

I write on behalf of the Kingston upon Thames Society, which wants its formal objections to the above scheme taken into account.

1. The height of the main block of the scheme at 17 storeys + Ground floor is excessive in a context where most of the **recent** developments are only 6-8 storeys high (Regents Court, Sopwith Way, 6 storeys; Royal Quarter Kings Way, 6; Berkeley Homes, Kingsway, 6; Berkeley Homes facing Kingsgate Road, 8). Despite the applicant's arguing that the building will hardly be seen from numerous vantage points, we do not agree with this statement. At 17+1 storeys it **WILL** be visible from those crossing Kingston Bridge, the footpath alongside Home Park and in the distance from Richmond Park's protected view. It will also dominate the view of Kingston Station looking from the town centre (from the south). In connexion with this, we suspect that the illustrations on p. 26 of the Design and Access Statement Addendum are 'wide angle', which misleadingly minimises the impact of the heights of the development compared to the existing buildings. The east elevation on p.27 gives a more realistic view of the harmful impact of the development on the surrounding townscape.
2. The architects maintain that they have made "changes to the articulation of the facades introducing visual breaks " and by " identifying the communal amenity floor " [11th floor] the Society maintains that the design of the various facades is bland and unrelieved at best, with nothing to commend them. They lack any proper architectural skill and imagination despite the views given by the Design Review panel. It is very regrettable that neither the applicant nor the Council have published the Design Review Panel's reports in full as part of the application, denying the public important information relating to this application. This suggests that the Panel may have made other relevant comments which the public are denied and that have not been addressed by the applicant.
3. RBK's Views Study – which incidentally has never been released for public consultation – states at Para 4.58 that there should be "sensitive integration " etc. etc. This scheme - due to its excessive height and harsh elevations – cannot be described as being "sensitively integrated into its surrounding buildings".
4. RBK's Policy CS8 states that "the Council will protect the primarily suburban character of the Borough.. buildings of high quality..". The Council will seek opportunities for "...sensitive enhancement .." New development should relate well to its surrounding.. Tall buildings MAY be appropriate *but in some areas they will be inappropriate or too sensitive for such buildings..*" The Society suggests that this scheme will be clearly seen by residents across the north Kingston area with roads such as Acre, Gibbon, East, Kings' and Richmond Park Roads all being significantly affected.
5. The North Kingston area and the roads mentioned above and the area adjacent to Canbury Gardens and the Thames are primarily 2-3 storeys high, suburban in character. The Council's Policies support this statement. RBK's adopted Policy DM12 states that "Development in Conservation Areas which affects heritage assets should "promote high quality design.. enhancing locally distinctive Heritage Assets [HA's] the Society recognises that this site is not within a CA but it will be clearly seen from the Canbury, North Kingston, Kingston Town Centre CA's. These are designated "heritage assets " within the meaning of the NPPF.

6. The NPPF Para 127 states that “...buildings should be visually attractive as a result of good architecture .. and be sensitive to local character and history including the surrounding built environment and landscape setting”.
7. Chapter 16 of the 2019 NPPF describes HA’s as being “ an irreplaceable resource and should be conserved in a manner appropriate to their significance so as to be enjoyed for their contribution to the quality of life ..” etc. etc.
8. The architects allege that there will be little or no harm to the 2 adjacent Listed Buildings – Kingston College building and the Regal cinema on Richmond Road and that the scheme “ preserves “the special architectural and historic interest” of these two buildings and the Conservation Areas affected by the development”. This assertion seems to lack any credibility because the heights and overbearing massing of the new development will be overly disproportionate to the Listed buildings. The Society would argue the exact opposite were it be given the chance to do so, saying that there will be “substantial harm” caused to all of the surrounding area both adjacent to it and across a much wider area. The Society totally refutes the applicant’s statement at their Paras 6.8 and 6.9 of the Heritage Impact report.
9. At 6.18 the applicants allege that their scheme follows RBK’s Action Plan requiring “the highest standards of design in all new developments”. They suggest that the setting of landmarks and Conservation Areas have been preserved. Again we disagree with this statement and with their allegation that the setting of HA’s have been preserved by this scheme. It will unavoidably cause substantial harm to the character of the adjacent older buildings, the wider street scene and neighbouring amenities (chapter 12, NPPF 2019).

The Kingston upon Thames Society has fought against inappropriate new developments across the Royal Borough for many years. We are on record opposing that Kingston Borough be declared an “Development Opportunity Area” some time ago which has resulted in a host of Applications such as this one being submitted with the tacit understanding by the developers that it may succeed.

We deplore this state of affairs and sincerely hope that Councillors will read our opinions above and refuse this Application outright.

Yours sincerely,

Anthony Evans
Chair