the

construction of that section of the mini-Holland cycling network. The team observes that the failure to dedicate sufficient land is contrary to Core Strategy 2012 policies CS6 and DM8 and the Proposals Map (strategic cycling network) 2012 where written evidence exists of the requirement for the land prior to the submission of the current planning application. A satisfactory negotiated resolution of the above will remove the mini-Holland team's objection to the proposed development.

42. Sustainable Transport: Additional information regarding the proposed cycle parking facilities required to clarify how the cycle stores are accessed, particularly the large basement store. Access routes within the store aren't clear. It also doesn't show the type of cycle parking that will be used and whether it is for residents/ employees etc. The proposed amount of public cycle parking provided at ground level is inadequate and should be increased.
43. Designing Out Crime Officer: Full Secured By Design accreditation should be sought. Clear lines of vision should be designed into courtyard landscaping and into the public realm. Concern that colonnade feature behind raised planters could provide shelter for homeless/ rough sleepers.

RECONSULTATION (APRIL 2015 PROPOSAL):

44. Site and Press Notice Displayed. Those within original consultation area and those who made previous representations were reconsulted:
45. 318 letters reiterating previous concerns and additional comments: Changes not significant; Objection to height of tower which is higher than Lever House and Kingston College; Existing tall buildings should not be used as justification for tall buildings on this site; A landmark building is not required and if it does a landmark building need not be tall; Concern regarding quality of design; Design review panel did not support proposal; Insufficient changes to make this acceptable; Concern that visual representations are inaccurate; Amendments do not overcome concerns in this regard, exceeding the height in the Eden Quarter Development Brief (images within this document indicate 13 storeys for the tower); Declaration of this area as an "Opportunity Area" is being used to partially justify this development. Tall Building Supplementary Planning Document should be finalised prior to allowing this development. Excessive density out of keeping with surrounding density of Fairfield/ Knights Park, impact on historic buildings, amenities of adjacent properties, noise reflecting from proposed buildings and impact on traffic increased pressure on services/ facilities; Inadequate car club spaces; Concern that units won't provide housing for local people or sufficient affordable housing; Lack of play space/ sports facilities provision; Some support for the principle of development, including additional housing, bringing back into use the listed buildings, shops, cafes and restaurants; Any residential units should be sold to British people not used as investments; Residential development should not be provided in the town centre; Tall development to the south of the post office square will block sunlight to this space and this space will be retained by the developer; Proposal will not humanise

Wheatfield Way. Lack of access to tallest building; Lack of public art; Concern regarding impact on street scene of Fairfield and Queen Anne's statue in the Market Place and light to Brook St; Lack of visual link between listed buildings; Lack of compliance with Eden Quarter Development Brief/ policy; Impact on traffic, parking, air quality, schools, archaeology, policing, light, privacy; Adds little commercial floorspace; Poor sustainability level; Over 5 years build and therefore site construction traffic is unacceptable. Insufficient car club spaces and free car club membership funding; 1 response would prefer to lose the existing heritage buildings on site if height of proposals could be constrained to 8 storeys.

46. 18 letters of support for development of vacant site, including a number from local businesses: This area is in desperate need of investment and currently offers nothing of value and which has been an eyesore for too long. Significant time and thought has been put into this. Council should work hard to ensure as much benefit as possible through jobs, homes for local people and beautiful public spaces. The proposed heights and mix of uses and open space should provide a viable scheme to enable it to become a reality. Community space, independent retailers and public space will be a benefit to Kingston and should not be lost due to concerns about a tall building. This will encourage further investment in the town centre which is required if Kingston is to remain a successful and attractive town centre. It will boost the local economy bringing new shoppers, residents, jobs and investment to the town centre. Mini-Hollands route and cycle parking is beneficial to encouraging cycling rather than car use. New housing is required here and in London and new residents will bring more prosperity to the area and support local shops, restaurants, etc. If the site were to remain derelict, if no credible alternative comes forward, it would provide no amenities and would detract from Kingston's character.
47. 1 letter supporting tower, but concerned about other blocks of 9 storeys and higher.
48. Laurie South, Chair, Kingston and Surbiton Constituency Labour Party: High rise building is inappropriate in Kingston town centre, poor architectural quality, lack of affordable housing, will subsume Frances House.
49. TOPO (Campaign group for conservation and community use of former Post Office buildings): Welcome plans to conserve and bring into use more space in the town centre, which we could make good use of, subject to it being brought up to a useable state, access and affordability.
50. Housing: Support: The applicant has confirmed that they would deliver affordable housing on Scenario A consisting of 22 affordable rent units and 32 Intermediate Discount Market Sale (DMS) units to agreed and acceptable affordability levels. Support the unit mix on this site which is considered suitable for one and two bedroom flats for households wishing to downsize from family housing. The site is considered suitable given its proximity to the town centre and transport links. The tenure split of the affordable housing is 40/60 affordable rent to intermediate for Scenario A

and 42/58 for Scenario B, which is not policy compliant but is acceptable. The intermediate housing would be provided as discount market sale where the purchaser buys a portion of equity in his/her home, although there is no rent to be paid on the un-owned equity. The unsold equity would be held by the Council. This form of housing is acceptable and the affordability levels have been agreed with the applicant, as per the table below:

Unit type	Intermediate (DMS)	DMS prices	Household incomes
Manhattan	5	5 x £203,000	£58,000
1 bed two person	22	6 x £122,500 7 x £168,000 9 x £203,000	£35,000 £48,000 £58,000
2 bed	5	5 x £168,000	£48,000
Total	32	Average	£49,938

DMS homes are typically sold subject to a resale covenant which secures them as affordable housing in perpetuity. This resale covenant binds all subsequent purchasers, unless released by the Council, and we would expect the same eligibility criteria to apply to subsequent sales as to the original sale, which would normally include income eligibility, living/working in the borough and not owning property elsewhere, although for mortgage purposes there has to be a cascade in the event of default. The applicant has confirmed that the DMS units would be pepper potted around the development, however, the development does not incorporate leisure facilities and service charges would be kept inherently low. The applicant has confirmed that they would start discussions with partner Registered Providers regarding the affordable rented housing if planning consent was granted. The applicant has agreed to provide 11 parking places to affordable housing residents, which represents provision for approximately 20% of the affordable housing units. The RP would not incur a charge for the parking, however, the user would incur a small service charge to cover lighting, cleaning and maintenance. Revisions have been made to the plans which improve light and layout in some of the units. The applicant has confirmed that the kitchens would be ventilated mechanically to provide adequate ventilation to internal kitchens. The applicant has confirmed that five wheelchair standard homes would be included, as per revised plans, including three units on Level 1 (1 x 1 bed and 2 x 2 beds) and two units on Level 2 (2 x 2 beds).

51. Public Health: Consulted with colleagues in NHS England who commission primary care in Kingston. Practices that would serve the redevelopment are already at or above the recommended level of space provision for the population they serve. Even if the population of the redevelopment were spread over all the practices they could register with, the combined effect would be to exacerbate the existing pressure on local health services. We would therefore support seeking planning contributions under Section 106 Planning Obligations to offset this impact.
52. Education: Section 106 contributions should be sought to expand King Athelstan Primary School.
53. Neighbourhood Engineer: 132 car parking spaces are proposed, which would result in a shortfall of 233 spaces for the site in an area which is heavily subscribed. The lack of parking would lead to added pressure for residents parking provision in the area and therefore on the basis that residents are not eligible to apply for parking permits in the Controlled Parking Zone or car parks they raise no highway objections. 152 public car parking spaces would be lost which contradicts the vision of having a larger car park at the edge of the town centre to intercept traffic on the approach roads. The trip generation from residents of the site is modelled to be 34 during the AM peak and 32 movements during the PM peak and considered to be acceptable in terms of their impact on the highway network. The applicant is proposing to provide 578 cycle stands. A travel plan and 20% active/ 20% passive Electric Vehicle Charging Points are proposed. The drop off/ pick up area is not long enough to accommodate HGVs. Need to understand how the drop off/ pick up area will be controlled/ enforced to ensure no illegal parking takes place. A Section 278 agreement will be required for the new crossover, the layby, the footway and the removal of existing crossovers at the applicant's expense. The height of the car park/access should be 4.65m in height to allow fire brigade access. Development should take place in accordance with a construction management plan to be approved by the local planning authority. A car park management plan will be required.
54. Mini-Holland Team: Withdraw objection to the proposals as presented provided that what remains after tree planting is: Minimum 1.8m clear unobstructed pedestrian space (behind the trees); Minimum 3.0m clear unobstructed cycle track. To fulfil the clear space requirement above it may be that street lighting needs to be installed within the line of trees, on the central reservation or on buildings
55. Sustainable Travel Officer: The Travel Plan is acceptable. The type of cycle parking proposed is not normally acceptable, so suggest a condition requiring full details of cycle parking to be submitted for approval.
56. Tree and Landscape Officer: The proposed external landscaping is acceptable, in particular the planting of trees shown along Wheatfield way provided that these are planted in approved large cellular confinement

systems with structural soil and irrigation, that they are anchored below ground instead of staking and that they are the following species and size at time of planting: London Plane 6-7m staggered with Tulip Trees 6-7m so that there is Plane Tulip Plane Tulip Plane etc. The feature tree on the corner of Wheatfield way should be a large Liquidambar planted at 6-7m. This is to continue the scheme planted on Penrhyn Road as a main access to the town centre and one way system. Any trees planted on Brook Street should be capable of growing well in pollution and shade. The internal courtyards should include more mounding and hollows etc and allow for a less formal space with trees being planted into hillocks for greater soil depth rather than planters.

57. Carbon Reduction and Sustainability Officer: Energy Statement: The submitted energy statement is structured according to the GLA's energy hierarchy as required, and provides the emissions reduction contribution from each individual stage of the hierarchy. Energy demand is reduced through the implementation of improved insulation standards from Building Regulations Part L, high levels of air tightness with mechanical ventilation and heat recovery. The worst case scenario (i.e. building regs equivalent) is proposed for thermal bridging, which may be improved upon during detailed design/construction. It is proposed penthouse apartments will have cooling provided through a communal chilled water system, while passive cooling measures will be implemented elsewhere to eliminate the need for cooling, such as air tightness and insulation. Further measures to minimise solar heat gains during the summer such as shading provided by balconies and solar control glazing (particularly important for single aspect flats) are proposed. Green roofs are to be implemented which may also provide some shading and increase the heat transfer away from the building structure through evaporation/transpiration.
58. Measures are proposed for the refurbishment of listed buildings such as improved glazing and insulation, however there are parts of the old telephone exchange building that will remain solid brick and therefore be a significant source of heat loss (which is a concern). It is appreciated that the listed status provides some barriers regarding this, however it is not explained adequately why implementing internal wall insulation for example is not considered. The refurbishment cannot easily be taken into account within the same calculations as the new build, however the emissions reduction associated with these parts of the development achieving BREEAM Excellent demonstrate a good level of improvement.
59. A site wide communal heating and hot water system is proposed, to be delivered by a CHP system scaled to provide 100% summer hot water and heat demand, with gas top up boilers to provide hot water and space during the winter. The implementation of this communal system is expected to contribute 29% towards the 35% emission reduction target. Steps are also expected to be taken to ensure connection to a district heat network is possible.
60. The remaining emissions reduction requirement is met through installing 128 Solar PV panels across 457sqm of roof space. In total the 35% emissions reduction target from building regulations part L 2013 should be met via the measures detailed, and should be secured using the

conditions as below.

61. Code for Sustainable Homes/ BREEAM: As CfSH can no longer be a requirement, a suitable level of energy efficiency should be met through the details as above. Water efficiency should be dealt with through the conditions proposed below, and are in line with Code level 4 equivalent. This should already be planned based on the submitted CfSH pre-assessment report which targeted code level 4. For the office and retail parts of the development BREEAM assessments in line with Policy DM1 are required to be carried out. The application proposes to target BREEAM Excellent. Considering the refurbishment and listed building barriers encountered by the majority of retail and office development, the proposed Excellent rating seems reasonable.
62. Historic Royal Palaces: Despite the reduction in height to 19 storeys, the proposed residential tower remains a tall building and will still have an impact on views from Hampton Court Palace and Home Park and it remains difficult to understand just what the extent of that impact will be. Concern that the view from the west of Shepherds Cottages, within Home Park, underplays the impact of the development during the day and night. Measures should be put in place to ensure light from high level windows are automatically obscured after dark to prevent intrusive light emission. An additional view has been provided from the Queen's Apartments and agree that the residential tower would not be visible, being obscured by existing trees. Lighted windows in the tower would be visible after dusk and the tower itself would come into view should the existing trees be lost. No views have been taken from the third floor of the Palace above the Queen's Apartment. We consider this an omission as we intend to make these publicly accessible as soon as funding permits. A further reduction to the height of the tower element would significantly help to mitigate concerns.
63. Natural England: No objection.
64. National Rail: No objection.
65. Designing Out Crime Officer: Post Office Square and Brook Street: Consider these to be good changes regarding the security for communal areas, removal of the colonnades will remove the chance of this area being used as a shelter by rough sleepers. The distinct separate public spaces will encourage use so increase activity which can reduce the risk of crime. Wheatfield Way: Again these are good changes, although I would like to point out that tree planting should not impede the opportunity for natural surveillance or create potential hiding places. The trees should have no foliage, epicormic growth or lower branches below 2.4 metres. Servicing and access: The car parking areas should follow Park Mark principles including access control, lighting, and finishes. Although the cycle parking is within separate stores, access to the residential cycle parking appears to be via the commercial bike store. The access to each store should be separate. Bookend Building on Ashdown Road: The three storey colonnade would be more open to the elements than the original colonnades which were proposed for the Brook Street elevation, but still have the potential to provide shelter from inclement weather for the rough sleepers so I would like to view the

proposed security policy to combat this. I would recommend that Secured by Design (SBD) principles should be incorporated as a minimum security standard for this development and that full SBD accreditation is sought.

66. Petition update: A total of 1052 signatures have been made for Change.org petition: Reject plans for high-rise buildings in Kingston
67. Kingston Resident's Alliance: Overdevelopment: Too dense and high with little justification for the many and significant policy contraventions. It should be rejected due to: Visual Impact and impact on surrounding conservation areas and adjacent Buildings of Townscape Merit; insufficient affordable housing; Excessive height and scale which is greater than anything else in Kingston and the heights envisaged by the Eden Quarter Development Brief; Insufficient design quality which fails to incorporate materials and detailing that complements the historic nature of the listed host buildings or the traditional buildings found in Kingston; Excessive density; Inadequate sustainability standards contrary to Council policy; Impact on parking, transport, infrastructure and services; Ineffective public consultation by St George which did not show height of proposed buildings or respond to feedback; Public Realm will be overwhelmed by tall buildings to the south casting almost permanent shade. Lack of access to the tall buildings and lack of public art.
68. Mill Street Residents' Association: Still object: Reduction of two storeys from 21 to 19 storeys is still unacceptable as are the height of the other proposed blocks. RB Kingston's fears that as the developers achieved 16 storeys on Appeal for flats on the riverside to the north should not scare them into accepting this height. The position of this site in the centre of this Ancient Market Town is very different. Its position between two conservation areas would destroy the skyline and dwarf the two listed buildings on site. Totally unacceptable to build on this scale opposite two storey Victorian homes to the east and the Ancient Market Place to the west. St George's representations show the listed buildings bathed in sunlight but not showing how they will look if the development is allowed is very misleading. They will be cramped and insignificant amongst the tall ugly buildings surrounding them. Too dense and insufficient affordable housing. Historic England's rejection of these proposals should be taken into serious consideration by Councillors and Officers when considering this application.
69. Tech city: The telephone exchange will provide the social and physical infrastructure needed to underpin the development of a thriving cluster of growth space for local firms on the site and more broadly for Kingston. The leadership St George are showing is exemplary and is welcomed as part of the landscape of the broader London tech and high growth corridor. Access to event spaces and a cafe to support the building can enable companies to scale until such time as they are mature enough to participate in the broader property market.
70. Kingston Mill Public House: Support: The development would regenerate

an ugly and under-used site into a new destination with an attractive public square, new commercial space and homes bringing new spending and footfall for local businesses across the town centre. The redevelopment of the Old Post Office is long overdue.

71. National Planning Casework Unit: No comments.

72. Kingston Upon Thames Society: Welcome restoration of the Old Post Office and Telephone Exchange and addition to retail outlets. Concern that public space will be poorly sunlit and that any seats will be linked to commercial outlets. Support revisions to incorporate mini-Hollands scheme on Wheatfield Way and mix of heights. Don't like unbroken frontage with its lack of permeability. Telephone Exchange building looks hemmed in and tower between listed buildings is particularly obtrusive. Excessive density and insufficient affordable housing. 19 storey tower is excessive being taller than anything else nearby which would have an unacceptable impact on views from Richmond Park and the Fairfield. It would set a dangerous precedent for other locations, including Eden Walk. Don't accept that this would provide an appropriate gateway to the town.

73. Mill Street Residents' Association: Overdevelopment: too dense, too high, visual impact including impact on conservation areas, the Fairfield, Richmond Park and Home Park, insufficient affordable housing, impact on parking, transport, infrastructure and services, public space will be dark and windy. No right of assembly granted to public space. No public art. Lack of public access to tower.

74. Historic England (Built Environment): Encourage the Council to reject these proposals. Welcome bringing back into use two Grade II listed buildings which are on the Heritage at Risk Register. The proposals would, however, cause significant harm to the setting of the listed buildings on the site due to the 13, 10 and 9 storey elements in particular, and harm to the setting of the Market House due to the proposed 19 storey tower, notably the glazed top. The development would detract from the setting of the Kingston Old Town Conservation Area and the Fairfield/Knight's Park Conservation Areas, failing to meet the statutory test to preserve and enhance the character and appearance of locally and nationally designated heritage assets. It would also cause unnecessary and undesirable harm to the setting of Richmond Park, Bushy Park and Hampton Court Park and Hampton Court Palace which is of international significance, by increasing the prominence of built form of Kingston town centre and reducing the sense of openness of these historic landscapes, in particular due to the proposed tower with its light box tip. The harm has not been justified. The proposal does not meet the Council's detailed guidance for development on this site and should be in accordance with the Eden Quarter SPD. Insensitive post war developments have undue dominance in near and distant views in Kingston. Regrettably the tower would surpass these buildings in height. As this site would clearly benefit from development and is a key part of the Eden Quarter Masterplan, we would encourage the Council to reject

these proposals and encourage the developer to return with a scheme that respects its context and the unique identity of Kingston. Disagree that the proposals represent distinctive architecture that respond to the prevailing rhythm and articulation of the historic and modern buildings in the surrounding area, as the proposal is similar to other developments across London.

75. St George's comments in relation to Historic England's letter:

76. Pleased to note Historic England's (HE) support for RBK's aspirations for delivering intensification in the town centre and the proactive approach being taken to providing a positive framework for such development. Further, we welcome HE's recognition that such intensification is the best way to ensure that RBK's heritage assets have uses that enable their continued maintenance and allow them to make a positive contribution to the local townscape.
77. The design of the submitted scheme evolved to more closely reflect local character and identity not least that derived from Kingston's heritage assets. We hold that the planning application shows a clear and comprehensive understanding and appreciation for the individual and positive qualities of the heritage assets potentially affected by the proposed development. Moreover, the proposals will better reveal the historical significance of the site's listed buildings, something which is currently inhibited by the fragility of their current vacant state and their poor setting. We welcome HE's support for the re-use of these buildings but consider that greater weight needs to be placed on the benefit of doing so, as both buildings are on the Heritage At Risk register, have been vacant for up to 31 years, and are in a very poor state of repair.
78. The planning submission provides a reasoned justification for the limited harm it will cause to these two listed buildings, as a result both of the interventions necessary to bring them back into use, and of the need to ensure that the former Telephone Exchange - and the development as a whole - engage appropriately with Wheatfield Way. This harm is outweighed by the benefits brought about by the proposed development (this is explained further in the policy section below). We maintain that the effects on all other heritage assets are either beneficial or neutral.
79. The future character of Kingston, its identity and sense of place would be enhanced by the submitted scheme. The submitted scheme would help RBK deliver on its objectives, as set out in the Eden Quarter SPD (2015), and we believe that it is consistent with RBK's aspirations for the Old Post Office site as detailed in that document. We strongly disagree with HE's assertion that the application would not meet the Government's definition of sustainable development. The proposals are clearly sustainable in economic, social and environmental terms and therefore clearly meet the definition of sustainable development in paragraph 7 of the NPPF.
80. Kingston Town Neighbourhood Conservation Areas Advisory Committee:
It appears that the density exceeds London Plan standards while many units are below the range in the London Plan. The size of the outdoor spaces appears to be limited and details of the proposed control and management of the space should be agreed and its impact on the living conditions of the residential properties. The buildings should not exceed 16 storeys, the equivalent of Kingston College and Kingston Riverside.

The proposed buildings have limited architectural merit. The buildings should be designed to reflect light down to the ground to avoid shadows. Affordable housing provision should be revisited.

81. Historic England (Archaeology): reiterate previous advice.
82. Environment Agency: No objection, subject to final details of the compensatory flood storage and emergency escape routes. The commercial units as proposed at ground floor level would be liable to flooding and although we would prefer them to be above flood level understand that Kingston Council wish these to be at ground level to improve the street scene and do not object to this approach.
83. Council's Flood Risk Officer: Although at least 50% betterment in peak runoff rates are proposed, this does not necessarily achieve the London Plan requirement which aims for greenfield runoff rates. Supportive of rainwater harvesting and green roofs which will assist with the reduction of surface water runoff from the site. Need clarification as to why a number of the surface water manholes have status of flood risk or surcharged. Applicant needs to demonstrate that the drainage system will be suitably managed for the lifetime of the development to ensure that it continues to work effectively in reducing surface water flood risk.
84. Thames Water: No objection subject to provision being made for drainage to ground, water courses or a suitable sewer, installation of properly maintained fat traps, a study of existing water supply to determine the magnitude of any new additional capacity required and a suitable connection point and impact piling only taking place once a piling method statement has been undertaken.
85. Natural England: Pleased to see new street planting, residents' gardens and a green boulevard. Green Infrastructure is encouraged as this location would benefit from enhanced green infrastructure provision. Welcome the provision of green and brown roofs. Standing advice should be used to assess the impact on protected species.
86. Kingston First: Kingston is a thriving town centre, but as consumer shopping habits and expectations continue to change, mobile technology offers greater choice, consumers search for the authentic experience and the West End and the competing centres of Croydon and Guildford continue to attract significant new development, the need to move forward, embrace change and growth is more important now than ever before. We support the plans of Kingston Futures. We support the principles of developing the Post Office, which has been underused and an eyesore in the town centre. The proposals would provide the opportunity to invigorate this part of the town and to kick start the regeneration of the Eden Quarter. The main benefits include: A greater number of people living in the Town Centre providing additional consumers for businesses; a high quality public realm/ destination; 200 plus permanent job opportunities; temporary jobs and apprenticeship opportunities during the development of the scheme, greater opportunity for businesses to recruit locally

87. Surrey County Council: No comments

88. Kingston Town Neighbourhood Planning Sub-Committee: In considering the proposals a range of views were expressed by the sub-committee. There was a general opinion that a balance was needed between the benefits afforded by the scheme and its bulk and height and the quality of design is important. Members welcomed the reduction in height of the tall tower from 21 to 19 storeys and the recessing of balconies but felt that the building was still too high and questioned the addition of a light box at the top. Proposals for public access to the top of the tower such as a restaurant would be welcomed. Members noted that the view from Hampton Court was obscured by yew trees and there are increasing numbers of tall buildings in the London area. Suggestions were made about possible conditions including preventing the addition of external aerials and satellite dishes to the tower and clutter on balconies. A request was also made to try and ensure housing is for residential purpose and to avoid "buy to let". They noted that currently part of the area is derelict, and Kingston requires additional housing including affordable housing and particularly key worker housing. The viability of the scheme needs to be taken into account and a review mechanism should be considered. The provision of additional residential accommodation in the town centre was welcomed and it was suggested that this could have a positive impact on the night time economy and help visitors feel safer. Members expressed different opinions about the visual impact of the scheme: some felt that it was not appropriate for a historic town but others welcomed the integration of the old with the new. The quality of the design was considered to be an important issue in relation to the success of the development. Members welcomed the economic growth and activity which would be afforded by the proposals together with the refurbishment of the two listed buildings.

89. Objection from Councillor Kevin Davis, Leader of the Council: The density is aligned with the London Plan. Concern about lack of visibility of viability assessment, however, the viability assessment suggests level of affordable housing is appropriate and a review mechanism will ensure the Royal Borough of Kingston gets its fair share. Height in itself not a problem if the building is of an excellent and spectacular design. Height provides extra money for schools, affordable housing and the restoration of the listed buildings. The redesign has been an improvement, moving away from a solid form to more glass and a different scale. The finishes have improved considerably and the setting of the listed buildings has been adjusted and more public realm has been provided. This development will provide many benefits to Kingston and in policy terms this is difficult to turn down because on balance it conforms to so many things that we want locally and what London expects of us regionally. However, despite its changes, this development is not exceptional: It lacks permeability; still has too many balconies; a glass block on top that adds nothing to the design and concerns still regarding the tall building's relationship with the corner and the lack of activity on that corner. Concern about a building that St George do not own within the midst of the development. This building does not stir my heart and this application should be rejected on the grounds of design quality, finishes and

materials.

90. London Borough of Richmond: maintains its strong objection: The overall size, height and position of the proposed development is considered to be excessive in that the extent and prominence of the projection above the skyline would appear visually intrusive and as such fail to preserve the context of many of the historic assets of this borough, including Listed Buildings and Grade 1 Historic Parks.
91. The Richmond Society: Grateful for reductions in height, however, the bulk and mass would be clearly visible from important points in Richmond Park and would remain a significant impact on the park which would reduce the enjoyment of the park for all.
92. Council for the Protection of Rural England (London): Concern about the height of the proposed development and its impact on protected views and vistas and concern that insufficient weight is being given to the impact on these views, including the view from Richmond Hill.
93. Network Rail: No objection or further observations.
94. Luminar Group (owner of the Hippodrome on St James Road): Objection: reiterate previous concerns. Acknowledge that noise insulation and acoustic ventilation are proposed to reduce the impact of noise, but that scheme otherwise unchanged.
95. Kingston Race and Equalities Council: Support redevelopment of this site, including the Old Post Office which has lain vacant and derelict since its last use around 1995. The private sector development of this site represents the best positive opportunity as it provides offices and a community resource, which the public sector does not have the resources to provide. This will also provide additional housing which is lacking in Kingston. St George currently engage with the voluntary and community sector to provide space at the Former Post Office when it is unused and available. This development will make the site and Kingston a better place.
96. London Fire and Emergency Planning Authority: Burning is not the recommended method of disposing of waste materials and the Council's Environmental Health department should be contacted before such methods are employed.
97. RECONSULTATION (SEPTEMBER 2015 PROPOSAL):
98. Site and Press Notices displayed. Initial consultation area, statutory consultees and those who responded reconsulted:
 - a) 95 letters reiterating previous concerns and additional comments:
 - b) No significant improvement in terms of the height of the tower. Design and materials are not of sufficient quality. Maximum height should not exceed 35m high Unilever House/ Brook House/ Kingston College/ 6 storeys/ 8 storeys/ 9 storeys/ 12 storeys/ 13 storeys as per Eden Quarter Development Brief. Kingston College should not be used as a precedent for a tall building, as it is of no architectural value. The reduction in height does not make this scheme acceptable. Not

convinced that this proposal is an improvement over previous proposals. It will tower over and ruin Kingston's beautiful riverside, parks and gardens and the settings of the on-site listed buildings and views to the site. Impact on Fairfield Conservation Area. Welcome improvements, although this is still not of sufficient quality to meet residents and neighbours previous concerns, including the Leader's comments that development of this site should be of very high quality. Quality is satisfactory, but density is excessive in this sensitive location. Would rather site remained as existing than be developed as proposed. Tower is now same height as it started prior to submission of planning application. Fortress approach. Given changes to design of tower, concern that overall development does not now work together. Consideration should be given to how this will be viewed with the Eden Walk redevelopment. No public access up tower. Welcome use of red brick and stone. Iron railings should be retained.

- c) Insufficient parking. Public parking should be provided/ retained. Extra retail in Kingston will exacerbate traffic congestion generating further air pollution and road casualties.
 - d) Insufficient affordable housing. Concern at what will happen to Frances House residents. Housing should not be for buy to let investors.
 - e) It does not provide a well sunlit public space. St George images show sunlight in square that is misleading. Increased wind. Circulation and commercial tables will reduce public use of the proposed space.
 - f) The Post Office should all be used for community use rather than commercial.
 - g) Loss of privacy and light to surrounding properties.
 - h) Welcome redevelopment of partially derelict site, new housing, restoration of old post office and new shops and restaurants. Welcome demolition of Frances House.
 - i) Insufficient cycle route connectivity. Some support for improved cycle facilities, although extra ground level cycle parking should be provided. Lack of through routes for pedestrians.
 - j) Telephone Exchange wasted as offices and should be used for hotel or restaurant.
 - k) Concern that development does not represent sustainable development.
 - l) Disruption during construction.
 - m)
99. 110 tick box cards: reiterating objections as above.
100. 2 supporting proposed development.
101. 4 comments: Application is much improved, including the corners and through provision of public art. Much improved, although 16 storey building is too high. Pleased that no on-street parking permits will be provided for residents. Concern about limited parking and amount of affordable housing. The new residents should not be able to apply for parking permits due to existing parking pressure. More jobs and housing are required for the present and next generation
102. 27 letters of support: Improvement on earlier plans/ satisfactory compromise. Welcome reduction in height of tower and reduced number of homes which now provides a fitting gateway to the town centre. The existing site is squalid and an eyesore providing a poor entrance to the town centre and should be regenerated now. This will improve a part of

the town in need of regeneration and inject much needed life into this part of the town centre. This will provide more housing and jobs. The proposed height is acceptable. It will respect the adjoining residential area. Development would allow listed buildings to become centrepieces. Unconvinced that sorting office at rear of Post Office should be retained. More car parking required.

103. Greater London Authority: The proposed changes do not fundamentally alter the position outlined in the Greater London Authority's Stage 1 report. The changes will be considered in the Greater London Authority's Stage 2 report.
104. Historic England: Welcomes the alterations made, in particular the reduction in the height of the tallest elements of the scheme and the reconsideration of the detailed design approach. The extent of harm to the historic environment would be reduced in comparison to the earlier proposals. The changes do not, however, eliminate harmful impacts which should be avoided, in particular due to the height of the 16 and 12 storey elements and is therefore not in line with national planning policies contained in the NPPF or the Council's policies relating to heritage, design or this town centre and exceeds the heights set out in the Eden Quarter Development Brief SPD. Support re-use of the two listed buildings and those elements of the scheme that comply with the Eden Quarter Development Brief. Care needs to be taken when assessing the impact on the setting of the historic assets. Once the extent of harm, individually and cumulatively have been established, a clear assessment of if and how the public benefits clearly and convincingly outweigh the harm. Historic England considers that the proposals would still cause harm to the setting of the listed buildings on the site and detract from the setting of the Market House. It would also detract from the Kingston Old Town Conservation Area and the Fairfield/ Knight's Park Conservation Areas failing to preserve or enhance the character and appearance of locally and nationally designated heritage assets. The harm to the setting of Richmond Park, Bushy Park and Hampton Court Park and Hampton Court Palace is still perceptible and still lacks a convincing justification. However, due to the reduction in the height of the tallest element of the scheme, we accept that these impacts have been reduced and that the degree of harm would be smaller than the previous proposals.
105. Historic England (Archaeology): Reiterate previous advice.
106. Historic Royal Palaces: Welcome reduction of the tallest element from 21 storeys originally to 16 storeys, which addresses most of our concerns about impact on key views from the palace. Note, however, that there has been a change in materials to glazing for the topmost storeys. Seek reassurance that there will not be any light spillage from the facades facing the palace.
107. Environment Agency: reiterate previous comments and suggest conditions. In addition they suggest provision of flood resilience and resistance measures to the less vulnerable ground floor commercial uses and do not support the approach of allowing the commercial premises to flood, although this is for Kingston Council to decide.

108. Thames Water: Reiterate previous advice and suggested conditions.
109. Natural England: No objection: Previous advice still applies.
110. Sport England: Welcomes the proposed financial contribution of £157,500 being secured via a Section 106 agreement towards improvements to the Fairfield Recreation Ground. The local authority should satisfy itself that the proposed development is in line with the NPPF, in particular Principle 12, and Kingston Core Strategy Policies DM5b Green Belt, Metropolitan Open Land and Open Space Needs, DM24 Protection and Provision of Community Facilities and IMP3 Securing Infrastructure and the Kingston Playing Pitch Strategy (which identifies that there is a shortfall of all pitch types for future demand except for adult pitches. The Kingston Playing Pitch Strategy also identifies a number of recommended actions for the Kingston sub area. Further financial contributions could therefore be sought to help deliver one or more of these recommended actions. Sport England therefore maintains its objection, although will be happy to review its position if further mitigation measures are proposed to meet the new sports facility needs arising as a result of the development.
111. Friends of Richmond Park: The reduction in height is welcomed, however, the impact on the view from Richmond Park would be unacceptable. The justification that it would improve the outline of the town against the hills to the south-west is misconceived. There is no merit in marking out a town centre by means of over-dominant and visually intrusive buildings which will have a major impact on a view which is acknowledged to be one of high sensitivity. A further reduction in height, so that no part of the building would intrude above the horizon when viewed from Thatched House Lodge in Richmond Park should be required before permission is granted.
112. The Old Post Office Consortium (TOPO): Welcome conservation of Grade 2 Listed Post Office Buildings and the offer of the two upper floors in the former Post Office building to the community and are sure that local community, arts, environmental groups will make very good use of this town centre site for events and office space and bringing this neglected building and site back to life. Successful community use will depend on the building being brought up to a useable state as well as accessibility, affordability, active promotion and management of the venue and a cooperative relationship with the ground floor tenant. Our comments relate solely to our remit of securing community space on this site.
113. Kingston Residents Alliance: Welcome the changes, especially the reduction in height of the tower. The changes don't, however, go far enough therefore object to this proposal. Concern that this represents a piecemeal approach to planning of this area. The proposal does not comply with the National Planning Policy Framework (NPPF) "Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise" as the proposal exceeds the Eden Quarter Supplementary Planning Document heights. The tower is not of

exemplar design. The scheme fails to comply with the London Plan on “The impact of tall buildings proposed in sensitive locations” and Historic England/ CABI guidance for tall buildings. The proposal would not be sustainable development nor respond to local distinctiveness in accordance with the NPPF. Likely to lead to isolation for residents. Would detract from setting of heritage assets. Poor environmental standards. Impact on adjoining development sites due to overshadowing. The development has not taken account of the views of the local community as required by the NPPF.

114. Mill Street Residents Association: Reduction in height of tower welcomed, although this is only one storey below the original proposal. Object due to visual impact of tall buildings on historic surroundings and the Fairfield; Excessive height/ density/ insufficient quality; Lack of sufficient affordable housing; Inadequate room sizes in some residential units; lack of permeability, impact on parking in area and schools/ healthcare facilities. The proposed public space will be in shadow from tall buildings to the south, will be windy and will not provide a useable public space. No provision of public art and lack of access to tall building. It is with regret that we object as we want the site to work and benefit business, the existing heritage assets and the community at large.
115. Zac Goldsmith (MP for Richmond Park and North Kingston): Welcome reduction of height, although consider height is still disproportionate although appreciate that Kingston College building next door is the same height. New designs are no less inappropriate for the area and seem not to have taken into account the context. This proposal does not take the opportunity to enhance Kingston’s historic town centre. Urge the committee to reject the application. Insufficient affordable housing.
116. Elmbridge Borough Council: No objection.
117. Kingston First: Kingston is a thriving town centre, but as consumer shopping habits and expectations continue to change, mobile technology offers greater choice, consumers search for the authentic experience and the West End and the competing centres of Croydon and Guildford continue to attract significant new development, the need to move forward, embrace change and growth is more important now than ever before. We support the plans of Kingston Futures. We support the principles of developing the Post Office, which has been underused and an eyesore in the town centre. The proposals would provide the opportunity to invigorate this part of the town and to kick start the regeneration of the Eden Quarter. The main benefits include: A greater number of people living in the Town Centre providing additional consumers for businesses; a high quality public realm/ destination; 200 plus permanent job opportunities; temporary jobs and apprenticeship opportunities during the development of the scheme, greater opportunity for businesses to recruit locally, new offices in the town centre which has a shortage of office space approaching a crisis point, and the Post Office has stood empty for and derelict for over 20 years. Kingston cannot and must not stand still. There is a need for change. We encourage all stakeholders to embrace and capitalise on the opportunities the development of this site offers to the town.

118. Designing Out Crime Officer: The colonnade areas should be included in the CCTV coverage to monitor any possible issues with homeless persons sheltering and sleeping there. There should be no links between residential and commercial/office areas. The car parking areas should follow the Park Mark ® safer parking scheme standards to ensure the safety of people and vehicles. The landscaping within new public realm area at the junction of Wheatfield Way and Ashdown Road should allow for a vision channel to provide surveillance throughout the area. Secured by Design (SBD) principles should be incorporated as a minimum security standard for this development and full SBD accreditation should be sought.
119. Network Rail: No objection
120. Carbon Reduction and Sustainability Officer: On the basis that sufficient solar photo voltaic cells will be provided on site to meet renewable requirements without the need for an offset payment the proposal is acceptable. This would comply with both London Plan and RBK Core Strategy Policies. As previously demonstrated in the proposed development's energy strategy, the overall 35% reduction in carbon emissions from the Part L 2013 baseline can be achieved through passive efficiency measures, Solar PV and site wide CHP to supply heat and hot water.
121. Housing: The independent review confirms that the development cannot support any additional affordable housing. The reviewers have suggested that a review mechanism should be incorporated to re-appraise the costs and values at a later date given the uncertainties about sales values, the 5.5 year phasing of the scheme and to capture the final acquisition costs. The ratio of 61/39 affordable rent to intermediate housing is acceptable given that the applicant has shown that the development cannot support the delivery of additional affordable housing. The applicant should confirm that the affordable rent units would be provided at a rate that is 80% of the market rent or the Local Housing Allowance whichever is lower and sold to one of RBK's partner Registered Providers. Housing Services would have liked to deliver 100% of the intermediate units at RBK affordability levels, but the scheme viability has meant that this is not possible. A sliding scale of affordability has been agreed to deliver units close to RBK affordability levels, which is acceptable to Housing Services. The Discount Market Sale units are acceptable on the condition that any equity from the sale of the intermediate units comes to the Council to be used to support the development of affordable housing. The applicant has made some alterations to the floorplans in response to feedback from Housing Services. The revised floor plans for the affordable housing units are now acceptable. Satisfied with the proposals to phase the development of Frances House and re-house the tenants living in Frances House. Accept the proposal to deliver 10 car parking spaces for affordable housing residents and that there will be no charge. 2 units of wheelchair housing should be provided for affordable rent.
122. Environmental Health: No further comments.

Site and Surroundings

123. The 0.97 hectare broadly triangular site is bounded by Ashdown Road to the north-east, Wheatfield Way to the south-east and Brook Street to the west. It is located within Kingston Town Centre, an Archaeological Priority Area and Flood Zones 1/2/3A/3B. This site is identified as "The Old Post Office" site within the Eden Quarter Development Brief and is part of Proposal site P3a within the Kingston Town Centre Area Action Plan and is designated as an "Extension to Primary Shopping Area" within the Core Strategy.
124. The site includes the Former Post Office building (Grade II Listed) in the north-western corner and the Former Telephone Exchange (Grade II Listed) in the eastern corner. In the south-western corner of the site is Argyll House, which is a 4 storey vacant office building. Located along the western side of the site is a five storey office building partly occupied by the Job Centre Plus. The majority of the site is hard surfaced car park. Frances House, which is included within the site, is a three storey building which contains six social rented flats and a car park to the rear.
125. To the west of the site on the opposite side of Brook Street is Surrey House, as identified within the Eden Quarter Development Brief. This site contains a three to five storey retail/ office/ car park use adjacent to the site with the 8 storey Lever House (occupied by Unilever) at the southern end of this block. Kingston College further to the south is 11 storeys in height (120m from the site).
126. To the north-west of the site is Eden Walk, again identified within the Eden Quarter Development Brief. This contains three to four storey buildings containing a mix of larger and smaller retail units, offices above and a four storey car park above with access from Union Street. The site contains the United Reform Church building which is Grade II Listed.
127. To the north-east of the site on the opposite side of Ashdown Road is the Ashdown Road car park site, again identified within the Eden Quarter Development Brief. This site contains a surface public car park and a three storey terrace of buildings fronting Eden Street which include ground floor retail/commercial units. Beyond this to the northeast of the site is the four storey block of flats, Caversham House and International House at 13 storeys (120m from the site) which contains Premier Inn and Travelodge hotels.
128. The taller buildings, Lever House, Kingston College and International House are identified in the above three paragraphs along Wheatfield Way and adjacent to College roundabout have been identified in the Council's K+20 Area Action Plan to be of average/poor quality.
129. To the south-east of the site is Wheatfield Way which is a dual carriageway that carries through traffic around the core of Kingston Town Centre. Beyond this are generally two storey houses. 4-18 Wheatfield Way, which are directly opposite the site, and 20-24, 30-42 Orchard Road further to the east are designated as Buildings of Townscape Merit. Beyond these buildings further to the east, 100m from the site, is the Fairfield public open space with the Grade II Listed Museum/ Library at the north-western corner of the Fairfield. The above buildings and the Fairfield are located within the Fairfield/

Knights Park Conservation Area.

130. Approximately 100m to the west of the site is the Kingston Old Town Conservation Area. Within this area, 170m to the north-west of the site is the Market Place with the Grade II* Listed Market House at its centre, the Grade I Listed All Saints Church to its north 220m north-west of the site and the Grade II Listed Guildhall 135m from the site to the west. There are other listed buildings in Kingston Town Centre, many around the Market Place.
131. To the south-west of the site are existing taller buildings: Kingston College at 11 storeys/ 59.77m in height AOD (120m from the site) and the Unilever building at 8 storeys (30m from the site). 62m to the south-west of the site is the Hogsmill River.
132. 335m to the west of the site is the River Thames. Beyond the River is Hampton Court Park, a Grade I Registered Landscape, and approximately 2.2km away is the Grade I Listed Hampton Court Palace which includes Key Views towards All Saints Church and along and beyond The Long Water.
133. To the north-west of the site beyond the River Thames is Bushy Park, a Grade I Registered Landscape, including the Grade I Listed Diana Fountain. 1.7km to the north-east of the site is Richmond Park, with Thatched House Lodge Key View 2.4km away from the site. All these parks are designated as Metropolitan Open Land and conservation areas and all have public access.

Proposal

134. Planning application (ref. 14/13247/FUL): Erection of new buildings of 4 to 16 storeys in height (maximum 59.2m AOD/ 51.85m height above ground level), and part demolition, alterations and change of use of Former Post Office and Former Telephone Exchange listed buildings to provide 2,136sqm of retail/ cafe/ restaurant uses (A1-A5 use), and 638 sqm of flexible floorspace to be used for either retail/café/ restaurant uses (A1-A5) or Office (B1), 931sqm of offices (B1) and 253sqm of community/leisure (D1/D2 use) and 338 residential units. 132 car parking spaces proposed with access from Ashdown Road and 636 cycle parking spaces.
135. The application has been subject to amendment and the main changes from the April 2015 proposal include:
 - a) Reduction in number of flats from 360 to 338;
 - b) Redesign, change of materials and reduction in height of tower from 19 storeys (68.3m AOD) to 16 storeys (59.2m AOD) including provision of double height commercial unit and colonnade at its base;
 - c) Amendment to design of Wheatfield Way frontage buildings including increased setback of fifth storey and further increased setback of sixth storey of the six storey parts of this frontage;
 - d) Reduction in height by one storey to 8 storeys, setting back and setting away of building on the south side of the Telephone Exchange and provision of a three storey link building between this and the Telephone Exchange building, including consequent alterations to Listed Building Consent (ref. 14/13250/LBC);

- e) Reduction in height of building between Telephone Exchange and Post Office building by one storey to 8/12 storeys;
 - f) Alteration to design and materials of Brook Street frontage buildings, including removal of the eleventh and twelfth storey elements adjacent to the tower;
 - g) Further to St George exchanging contracts to buy Frances House from London & Quadrant Housing Trust, removal of Scenario B alternative so that development is comprehensive now incorporating Frances House.
136. Since the main changes were submitted in September 2015, glazing has been removed from the Brook Street elevation of the mezzanine level at the base of the 16 storey tower so that it is now a two storey open colonnade.
137. Listed Building Consent (14/13248/LBC): Alterations, reconfiguration, change of use of Old Post Office to provide retail/restaurant/cafe (use class A1-A5), community/ leisure (use class D1/ D2) uses. Works include demolition of infill additions to courtyard, internal partitions, creation of new/ restored openings, new lift shaft, repair including re-roofing of front range, internal alterations, associated works, addition of finials.
138. Listed Building Consent (14/13250/LBC): Alterations, reconfiguration, change of use of Telephone Exchange to offices (B1)/ residential cycle storage (partitions added) including demolition of outbuildings/boundary walls to east courtyard, west light-well walls, internal partitions/modifications to external stairs, fenestration, creation of new/restored openings, re-roofing of front range, installation of lift and addition of finials. Additional partitions at basement level for office/ retail cycle parking.

139. ASSESSMENT

The main considerations material to the determination of this application are:

- Principle of Proposed Development
 - Policy Context
 - The current policy context in Kingston
 - Kingston Council's Policy Programme
 - National Planning Policy
 - Proposed Mix of Uses
- Impact on Character and Heritage of the Area
 - Relationship of building with its immediate surroundings
 - Public realm
 - Impact on Heritage Assets including their setting
 - Tall Buildings
 - Townscape and Visual Impact Assessment
- Housing Quality and Mix
- Flood Risk
- Impact on Neighbour's Residential Amenity
- Highways and Parking
- Trees
- Legal Agreements
- Other Material Considerations

It should be noted that this assessment relates to the consideration of the proposal on its own merits as well as a comparison with iterations of the scheme as it has evolved.

Principle of Proposed Development

Policy context

Central Government Advice:

140. In March 2012 the National Planning Policy Framework (NPPF) was published and in doing so it replaced many documents including all Planning Policy Guidance Notes and Planning Policy Statements. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. Annex 1 of the NPPF provides guidance on how existing Development Plan policies which have been prepared prior or close to the publication of the NPPF should be treated. Paragraph 215 of the NPPF applies which states that only due weight should be afforded to the relevant policies in the adopted local plan according to their degree of consistency with it.
141. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF is itself a material consideration. Given that the advice that the weight to be given to relevant policies in the local plan will depend on their degree of consistency with the NPPF, it will be necessary in the determination of this application to assess the consistency of the relevant local plan policies with the NPPF. The NPPF applies a presumption in favour of sustainable development.
142. In addition to the NPPF advice in the National Planning Practice Guidance (March 2014) also needs to be taken into account. It states that, where the development plan is absent, silent or the relevant policies are out of date, paragraph 14 of the National Planning Policy Framework requires the application to be determined in accordance with the presumption in favour of sustainable development unless otherwise specified.

The Relationship between the NPPF and the Development for the Royal Borough of Kingston upon Thames:

143. In the determination of planning applications development must be in accordance with the statutory development plan unless material considerations indicate otherwise. For the Royal Borough of Kingston upon Thames the statutory development plan comprises:
 - The London Plan as Further Amended – March 2015
 - The Core Strategy – 2012
 - The Kingston Town Area Action Plan (K+20) – 2008
144. Sitting beneath these documents are a number of Supplementary Planning Documents which have all been adopted and form part of the Local Development Framework for the Royal Borough. These cover such topics as residential design, parking standards etc. The most recent and relevant of these for the current application is the:
 - Eden Quarter Development Brief – 2015
145. In considering the policy implications of any development proposal the Local Planning Authority will assess each case on its individual merits, however where there may be conflict between policies in the

- existing Development Plan and policies in the NPPF careful consideration should be given to the advice in paragraph 142 above.
146. Policies in the Core Strategy and the K+20 documents can be given weight only insofar as they are consistent with the NPPF.
 147. The London Plan as Further Amended 2015 can be assumed to be in accordance with the NPPF as it was examined and adopted after the NPPF came into effect.
 148. In addition the Eden Quarter Development Brief has particular relevance having been adopted by the Council as recently as March 2015, and can be regarded as being in accordance with the NPPF.

The current policy context in Kingston

149. Kingston is a Royal Borough which has positively chosen its future. Its determination is to drive and shape what is achieved to the benefit of the whole Royal Borough. Kingston has fantastic fundamental strengths. Its determination is that the legacy passed on to future generations nurtures and sustains these strengths. This is what underpins the 'Kingston Futures' regeneration programme.
150. Kingston Futures is about the whole spirit with which we approach the future. Physical planning and regeneration, inward investment, growth and business opportunities are important parts of it but it is not limited to that. It is about everything the Council does.
151. The vision for Kingston as a Borough is where:
 - People choose to live, learn, work, create and prosper.
 - Business chooses to invest and grow.
 - History and culture is cherished and celebrated.
 - People have choices and have the confidence and skills to make those choices.
152. The Kingston Futures Vision and Strategy forms part of the Council's corporate policy programme and is supported by the statutory planning process including the Eden Quarter Development Brief SPD (adopted on 27th March 2015). The development brief sets the policy framework for growth in that part of the town centre, identifies appropriate uses for different land parcels, and also identifies where buildings of height will be appropriate. The Brief sets out three locations in this part of the town centre where tall buildings will be supported. One of those locations is the southern end of the application site which is where the tallest building in the proposed development is proposed to be located. In order to accommodate the significantly increased housing targets adopted in the Amended London Plan the Council has decided to concentrate development in limited areas of the Borough, one of which is Kingston Town Centre, and Eden quarter is a contribution to that increased growth. In addition it has been identified that the town centre is capable of accommodating additional retail growth. This is essential to retain the town's competitive edge as a Metropolitan Centre in the London Plan and to retain the vitality and viability of the town centre.
153. The Eden Quarter Development Brief includes five major development opportunities that are seen as key to delivering the Kingston Futures Vision for a vibrant and prosperous Kingston town centre. The first of those sites to come forward is the Old Post Office site; the subject of this planning application. The proposal provides

for new homes that are seen as key to bring life back to a neglected part of the town. The increase in foot fall, particularly in the evenings is a key element of a balanced and vibrant evening economy and provides a more encouraging sense of being able to be in public space during the evening. A balance of shops and restaurants provide a focus for movement and vibrancy throughout the day and into the late evening in addition to providing employment opportunities. Further employment opportunities will be provided within the telephone exchange and further business space within the development. The proposal to retain and refurbish two listed buildings is an important contribution to the Kingston Futures Vision of celebrating and cherishing our history and culture.

154. In summary the Old Post Office development is aligned with and contributes to the delivery of the Kingston Futures Vision for the borough generally and the town centre of Kingston specifically.
155. It is important and essential that the consideration of this application is considered against the context of the proposed regeneration of this part of the town centre, and not the existing quality, appearance, character and density of the area.
156. The application site is part of the area identified in the Kingston Town Centre Area Action Plan as capable of accommodating some of the additional retail floorspace needed within the town centre, and forming part of an enhanced and extended Primary Shopping Area.
157. Policy P3 of the Kingston Town Centre Area Action Plan (2008) relating to the application site East of Eden Street and The Ashdown Road Sites: Eden Quarter outlines the preferred options for the sites listed. In relation to the application site, which forms part of P3a (the other part being the Ashdown Road car park) it states: "The Council will work with land and property owners, developers and TfL London Buses to secure the comprehensive development and upgrading of this site to provide high quality mixed use development including: the extension of the Primary Shopping Area onto the Ashdown Road sites by the provision of high quality new comparison shopping facilities in an open street format, with a mix of shop sizes; Retail related A2 and A3 uses; Residential including affordable housing and offices above retail; Community uses; A new public space; Basement servicing with access from Wheatfield Way; A multi-storey car park accessed from Wheatfield Way; Maintain and extend cycle routes; A secure public cycle parking centre; Refurbishment and re-use of the listed former post office building to include community use; Public Art; The site is within Flood Risk Zones 2, 3a and 3b and development proposals should accord with Policy K24 and the Strategic Flood Risk Assessment (SFRA)." This has been supplemented by the most recent policy document, the Eden Quarter Development Brief.
158. The objectives of the Eden Quarter Development Brief SPD in relation to this site are:
- 1) To refurbish and provide appropriate new uses within the former post office (Grade II listed) and improve its setting within an area of high quality public realm, linked to Eden Square.
 - 2) To refurbish and provide appropriate new uses within the former telephone exchange (Grade II listed), using the building as an attractive corner at this side of any new development.
 - 3) To create a new restaurant, retail and leisure destination using the

historic buildings and high quality new public realm to establish an attractive and distinctive sense of place.

- 4) To form a new urban block with active frontage on all sides, knitting the urban fabric back together.
 - 5) To improve the view of the town centre when arriving from the south from College Roundabout.
159. Development parameters within the Eden Quarter Development Brief: This site has significant potential to help transform the Eden Quarter and form a mixed use block that helps to meet retail, leisure and housing need. The two listed buildings, the former post office and telephone exchange should be refurbished to a high standard. The post office building should stand alone from the block as a 'gem' sitting within high quality public realm. The building should form the heart of a new restaurant and retail area, with cafes and outdoor seating occupying the pedestrianised space.

Kingston Council's policy programme

160. Destination Kingston 2015-19 is The Royal Borough of Kingston's medium term service and financial plan, which sets out broad general policy and the Council's direction of travel over the coming years.
161. To quote from this strategic policy document: 'The Royal Borough of Kingston, including Kingston Town Centre will need to take its share of the projected increase in the capital's population and at the same time deliver benefits for our communities. As part of this background, Kingston Futures has been established to drive growth opportunities and lobby for infrastructure improvements by seeking external funding to deliver projects designed to facilitate residential and business growth. Kingston Futures have been working with the Greater London Authority to bring the borough 'opportunity' status. This will bring significant additional investment to high streets and shopping parades across the borough. By planning for growth in this way we can ensure that the Council takes a holistic approach to the additional infrastructure that will be required, including provision of new school places, health services and improved rail and bus services across the borough, as well as Crossrail 2. Around one third of the borough is protected green space, including parks and green belt. The Council's vision is not to allow Kingston to become a concrete jungle and are committed to protecting the green belt. Our choice is therefore to build 'out or up'.

162. National Planning Policy

163. Paragraph 6 of the National Planning Policy Framework states "The purpose of the planning system is to contribute to the achievement of sustainable development. International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

164. Paragraphs 7-14 of the National Planning Policy Framework state:
165. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:
- a) an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - b) a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
 - c) an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
166. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
167. For decision-making this means: approving development proposals that accord with the development plan without delay; granting permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.
168. Paragraphs 56 and 60-66 of the National Planning Policy Framework require good design, as set out below:
169. Para. 56: The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
170. Para.60: Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.
171. Para.61: Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.
172. Para.62: Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. They should also when appropriate refer major projects for a national design review. In general, early engagement on design produces

- the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel.
173. Para.63: In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.
174. Para.64: Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
175. Para.65: Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).
176. Para.66: Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.
177. As concluded in this report, careful consideration has been given to all matters raised by this proposal and it is considered that the benefits of the proposed development in this case significantly outweigh any perceived adverse impacts, including the impact on the setting of designated heritage assets, and therefore in the context of the NPPF the development should be granted.

Proposed Mix Of Uses

178. Policy DM17 states that the Council will protect all employment land and premises in A) Kingston Town Centre, to develop its role as a successful, sustainable Metropolitan Centre through the implementation of the Kingston Town Centre Area Action Plan (K+20 AAP). Mixed use development schemes should not result in a net loss of employment capacity (floorspace and/or land and should not compromise the viability of the site and/or its surroundings for employment purposes).
179. Policy K4 of K+20 Kingston Town Centre Area Action Plan states "Development proposals resulting in a net loss of B1 office floorspace will only be acceptable if office floorspace is re-provided as part of a mixed-use development of the site, or the loss of the office floorspace is outweighed by the achievement of other Area Action Plan objectives through the proposed development."
180. It states that the Council will promote the town centre as an office and business centre and improve the quality and range of office and business accommodation by encouraging and supporting: development proposals that incorporate high specification B1 office space; the redevelopment and improvement of the existing office stock; and the provision of workshop, studio, exhibition space and offices suited to the needs of the 'creative industries' sector. The proposal will replace poor quality and under occupied office floorspace with new high specification office space in the Telephone Exchange on the eastern edge of the site that would meet identified Small Medium Enterprises accommodation needs and deliver an estimated 80 jobs.

181. The proposal would result in the loss of a total of 4669sqm of B1 floorspace in the form of Brook House (Job Centre Plus) and Argyll House. 931sqm of B1 office floorspace would be provided and 2136sqm of retail, 638sqm of flexible commercial (A1-A5/B1) and 253sqm of community use. St George has agreed to the Council renting approximately 550sqm of Argyll House to enable it to be used for start up businesses and small and medium enterprises shortly after St George take control of the site until it being demolished for redevelopment. The Council will be able to use GLA funding to secure this benefit. This would provide additional employment for Kingston Town Centre. Although this would be on a temporary basis, it would be the intention that the jobs created would be relocated within Kingston Town Centre.
182. The first relevant test of Policy DM17 requires that mixed use development schemes should not result in a net loss of employment capacity (floorspace and/or land), and should not compromise the viability of the site and/or its surroundings for employment purposes. Whilst the proposed Old Post Office scheme would result in a net overall loss of up to 3738sqm (or 3100sqm if the flexible commercial floorspace is used for B1 office purposes), the quality of the existing office floorspace is poor and has been under utilised for some time and currently is only occupied by 80 staff at the Job Centre. The scheme proposes new high quality office floorspace located within the former Telephone Exchange and an additional office unit, and whilst the quantum of floorspace will be less it will be new high quality floorspace that will provide a similar number of employment opportunities as the existing space. Additionally, the remainder of the Old Post Office site that is currently non-employment generating will deliver new retailing jobs. 145 net additional Full Time Equivalent jobs will be created by this development. The temporary employment provided within Argyll House would be in addition. The additional employment generation is an important benefit provided by the scheme.
183. The other relevant DM17 test states that residential use within mixed use schemes will not be appropriate where it would be incompatible with established employment uses, or prejudicial to the site's continued operation for employment purposes. The site is identified in the K+20 AAP as being suitable for a mixed use scheme, and residential is specifically identified as an acceptable use, therefore the proposal satisfies this policy test.
184. Thus, the proposal is considered to comply with AAP Policies P3 and K4, Core Strategy Policy DM17 and the site guidance set out for the Old Post Office site in the recently adopted Eden Quarter Development Brief SPD that addresses employment issues.
185. Future office floorspace is planned for the wider Eden Quarter area as identified in the recently adopted Eden Quarter Development Brief. The Brief identifies a site fronting Wheatfield Way in the Ashdown Road site as being suitable for a new office building. In contrast the Eden Quarter Development Brief identifies that the main uses for the Old Post Office site should be retail, leisure and housing, and office use or residential are the options for redevelopment of the east and southern edges of the site. Future office development on the Ashdown

Road site will generate an overall increase in the office employment floorspace in the Eden Quarter area in a location that will extend Kingston's commercial core.

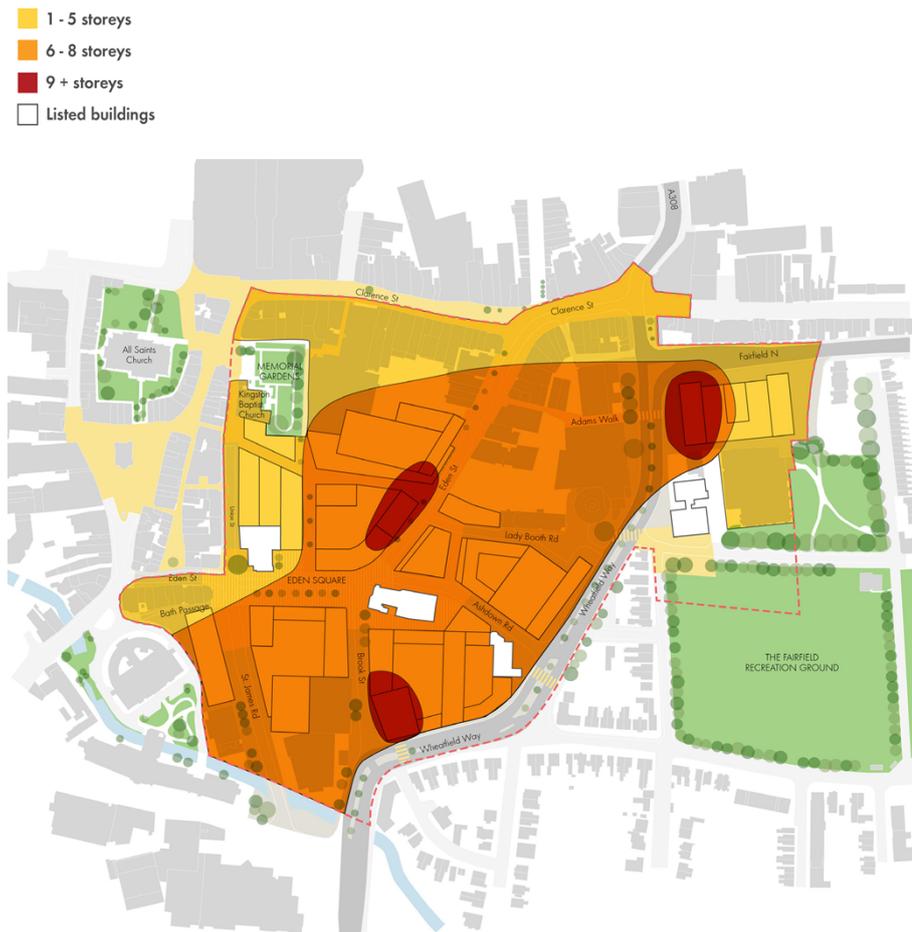
186. Core Strategy Policy DM20 supports the provision of new retail development in designated centres and the co-location of retail and community facilities in appropriate locations. DM20 seeks to minimise any negative impacts on a number of key factors, such as climate change and pollution, and these matters will be addressed in other observations.
187. Policy K1 seeks to provide 50000sqm of additional retail floorspace by 2016 through the promotion of new retail development on this and adjoining sites. K+20 AAP Policy K4 seeks to promote employment uses within Kingston Town Centre. The Eden Quarter Development Brief identifies the site as suitable for retail use. The Brief proposes retail, restaurant and cafe uses occupying the buildings framing the public space adjacent to the Old Post Office, but does not specify a target floorspace. This mix of uses, and the space modelled on the Apple Market suggests a focus on niche / speciality / leisure retailing rather than comparison retailing. The scheme proposes 2136sqm of retail floorspace (or 2774sqm of retail if the flexible commercial floorspace is used as retail floorspace) as part of the mixed use development. Whilst in principle the site could accommodate a larger amount of retail, the Eden Quarter Development Brief identifies the adjoining site to the west (Surrey House) and the adjoining site to the north (Ashdown Rd) as being capable of extending Kingston town centre's retail circuit. Therefore the proposal is considered to satisfy the retail planning policy requirements and this would be a benefit of the proposals.
188. The Borough has failed to deliver its previous 2011/12-20/21 London Plan housing target of 375 units per year. The Borough's past under supply should be provided in addition to the current housing target. In addition, in line with the National Planning Policy Framework, where Boroughs consistently do not meet their annual targets, a 20% buffer must be identified. This equates to a five year land supply requirement for the Borough of Kingston of 2703 units. The Annual Monitoring Report demonstrates that a total of 3703 units can be delivered in the Borough between 2014/15 and 2018/19. The Old Post Office Site has historically formed part of the housing trajectory, as part of Proposal Site P3 in the Kingston Town Centre Area Action Plan, which identified the site capacity as 300 units, with expected delivery in 2021/22, however this capacity is expected to be exceeded. Policy CS10 seeks to take advantage of opportunities to deliver new housing with the current target as per the London Plan (March 2015) to achieve a new housing target of 643 new units a year from 2015/16- 2024/25. This equates to a total of 3,215 units over five years, which is expected to be met and exceeded as stated in Policy CS10 which refers to the need to deliver new housing in the most sustainable locations. The London Plan states that borough housing targets are a minimum and encourages boroughs to exceed targets to assist the Council with meeting housing targets. The London Plan sets out that the Mayor will work with the Council to realise the potential of a new Opportunity Area at Kingston Town Centre, and appropriate high density development would support this.

189. The site is located in Kingston Town Centre. Policy K7 of the K+20 AAP (2008) states that provision is made for around 1000 new homes to be built in the town centre over the period 2006-2020 as part of mixed use development to meet a range of housing needs, including private and affordable housing with a range of flat sizes. More recent housing targets within the Eden Quarter Development Brief state that the Eden Quarter area, which includes the Surrey House site, Eden Walk, Ashdown Road Car Park and Cattle Market sites has an estimated capacity for 1200 new dwellings.
190. The Eden Quarter Development Brief supports the principle of housing above retail on the central and western part of the site above ground floor uses. Additional residential is proposed at the ground floor of the proposal fronting Wheatfield Way which does not comply with the guidance, however, there is a direct connection between the residential units and the street. Wheatfield Way is not envisaged to form part of the principal retail circuit in the future, as identified within the Eden Quarter Development Brief, although the corners provide active frontages to help bring people into the town centre.
191. Policy 3.4 of the London Plan 'Optimising Housing Potential', taking into account local context and character and public transport capacity, seeks to optimise housing output for different types of location within the relevant density range. The site has a Public Transport Accessibility Level (PTAL) of 6a (Excellent) and is a Central location (defined as areas with very dense development, a mix of different uses, large building footprints and typically buildings of 4-6 storeys within 800m of Metropolitan Town Centre (Kingston is a Metropolitan Town Centre). The site is within Kingston town centre although adjacent to domestic scale buildings on the other side of Wheatfield Way, which are outside the town centre. The London Plan's density range for a site with these characteristics is 650-1100 habitable rooms per hectare and 215-405 units per hectare (for schemes with 2.7- 3.0 habitable rooms per unit). The paragraph below sets out the calculation based on Council/ Mayoral guidance.
192. The Council's Residential Design Supplementary Planning Document (July 2013) states that density should be calculated in accordance with the Mayor's/ Greater London Authority's Housing Supplementary Planning Guidance (Nov 2012). The London Plan defines density in terms of net residential site area (This relates to the 'red line' planning application site boundary and excludes adjoining footways). The site area, which excludes the surrounding pavements, but includes all other parts of the site is measured as 0.97 hectares. 91% of the floorspace of the site is residential. 91% of the site area equals 0.88 hectares. In accordance with this methodology, the density is calculated as 931 habitable rooms/0.88 hectares which equals 1061 habitable rooms per hectare or 338 units/ 0.88 hectares which equals 385 units per hectare.
193. The density of the scheme in terms of habitable rooms per hectare would therefore be below the upper limit of the density range within the London Plan. In terms of units per hectare the density would be below the upper end of the range. Given that the PTAL is 6a, which is towards the upper end of the 4-6 range and that the site is within the town centre and therefore well within a Central location as defined within the London Plan, it would be expected to be towards the upper

end of the density range. Consideration should be given to the surroundings which includes a mix of different building heights, which ranges from two storey villas on the opposite side of Wheatfield Way to 4-6 storeys at Eden Walk, 4-5 storeys on the opposite side of Brook Street and 7-8 storeys at Lever House. The density of the proposals are therefore, in principle, considered to be appropriate for this location, particularly when it is considered that the surrounding sites are likely to change in accordance with guidance within the Eden Quarter Development Brief regarding building heights on adjoining sites states that 6-8 storeys would be appropriate on the Surrey House, Ashdown Road and Eden Walk sites, including an element of 9+ storeys.

Impact on Character of Area/ Relationship to the Eden Quarter Development Brief

194. Paragraphs 63-64 of the National Planning Policy Framework state that great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
195. Paragraph 65 states that planning permission should not be refused for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits). The impacts are considered in detail in relation to the impact on the setting of heritage assets section of the report.
196. Policy DM10 states that development proposals will be required to incorporate principles of good design. The Eden Quarter Development Brief SPD provides guidance for the development of this site in the context of development within this area. It states "The new block will vary in scale. Towards the eastern end the block should step down in height towards the former telephone exchange. The north western corner could be taller to mirror the massing of adjacent buildings. Where the building wraps the former post office the scale and material palette should be sensitive to this asset. The south west corner could be an appropriate location for a residential tower. This tower would form a strong landmark when arriving in Kingston from the south (Penrhyn Road) and especially high quality design is therefore expected."
197. The Brief shows a plan of the Eden Quarter entitled "Guidance on building heights within the Eden Quarter", indicating a building of 9+ storeys in the south-western corner and 6-8 storeys on the remainder of the site with a public space to the south and east of the Former Post Office building:



198. The maximum height of the proposed tower in the south-western corner of the site has been reduced from a combination of 21/16 storeys to 19/15 storeys and now to 16/14 storeys, has been reduced in width when viewed from the east and west although increased in width when viewed from north and south. amended in design by reducing the amount of brickwork and increasing the amount of glazing and providing a double height commercial base. The existing Listed Buildings, the Old Post Office and former Telephone Exchange will be retained, refurbished and brought back into use. The proposed development varies in height from a minimum of four to six storeys adjacent to the open space and eight to twelve storeys between the two retained listed buildings. Along Wheatfield Way, the height varies from four/five/six storeys, including setback top two floors, to eight and

ten storeys. The development would be setback 7m from the front edge of the pavement to allow a 3m route to allow Wheatfield Way to accommodate mini-Hollands and a 4m pavement to incorporate regular tree planting. Along Brook Street, the height varies from nine to ten storeys. The materials are proposed to be a mix of brick, cast stone and glazing. The proposed heights exceed those in the Eden Quarter Development Brief in three locations; a) The northern end of the Brook Street elevation is proposed as 10 storeys whereas the brief gives guidance of 6-8 storeys; b) The rear part of the building between the two on site listed buildings is proposed as 12 storeys whereas the brief gives guidance of 6-8 storeys; and c) The central block that runs north from the centre of the proposed Wheatfield Way elevation is proposed as 10 storeys whereas the brief gives guidance of 6-8 storeys. The brief gives guidance of 9+ storeys for the proposed 14/16 storey tower. This does not conflict with the brief. These impacts are assessed later in the report. The front part of the building between the two on site listed buildings and the building to the south of the Former Telephone Exchange would be in accordance with the guidance. The remainder of the Wheatfield Way frontage would be 4-6 storeys which compares to guidance of 6-8 storeys and the building to the south of the Former Post Office building would be 5-7 storeys which compares to the guidance of 6-8 storeys. These lower heights help reduce the scale opposite the two storey houses fronting Wheatfield Way and help increase the sunlight into the new public realm to the south of the Former Post Office whilst reducing the potential impact on the setting of the listed buildings.

199. The Eden Quarter Development Brief states “Kingston Town Centre has a unique heritage and character and it is important that any new development enhances and reinforces this sense of place. The Eden Quarter has some significant Edwardian buildings which should be protected and enhanced. New connections should be forged and existing connections strengthened to neighbouring characterful areas to reinforce the sense of place in the Eden Quarter. These existing assets should help inform the quality of new buildings and new public realm should be designed with these historic proportions in mind.” In relation to the Former Post Office building, although there are ten and twelve storey buildings at either end of the post office public square, the height of the buildings between these is 5-7 storeys and space has been created between these buildings and proposed development. Amendments have been made to the buildings adjacent to the Former Telephone Exchange to reduce their height and improve their relationship with this building, although it is acknowledged that there is a significant change of scale between the Former Telephone Exchange and the proposed neighbouring buildings.
200. The layout and quantum of the proposed development responds positively to the site’s strategic importance in the town centre and role within the Eden Quarter Development Brief. It brings back into use two listed buildings that are on the Boroughs ‘at risk’ register. It would provide high quality housing and retail uses in an urban location, which would contribute to the diversification and overall vitality of the town centre.
201. The Eden Quarter Brief states “Ensuring that frontages along all streets are active, with shop fronts and windows, will be an essential

part of improving streets and spaces in the town centre.” “The block structure must be permeable and reflect the existing varied character of Kingston Town Centre, delivering intimate spaces and larger floor plates for retail use and possibly a new department store.”

202. The perimeter block layout creates strong continuity and enclosure of the site, responding positively to the edges that face the site. The active frontages will contribute to the animation of the street scene in this location, which is currently generally inactive. This, combined with the neighbouring redevelopment sites identified in the Eden Quarter Development Brief, would act as a southern magnet to the Town Centre, drawing much needed footfall to an area that is currently underperforming. For this reason, the site cannot be considered in isolation, as it would be part of the first wave of development for the Eden Quarter Development Brief Area.
203. The Eden Quarter Development Brief states “Kingston Town Centre is surrounded by many attractive residential neighbourhoods but there is a lack of homes within the core urban area. The Eden Quarter should help to deliver a significant number of new homes for Kingston as required in the London Plan, helping to keep the town centre active and busy during the day and evenings. Generally these high quality new homes will be flats, meeting the needs of both younger and older people wishing to live in the town centre.”
204. The proposal is broadly compliant with the Eden Quarter Development Brief with regards to land use, active frontages and the scale of the development. The scheme is, however, taller in some locations than the Eden Quarter Development Brief. Therefore the overall impact has to be carefully considered, as well as the accumulated impact, as other development sites come forward that will ultimately change the built form of this part of the Town Centre.

Relationship of building with its immediate surroundings

205. Policy CS8 states that the Council will seek to ensure that new development recognises distinctive local features and character and relates well and connects to its surroundings. The Brook Street frontage has been brought down to the existing street level, although there is still a small section that is raised so as not to reduce the flood storage capacity of the site. A condition is attached to review this element if off site works have been undertaken to reduce the flood risk at this site. Bringing the development down to ground level will allow direct interaction with the street and new public realm rather than being set 1m above the pavement level as in the originally submitted proposal. Integrated balconies have replaced a number of the previously proposed bolt on balconies which is considered an enhancement of the scheme.
206. The Ashdown Road frontage has been revised to allow for a direct visual link to both the listed buildings that will create a new setting, role and function for both these historic assets. The listed buildings are read as foreground buildings with the enabling development in the background. This again helps to define the setting of the historic assets. Servicing and car park access is consolidated and served from Ashdown Road so no other vehicular accesses are required as would have been retained under Scenario B.
207. The Wheatfield Way frontage has evolved through a further set

back of the building line, with reduced massing of the tower. The setback would allow for more space for the proposed mini-Holland cycling route to be incorporated within Wheatfield Way. It would also allow for more public realm and landscaping along this important frontage that will contribute to the overall 'humanising' of this urban carriageway. The linear pedestrian route which is interjected with the pocket space around the listed Telephone Exchange will be more inviting to use, rather than the development turning its back on Wheatfield Way and its environs, due to the perceived environmental conditions and outlook from this elevation. The mass and form of the building has been broken down into distinct components that respond to a variety of scales, which the development has to address. This is not an easy task, as there is a juxtaposition of scales converging onto one location, which the site occupies. The scheme is required to celebrate and clearly define the arrival 'gateway G4' (KTC AAP K+20) from Penrhyn Road. The site fronts the wide street section of Wheatfield Way. These elements combined warrant a larger scale of development to be accommodated on the site at this location. The revised scheme brings these opposing conditions into balance through the distribution of heights across the scheme, and fenestration details that further bridge the scale differences in the local vicinity, with the conservation area in the background.

208. The proposed podium level amenity space is supported. This makes best use of this space and creates an interesting new layer of activity at this level. It is recommended that further design work is required to resolve some of the detailed issues regarding the soft landscape materials and planters.

Public realm

209. Policy CS3 states that appropriate elements of public open space should be incorporated into new developments. A public space is proposed adjacent to the Old Post Office building which would be 1164sqm and a 350sqm space on the corner of Wheatfield Way and Ashdown Road in front of the Former Telephone Exchange building. Regarding sunlight received for the public space adjacent to the Post Office on 21st March, 18.33% of the space would receive a minimum of 2 hours of sunlight, which is below the guideline figure of 50% within the Building Research Establishment's (BRE) Sunlight and Daylight Guide to Good Site Planning. On 21st March/ 21st September, there would be no direct sunlight in the post office square until midday. However in small areas to the east of the Former Post Office building and to the south of the western end of the Former Post Office building, sunlight would light the public realm from midday until 3pm/4pm. The remainder of the space would be in shadow throughout the day. Although the BRE guidance refers to 21st March/ 21st September, it is worth noting that on 21st June, the proportion of the space that would be sunlit for two hours or more would be 75.61%. Significant parts of the public realm would be sunlit throughout the day from 9am to 6pm. Overall in the public realm the amount of sunlight would increase in the public space from March 21st to June 21st and decrease again until 21st September, which are the times when people are most likely to spend time outside. From 21st September until 21st March the level of sunlight would decrease and the public realm would not be well sunlit and

would be largely in shade.

210. It would be ideal if the public space had the benefit of more sunlight, however, the space is located to the north of the proposed development and this relationship would mean that it would therefore cast some shadow over this space. Although the part of the development fronting Brook Street is up to 10 storeys in height, most of the buildings fronting the new public square would be 5 storeys with setback sixth and seventh storeys to allow some sunlight into the space particularly during the months of March to September. The space is 37% larger than that required in the Eden Quarter Development Brief. This fact alone, allows more of the space to be sunlit. The 10 storey building to the south west of the space and the 12 storey building to the east of the space are higher than that indicated within the development brief, however, the middle element to the south of the majority of the square is a storey lower than the brief at 5-7 storeys in comparison to guidance of 6-8 storeys. Overall this space is likely to be as well sunlit as envisaged in the brief and efforts have been made to increase the amount of sunlight penetration into large parts of this space. It is considered that it would be difficult to maintain that the development should be refused on this basis and it is likely that the mix of uses surrounding the space and the use made of that space will respond to the sunlight and shadow at different times of the day and year.
211. Regarding the wind environment, most of the outside of the proposed buildings in the summer would be suitable for sitting with relatively small areas being only considered suitable for standing and entrances. During the windiest season (typically winter) the public square would generally be suitable for leisure walking with some smaller elements suitable for standing/ entrance being only considered suitable for standing and entrances. This demonstrates that the public space would have acceptable conditions through much of the year, particularly in late spring/summer months when outside space is used more frequently.
212. The Eden Quarter Development Brief Objective 4 for The Old Post Office Site is to form a new urban block with active frontage on all sides, knitting the urban fabric back together. The development would consist of a perimeter block surrounding private courtyards, which would provide a mixture of active frontages on the outside of the development adding to the vitality of the area and connecting the development into its surroundings and more private courtyards internally which would provide a space that is protected from the surrounding commercial streets and traffic which would add to the amenity of the proposed residential properties.
213. The development would provide active commercial frontages to the south and east of the newly proposed public space which would be located to the south of the refurbished Old Post Office building which would itself provide restaurant/ cafe/ retail uses at ground floor. To the east the former Telephone Exchange would be refurbished to provide office uses. Along Brook Street retail/ restaurant uses and an office use would be provided at ground level including at the base of the tower at the corner with Wheatfield Way. Along Wheatfield Way, the ground floor units would be residential units which would have direct access from the street as well as from the rear. These will provide the benefit

of active frontages around the perimeter of the site.

214. The provision of a public space that is accessible from Brook Street/ Eden Street and Ashdown Road is welcomed. The layout of the proposed scheme successfully integrates the provision for open space around the two listed buildings and is larger than the area allocated for public space in this location by the Eden Quarter Development Brief. The public space would therefore serve the development and the wider Eden Quarter Development Brief area, which is supported. This inclusive approach will ensure that the scheme will have a positive and active interface with the town centre.
215. The materials and detailing of the facades are proposed to be of high quality and sensitive to the listed buildings at this level. The taller background building acts as an interesting foil to this scale and reinforces the collage approach to layering the buildings from listed buildings to a more contemporary setting with the use of traditional building materials. Porphyry is proposed as a high quality material for the public open space. Details will be secured by condition.
216. Pushing the steps back into the public space has allowed for an improved interface with Brook Street and Eden Street and will encourage more activity at this level. The setting back and opening up of the Brook St block helps to define and celebrate the entry to this space, as it is located on a pivotal point on Eden Street that will capture footfall, as part of the wider retail circuit for the town centre. The proposed public spaces in themselves would provide a significant benefit to the area and would benefit the settings of the listed buildings, although will need to be weighed against the proposed buildings and their relationship/impact on the setting of the listed buildings and other heritage assets.

Impact on Heritage Assets

217. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) places a duty on the Council in respect of listed buildings in exercising its planning functions. In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
218. Section 72 of the of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) places a duty on the Council in respect of Conservation Areas in exercising its functions that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
219. Section 12 of the National Planning Policy Framework (NPPF) and accompanying National Planning Practice Guidance (NPPG) relates to Conserving and enhancing the historic environment (updated 10.04.2014). Paragraph 128 of the NPPF states that 'Local planning

authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.' Paragraph 133 states that where a proposed development results in substantial harm to a designated heritage asset, then permission should be refused unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh the harm, or all the following tests apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 17 of the NPPG states 'In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.'. Paragraph 135 of the NPPF goes on to state that "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

220. Policy CS8 states that the Council will seek to ensure that new development recognises distinctive local features and character; has regard to the historic and natural environment and helps enhance locally distinctive places of high architectural and urban design quality.

221. Policy DM12 states that the Council will preserve or enhance the existing heritage assets of the Borough through the promotion of high quality design and a focus on heritage-led regeneration; allow

alterations which preserve or enhance the established character and architectural interest of a heritage asset, its fabric or its setting; ensure that development proposals affecting historic assets will use high quality materials and design features which incorporate or complement those of the host building or immediate area.

222. A key document in assessing the impact on historic assets is 'Historic England's The Setting of Heritage Assets' (Historic Environment Good Practice Advice in Planning:3, March 2015). The guidance sets out 5 key steps which this document will use to inform the approach for the assessment of the proposed scheme. The five steps are; 1) identifying the heritage assets affected and their settings, 2) assessing whether, how, and to what degree these settings make contribution to the significance of the heritage asset(s), 3) assessing the effect of the proposed development on the significance of the asset(s), 4) maximising enhancement and minimising harm, 5) making and documenting the decision and monitoring outcomes.
223. Aside from proposed changes to the setting of listed buildings within the site itself have been identified a number of heritage assets whose settings could be affected. These include two adjacent conservation areas, The Old Town Conservation Area to the west and the Fairfield/Knights Park Conservation Area to the east; the Grade 1 listed All Saints Church; Grade 2* listed Kingston Bridge; Grade 2* listed Market House and other listed buildings in the Town Centre; key Grade 1-listed heritage assets outside RBK's boundary including Hampton Court Palace, Hampton Court Park, Bushy Park and Richmond Park.
224. Historic England, the Victorian Society and others have expressed concern about the impact of the new development on the retained listed buildings, albeit that the Victorian Society only objected to the previous version of the proposed development.
225. As such, in assessing this application, considerable importance and great weight has been given to the desirability of preserving the setting of heritage assets, including taking account of archaeological heritage where appropriate. The proposal was therefore assessed in accordance with the requirements of Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and those of the NPPF and NPPG. Any impacts identified below are given significant weight when considered against the public benefits of this proposal in the conclusion of this report.

Former Post Office and Telephone Exchange, both Grade II Listed

226. The new buildings proposed would result in a change to the setting of two listed buildings presently within the demise of the scheme. The former Head Post Office is a Victorian building, built in the 1870s. The Sorting Office is an Edwardian building (noted as the former Telephone Exchange). Their listings particularly relate to the

existing external elements. The Post Office sits on a prominent site, on the corner of Ashdown Road and Eden Street. It was clearly designed to be seen from the town centre. There is intervisibility with the nearby Former Telephone Exchange.

227. Since construction, the setting of the Post Office and Telephone Exchange has evolved and was greatly changed in 1988 with the opening of Wheatfield Way and the associated realignment of the east end of Ashdown Road. This development fundamentally changed the setting of the Telephone Exchange, leaving it isolated at the end of Ashdown Road close to the dual carriageway. The existing taller poor quality buildings on this site and to the south are seen behind and adjacent to these buildings and have a detrimental impact on these buildings current settings. It is noted, the existing setting lacks the context of low-rise terrace dwellings whilst there is still a relationship between the two in terms of scale, design and materiality. Other town centre buildings on adjacent and nearby sites are also visible in the setting of the listed buildings. The existing setting adversely affects the ability to appreciate the original significance of the heritage assets.

228. The proposed design responds to the area's character in key locations and creates new buildings and spaces for areas that are currently inactive. The collage of buildings serves to break down the mass of the block form in response to each of the edges, varying character and setting for the site. The variety of heights and layering of the facades break up the scale of the development and is considered to be sympathetic. The frontages respond to context through the choice of sympathetic materials and detailing. This works with the active frontages that address the listed buildings and public space around the former Post Office and Telephone Exchange buildings, and the frontage onto Wheatfield Way. New space created around the Post Office reinstates its prominence and is deemed an improved setting. The buildings around the assets' use of red brick and stone provide a sympathetic, but contemporary, relationship with the heritage assets' materiality. It is noted that the facades were previously taller and set further forward against the conservation area and listed buildings. The proposed scheme's colonnade between the two retained listed buildings provides a greater visual and physical relationship and connects the two buildings through activity. Staggered heights stepping away from the listed buildings give additional relief to these important frontages of two listed buildings along Ashdown Road. The removal of the existing structures and boundaries in front of the building on the corner of Wheatfield Way and Ashdown Road and its replacement with a public space will provide a significant improvement to the setting of this listed building providing greater visibility and accessibility to this historic and attractive frontage. The council recognise there is a significant change in scale between the Telephone Exchange building and the buildings adjacent to it, which cause some harm, however, the

site is in a town centre location. A contemporary scheme, with heritage design cues in this setting, has meant that the detrimental effect of the massing and scale of the adjacent development is appropriately mitigated.

229. Any perceived harm caused by the new development needs to be balanced against the sensitive restoration of the two 'at risk' Listed Buildings and subsequently bringing the two buildings back into appropriate use, which is a substantial public benefit, and other public benefits.

Old Town Conservation Area

230. The Old Town Conservation Area covers Kingston's historic core that is defined by a medieval street pattern and historic assets spanning numerous historic periods. It contains 37 buildings and structures that are Listed Buildings and 30 buildings are identified as Buildings of Townscape Merit. Its mixture of exceptional examples of various architectural styles between 2 and 4 storeys creates a fine grained and interesting townscape. Pevsner describes the area as the best preserved of its type in outer London.

231. Since the medieval period there have been numerous additions to the Old Town which have enhanced its setting. These positive changes have been as recent as early-20th century architecture, such as The Guildhall (1934-5). These additions contribute to the rich grain of the Old Town and form an important element in its setting.

232. However, the Old Town's setting has been eroded by unsympathetic development in the post-war period. The view south from the marketplace is affected by the council's post-war administrative buildings and the police station, which sit behind the Guildhall. They form an unsympathetic and harmful backdrop to the Ancient Market and Guildhall (Grade 2 listed). The conservation area's setting is harmed by this period of architecture, which is harmful to its setting. This unsympathetic development has also created a significant amount of severance between assets. The post-war buildings lack permeability, visual interest and any sort of meaningful activation around a thoughtfully designed public realm. The area is in need of a development that provides a meaningful connection to the edge of Kingston Town Centre, which is presently dominated by inactive frontages, surface car parking and the severance of Wheatfield Way. The proposed development delivers an enhanced physical and visual connection to the Old Town Conservation Area.

233. It is within this context of change that the scheme's effect on the setting of the old town will be assessed. The new scheme undoubtedly affects, from some points, the setting of the Old Town in the sense that the 16-storey tower is clearly visible as pedestrians move about the area. However, the revised tower, with a more slender design and

reduced height does not appear as overbearing in context of the elegant, fine-grained townscape. The tower itself has been revised to provide a lighter materiality, the bronze coloured metal providing a contemporary framing to the layered glazing. This element, which represents the top two storeys, is set back within the buildings form and breaks up the verticality and scale of the tower. The metal profiled roof and aluminium curtain walling system add another layer that soften the building's appearance, but provide a sufficient amount of variation and visual interest to mitigate the negative effect it would have on the Old Town Conservation Area. Other elements of the scheme, such as the lower residential tower are not visible in the key views and therefore have a negligible effect on the wider setting of the Old Town Conservation Area.

234. These elements as discussed above are effective in mitigating its effect on the conservation area given that, whilst the tower is visible from certain key views, it does not feel overbearing and provides a contemporary backdrop where the only other large architectural reference points are of poor contextual quality, particularly with respect to their materiality. The scheme represents a change within Kingston to provide a more sympathetic and neutral setting.

The Fairfield/Knights Park Conservation Area

235. Fairfield/Knight's Park is an early suburb of Kingston Town Centre comprising houses of various sizes and designs dating mainly from the 1820s–1900 around Fairfield, a recreational open space since 1855. The original street pattern meant there was gradual transition of architectural styles between the Old Town Conservation Area and Fairfield/Knights Park Conversation Area. The area's major morphological change in recent history was the construction of Wheatfield Way, which involved the destruction of dozens of houses and cut a swathe through the original Victorian street pattern, severing it from Kingston Town Centre. The eastern edge of Wheatfield Way, which is the principal interface with this conservation area is an awkward mix of highway design, leftover stretches of poorly landscaped greenery and an approximately 2 metre high wall lacking integration with the town centre. Many of the existing taller buildings are visible from the edge and within this conservation area and from the Fairfield Recreation Ground and have an existing impact on the setting of this conservation area.
236. The town centre's main contribution to the setting of the conservation area is the civic and cultural contribution as the centre to which the suburb belongs, as opposed to a visual relationship.
237. The visual impact on this area varies from 'no effect' to 'major'. The areas of major effect are in places such as Grange Road, Wheatfield Way and the Fairfield Recreation Ground which sits directly

adjacent to the eastern edge of the town centre. Unlike other parts of Kingston, from this heritage asset one experiences the entirety of the development, rather than just the 16-storey tower. This western edge of the conservation area is arguably the area that presents the greatest risk of harm. Whilst this interface with the town centre needs improvement, as it is presently detrimental to the setting of the conservation area, the scale of the scheme will cause some harm due to its imposing presence on what is a Victorian area with 2 to 3 storey buildings opposite, a number of which are Buildings of Townscape Merit.

All Saints' Church, Grade 1 Listed Building

238. All Saints' Church is a Grade 1 Listed heritage asset largely constructed within the 14C and 15C but it also includes a Norman chapel on the south side that forms part of the listing and are of special historic and architectural interest. The church has undergone a number of alterations, as recently as 1865. It is a cruciform church with a central tower and a four-bay nave, forming a landmark feature at the core of the historic town, and the key feature in several views within Kingston and from Hampton Court Palace. It is also a site of considerable historical importance that predates the construction of the church, being the location where several Saxon kings were coronated. It is set within a lawned landscape, with several large trees, on both north and south edges of the Church. This has provided the church with a buffer from large, relatively unsympathetic late-20c development that occurred within the Town Centre, particularly to the north. All Saints' Church's setting has been adversely affected by these developments through its unsympathetic scale, materiality and generally diminishing its prominence. More so than any development in Eden Quarter, it forms the defining backdrop to the church's setting. The set back within the landscape presently mitigates the worst effects of these dated buildings and would continue to do so regardless of any perceived harm that the new development could cause. The view south, in front of the northern part of the church lawn on Clarence Street, is dominated by the carpark at Eden Walk. The scheme is visible from the landscaped area in the northern part of the Church. The proposed scheme's effect, particularly given the reduction in scale of the largest elements, in this context, means that it will be only slightly negative.

Kingston Market House, Grade 2* Listed Building

239. From its opening in 1840 the building was used as Kingston's Guildhall, until being replaced by the present Guildhall in 1935. It has a distinctive lead statue of Queen Anne above the entrance that predates

the building and forms part of the listing. It sits in the middle of a paved marketplace in the Old Town Conservation Area and is an important element in the setting of the Ancient Market Place.

240. The critical aspects of the Ancient Market Place's setting are the view north from the southern entrance of the market place. The fine grain of the built form fronting the market place and the All Saints Church sets up an important layered background.
241. The views from the Ancient Market Place have raised concerns by Historic England regarding the creation of a 'fifth turret' for the Market building, when viewed from the north-western part of the Ancient Market Place to the side of the Market House, therefore imposing on its setting. This is now less of an issue with the reduced heights and massing proposed in the revised scheme. Previously the exposed tall building was disproportionate to the roofscape surrounding the market and too prominent against the Market House. Now it creates an interesting foil to the Market Place that is not deemed over-bearing, due to the improved design and articulation of the revised scheme.
242. The impact on the setting of the Ancient Market Place can be said to be more generally of minor to moderate impact. While it is reasonable that the market place, being in a major metropolitan area, would be subject to change there is some negative effect of having such a scheme in relatively close proximity.

Kingston Bridge, Grade 2* Listed Structure

243. Kingston Bridge serves as a primary link between Richmond and Kingston, and has done so at this location for centuries. Its listing describes its rusticated, stone arches and other architectural details as important elements in its design. The listing also noted that it was widened in 1914. It was also widened in 2000 in order to accommodate greater traffic movement, a fact not included in the listing. The widening of the bridge in order to intensify its use by cars has been detrimental to its setting. More broadly, the setting of the asset, on the Kingston side in particular, is defined by on-going riverside development.
244. The bridge's principal setting is the Thames which, at this point, is considerably wide. The river activity further enhances the setting as it connects the river's historic role in the area between past and present. Another key element of the setting is contrast between the leafy environs of the back of Hampton Court Park on the western bank and Kingston Town Centre on the eastern side. It is this contrast that has defined the setting since the bridge's construction and continues to contribute positively today.
245. As people transition across the bridge from Hampton Wick the development appears in the backdrop of the town centre. It has minimal visual impact and no effect on the setting, as it forms a

reasonable part of the built form of the town centre. It does not impede any existing views nor is it overly intrusive.

Hampton Court Palace and Hampton Court Park

246. Hampton Court Palace is a Grade I Listed Royal Palace. It is an exceptional example of Tudor architecture and one of only two surviving of King Henry VIII's palaces. It is a major tourist attraction. The estate, landscape and gardens of the palace are a unique, historical and horticultural resource of international value. The park covers 750 acres (304 hectares), the formal gardens 60 acres (26 hectares) and the palace buildings 6 acres (2.5 hectares). The Palace and Park back onto the Thames opposite the Royal Borough of Kingston's boundary. The palace itself sits south-west of Kingston Town Centre.
247. The Palace is designed as part of landscape, with both key views from certain rooms, and other informal views. Kingston has a place in both types of views; from the Palace and from the Grade I registered Park. In some places, such as the All Saints view, it is an important positive feature.
248. The important views from Hampton Court Park's Long Water, North Canal Gate, The Queen's Apartments and east park entrance are not impeded by the proposed scheme. Therefore, the proposal is considered to have no detrimental effect on the setting of these historic assets.
249. The view from Long Water east and the Old Ice House does show the development in the background, but is masked/ softened by the existing landscape and vegetation in the foreground. Other key views that form the total of the setting are unaffected.
250. The effect on the setting of these key assets is negligible in summer and slight in winter. The effect in winter is mitigated by its lack of prominence in the background of the critical features of the assets. The palace's proximity to urban areas is known, thus the slight effect on the setting in winter represents a reasonable proposal that does not diminish its tranquillity or grandeur.
251. At the western edge of Hampton Court Park, the development's massing is discernible. In the visual impact assessment (Environmental Statement Addendum Volume II: Townscape, Heritage and Visual Impact Assessment, Sept 2015) it is deemed as moderate, hence in terms of its setting it can be said that there is a mildly detrimental impact. However, there is a mature treeline which provides a definitive edge to the parklands. This, and its physical distance from the park itself, demarcates the townscape from the setting of this critical edge. The effect on the setting is reasonable, as this section of the park backs on to a major metropolitan centre that is changing, and which currently includes some visible taller buildings that are not of the quality

expected for Kingston Town Centre.

252. Generally, the effect on the setting of the Royal Palace and the park is found to be neither harmful nor beneficial due to its negligible impact.

Bushy Park

253. Bushy Park is a large Royal Park at 1,000 acres (445 hectares). It is immediately north of Hampton Court Palace and west/north-west of Kingston Town Centre and the proposed scheme. Its defining design feature is Chestnut Avenue, which is axially aligned with Hampton Court Palace as intended to serve as a designed, grand approach. The next more important designed element of the park is the Lime Avenue, which sets up an axial view of the Diana Fountain (Grade 1) on an east-west axis. Much of the wider park is of a natural, rustic woodland character and contains important ecological features.

254. The view towards Kingston down the Lime Avenue is screened out entirely in summer and only slightly visible in winter. The winter context is so slight that the proposed scheme does not negatively affect the blue-sky setting on the park.

255. The views from Bushy Park show a dominant foreground of high quality large open space and densely planted areas, with the proposed development in the background within the context of other buildings including two buildings of a similar height to the proposal. If the landscape is to be removed or heavily managed, then the development might be exposed. The effect on the setting of Bushy Park is negligible.

Richmond Park

256. Richmond Park is Grade I Registered and is an important Royal Park. The park itself contains several listed structures including the wall that encloses it. The edge of the park is clearly defined by large, mature planting. As with other Royal Parks, there is a sense of enclosure and demarcation from surrounding urban and suburban areas. However, there are important moments within the park where the undulating topography sets up key vistas across south-west London, including Kingston.

257. From these key views there are sweeping outlooks that take in the entire town centre. There is a strong sense of geographic separation as there is a line of mature planting, low-scale Victorian suburbs and then the distinct skyline of Kingston Town Centre. The skyline of Kingston is distinct in the sense the intensification of built form demarcates it as a town centre. The proposed scheme would sit within the existing townscape. Whilst Richmond Park was established by Charles I in the 17th century, it was the Victorians who established public access in 1872. Thus, the public's experience of the setting has

always been a contrast between the urban/suburban areas that surround the park. The view of Kingston and its surrounding low scale built form have a positive effect in this sense.

258. From much of the park the proposed development would not be visible. However, where the scheme is visible it is not deemed to diminish the setting as it is reasonable to have this type of development within the existing townscape of Kingston. The views of the rural hills beyond London are unaffected. In many respects it is an improvement on the setting as the existing built form has little variation and the scheme would provide welcome variation to the existing datum level.

Location and Design of Tall Buildings

259. Policy CS8 states that Tall Buildings may be appropriate in the Borough's town centres; however, some parts of these areas will be inappropriate or too sensitive for such buildings. Relevant SPDs will provide further guidance on this matter and the Council will determine applications for tall buildings on the basis of the criteria in the English Heritage/ CABE Guidance on Tall Buildings (July 2007) and the London Plan. The Council will also require higher standards of design generally to achieve a more attractive, sustainable and accessible environment.
260. Policy 7.7 (Location and Design of Tall and Large Buildings) of the London Plan states that 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.
261. The Eden Quarter Development Brief provides recently adopted guidance regarding appropriate locations for taller buildings and the development is assessed against this.
262. Policy 7.7 also states Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet identified criteria and does not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference or impact on local or strategic views adversely. The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens or Metropolitan Open Land.
263. The English Heritage/ CABE Guidance on Tall Buildings (July 2007) states that applications for tall buildings should consider the following issues: The relationship to context; The effect on the historic context; The effect on world heritage sites; The relationship to transport infrastructure; The architectural quality of the building; The sustainable design and construction of the proposal; The credibility of the design; The contribution to public space and facilities; The effect on the local environment; The contribution made to the permeability of a site and the wider area; and The provision of a well-designed environment.
264. These issues are considered below in relation to the 16 storey

building (A) and the 12 storey building (B):

The relationship to context;

265. The scheme is required to celebrate and clearly define the arrival 'gateway G4' (KTC AAP K+20) from Penrhyn Road and relate to the other elements of its surroundings. The proposed development responds to the variety of its surroundings and provides active frontages to knit into the town centre context.

The effect on the historic context;

266. **A & B)** The effect on the historic context is mixed and is set out in greater detail under 'setting of historic assets'

The effect on world heritage sites;

267. There are no world heritage sites affected.

The relationship to transport infrastructure;

268. **A & B)** The buildings will sit adjacent to the 'Mini-Holland' strategic cycling route. The scheme is approximately 600m from Kingston station and 1.8km from Surbiton station. It is within 200m of the major bus stops in Eden Street. The cumulative effect of the proximity to these transport nodes is a PTAL Rating of 6a.

The architectural quality of the building;

269. **A)** A tall, landmark building at this location conforms with the Eden Quarter Development Brief, 2015. The building has been reduced to 14/16 storeys and the top composed of largely curtain wall glazing with the aforementioned stone frame. This provides a lighter effect to the skyline, reducing overall massing and successfully emphasises its slenderness. The layered composition of the building's massing successfully breaks up the mass of the tower. The double height colonnade at the base of the building along Wheatfield Way successfully grounds the building.
270. The change in materials from brick to reconstituted stone allows the tall building to differentiate itself from the rest of the scheme. However, by departing materially from the rest of the scheme, the building is less integrated with its local context and the scheme itself.
271. The use of a continuous bronze-colour metal frame around the central element of the building creates appropriate visual interest and goes some way to mitigate the mass of the building by breaking up the overall volume. It also provides an interesting silhouette. The integrated balconies are supported, reinforcing the slenderness of the building.
272. **B)** A proposed 12-storey building in this location does not conform with the EQDB, 2015 and is not fully justified within the design and access statement. However, this is not deemed to be a decisive

factor in assessing its appropriateness. The massing of the tall building is appropriate in relationship to the rest of the scheme. The buildings abutting the tall building, on the southern flank, have a variety of heights that help break up the massing of the development and its impact is mitigated by its stepping down to Wheatfield way, with the 12th storey considerably setback.

273. The 12-storey building mimics the materiality, form and proportionality of the rest of the proposed scheme and achieves the aim of establishing the scheme's distinct character. The materiality of this building allows it to be a modest background building despite its height. The contrasting colours between the tall building and the Telephone Exchange means that there is sufficient visual variation. The revised scheme has increased the height of the colonnade between the two retained listed buildings to provide a greater relationship between the two listed buildings. Staggered heights in section, give additional relief to these important frontages, against the more sensitive components of the site. There is a significant change in scale between the Telephone Exchange building and the buildings adjacent to it, which causes some harm, however, given the site's town centre location and the heights proposed in the Eden Quarter Development Brief, it is inevitable that this building will be surrounded by taller buildings.

274. The elevation facing the listed building on either side add a welcome, human scale to the tall building and has appropriate detailing to support these frontages.

The sustainable design and construction of the proposal;

275. The submitted energy statement is structured according to the GLA's energy hierarchy as required, and provides the emissions reduction contribution from each individual stage of the hierarchy and is assessed later in this report. Solar photovoltaic cells would be provided and the development would be designed to connect to a District Heating Network.

The credibility of the design;

276. The developer has engaged well-known and respected architects and consultants who have delivered similar schemes around London. The developer has a solid record of delivering similar schemes as well, and has a significant professional reputation and portfolio of completed works.

The contribution to public space and facilities;

277. The building is setback on Wheatfield Way to make provision for a strategic cycleway and environmental improvements. The colonnade at ground level and the provision of an active frontage goes some way to humanising Wheatfield Way and will be an improvement on the

present site conditions.

278. The western elevation forms the frontage onto the Post Office building and its public realm. The double height colonnade with retail at ground, as aforementioned, is a supported design feature. The northern elevation is made up of at-grade service access, vehicular entrance/drop-off and an entrance to underground carparking.

279. **A&B)** Both buildings deliver doors on the street, overlooking and activity that would humanise Wheatfield Way. They provide a visual and physical connection to the Old Town Centre Conservation Area.

The effect on the local environment;

280. The site is an island site, so its impact on the amenities of the surrounding environment will be less than it might otherwise be. This has been thoroughly assessed and the impact is considered to be acceptable.

The provision of a well-designed environment.

281. The apartments within the towers are all, at a minimum, dual aspect. Those apartments which have a northern frontage, from the 9th storey up, are designed with a triple aspect. The apartments are planned to be higher-end residential dwellings and the living environment will undoubtedly correspond to the monetary value of the property. The units have private balconies and a communal courtyard which meet the Council's amenity space standards.

Conclusion

282. The tall buildings have been considered against the CABE/ English Heritage Guidance on Tall Buildings and is considered to comply with the stated criteria.

Townscape and Visual Impact Assessment

283. A Townscape and Visual Impact Assessment has been provided as part of the Environmental Statement. This has been updated to include consideration of the revised scheme and consists of images which are either photorealistic images, wireline images or night time images from 44 locations (in 54 views) within and around Kingston Town Centre and from the opposite bank of the River Thames, Hampton Court Palace/ Hampton Court Park, Bushy Park and Richmond Park. Additional views were provided following representations from Historic England (formerly English Heritage) and Historic Royal Palaces. It is considered that the information submitted, which includes additional information requested by consultees, is sufficient to reach an informed judgement on the proposals. The relationship of the buildings to its surroundings is assessed in the following paragraphs.

284. The two 'taller' elements have been tested by the applicant with the views from a range of locations, local and strategic. The tallest

element of 16/14 storeys is sited in a prominent townscape location, which is identified in the Eden Quarter Development Brief. The lower 12 storey building is an additional element, which is not identified in the Eden Quarter Development Brief. The principle of the appropriateness of the site for accommodating tall buildings is supported. The site is located on an arc of existing development in the town centre which is considered tall (8-16 storeys). The quality of the existing buildings is low, and therefore the proposed scheme is a welcome opportunity to break the monolithic forms that dominate the townscape in this location.

285. The introduction of a second lower tall building creates an interesting synergy between the two taller elements proposed for the site, creating additional townscape interest for the Eden Quarter Development Brief area, which has not been previously identified in the Eden Quarter Development Brief and is not therefore in accordance with the Eden Quarter Development Brief which identifies building height of 6-8 storeys in this location. This presents an opportunity to address the scale difference between the proposed tall building and the context, by acting as an additional element that will again serve to break up the existing monolithic buildings in this location. The increased variety and scale difference in the 'roofscape' and subsequent skyline is an interesting interpretation of the existing fabric of the Town Centre, albeit a more contemporary approach to development in this location.
286. The applicant has revised the design of both tall buildings in response to concerns from the Council and public representations regarding the form and scale of the originally submitted scheme. The changes are welcome, as they have significantly reduced the visual impact of the individual buildings and therefore the overall development. The changes have seen more layering in the façade treatment, a reduction in height and a reduction in the overall mass of the taller buildings. Therefore the buildings are less intrusive on the skyline, considering the overall height and use of the buildings; this is a significant change from the submitted scheme.
287. The taller elements of the scheme triggered further examination of the scheme from the identified key views by the applicant. These agreed vantage points are an amalgamation of the Council's and Historic England's position on key views to the site. The revised scheme generally addresses most of the concerns with the submitted application. If a tall building is to break the skyline, then the design will need to be of high quality, in order to celebrate and clearly define the difference between the historic components of the town centre, and the planned development that will meet the town centre's aspirations for growth.
288. The long view from Richmond Park highlights the need for additional development in the town centre to contribute towards the non-descript skyline of Kingston. The dominant features on the skyline are the Kingston Riverside development, the monolithic institutional buildings and car parking structures. A high quality and distinctively designed building is a welcomed addition to the skyline, as it adds another feature to break up the dominance of the existing dull marker buildings. It also increases the legibility and identity of Kingston, when viewed from afar. And will combine well with other recently consented

applications such as those at the former Gas Holders site. It is considered that the proposed development does not impact adversely on the views to and from the Town Centre's historic assets such as All Saints Church, The Ancient Market Place, the Guildhall, and others.

289. The views from the Ancient Market Place have raised concerns regarding the creation of a 'fifth turret' for the grade II* listed Market building, therefore imposing on its setting. This is now less of an issue with the reduced heights and massing proposed in the revised scheme. Previously the exposed tall building was disproportionate to the roofscape surrounding the market and too prominent against the Market House. Now it creates an interesting foil to the Market Place that is not over-bearing, due to the improved design and articulation of the revised scheme.
290. The development is clearly visible from the listed Kingston Bridge and when viewed in conjunction with the historic and recent development, it makes a positive contribution to the skyline. The proposed scheme is broadly located equidistant between All Saints and Charter Quay, and had a proportional separation from Guildhall, which is partially obscured by other urban forms. Therefore the proposal gives breathing space to existing buildings that dominate the skyline from this location, which is acceptable.
291. The view from Fairfield is currently nondescript. The defining features being the Travel lodge/Premier Inn and Unilever buildings, which are considered low quality buildings. The additions to the skyline from this location are well proportioned and serve to make a positive contribution that are not overbearing. It also aids legibility and wayfinding from this area, as the town centre is now more readily identifiable. The undulation of the built form, materials and detailing make it an interesting composite view.
292. The views from Wheatfield Way show how the proposed development works well with the existing scale of the Unilever Building, and forms a new relationship with the Telephone Exchange and Villas at the extent of the conservation area. The concerns expressed by many that new development can swamp or detract from listed buildings or conservation area is understood and appreciated. Careful consideration has been given to these views. The setback from Wheatfield Way, combined with the reduction in heights and increased articulation in form, does show how the two edge conditions, town centre and conservation area, can work well together. This is amplified by the use of good design and variations in height, scale and massing which create an interesting juxtaposition between the two. The development does not shy away from this difference. A proposal which was more pastiche in style and scale may also have a similar 'swamping' effect. The goal is to clearly define the two elements as separate entities that can coexist together and not mimic them. Regard has been given to the examples cited by Historic England elsewhere, however this site should be considered on its individual merits and is considered to be distinguishable from the other locations cited.
293. The fact the development proposes to bring back into life the buildings that are on the buildings as risk register will give new purpose to their use that chimes well with the context that it will reside within and serve. The proposed public space in front of and around the listed buildings does help to mitigate the overbearing concerns, by enabling

the foreground not to be intruded upon and therefore celebrating this buildings contribution to the evolving fabric of the Town Centre, since its frontage and features are not intruded upon, with the new development emerging from the background.

294. The view from the residential parts of the Fairfield/ Knights Park conservation area would change significantly. Currently the site is a void, a gap in the urban fabric. It is noted that any development coming forward would occupy this void. The proposal for a high quality development in this void will make a positive contribution to the view from this location. Inevitably there will be view points towards the development where the proposal will appear to cluster or be concentrated, therefore losing some of the articulation of the built form. The Knights Park area is one of those locations. However, the varying height and gaps between the 'arms' of development can be seen, therefore mitigating some of the clustering issues. The other view points from Grange Road show a few elements of the development breaking the skyline. However, the scheme is more dispersed at this location, with an increased variety in the roofscape that articulates significant breaks in the development form, which reduces its impact.
295. The views from Penrhyn Road clearly show the tall building in its entirety. This approach celebrates the gateway G4 (K+20) through high quality detailing and distinctive form. The tall building also appears to stand alone with a largely uninterrupted fenestration, which again reinforces the articulation of the building, rather than a 'point block' design, which is not considered as good practice.
296. The series of views along the lower end of Eden St show a slim part of the development in the background. This does not compromise the setting of the Old Post Office listed building. The closer views show even less of an intrusion on the Old Post Office building. The tall building to the south is clearly visible, but reads as a separate component to the development, therefore adding variety to the townscape setting in this location. It is also worth noting that the Surrey House site in the foreground has been identified as a development opportunity, and therefore any future development will potentially mask the tall building in the background.
297. The view south along Brook St shows the arm of the main development in the background, with the listed Old Post Office in the foreground. The scale, articulation and materials of the new background building do not dominate the listed building. The new development provides a background and purpose for the listed building, which is a positive approach to developing the site. The setbacks of the proposed development have also allowed for the large scale street trees to flourish in this location that will be a positive defining factor of the public realm. This in conjunction with the new ground floor activity brought about by the development, and access to the new public square around the listed building, will see a welcomed increase in public activity at this location.
298. The view along Ashdown Road shows the lower of the tall buildings in the background, with the Old Post Office in the foreground. The strong vertical articulation of the building, use of materials and detailing set apart the new development from the existing heritage assets. There is sufficient gap at the roofscape level to differentiate between the two components. The revised scheme is a positive

response to previous concerns at this location.

299. The important views from Hampton Court Park's Long Water, North Canal Gate, The Queens's Apartments and east park entrance are not impeded at all by the proposed revised scheme. Therefore the proposal is considered to have no detrimental effect on the setting of these historic assets. The view from Long Water east and the Old Ice House does show the development in the background, but is masked/softened by the existing high quality landscape and vegetation in the foreground. Historic England have suggested that the current mature high quality landscape is to be removed or heavily managed. Discussions with Hampton Court Palace have clarified that no such changes to the historic landscape are being considered or intended.
300. The view from West of Shepherd's Cottages does reveal the scheme in the background. When the views towards the proposed revised scheme are exposed, it is considered that they are not seen as detrimental from the vantage point's settings, as the new development is of high quality design and will be a defining feature of the town centre, which is currently low quality. It is important to note that the skyline of Kingston will change over time, and therefore this view will see more positive additions, as the Town Centre grows, rather than the existing poorer quality tall buildings that define its horizon.
301. The view from Palmer Crescent reveals most of the tall building from this location. The building reads as a standalone feature, due to the rest of the proposed scheme being hidden from this view or in the background. This exposes the well designed features and the articulation of its slenderness from this vantage point. There is a scale difference between the low-rise existing buildings and proposed tall building, therefore more subjective with regards to townscape benefits at this location.
302. The views southward along Eden St show the development breaking the skyline at this location. This is mainly due to the low rise development in this part of the Town Centre in the foreground, which will change over time, in line with the aspirations set out in the Eden Quarter Development Brief.
303. The views from Bushy Park show a dominant foreground of high quality large open space and densely planted areas, with the proposed development in the background. If the landscape is to be removed or heavily managed, then the development will be exposed. However, this is not seen as a detrimental effect, as the new development is of high quality design and will be a defining feature of the Town Centre, contributing to the overall improvement of the Town Centres skyline. The views from Diana Fountain is masked by the statue and podium in the foreground and/ or dense landscape in the background, therefore not considered as detrimental to this important setting.
304. The view from Barge Walk shows the proposed development breaking the skyline. However, it is of similar or smaller scale than other taller components in the Town Centre that can be seen from this vantage point. The proposed revised development has ample breathing space between itself and the other defining features of the skyline. Also it is set equidistant between the existing features such as Charter Quay, Guildhall and Unilever House. The scheme makes a positive and appropriately scaled contribution to the skyline from this location.

305. The view of All Saints Church shows the proposed revised scheme breaking the skyline. However, it is partially masked by planting, therefore not considered to be of significant concern. If the landscape were to be heavily managed, then this would expose the tall building. Again, this is not considered an issue, as the tall building is of high quality design and proportion that sit comfortably on the horizon from this location, contributing to the overall improvement in the skyline for the Town Centre.

Comprehensive Development

306. Now that St George have agreed to purchase Frances House, it is only a comprehensive redevelopment of the site which is now proposed. This is welcomed.

Housing Quality and Mix

307. The proposed housing mix is set out below:

Tenure	Studio	1 bed	2 bed	3 bed	Total
Affordable rent	0	11	8	0	19 (5.7%)
Intermediate	5	25	0	0	30 (9%)
Market Sale	0	64	186	33	283 (85.2%)
Overall	5 (1.5%)	106 (31.9%)	194 (58.4%)	33 (10%)	332

* In addition the 6 units lost by demolition of Frances House will be provided in the proposal to make a total of 338 residential units.

308. Policy DM13 states that housing developments should incorporate a mix of unit sizes and provide a minimum of 30% of dwellings as 3 or more bedroom units, unless it can be robustly demonstrated that this would be unsuitable or unviable. 33 out of 338 units would be 3 bedroom units or more, which represents 9.8% (increased from 8.3% previously. The applicant seeks to justify this shortfall due to the site’s town centre location and the flatted nature of the development. In addition, on page 15 of the Eden Quarter Development Brief, in relation to the provision of new town centre residential accommodation, it states “Generally these high quality new homes will be flats, meeting the needs of both younger and older people wishing to live in the town centre.” Policy DM13 states that the Council will expect proposals for new residential development to accord with London Plan policies, demonstrating that the scheme has been designed to provide adequate internal space appropriate to the intended number of occupants. All residential units would comply with the minimum standards. Regarding the quality of the proposed accommodation, 93% of the rooms proposed would meet BRE guidelines for daylight. Policy Guidance 16 states that: A separation distance of no less than 21m shall normally be maintained between facing windows of habitable rooms. The distances between facing rooms across the communal courtyards is at least 25m which would exceed the guideline figure. 37 north facing single aspect units are included as part of the development (11% of the total). The number of

dwelling accessed from a single core should not exceed eight per floor. 6 of the cores have between 6-8 dwellings per floor with one core having 14 dwellings per core, These consist of 11 No. 1 bedroom and 3 No. 2 bedroom units. The Greater London Authority are satisfied that the design of these units, their location and outlook will ensure a high quality environment to outweigh the issues of partial non-compliance.

309. The development is located in Kingston town centre and would be subject to a variety of noise sources, including from traffic from surrounding roads, from pedestrian movements and from the proposed uses on the site and those that currently and will in the future surround the site. Owners of the nearby Hippodrome night club have expressed concern about the compatibility of the proposed residential development with the existing nightclub. Sound insulation and ventilation of the residential units will need to be provided to a high standard to ensure a good internal noise environment and this will be secured by condition. It should also be noted that the Hippodrome nightclub and other sites in the town centre are identified for redevelopment and the town centre is expected to be the focus for housing development in the Borough.
310. The residential accommodation proposed would generally provide a good standard of accommodation in terms of light, outlook and privacy and would be designed to provide a good standard of internal noise environment. The Greater London Authority are satisfied with the standard of accommodation and on balance Officers consider this to be reasonable given that this town centre site with good public transport accessibility is in principle appropriate for a high density scheme.
311. Policy DM13 states that appropriate amenity and play space shall be provided. London Plan policy seeks 10sqm of play space per child and it is estimated that 41 children (based on the number of affordable housing units being 55 would live in the new development across both tenures generating a requirement for 410sqm of play space. 1174sqm of courtyard amenity space in the centre of this development is proposed. Informal play space, including interactive pieces of play equipment would be provided within these spaces. A condition is proposed to ensure that this is delivered. Policy Guidance 13 of the Residential Design SPD states that 10sqm of private amenity space should be provided per flat plus 1sqm per additional occupant and an additional 50sqm. This generates a requirement of 4161sqm of private and communal amenity space. Balconies have been provided for all of the residential units. The total area of balconies and terraces equals 5583sqm. Policy guidance 14 states that any shortfall below 10sqm in proposed private amenity space should be made up in Communal Amenity space. A number of the units have less amenity space than required above. The shortfall would be 1086sqm. 1086sqm plus 50sqm equals 1136sqm which is the amount required by Policy Guidance 14. 1174sqm of communal amenity space which exceeds this amount by 38sqm. With regard to the quality of the amenity space two internal courtyard amenity spaces would receive 2 hours of sunlight over 35.6% and 48% of the spaces on 21st March/ 21st September, which is below the guideline figure of 50%. Sunlight levels would increase so that on 21st June they would be 79.25% and 84.99%. The March/ September figures are less than that

recommended within the Building Research Establishment's Guidelines for Sunlight and Daylight, however, only marginally less for the eastern courtyard. Given that this is a high density scheme within the town centre these figures are not unreasonable, particularly given that the scheme complies with the total amount of amenity space required by policy. Although the amount of communal amenity space complies with policy, the useability and quality of that space will need to be secured by condition, details of which will be required prior to commencement of development to ensure that sufficient soil depth and below ground pits for tree planting are incorporated to ensure that a green space can be provided that avoids excessive raised planters, which do not provide useable space and can restrict easy access to the amenity space. The submitted drawings and images show large areas of raised planters which is unlikely to be acceptable if the proposal is to provide useable amenity space rather than a space that just provides visual amenity. Amendments will be required when details are submitted pursuant to the conditions.

312. Policies 3.11 and 3.12 of the London Plan states that the maximum reasonable amount of affordable housing should be delivered taking into account the need to encourage rather than restrain development, the housing needs of particular locations, the requirement for mixed and balanced communities and the specific circumstances of individual sites. Core Strategy Policy CS10 seeks to maximise the delivery of affordable housing. Policy DM15 requires 50% of the units to be provided as affordable housing and proposals departing from these requirements will be expected to justify any lower provision through the submission of a financial appraisal.
313. 49 affordable housing units are proposed plus replacement of the 6 existing social rent units currently in Frances House. The Greater London Authority states that the applicant's viability appraisal needs to be independently verified and the findings supplied to the Greater London Authority, to verify that the maximum reasonable amount of affordable housing is being delivered. At 14.7% the affordable housing would be below the level of 50% and therefore a financial appraisal has been submitted and assessed by independent viability consultants on behalf of the Council. The conclusions are that the development cannot afford any additional affordable housing above that offered.
314. The Council's independent viability report has highlighted there is limited comparable Town Centre residential development as development has focused heavily upon the Riverside in recent years. Due to the uniqueness of this scheme, the length of the project programme (c. 5.5 years) and in the absence of any comparable Kingston Town Centre developments to fully support the values relied upon there remains the possibility the scheme could outperform the Applicant's sales values. In addition, there are certain "unknowns" in respect of what the final acquisition costs of the Royal Mail Land which forms part of the site will be. Whilst the costs adopted do not appear to be unreasonable there remains the possibility that the actual acquisition costs of these interests could be lower than those currently relied upon. In summary, as the scheme is currently offering only 14.7% affordable housing the Council's independent advisors stated that the Council may wish to consider a review mechanism in order to ascertain whether the scheme can support any further affordable

housing at an agreed point in the future. This is supported by the Mayor of London's Draft Interim Housing Supplementary Planning Guidance, the Council proposes that a review should be undertaken by the applicant. The Council will appoint an independent assessor paid for by the applicant to assess the economic viability of the scheme taking account of final sales values achieved and other relevant costs, which in this instance will include acquisition costs of any unowned land. Any additional profits are proposed to be split 50%/50% between the developer and the Council up to a maximum equivalent of 50% affordable housing. For clarification, if there were any decrease in profits, the proposal would still be expected to provide the amount of affordable housing agreed within this report. The Council would use their 50% to provide additional off-site affordable housing. This would be undertaken after the completion of sales of 90% of the private units.

315. Policy DM15 seeks a tenure split of 70:30 between Social/Affordable Rent and Intermediate provision. The tenure split suggested by the London Plan is 60:40 between social/affordable rent and intermediate provision. The development would provide 39% affordable rented housing and 61% discount market sale. The proposal would not therefore comply with this part of the policy, however, the Council's housing team supports the tenure and unit mix on this site which is considered suitable for one and two bedroom flats for households wishing to downsize from family housing. The site is considered suitable given its proximity to the town centre and transport links. The intermediate housing would be provided as discount market sale where the purchaser buys a portion of equity in his/her home, although there is no rent to be paid on the un-owned equity. The unsold equity would be held by the Council. This form of housing is acceptable and the affordability levels have been agreed with the applicant, as per the table below:

Unit type	Intermediate (DMS)	DMS prices	Household incomes
Manhattan	5	5 x £203,000	£58,000
1 bed two person	25	7 x £122,500 8 x £168,000 10 x £203,000	£35,000 £48,000 £58,000

316. The applicant has confirmed that the Discount Market Sale (DMS) units would be pepper potted around the development. As the development does not incorporate leisure facilities the service charges would be kept inherently low and the applicant has agreed to provide 10 parking places to affordable housing residents. Revisions have been made to the plans which improve light and layout in some of the units and the applicant has confirmed that five wheelchair standard homes would be included, as per revised plans.

317. The affordable housing offered is considered acceptable, subject to the review mechanism which would allow additional money from increased sales values or any reduced costs to go towards a commuted sum to provide off-site affordable housing.

Flood Risk

318. The western part of the site is located within Flood Zone 3B (flood plain). To the east of this the site is designated as Flood Zone 3A. The eastern part of the site is located within Flood Zone 2/1. Policy DM4 requires a Flood Risk Assessment for major development proposals within Flood Zone 1 of one hectare or more and all new development in Flood zones 2 and 3. A revised Flood Risk Assessment has been submitted following amendments to the scheme to bring the retail units and part of the space adjacent to the Former Post Office building down to the pavement level of Brook Street.
319. The Environment Agency has advised that it has no objection to the proposals noting that whilst the site falls within the functional flood plain, this has been taken into account in policy terms by the site's identification for redevelopment in the Eden Quarter Development Brief.
320. The Environment Agency has advised that the proposed flood mitigation and compensation measures are satisfactory in principle, with vulnerable uses (i.e. residential units) located above the 1 in 100 plus climate change flood level.
321. The Environment Agency advise that clarifications will be required in due course in respect of compensatory flood storage options and emergency access and egress routes and whether the commercial units would be floodable. A condition has been included to provide these details in accordance with the Environment Agency's recommendations.
322. With regard to surface water flooding, a condition is attached to ensure that this is kept to an acceptable to no more than 3 times Greenfield run off rates.

Impact on Neighbours' Residential Amenity

323. Policy DM10 states that development proposals should 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.
324. Regarding the impact on daylight to surrounding properties, the BRE publication, Site Layout Planning For Daylight and Sunlight provides guidance regarding the impact of proposals on the sunlight and daylight of surrounding properties. This states that daylight may be adversely affected if a proposed building would be above the 25 degree line measured from the centre of an existing window: With regard to The Vertical Sky Component (a measure of daylight, i.e. light received from the sky), daylighting may be adversely affected if it is less than 27% and less than 0.8 times its former value; Daylight distribution may be adversely affected if the area of the working plane (in residential accommodation this is a flat surface 0.85m above floor level) in a room which can receive direct skylight being reduced to less than 0.8 times its former value. If either of these scenarios occurs the daylighting to these windows may be adversely affected.
325. Now that Frances House is proposed to be redeveloped as part of these proposals, the impact on daylight does not need to be considered for Frances House.
326. There would be an impact on daylight to properties in Wheatfield

Way as set out in this paragraph. There would be a noticeable loss for 4 Wheatfield Way, with one reception room and one bedroom suffering losses of 30% to a VSC of 21.3%. There would be a noticeable loss for 6 Wheatfield Way which would suffer a loss of 34% for one reception room and one bedroom to a VSC of 20.65% and 21.22%. There would be a noticeable loss of 28-35% for 8 Wheatfield Way for 2 rooms resulting in VSC levels of 18.49- 22.72. There would be a noticeable loss of 33-35% for 10 Wheatfield Way for all 3 rooms to 22.37-23.07. There would be a noticeable loss of 30-33% VSC for 12 Wheatfield Way to 23.2-24.3 for all 3 rooms. The reduction of VSC for 14 Wheatfield Way would be 29-31% at 24.3-24.9 for the bedrooms. The ground floor living space would be 0.83 times its former value. The VSC for the ground floor of 16 Wheatfield Way at 26.7% would be just below the 27% level. The first floor rooms would be above 27%. Daylight distribution in terms of the working plane for 10 and 8 Wheatfield Way in two rooms would fall below 0.8, at 0.79 or 0.75. There would therefore be a number of examples of losses over the 0.8 identified within the BRE guidance and the levels of daylight would in many cases fall below 27% which is the level identified as providing well daylit rooms. This impact would need to be weighed against the benefits of the development within the town centre. The proposed buildings, including the tower, are located to the north of these properties fronting Wheatfield Way and would not therefore impact upon their sunlight. There would be some limited impact on the low evening sunlight from this development to properties to the east of the site, although this would not be protected under the BRE guidance.

327. Policy Guidance 16 of the Council's Residential Design SPD states that a separation distance of no less than 21m shall normally be maintained between facing windows of habitable rooms. The minimum window to window distance from the properties facing this site on the opposite side of Wheatfield Way to the proposed development is 30.95m and therefore the separation distance would exceed the guideline figure.

328. The houses in Wheatfield Way facing directly towards this site currently have an open outlook across Wheatfield Way and many across the open car park beyond. This outlook would change significantly if development were approved on the site, although the new buildings would be at least 30.95m from these properties.

329. The development would be across the generally busy Wheatfield Way from the houses fronting Wheatfield Way. Other than some potential for additional noise and disturbance during the temporary construction period, it is unlikely that there would be any significant additional noise to surrounding residential properties.

Highways & Parking

330. The development has been set back 4m from the edge of the site to give a total of 7m footpath/ cycle route, including the existing 3m wide pavement. It is proposed that space for a 3m width two way cycle route would be safeguarded for widening of Wheatfield Way as part of the mini-Hollands scheme within Kingston town centre and a 4m wide public footpath with tree planting would be provided within the existing

development site. The Council's mini-Hollands team, Neighbourhood Engineer and Tree Officer have indicated that they are satisfied with this in principle. 636 cycle spaces is proposed. Sufficient cycle parking is proposed to accord with cycle parking standards. This will be secured by condition, details of which will include details of the specific type of stand, Sheffield stand where possible. Servicing of the site will now take place on-site rather than from the highway, as requested by the Neighbourhood Engineer and is considered acceptable.

331. The maximum number of off street parking spaces for the originally submitted proposal in accordance with the London Plan is 340 spaces which also states that 'All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit.' 132 spaces are proposed and for the residential accommodation this represents a ratio of 0.39 spaces per unit. The application site is in an area that has very limited on street parking provision for residents, and where on street parking is already heavily subscribed. The lack of off street parking provision would result in added pressure for residents' parking provision in the area, and therefore the Council's neighbourhood engineer raises no objection subject to a legal agreement precluding residents from applying for on street residents parking permits, including visitor parking permits and permits to park in Council owned car parks in the area and a requirement to inform potential buyers or tenants of the above exclusion and to publicise the lack of parking provision in sales brochures.
332. As a result of this application 150 public car parking spaces would be lost. The Council's vision in K+20 is to aim to maintain public off-street parking at around 7000 spaces. Policy P3 seeks provision of a multi-storey car park on this site or the Ashdown Road car park site accessed from Wheatfield Way. In the Eden Quarter brief, provision of a public car park is not listed as an objective for this site, but re-provision of existing surface car parking within a multi-storey car park is part of the development brief for the Ashdown Road site. The loss of the existing car park on this site which is not well used as a town centre shopper's car park is considered to be reasonable particularly given that a multi-storey car park is intended to be provided on the Ashdown Road car park.
333. The neighbourhood engineer states that the impact of the proposal on traffic in the surrounding area would not be significant. A Travel Plan and parking management plan should be submitted by the applicant for approval to ensure that the car parking is managed to allocate spaces flexibly to those needing them rather than being sold with flats. The neighbourhood engineer has stated that the applicant should provide a car club space within their development if this is possible. If not the applicant will need to make arrangements to provide a car club car/ space on street. Electric vehicle charging points should be provided to comply with the London Plan 2011: Active 20% of total number of parking spaces and passive 20% of total parking spaces. The drop off/ pick up area will need to be controlled and enforced to make sure no illegal on street parking takes place. Existing crossovers no longer required should be removed by the Local Authority but at the applicant's expense and the existing pavements surrounding the site should be re-surfaced.

Trees

334. Two of the existing trees the subject of a Tree Preservation Order would be retained adjacent to the western end of the new public square with an additional tree at the eastern end of the public square. These would be supplemented by 6 additional trees along Brook Street and 13 additional trees within the pavement area along Wheatfield Way and 4 additional trees in front of the Former Telephone Exchange. The Council's tree officer is satisfied with the principle of the loss of trees and their replacement with new trees, subject to details regarding species and size of proposed trees.

Legal Agreements

335. In the event of an approval, the application would be subject to a legal agreement covering the following provisions:
- i. The provision of on site affordable housing 19 affordable rent units/ 30 discount market sale units and a review mechanism that includes a review of sales values and costs
 - ii. One on-site car club car/ space (or off-site provision of car club car and space if no acceptable location can be found), including funding of £200 per unit to provide each unit with free car club membership for two years from first occupation;
 - iii. On-site provision of public open space/ publicly accessible pedestrian routes in the form of the public space;
 - iv. Provision of 4m strip of land along Wheatfield Way including provision of 4m wide pavement/tree planting to allow widening of Wheatfield Way/ 3m wide mini-Hollands route to be provided in place of existing pavement;
 - v. Section 278 Agreement to secure provision of new crossover, layby and footway surrounding the site and closure of existing crossovers no longer required;
 - vi. Submission of Construction Management Plan for approval and implementation prior to commencement of development;
 - vii. Development designed to connect to future District Heating Network in surrounding area and provision for connection;
 - viii. Car park management plan, including parking for disabled occupiers and for affordable accommodation occupiers and 20% Active and 20% Passive Electric Vehicle Charging Points;
 - ix. Exclusion from Controlled Parking Zone and Council owned car parks and requirement to notify potential buyers or tenants (£1500 towards amendment to traffic management order);
 - x. Signage scheme for car parks within the town centre;
 - xi. Secure community uses at affordable rate and provision of management plan;
 - xii. Rent Argyll House to the Council for business start up purposes pending redevelopment of this building;
 - xiii. Secure provision of commercial floorspace, including type and fitout;
 - xiv. Secure refurbishment and fitout and bringing into use of

- Former Post Office and Telephone Exchange;
- xv. Establishment of Employment and Training Initiative;
 - xvi. Provision of public art
336. The Planning Obligations SPD seeks provision for the following:
- i. £67,600 towards car club membership for 2 years for occupiers of the development;
 - i. Travel Plan monitoring fee of £3500;
 - ii. £150 Monitoring fee per planning obligation
337. Transport for London are requesting contributions towards the planned improvements for the town centre, surrounding roads and signage and Sport England are seeking confirmation of proposed sports facility provision.
338. The suggested Section 106 financial contributions are as below:
- ii. £67,600 towards car club membership for 2 years for occupiers of the development;
 - iii. £1500 towards amendment to the traffic management order in relation to the Controlled Parking Zone;
 - iv. £3500 for Travel Plan monitoring;
339. The Council is satisfied that the proposed Heads of Terms of the S106 agreement meets the statutory tests prescribed in regulation 122 of the Community Infrastructure Levy Regulations 2010 being (a)necessary to make the development acceptable in planning terms; (b)directly related to the development; and (c)fairly and reasonably related in scale and kind to the development. They can therefore be taken into account in assessing the proposal. All payments to be index linked from the date of the resolution to grant of planning permission to the month preceding the date when payment is due (RPI).
340. A Paper was presented on 13th October 2015 to Full Council for Approval of the Royal Borough of Kingston's Community Infrastructure Levy (CIL). The Council approved the introduction of the Council's Community Infrastructure Levy. This will be levied on all applicable planning applications that are determined from 1st November 2015, which includes this application. In this location, the amount payable would be approximately £4.5 million.
341. The Regulation 123 List identifies the projects that Kingston Council may wholly or partly fund through CIL. These include: Provision of new school places, health facilities, sports facilities, public realm improvements, and improvement of Council-owned parks, which could include the projects previously identified in relation to this proposal such as King Athelstan School, improvements to public realm in the Eden Quarter Development Brief area and improvements to Fairfield Recreation Ground.
342. The proposal would also be liable for a Mayoral Community Infrastructure Levy contribution, based on the net increase in floor area.

Sustainability

343. Policy DM1 states that major developments should meet Code level 5 regarding energy/CO2 and BREEAM Outstanding from 2013.

The DCLG have now abandoned Code for Sustainable Homes (CfSH), but the new changes allow local authorities to continue to apply energy and water efficiency standards in line with previous requirements under the Code at the current time. As CfSH can no longer be a requirement, a suitable level of energy efficiency should be met through the details as above. Water efficiency should be secured by condition, and are in line with Code level 4 equivalent. This should already be planned based on the submitted CfSH pre-assessment report which targeted code level 4. For the office and retail parts of the development, the Council can still require BREEAM assessments in line with Policy DM1 to be carried out. The application proposes to target BREEAM Excellent. Considering the refurbishment and listed building barriers encountered by the majority of retail and office development, the proposed Excellent rating seems reasonable. This should be secured through condition.

344. The submitted energy statement is structured according to the GLA's energy hierarchy as required, and provides the emissions reduction contribution from each individual stage of the hierarchy. Energy demand is reduced through the implementation of improved insulation standards from Building Regulations Part L, high levels of air tightness with mechanical ventilation and heat recovery. The worst case scenario (i.e. building regulations equivalent) is proposed for thermal bridging, which may be improved upon during detailed design/construction. It is proposed penthouse apartments will have cooling provided through a communal chilled water system, while passive cooling measures will be implemented elsewhere to eliminate the need for cooling, such as air tightness and insulation. Further measures to minimize solar heat gains during the summer such as shading provided by balconies and solar control glazing (particularly important for single aspect flats) are proposed. Green roofs are to be implemented which may also provide some shading and increase the heat transfer away from the building structure through evaporation/ transpiration.
345. Measures are proposed for the refurbishment of listed buildings such as improved glazing and insulation, however there are parts of the old telephone exchange building that will remain solid brick and therefore would be a significant source of heat loss, which is a concern. The listed status provides barriers regarding this and it would not be appropriate to include internal wall insulation for example. The refurbishment cannot easily be taken into account within the same calculations as the new build, however the emissions reduction associated with these parts of the development achieving BREEAM Excellent demonstrate a good level of improvement.
346. Policy DM2 seeks District Heating Networks in identified areas, which includes the Eden Quarter Development Brief area. As this is an identified area and the development will need to incorporate measures to connect into a possible future Kingston Town Centre heat network. A site wide communal heating and hot water system is proposed, to be delivered by a CHP system scaled to provide 100% summer hot water and heat demand, with gas top up boilers to provide hot water and space during the winter. The implementation of this communal system is expected to contribute 29% towards the 35% emission reduction target. Steps are also expected to be taken to ensure connection to a district heat network is possible. This would be secured via a Section

106 agreement.

347. The remaining emissions reduction requirement is met through installing 54kWp of Solar PV panels across 501.4sqm of roof space. In total the 35% emissions reduction target from building regulations part L 2013 should be met via the measures detailed, and should be secured using conditions.

Other Material Considerations

348. Water supply and waste water capacity: Thames Water have identified a need for additional water supply and waste water capacity. A condition is attached to secure this before development commences.
349. Lifetimes Homes/ Wheelchair accessible units: Policy DM13 states that new residential development will be expected to be designed and built to Lifetime Homes standards and ensure that at least 10% of units would be wheelchair accessible. All properties would be built to Lifetime Homes Standards and 10% of the units would be wheelchair accessible. Following the ministerial statement at the end of March 2015, the Lifetimes Homes Standard is no longer current policy. An equivalent standard would be expected.
350. Archaeology: Policy DM12 states that heritage assets should be preserved. The site is located within an Archaeological Priority Area. English Heritage (Archaeology) advise that there is good potential for archaeological remains within the development site. The archaeological interest should therefore be conserved by attaching two conditions in relation to recording of the standing historic buildings and a programme of archaeological fieldwork.
351. Land contamination: A land contamination report has been submitted with the application, including a quantitative risk assessment which identifies the need for mitigation measures in order to prevent potential harm to health or the environment. Conditions should be applied to any granted consent in order to ensure risks from land contamination to the future users of the land and neighbouring land are minimised. Air Quality: The development site falls within a declared Air Quality Management Area and an Air Quality Impact Assessment has been submitted as part of the application. The assessment identifies that the overall impact of the development is not anticipated to result in any significant increase in road traffic or energy plant emissions.
352. Wind microclimate: Entrances would be useable for sitting or standing throughout the year. Wind microclimate on thoroughfares is expected to be suitable for standing use during the windiest season. At the north west of the site, winds from the south west would be expected to generate windier leisure walking conditions. Balconies and terraces would generally have acceptable wind conditions, however, some are windier than desired and additional screening will be required to reduce the windiness.
353. Aviation/ Navigation: A formal response was received from National Air Traffic Services Safeguarding stating that the proposal did not conflict with their safeguarding criteria.
354. Designing out crime: Concern was raised regarding the colonnades behind raised planters that were initially proposed that they could provide shelter for homeless/ rough sleepers. These have been removed and there are now active commercial frontages to the new public square and along Ashdown Road to the corner with Wheatfield Way and along Brook Street. The frontage along Wheatfield Way would be fronted with residential units which would all have front doors onto Wheatfield Way and most of the units would have some defensible

space. The perimeter of the site would be overlooked by flats thereby reducing opportunities for crime. Biodiversity: Policy DM6 states that new developments should protect and promote biodiversity as part of sustainable design through the inclusion of sustainable drainage, tree planting, soft landscaping and habitat enhancement. Seven trees and a grassed area would be removed and replaced with two landscaped courtyards and 23 new trees which provides potential to improve the site's limited ecology. The applicants have commissioned a Phase 1 Survey which concluded that there was potential for bat roosts within the building, but no bat roosts were identified. A repeat survey was recommended if there is a delay of more than a year from the survey in August 2014 to development commencing. Bat friendly plant species is recommended to be provided within the landscaping. A condition would be attached to secure this.

355. Sports provision: Sport England have raised concerns about the provision of sports facilities in relation to the development. Although improvements were identified to the nearby Fairfield Recreation ground as part of a Section 106 agreement, contributions, which could be spent on indoor and outdoor sports facilities, would now be secured through the Council's Community Infrastructure Levy.

356. The Environmental Statement along with the additional information contained in the addendums to the Environmental Statement presents a sound assessment of the likely impacts of the development. The mitigation measures identified within the assessment of the Environmental Statement should be secured through appropriate Conditions/Section 106 obligations, as suggested within this report.

Conclusion:

357. It is considered the development will provide a number of significant benefits including the bringing back into use and refurbishing two unused listed buildings which are on the listed buildings at risk register into appropriate and economic uses, provision of new public realm, new retail, office space, community space, 338 housing units, including 49 affordable housing units (14.7% of the total) and replacement of the six existing affordable housing units within Frances House. The design and quality of the proposed development is considered to be very high. The development accords with the London Plan's density matrix and responds to the complex environments that surround it directly and from medium and long distance views. It complies with the objectives and principles of the Eden Quarter Development Brief and will begin further much needed regeneration in this area of the town centre. £4.5 million Community Infrastructure Levy will be provided, which is an increase of approximately £1.6 million above the Section 106 contribution that would have been secured towards improvements to public realm in the Eden Quarter area, the Fairfield, King Athelstan School. In addition, the development is being setback from the site boundary to allow provision of a mini-Hollands route and improvements to the environment of Wheatfield Way.

358. These positive aspects need to be weighed against issues in relation to a number of aspects: the height of the 16/14 storey building and the 12 storey building and some 9-10 storey buildings exceeding the guidance in the Eden Quarter Development Brief, although given its demonstrated high quality design it would from many viewpoints be an asset to Kingston.

359. Concern and objection has been expressed in relation to harm to the setting of the Telephone Exchange, in particular due to the juxtaposition of the proposed buildings which are significantly taller than the Telephone Exchange building, its visibility from the Market Place and conservation areas and historic parks, including Hampton Court Palace. The Council has however considered the

impact on the setting of all on site and surrounding heritage assets. The Council has: 1) Identified which heritage assets and their settings are affected; 2) Assessed whether, how and to what degree these settings make a contribution to the significance of the heritage assets; 3) Assessed the effects of the proposed development, whether beneficial or harmful, on that significance; 4) Explored the way to maximise enhancement and avoid or minimise harm. When considering the significance of the heritage assets It is considered the impact would be less than substantial. The benefits, as highlighted above, include: Sustaining and enhancing two listed buildings on the Heritage at Risk Register, the regeneration of an underused site, 332 additional residential units, the creation of a public square and the setback from Wheatfield Way and additional retail and office space. In weighing the less than substantial harm against those benefits in accordance with paragraphs 133 and 134 of the NPPF, it is concluded that the public benefits outweigh the harm. The archaeological significance of the site has been given weight and are satisfied that these assets can be appropriately recorded and preserved through the implementation of measures secured by planning conditions.

360. There would be an impact on daylight to some residential properties in Wheatfield Way which exceed the guidelines in the Building Research Establishment's Guidance on Sunlight and Daylight impacts, although not unusual in a town centre context.
361. Concern has been expressed about the proportion of affordable housing. An independent viability assessment has confirmed that the amount of affordable housing has been maximised, and the quantity and type of affordable housing has been agreed with the Housing Service. However a review mechanism is proposed to be secured within the Section 106 Heads of Terms to ensure that any uplift in values during the phased construction of this major development is captured.
362. The National Planning Policy Framework states that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.
363. This is considered to be a welcome development which would provide a comprehensive redevelopment of this underused urban block that lies close to the heart of Kingston Town Centre.

RECOMMENDATION:

A) Subject to the satisfactory agreement of the Heads of Terms of the Section 106 agreement as set out in the report, Approve subject further to referral to the Mayor of London under the Town & Country Planning (Mayor of London) Order 2008 and subject to the completion of an agreement under Section 106 of the Town and Country Planning Act 1990 (as amended), as specified in the above legal agreements section, and the following conditions:

B) To delegate to the Head of Planning and Transport any changes to conditions where necessary, including where required to conform with the agreed Section 106 agreement:

1. 14/13247/FUL (Planning Application):

1) The development hereby permitted shall be commenced within 3 years from the date of this decision.

Reason: In order to comply with Section 91 of the Town and Country Planning

Act, 1990. (As amended)

2) The development hereby permitted shall be carried out in accordance with the following approved plans:

00852_JTP_P1_004 P5 Proposed Demolition plan	Received	04/09/2015
00852_JTP_P1_005 P05 Proposed site plan	Received	04/09/2015
00852_JTP_P1_006 P05 Existing basement plan	Received	04/09/2015
00852_JTP_P1_010 P05 Proposed basement plan	Received	04/09/2015
00852_JTP_P1_100 P05 Proposed ground floor plan	Received	04/09/2015
00852_JTP_P1_101 P06 Proposed mezzanine floor	Received	23/09/2015
00852_JTP_P1_102 P05 Proposed level 01 plan	Received	04/09/2015
00852_JTP_P1_103 P05 Proposed level 02 plan	Received	04/09/2015
00852_JTP_P1_104 P05 Proposed level 03 plan	Received	04/09/2015
00852_JTP_P1_105 P05 Proposed level 04 plan	Received	04/09/2015
00852_JTP_P1_106 P05 Proposed level 05 plan	Received	04/09/2015
00852_JTP_P1_107 P05 Proposed level 06 plan	Received	04/09/2015
00852_JTP_P1_108 P05 Proposed level 07 plan	Received	04/09/2015
00852_JTP_P1_109 P05 Proposed level 08 plan	Received	04/09/2015
00852_JTP_P1_110 P05 Proposed level 09 plan	Received	04/09/2015
00852_JTP_P1_111 P05 Proposed level 10 plan	Received	04/09/2015
00852_JTP_P1_112 P05 Proposed level 11 plan	Received	04/09/2015
00852_JTP_P1_113 P05 Proposed level 12 plan	Received	04/09/2015
00852_JTP_P1_114 P05 Proposed level 13 plan	Received	04/09/2015
00852_JTP_P1_115 P05 Proposed level 14 plan	Received	04/09/2015
00852_JTP_P1_116 P05 Proposed roof plan	Received	04/09/2015
00852_JTP_P1_120 P05 Proposed roof plan, green & brown roofs and PV locations	Received	04/09/2015
00852_JTP_P1_200 P05 Proposed North elevation AA	Received	04/09/2015
00852_JTP_P1_201 P05 Proposed North elevation BB	Received	04/09/2015
00852_JTP_P1_202 P05 Proposed East elevation CC	Received	04/09/2015
00852_JTP_P1_203 P05 Proposed East elevation DD	Received	04/09/2015
00852_JTP_P1_204 P05 Proposed South elevation EE	Received	04/09/2015

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00852_JTP_P1_001 P05 Red line plan	Received	04/09/2015
00852_JTP_P1_002 P05 Existing Topo Survey	Received	04/09/2015
00852_JTP_P1_003 P05 Existing site plan	Received	04/09/2015
00852_JTP_P1_206 P05 Proposed North Elevation GG	Received	04/09/2015
00852_JTP_P1_207 Proposed South elevation HH	Received	04/09/2015
00852_JTP_P1_300 P05 Proposed Section AA	Received	04/09/2015
00852_JTP_P1_301 P05 Proposed Section BB	Received	04/09/2015
00852_JTP_P1_302 P05 Proposed Section CC	Received	04/09/2015
00852_JTP_P1_303 P05 Proposed Section DD	Received	04/09/2015
00852_JTP_P1_304 P05 Proposed Section EE	Received	04/09/2015
00852_JTP_P1_305 P05 Proposed Section FF	Received	04/09/2015
00852_JTP_P1_306 P05 Proposed Section GG	Received	04/09/2015
00852_JTP_P2_205 rev P06 Proposed West elevation FF	Received	23/09/2015
Affordable Housing Statement	Received	11/12/2014
Affordable Housing Statement - Sept 2015 Addendum	Received	04/09/2015
Appendix A Tree Survey Plan	Received	11/12/2014
Appendix B Materials Reference Plan	Received	11/12/2014
Appendix C Tree Protection Plan	Received	11/12/2014
Car Parking Management Plan	Received	15/09/2015
Community Engagement Report	Received	11/12/2014
Community Engagement Report Addendum	Received	09/04/2015
Community Engagement Report Addendum Sep 2015	Received	04/09/2015
DAS Sept 2015	Received	04/09/2015
Delivery Service Plan- FINAL/FULL	Received	09/04/2015
DSP Figures & Appendix FINAL/FULL	Received	09/04/2015
Energy & Sustainability Strategy - Sept 2015 Addendum	Received	04/09/2015
Energy & Sustainability Statement	Received	11/12/2014
ES Non Technical Summary	Received	04/09/2015
ES Volume 2 Townscape, Visual Impact and Built Heritage	Received	04/09/2015
ES Volume 3 Technical Appendices	Received	04/09/2015
Health Impact Assessment - September 2015	Received	04/09/2015
Heritage Statement	Received	11/12/2014

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Heritage Statement - Sept 2015 Addendum	Received	04/09/2015
Indicative Location of Residential	Received	11/12/2014
L-100 Materials Reference Plan Scenario A	Received	11/12/2014
L-200 Landscape Plan - Old Post Office Courtyard Scenario A	Received	11/12/2014
L-201 Landscape Plan - streetscapes Scenario A	Received	11/12/2014
L-202 Landscape Plan - podium garden Scenario A	Received	11/12/2014
L-203 Hard Landscape Plan - private roof terrace Scenario A	Received	11/12/2014
Light Within Report - Sept 2015 Addendum Part 1	Received	04/09/2015
Light Within Report - Sept 2015 Addendum Part 2	Received	04/09/2015
Photographs of Street View	Received	23/09/2015
Planning Statement	Received	11/12/2014
Planning Statement with Regeneration Statement - Sept 2015 Addendum.	Received	04/09/2015
Regeneration Statement	Received	11/12/2014
Retail vision	Received	11/12/2014
TOPO ES Addendum September 2015	Received	04/09/2015
TP - Appendix A	Received	09/04/2015
TP - Figures	Received	09/04/2015
Transport Assessment	Received	11/12/2014
Transport Assessment Addendum - Sept 2015 Addendum	Received	04/09/2015
Transport Framework Travel Plan - FINAL/FULL	Received	09/04/2015
Tree Survey Report	Received	11/12/2014

3) A Delivery and Service Management Plan shall be submitted to and approved in writing by the local planning authority before first occupation of the development. The development shall be carried out in accordance with the approved details.

Reason: In order to safeguard the amenities of the surrounding residential occupiers and to safeguard highway safety and the free flow of traffic in accordance with Policies DM9 (Managing Vehicle Use for New Development) and Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

4) A Car Park Management Plan shall be submitted to and approved in writing by the local planning authority 6 months prior to anticipated first occupation. The development shall be carried out in accordance with the approved details.

Reason: In order to safeguard the amenities of the surrounding residential occupiers and to safeguard highway safety and the free flow of traffic in accordance with Policies DM9 (Managing Vehicle Use for New Development) and Policy DM10 (Design Requirements for New Developments including House

Extensions) of the LDF Core Strategy Adopted April 2012.

5) Any works/events carried out either by, or at the behest of, the developer, whether they are located on, or affecting a prospectively maintainable highway, as defined under Section 87 of the New Roads and Street Works Act 1991, or on or affecting the public highway, shall be co-ordinated under the requirements of the New Roads and Street Works Act 1991 and the Traffic Management Act 2004 and licensed accordingly in order to secure the expeditious movement of traffic by minimising disruption to users of the highway network in Kingston upon Thames. Any such works or events commissioned by the developer and particularly those involving the connection of any utility to the site, shall be co-ordinated by them in liaison with the Royal Borough of Kingston upon Thames, Street Works Section, (telephone 020 8547 5982). This must take place at least one month in advance of the works and particularly to ensure that statutory undertaker connections/supplies to the site are co-ordinated to take place wherever possible at the same time.

Reason: In order to minimise disruption to road users, be they pedestrians or vehicular traffic, under the requirements of the New Roads and Street Works Act 1991 and the Traffic Management Act 2004. In order to satisfy the licensing requirements of the Highways Act 1980.

6) Before above ground development commences on the relevant part of the development, details of external lighting in relation to the relevant part of the development shall be submitted to and approved in writing by the Local Planning Authority. The external lighting shall be installed in accordance with the approved details and thereby retained as such unless a variation is subsequently submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the amenities of the adjoining residential occupiers in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

7) Full details of the materials, colour and texture of the external finish of the buildings shall be submitted to and approved in writing by the Local Planning Authority before above ground development commences on the relevant part of the development and the development shall be constructed in accordance with the approved finishes.

Reason: To ensure a satisfactory appearance on completion of the development in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

8) Before above ground development commences, a panel of brickwork indicating the facebond mortar colour and pointing style shall be constructed on the site for the approval in writing of the Local Planning Authority. The development shall thereafter be constructed only in accordance with the panel as approved which shall be retained on site until such work has been completed.

Reason: To ensure a satisfactory appearance on completion of the development in accordance with Policies BE11 (Design of New Buildings and Extensions) and STR6 (Conserving and Enhancing the Built Environment) of the Royal Borough of Kingston upon Thames Unitary Development Plan First Alteration.

9) The levels of buildings, roads, parking areas and pathways within the site shall only be in accordance with those shown on the approved plans.

Reason: To ensure that the appearance and functioning of the development is satisfactory and to safeguard the amenities of adjoining occupiers in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012 and comply with Supplementary Planning Document 'Access for All' (July 2005).

10) All works on site shall take place in accordance with the following details which shall have previously been submitted to and approved in writing by the Local Planning Authority prior to the commencement of work:

- (a) Provision for loading/unloading materials.
- (b) Storage of plant, materials and operatives vehicles.
- (c) Temporary site access.
- (d) Signing system for works traffic.
- (e) Measures for the laying of dust, suppression of noise and abatement of other nuisance arising from development works.
- (f) Location of all ancillary site buildings.
- (g) Measures to protect any tree, shrubbery and other landscape features to be retained on the site during the course of development.
- (h) Means of enclosure of the site.
- (i) Wheel washing equipment.

Reason: In order to safeguard the amenities of the surrounding residential occupiers and to safeguard highway safety and the free flow of traffic in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

11) Prior to commencement of any development on site, a Construction Management Plan shall be submitted to the planning authority for written agreement. The development shall only be implemented in accordance with the details and measures approved as part of the construction management plan, which shall be maintained throughout the entire construction period.

Reason: In order to safeguard the amenities of the surrounding residential occupiers and to safeguard highway safety and the free flow of traffic in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

12) No fans, louvres, ducts or other external plant or telecommunication masts/equipment other than those shown on the drawings hereby approved shall be installed without the prior written approval of the Local Planning Authority.

Reason: To safeguard the amenities of the occupiers of the neighbouring properties and the visual amenities of the area in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

13) No development shall commence until a landscaping scheme for the whole site, including the hard surfaced areas, the retention of the existing trees, provision of new tree planting and provision of play equipment, shall have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented within the first planting season following completion of the development and the tree planting and landscaping shall thereafter be maintained for five years to the satisfaction of the Local Planning Authority. Any trees or shrubs which die during this period shall be replaced in the

first available planting season, and the area shown to be landscaped shall be permanently retained for that purpose only.

Reason: In the interests of visual amenity and also that the Local Planning Authority shall be satisfied as to the details of the development in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

14) No development shall commence until a scheme to enhance the nature conservation interest of the site has been submitted to and agreed in writing by the Local Planning Authority. The scheme shall be implemented in full prior to the occupation of the development hereby approved.

Reason: To safeguard and protect the sites bio diversity and nature conservation value in accordance with Policy DM6 (Biodiversity) of the LDF Core Strategy Adopted April 2012.

15) Prior to commencement of the relevant part of the development, detailed drawings of the following shall be submitted to and approved by the Local Planning Authority:

- Ventilation to car park
- Landscaped and Green/ brown roofs
- Windows, doors/canopies, shopfronts, car park entrance (including parapet walls) and other openings
- Balconies and balustrades
- Details of any screening to reduce the effects of wind
- The design and layout of the new area of public realm and defensible space/ front gardens
- The lift overruns and building maintenance units and associated enclosures
- Any means of extraction for the retail/ commercial units
- Cycle and refuse storage areas
- Street furniture

Reason: To ensure that the development has a satisfactory appearance in accordance with Policies DM10 and DM11 of the Local Development Framework Core Strategy Adopted April 2012.

16) Before commencement of above ground works for the relevant part of the development, a scheme for protecting the relevant proposed dwellings from traffic noise shall be submitted to and approved in writing by the Local Planning Authority. Any works which form part of the scheme shall be completed before any of the relevant dwellings are occupied.

Reason: In order to safeguard the amenities of the occupiers of the dwellings in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

17) Prior to the commencement of above ground works for the relevant part of the development, a scheme shall be submitted to and approved in writing by the Local Planning Authority for the acoustic insulation of the relevant buildings. The scheme shall be implemented before the buildings are first occupied and thereafter permanently retained.

Reason: In order to safeguard the amenities of the occupiers of the dwellings in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

18) Before the use of any restaurant/ cafe uses hereby permitted commences, details shall have been submitted to and approved in writing by the Local Planning Authority for the effective control of fumes and odours from the relevant premises. The scheme shall be implemented before the use commences and maintained for the duration of the use.

Reason: In the interests of the amenities of the area in accordance with Policies H1 (Protection of Residential Amenities) and STR11 (Pollution Control) of the Royal Borough of Kingston upon Thames Unitary Development Plan First Alteration.

19) No site and building works which are audible at the site boundary shall be carried out outside of the hours of 08.00 and 18.00 Mondays to Fridays and between 08.00 and 13.00 on Saturdays and not at all on Bank Holidays and Sundays

Reason: In order to safeguard the amenities of the surrounding residential occupiers and to safeguard highway safety and the free flow of traffic in accordance with Policies DM9 (Managing Vehicle Use for New Development) and Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

20) The car parking, servicing and manoeuvring areas shown on the approved drawing shall be provided with a hard, bound, dust-free surface, adequately drained before the development is occupied for the purpose hereby permitted. The respective areas shall be kept free from obstruction at all times, and shall not thereafter be used for any other purposes other than those shown on the approved drawing.

Reason: To ensure that the proposed development does not prejudice the free flow of traffic or conditions of general safety on adjoining highways and that adequate parking servicing and manoeuvring provision is made in accordance with Policies BE12 (Layout and Amenity of Buildings and Extensions), T1 (Transport Safety), T20 (Compliance with Car and Cycle Parking Standards) and T21a (Provision and Management of Public Car Parking) of the Royal Borough of Kingston upon Thames Unitary Development Plan First Alteration.

21) The rating level of the noise determined by the cumulative sound emissions of post development plant hereby permitted shall be at least 5dBA lower than the existing background noise level at any given time of operation. The noise levels shall be measured or predicted 1m externally to any window at the nearest residential facade. Measurements and assessment shall be made according to British Standard 4142:2014.

Reason: In order to safeguard the amenities of the occupiers of the dwellings in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012.

22) The restaurant and cafe premises shall not be used for the purposes hereby permitted before 0700 or after midnight Monday to Saturday and before 0800 and after 23.00 at any time on Sundays or Bank Holidays. The outside seating areas associated with the restaurant and cafe uses shall not be used for the purposes hereby permitted before 0800 or after 23.00 on any day. The servicing of commercial units shall only take place between 7am and 8pm 7 days a week.

Reason: To safeguard the amenities of the occupiers of the neighbouring

properties in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012

23) Prior to the commencement of demolition works the applicant shall submit an application to the Council for Prior Consent under Section 61 of Control of Pollution Act 1974.

Reason: To safeguard the amenities of the occupiers of the neighbouring properties in accordance with Policy DM10 (Design Requirements for New Developments including House Extensions) of the LDF Core Strategy Adopted April 2012

24) Construction shall be in accordance with the recommendations of the Energy Statement dated December 2014 and the Energy & Sustainability Strategy: Amended Scheme dated September 2015, and requiring that any combined heat and power plant be gas – as opposed to biomass – fuelled.

Reason: To ensure the construction works do not adversely affect the air quality of nearby residents.

25) The burning of any waste arising from any works required to implement the development hereby approved is prohibited on site.

Reason: To ensure the construction works do not adversely affect the air quality of nearby residents.

26) Prior to commencement of the relevant phase, a detailed remediation scheme designed to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings, other property and the natural and historical environment must be prepared, and submitted to the Local Planning Authority for approval. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures.

Reason: To prevent harm to human health and pollution of the environment.

27) The approved remediation scheme must be implemented in accordance with its terms prior to the commencement of development (unless otherwise agreed in writing by the Local Planning Authority). Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and submitted for approval to the Local Planning Authority.

Reason: To prevent harm to human health and pollution of the environment.

28) In the event at any time when carrying out the approved development that contamination is found that was not previously identified, it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken respect of this contamination and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of the relevant conditions above.

Reason: To prevent harm to human health and pollution of the environment.

29) Within 6 months of completion, Building Regulation 2013 Part L Output documents must be submitted and approved by the local planning authority, confirming that the minimum 35% emissions reduction from the BRUKL part L target emissions rate has been achieved for the development as a whole.

Reason: In the interests of sustainability and energy conservation in accordance with Policies 5.2 (Minimising Carbon Dioxide Emissions) and 5.3 (Sustainable Design & Construction) of the London Plan (July 2011) and Policy DM1 (Sustainable Design and Construction Standards) of the LDF Core Strategy Adopted April 2012.

30) Within 3 months of commencement, a BREEAM 2014 Design Stage Assessment and Interim Certificate covering the retail and office space for the relevant part of development should be submitted and approved by the local planning authority for that part. This should detail how an Excellent rating will be achieved.

Reason: In the interests of sustainability and energy conservation in accordance with Policies 5.2 (Minimising Carbon Dioxide Emissions) and 5.3 (Sustainable Design & Construction) of the London Plan (July 2011) and Policy DM1 (Sustainable Design and Construction Standards) of the LDF Core Strategy Adopted April 2012.

31) Within 6 months of completion of the retail and office space, a final BREEAM[2014] Excellent certificate covering the retail and office space should be submitted and approved by the LPA.

Reason: In the interests of sustainability and energy conservation in accordance with Policies 5.2 (Minimising Carbon Dioxide Emissions) and 5.3 (Sustainable Design & Construction) of the London Plan (July 2011) and Policy DM1 (Sustainable Design and Construction Standards) of the LDF Core Strategy Adopted April 2012.

32) No part of the residential development hereby approved shall be occupied until evidence has been submitted to the council confirming that the development has achieved not less than the CO2 reductions (ENE1) associated with meeting London Plan emissions requirements and internal water usage (WAT1) standards equivalent to Code for Sustainable Homes level 4 targets. Evidence requirements are detailed in the "Schedule of evidence Required for Post Construction Stage from ENE1 & WAT1 of the Code for Sustainable Homes Technical Guide. Evidence must demonstrate a minimum 35% emissions reduction compared to 2013 part L regulations, and internal water usage rates of 105l/p/day must be submitted to and approved by the Local Planning Authority, unless otherwise agreed in writing.

Reason: In the interests of sustainability and energy conservation in accordance with Policies 5.2 (Minimising Carbon Dioxide Emissions) and 5.3 (Sustainable Design & Construction) of the London Plan (July 2011) and Policy DM1 (Sustainable Design and Construction Standards) of the LDF Core Strategy Adopted April 2012.

33) Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until

the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

Reason: To ensure that the development manages and reduces surface water run off in accordance with Policy DM4 of the Local Development Framework Core Strategy Adopted April 2012.

34) Prior to commencement of the development, the applicant shall submit detailed drainage information which demonstrates that a) surface water runoff is being discharged at a rate no more than three times the Greenfield runoff rate; b) the combined volume of the proposed Sustainable Urban Drainage Systems (SuDS) features provides sufficient total storage to prevent flooding to and from the site.

Reason: To accord with the London Plan and Non-Statutory Technical Standards for SuDS.

35) Development should not be commenced until: Impact studies of the existing water and waste supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point.

Reason: To ensure that the water supply and waste infrastructure has sufficient capacity to cope with the/this additional demand.

36) No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure (The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement).

37) The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) – (October 2015 / ref. 4697/9a/MCH/AD/DM/SH109325 rev. F / compiled by JSA consulting engineers) and the following mitigation measures detailed within the FRA: 1. Provision of compensatory flood storage as per drawings 4697/FRA/01 Rev B and 4697/FRA/02 Rev A. Finalised volumes and other details on flood storage compensation to be submitted at the detailed design stage. 2. Identification and provision of safe route(s) into and out of the site from more vulnerable development to an appropriate safe haven. Full details to be submitted at the detailed design stage. 3. Finished floor levels for more vulnerable uses are set no lower than 8.35m above Ordnance Datum (AOD) with the inclusion of voids to allow water to naturally flow into a flood storage area on site as detailed in the FRA. The mitigation measures shall be fully implemented prior to occupation and

subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason 1. To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided. 2. To ensure safe access and egress from and to the site. 3. To reduce the risk of flooding to the proposed development and future occupants

38) The development shall be carried out in accordance with the recommendations of the "Bat Roost Assessment Report".

Reason: To safeguard and protect the sites bio diversity and nature conservation value in accordance with Policy DM6 (Biodiversity) of the LDF Core Strategy Adopted April 2012.

39) No development shall take place within the application site until the developer has secured the implementation of a programme of archaeological recording of the standing historic building(s), in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority.

Reason: Heritage assets of archaeological interest survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with Section 12 of the NPPF.

40) A) No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological site work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing and a report on that evaluation has been submitted to and approved by the local planning authority in writing. B) Under Part A, the applicant (or their heirs and successors in title) shall implement a programme of archaeological site work in accordance with a Written Scheme of Investigation. C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with Section 12 of the NPPF.

41) No construction of any residential unit hereby permitted shall begin until details of the wheelchair adaptable housing specification/standards have been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of the wheelchair housing occupants in order to comply with Policy DM13 (Housing Quality and Mix) of the LDF Core Strategy Adopted April 2012, Policy 7.2 (An Inclusive Environment) of the London Plan July 2011 and comply with Supplementary Planning Document 'Access for All' (July 2005).

42) Prior to commencement of works above ground relating to each building, a crime prevention strategy shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Police. The strategy shall demonstrate how the development makes reasonable endeavours to meet 'Secured by Design' standards and shall include details, where relevant, on the following:

- (a) Secured by Design physical protection measures to be incorporated in both the commercial and residential units.
- (b) External & Courtyard communal lighting be to BS 5489
- (c) Monitored Alarm facilities to the commercial units.
- (d) CCTV at the entrance and around the exterior of the site
- (e) Plant rooms to be lockable with robust security rated doors
- (f) Bin stores to be lockable
- (g) Cycle stores to be lockable
- (h) Security rated doors and windows for each unit
- (i) Good lighting to achieve a minimum of 0.25 uniformity

Reason: To ensure that satisfactory attention is given to security and community safety

43) Any alterations to the Grade II Listed Sorting Office and Telephone Exchange Buildings, whether or not required by other legislation involving the installation of mechanical ventilation including internal fitting and external plant shall be in accordance with details shall have been submitted to, and approved in writing by, the Local Planning Authority.

Reason: In order that the architectural and historic of the Listed Building is safeguarded in accordance with Policy CS8 (Character, Heritage and Design) and Policy DM12 (Development in Conservation Areas and Affecting Heritage Assets) of the LDF Core Strategy Adopted April 2012.

44) Notwithstanding the submitted details, details of the cycle parking shall be submitted to the local planning authority for approval prior to first occupation of the residential accommodation. The cycle parking shall be implemented in accordance with the approved details.

Reason: To ensure the provision of cycle parking in accordance with Policy 6.9 of the London Plan.

45) The garden area as shown on the approved drawings shall be permanently retained as open amenity space for the use of all the occupiers of all flats in the building and for no other purpose. Notwithstanding the provisions of Class A of Part 2 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995, (or any other Order revoking or re-enacting this Order), no walls, fences or any other means of enclosure whatsoever shall be erected so as to subdivide the amenity area shown on the approved drawing.

Reason: To ensure the satisfactory provision and retention of amenity space for use by all the occupiers of the flats as approved in accordance with Policies DM10 (Design Requirements for New Developments) of the LDF Core Strategy Adopted April 2012.

46) Prior to commencement of the Brook Street elevation, if off site works to improve the risk of flooding in have been undertaken or notice has been given that they will be undertaken shortly, the design of the flood storage works on

Brook Street shall be redesigned to take account.

To ensure that the development has a satisfactory appearance in accordance with Policies DM10 and DM11 of the Local Development Framework Core Strategy Adopted April 2012.

INFORMATIVE(S)

1) The Environmental Health Service advises that sound insulation should be provided to reach the following standard:

a. The wall, glazing and window frame specification to the rooms in question should be such that an internal noise level with windows closed should meet LAeq,T 40 dB (living rooms) and LAeq,T 35dB (Bedrooms)

b. Appropriate acoustic ventilation (passive or mechanical) should be provided so that the room can be sufficiently ventilated without the need to open windows. The acoustic performance of any passive vent, variable speed mechanical air supply unit or whole house ventilation must be sufficient to ensure that the internal noise level standards given above are not compromised

c. These requirements apply to all habitable rooms

2) It is recommended that a draft Section 61 application is made to the Local Authority in the first instance at least one month before the intended submission date to facilitate discussions. All communications for this should be made to the Environmental Control Section of Environmental Health Service.

3) The applicant is advised to submit an acoustic report assessing the noise created by the proposed commercial activities, the acoustic performance of existing building structures and what measures, if any, may be required to meet acceptable design standards within the proposed residential amenity. The acoustic consultant should seek advice from the Environmental Health Service when determining appropriate design standards.

4) Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines. They must be approved by the planning authority before any on-site development related activity occurs.

5) Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines. They must be approved by the planning authority before any on-site development related activity occurs.

6) The applicant should consult with the Borough Environmental Health Officer to ensure that the layout of any food premises complies with statutory requirements and the Council's standards.

7) The applicant's attention is drawn to the attached guidelines from the Environmental Health Service regarding possible environmental nuisance caused by the development

8) The applicant shall ensure that the premises be registered with the local authority as a food business 28 days prior to opening.

9) The applicant is advised to seek the services of an acoustic engineer regarding

potential vibration and noise problems from ventilation duct fans, compressors or other equipment, and the provision of anti-vibration mountings, acoustic enclosures etc.

10) Provision should be made for commercial waste to be stored in suitable receptacles so as not to cause or be detrimental to the amenities of the locality.

11) It is expected that the Construction Environment Management Plan will consider mitigation measures designed to limit emissions from vehicles used in connection with the development, including the use of low emission plant and vehicles (ideally Euro V emission standard or better) fitted with catalysts, diesel particulate filters or similar devices in respect of both on road and off road vehicles and plant.

12) Any vehicular crossing must be constructed and any redundant crossing reinstated as footway in accordance with the provisions of the Highways Act, 1980 by the Service Director (Planning & Transportation) (Highways), Directorate of Environmental Services, Guildhall II, Kingston upon Thames.

13) With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921.

A2. 14/13248/LBC (Old Post Office Listed Building Consent)

Grant Listed Building Consent subject to the following conditions:

1. The development hereby permitted shall be commenced within 3 years from the date of this decision.

Reason: In order to comply with Section 18 or 74 (3) of the Planning (Listed Buildings and Conservation Areas) Act 1990. (As amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

PD/02 rev 01 Floor plans and roof plans proposed	09/04/2015
PD/04 rev 01 elevations as proposed 1	09/04/2015
PD/05 rev 01 elevations as proposed 2	09/04/2015
Old Post Office Application Form - December 2014	18/12/2014
Old Post Office Method Statement - December 2014	18/12/2014
Old Post Office Structural Survey - December 2014	18/12/2014
POD/03 Sections as proposed	11/12/2014
POD/06 Sections as proposed	11/12/2014
PODM/01 Demolition plans - Ground and first floor	11/12/2014
PODM/02 Demolition plans first, second and roof levels	11/12/2014
POEX/01 Plans as existing	11/12/2014
POEX/02 Plans as existing	11/12/2014
POEX/03 Sections as existing	11/12/2014
POEX/04 Elevations as existing	11/12/2014
POEX/05 Elevations as existing	11/12/2014
POLOC/01 Location Plan	11/12/2014
POSP/01 Site plan as existing	11/12/2014
POSP/02 Site plan as proposed	11/12/2014

Reason: For avoidance of doubt and in the interests of proper planning.

- 3 Notwithstanding the details shown on the approved plans additional detailed drawings of the following items shall be submitted to and approved in writing by the Local Planning Authority before any development is commenced on site:

- a) Detailed drawings of the proposed new restaurant kitchens including the ventilation system;
- b) Details of the finials
- c) Detailed drawings of the new lift structures;
- d) Details of new external doors and windows inserted into the existing building;
- e) Any additional internal changes required in connection with the proposed uses.

Reason: In order that the special architectural and historic interest of this listed building is safeguarded in accordance with Policy CS8 (Character, Heritage and Design) and Policy DM 12 (Development in Conservation Areas and Affecting Heritage Assets) of the LDF Core Strategy Adopted April 2012.

4. Unless otherwise stated on the approved drawings all new work or work of making good to the Listed Building shall be executed on matching materials and

shall be detailed to match the existing colour, profile and/or bonding.

Reason: To ensure that the character, appearance and integrity of the building is not prejudiced, thereby preserving the special architectural or historic which it possesses in accordance with Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national guidance set out in the NPPF, and in accordance with Policy 7.8 of the London Plan 2011, and Policies CS08 and DM12 of the Royal Borough of Kingston upon Thames LDF Core Strategy 2012.

5. Written notification of the intended start of works on site shall be sent to Heritage England, 1 Waterhouse Square, 138-142 Holborn | London | EC1N 2ST), with a copy sent to the Local Planning Authority, at least seven days before the works hereby approved are commenced.

Reason: In order that Heritage England and the Local Planning Authority may be given the opportunity of monitoring the progress of works on site to ensure the preservation of the special interest of the building affected by the works hereby approved in accordance with Policy DM12 (Development in Conservation Areas and Affecting Heritage Assets) of the LDF Core Strategy Adopted April 2012.

A3. 14/13250/LBC (Former Telephone Exchange Listed Building Consent)

Grant Listed Building Consent subject to the following conditions:

1. The development hereby permitted shall be commenced within 3 years from the date of this decision.

Reason: In order to comply with Section 18 or 74 (3) of the Planning (Listed Buildings and Conservation Areas) Act 1990. (As amended).

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

TED/01 rev 01 Floor plans as proposed	09/04/2015
TED/04 rev 01 elevations as proposed 1	09/04/2015
TED/05 rev 01 elevations proposed 2	05/04/2015
Planning Statement APPENDIX 4 - Regeneration Statement	18/12/2014
Telephone Exchange Application Form - December 2014	18/12/2014
Telephone Exchange Method Statement - December 2014	18/12/2014
Telephone Exchange Structural Survey - December 2014	18/12/2014
TOPO Planning Statement 10.12.14	18/12/2014
TE EX/03 Section as existing	11/12/2014
TED/02 Plans as proposed	11/12/2014
TED/03 Sections as proposed	11/12/2014
TED06 Interior elevations as proposed	11/12/2014
TEDM/01 Demolition plans - basement and ground	11/12/2014
TEDM/02 Demolition area - plans as existing	11/12/2014
TEEX/01 Plans as existing	11/12/2014
TEEX/02 Plans as existing	11/12/2014
TEEX/03 Section as existing	11/12/2014
TEEX/04 Elevations as existing	11/12/2014
TEEX/05 Elevations as existing	11/12/2014
TEEX/06 Interior elevations as existing	11/12/2014
TELCO/01 Location plan	11/12/2014
TESP/01 Site plan as existing	11/12/2014
TESP/02 Site plan as proposed	11/12/2014

Reason: For avoidance of doubt and in the interests of proper planning.

3. Notwithstanding the details shown on the approved plans additional detailed drawings of the following items shall be submitted to and approved in writing by the Local Planning Authority before any development is commenced on site:

- a) Detailed drawings of the proposed new restaurant kitchens including the ventilation systems;
- b) Details of the finials
- c) Detailed drawings of the new lift structures;

- d) Details of new external doors and windows inserted into the existing building;
- e) Any additional internal changes required in connection with the proposed uses.

Reason: In order that the special architectural and historic interest of this listed building is safeguarded in accordance with Policy CS8 (Character, Heritage and Design) and Policy DM 12 (Development in Conservation Areas and Affecting Heritage Assets) of the LDF Core Adopted April 2012.

4 Unless otherwise stated on the approved drawings all new work or work of making good to the Listed Building shall be executed on matching materials and shall be detailed to match the existing colour, profile and/or bonding.

Reason: To ensure that the character, appearance and integrity of the building is not prejudiced, thereby preserving the special architectural or historic which it possesses in accordance with Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national guidance set out in the NPPF, and in accordance with Policy 7.8 of the London Plan 2011, and Policies CS08 and DM12 of the Royal Borough of Kingston upon Thames LDF Core Strategy 2012.

5 Written notification of the intended start of works on site shall be sent to Heritage England, 1 Waterhouse Square, 138-142 Holborn | London | EC1N 2ST), with a copy sent to the Local Planning Authority, at least seven days before the works hereby approved are commenced.

Reason: In order that Heritage England and the Local Planning Authority may be given the opportunity of monitoring the progress of works on site to ensure the preservation of the special interest of the building affected by the works hereby approved in accordance with Policy DM12 (Development in Conservation Areas and Affecting Heritage Assets) of the LDF Core Strategy Adopted April 2012.