

# Old Post Office site, Ashdown Road, Kingston

in the Royal Borough of Kingston upon Thames

planning application no. 14/13247/FUL

## Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

## The proposal

Demolition of all non-listed buildings and the retention, refurbishment, alteration and reconfiguration of two listed building (the Old Post Office and Telephone Exchange), together with the erection of new buildings between 4 and 16-storeys in height to provide 2,141 sq.m of retail/restaurant/cafe uses (Classes A1-A5), 931 sq.m of office (B1) and 638sq.m. of flexible floorspace to be used for either retail/cafe/restaurant (A1-A5) or office (B1) use and 253 sq.m of community/leisure uses (Classes D1/D2) and up to 319 residential units.

The main application is accompanied by two listed building consent applications for the detailed works to the two listed buildings.

## The applicant

The applicant is **St. George West London Ltd** and the architect is **John Thompson and Partners**.

## Strategic issues

The application complies with London Plan policies on land use principles, housing, urban design, heritage, inclusive access, sustainable development, flooding and transport and is strongly supported. The proposal will provide much needed housing, retail, office and community floorspace in the heart of the Kingston metropolitan centre. It will regenerate a run down and underused site which will revitalise this part of the centre. It will also secure the restoration of two Grade II Listed Buildings, both of which are in a poor state of repair and on the At Risk Register.

The S106 agreement and decision notice conditions regarding **affordable housing, inclusive access, climate change** and **transport** should address the issues raised in this and the previous report (D&P3431/01).

## Recommendation

That Kingston Council be advised that provided the S106 agreement and decision notice conditions are drafted in accordance with the advice in this and the previous report (D&P3431/01) the application complies with the London Plan.

## **Context**

1 On 31 December 2014 the Mayor of London received documents from Kingston Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. On 4 February 2016 the Mayor provided the Council with a statement (report and covering letter reference D& P/3431/01) which advised that the application broadly complies with the London Plan and that the proposal for a residential-led mixed use development on this site is supported but that further work regarding affordable housing, density, children's playspace, residential quality, inclusive access, energy and transport is required.

2 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report.

3 Following ongoing negotiations with the Council and GLA officers the applicant has made several significant changes to the proposal. This report provides an assessment of the amended scheme against London Plan policies.

4 Once Kingston Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

5 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

6 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Details of the proposal**

7 The amended application no longer includes two development scenarios. The development has been fixed to provide the demolition of all non-listed buildings and the retention, refurbishment, alteration and reconfiguration of two listed building (the Old Post Office and Telephone Exchange). Together with the erection of new buildings between 4 and 16-storeys in height to provide 2,141 sq.m of retail/restaurant/cafe uses (Classes A1-A5), 931 sq.m office (B1) use and 638sq.m. of flexible floorspace to be used for either retail/cafe/restaurant (A1-A5) or office (B1) use and 253 sq.m of community/leisure uses (Classes D1/D2) and up to 319 residential units

8 A new vehicular access is proposed off Ashdown Road to serve a car park with 132 spaces, and hard and soft landscaping works are proposed to include a new public space around the retained post office building.

9 The following table provides a comparison between the quantum of development in the original (Sept 2015) and amended (January 2016) schemes.

Land use	Sept 2015 scheme	Jan 2016 scheme	+/-
Number of homes	338 homes (including 6 replacement homes)	319 homes (including 6 replacement homes)	-19 homes
Retail/café/restaurant (A1-A5)	2,136 sq.m	2,141 sq.m.	+ 5 sq.m
Office (B1)	931 sq.m.	931 sq.m.	-
Flexible commercial (A1-A5, B1)	638 sq.m.	638 sq.m	-
Community Use (D1/D2)	253 sq.m	253 sq.m	-
Residential parking	132 (0.39 per home)	132 (0.41 per home)	+ 0.02 per home
Cycle spaces	636 (1.9 per home)	610 (1.9 per home)	-

**Table 1: Scheme comparison**

10 In terms of design the scheme has been amended in the following ways:-

- The Ashdown Road building has been reduced in height from 12 to 8-storeys, the building line has been amended to remove the projecting part of the building, the materials have changed to yellow stock brick with a stone banding, and the facade and roofline has been simplified.
- The roof storey has been removed from the link building, the materials have also been changed to yellow stock brick with a stone banding, the facade has been simplified and a green wall has been added.
- The corner building will continue the red brick on Brook Street and yellow stock brick on Wheatfield Way.
- Wheatfield Way materials have been changed to yellow stock brick with stone banding.
- The removal of the projection has increased the quantum of public space, there is now a visual link between the listed buildings.

## Update

### Housing

11 The amended scheme will provide 319 residential units, with the following unit mix:

	<b>Market</b>	<b>Affordable rent</b>	<b>Intermediate (DMS)</b>	
<b>Studio</b>	-	-	5	5
<b>1-bed</b>	57	11	23	91
<b>2-bed</b>	172	8	0	180
<b>3-bed</b>	37			37
<b>Frances House</b>	-	6	-	6
<b>Total</b>	<b>266</b>	<b>25</b>	<b>28</b>	<b>319</b>

**Table 2: Unit schedule**

### Affordable housing and tenure

12 The applicant is proposing to provide 47 affordable homes (15%), of which 19 (40%) will be affordable rent and 28 (60%) discounted market sale. The applicant has submitted updated viability information to support the amended scheme and this has been independently reviewed by BNP Paribas for the Council.

13 The independent appraisal confirms that the proposed scheme (with 15% affordable housing) is unviable. It is also noted that BNP Paribas recommend a review mechanism is included in the S106 agreement. This would put in place the opportunity to re-appraise the viability of the scheme to take account of the uniqueness of this scheme and the absence of comparable town centre developments to support the values relied upon in this assessment. This reflects GLA officers views that a review may be necessary based on the accuracy of the estimation of listed building restoration works. GLA officers understand the principle of this has been agreed by the applicant and that Council officers are working up a draft mechanism. Such a mechanism would need to be designed so as to ensure an appropriate proportion of any financial surplus would be awarded to the Council, and ring-fenced for the delivery of additional affordable housing units.

14 Discounted market sale (DMS) is proposed as the intermediate product, whereby the applicant delivers the homes directly to the market at a discounted rate, based on eligibility criteria agreed with the Council. The unsold equity is retained by the Council, and through the section 106 agreement, obligations will be required to ensure that these units are recycled in the affordable homes market by qualifying applicants. GLA officers are satisfied that the products proposed meet the definition of affordable housing in London Plan Policy 3.10.

15 As such the proposal will provide the maximum reasonable amount of affordable housing and does therefore comply with policy 3.11 and 3.12 of the London Plan.

### Mixed and balanced communities

16 London Plan policy 3.11 sets a pan London affordable housing target split of 60% social/affordable rent and 40% intermediate housing. The purpose of this policy is to provide a

diverse offer for the range of people requiring affordable housing. The site is located within the Grove Ward which has a higher proportion of affordable rented homes than the borough-wide average. The applicant therefore proposes to provide an affordable housing ratio of 40% social/affordable rent and 60% intermediate to realign the overall ratio of social/affordable rented units in this ward. This approach is supported by both GLA and Council officers.

17 The proportion of family sized units has increased from 8% to 14%. GLA officers recognise that within the metropolitan centre it is not always suitable and feasible to provide a high proportion of family sized units. The provision of 14% family units is therefore acceptable in this case. It is also noted that in the Mayor's most recent Annual Monitoring Report (July 2014), 24% of completions and 31% of approvals within Kingston were for family sized units.

## **Urban design**

18 As set out in the GLA's pre-application response on the previous scheme, the proposed layout of blocks is supported and introduces two linked perimeter blocks which provide an efficient and rational spatial approach to the site, forming well defined public frontages and private amenity spaces within the two courtyard areas. The containment of car parking and servicing access under a large single podium is also supported and helps to maximise the amount of active frontage onto the public realm, which includes commercial and residential frontages. The layout also responds successfully to the setting and orientation of the listed former post office and telephone exchange buildings and the recent design amendments to the 'book-end' Ashdown Road block, (which includes the removal of the colonnade element and its reduction in height from 12 to 8 storeys), forms an improved visual link between the two heritage assets and a well-defined area of public realm between the northern edge of blocks A, B and C and the former post office building. This itself is aligned to draw on footfall from the town centre to the west of the site.

19 The overall massing approach is supported and the recent design amendments have resulted in a more sympathetic sequence of building forms that enable the listed buildings to remain prominent in the streetscape. The scale of the tallest element at the south east corner of the site is also supported in this well connected, town centre location however the applicant should demonstrate that its position on the site does not result in significant overshadowing to the adjoining residential courtyard space.

20 Finally, officers welcome the recent amendments to the proposed facing materials palette and the transition to yellow stock brick to the majority of blocks gives potential to create a warm appearance which is sympathetic to the heritage sensitive context and consistent with supporting a convivial residential environment.

## **Inclusive access**

### Residential units

21 The applicant's design and access statement demonstrates that the principles of inclusive access have been incorporated throughout the amended proposal. The amended proposal has been designed to meet the Mayor's Lifetime Homes standards, and 10% (32 units) will be capable of easy adaptation for wheelchair users. Plans detailing the layout of these units have also been submitted.

22 As of 1 October 2015 the Government's technical housing standards came into effect. These standards required that 90% of homes to be built to lifetime homes standards to meet building regulations M4 (2) 'accessible and adaptable dwellings' and 10% to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users to meet building regulation M4(3) 'wheelchair user dwellings'.

23 The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard. As such Kingston Council should include conditions to ensure the application complies with the specifications in Building Regulation standards M4(2) and M4(3).

#### Parking

24 The amended proposal now includes 32 blue badge car parking spaces, one for each wheelchair accessible units. The applicant has also produced a car parking management plan to ensure the supply and demand of the spaces are regularly monitored and the provision reviewed. As such the proposal complies with London Plan policy 7.2 on creating an inclusive environment.

### **Climate change mitigation and adaptation**

#### Energy

25 In May 2015 the applicant submitted updated energy information.

26 The applicant has provided BRUKL sheets for the Old Post Office and Telephone Exchange as they are and following efficiency improvements and the inclusion of Combined Heat and Power plant (CHP). The total emissions associated with the two existing buildings are 300tCO<sub>2</sub>/year and will be reduced to 144tCO<sub>2</sub>/year following the integration of efficiency measures and connection to the CHP system.

27 Dynamic thermal modelling has been carried out for sample dwellings under current and future climate scenarios. Under current scenarios the dwellings do not overheat according to the CIBSE TM52 methodology. Under a 2080s climate scenario two of the dwelling types modelled fail the CIBSE TM52 overheating test. The applicant has suggested measures that could be retrofitted at a later date that would address this issue, these are: internal blinds, boosted mechanical ventilation and lower g value glazing. The integration of these design measures now would be supported.

28 The applicant has confirmed that all domestic and non-domestic building uses on site will be connected to the site heat network. A layout of the site heat network has been provided.

29 The applicant has confirmed that the controls will ensure that the heat provided from the CHP will be the lead heat source. The proportion of heating provided by the electric boost has been estimated based on dynamic modelling. The indicative installed capacity of electric heating top up available to a typical dwelling has been provided.

30 The applicant has stated that the graph shown in Figure 12 is indicative only and that in reality it is not expected that there will be a space heating demand in summer. The CHP has been sized to meet 75% of the heating demand in line with industry code of practice. For future reference the applicant should ensure that heat profiles used are as realistic as possible.

31 The applicant has confirmed that the management of the CHP will be addressed at early stages and given examples where the developer has delivered similar schemes successfully on other sites. The applicant has stated that, as the carbon reduction target is being met with the current PV proposal, the remainder of the roof areas have been allocated to amenity space.

32 As such the proposal complies with the London Plan policies on energy.

## **Flooding**

33 Whilst the updated Environmental Statement submitted in January 2016 addresses flood resilience and resistance it does not commit the applicant to deliver the suggested flood resistant design and materials. A flood-resilient building will reduce the consequences of flooding and facilitate a speedier recovery from the flooding. As such the provisions suggested in Appendix C of Vol III of the ES: Technical Appendices. Section 8.0 (p. 15) should be secured by condition to ensure compliance with the London Plan policies on flooding. As should the submission of a flood emergency plan and subscription to the Environment Agency flood warning service.

## **Planning conditions**

34 The Council is reminded of the advice contained in the Mayor's previous representation (D&P 3431/01) to included conditions relating to residential quality, child play space and surface water run-off to ensure compliance with the London Plan.

## **Transport for London**

### **Kingston Area Plan**

35 TfL is working closely with the Council and GLA to produce the Kingston Area Plan. The Area Plan boundary covers the town centre and surrounding area and therefore includes the site. The work is at the initial stages and a transport study will be undertaken taking forward some of the options provided within the Town Centre Movement Strategy prepared by Kingston, along with investigating alternative options for transport within the town centre. The work will then feed into an infrastructure funding study that will identify transport infrastructure requirements and a number of mechanisms for funding improvements.

### **Car Parking**

36 A total of 132 car parking spaces are proposed for the development, equivalent to a ratio of 0.4 per unit.

37 TfL welcomes the provision 20% active and a further 20% passive electric vehicle charging points and 32 Blue Badge parking spaces for the residential units, all in accordance with the London Plan standards. It is understood if a Blue Badge parking space is required by any of the employees at the site then this will be provided within the basement.

38 TfL welcomes the Car Parking Management Plan (CPMP) submitted in support of the application, and designed to operate alongside the Travel Plan. However, as previously stated, TfL requests car parking spaces are not sold with individual properties, but leased to residents to allow for future flexibility and ensure the Blue Badge and EVCP spaces are used efficiently.

39 The applicant has also committed to providing a contribution for the provision of an on street Car Club space and two years free Car Club Membership for all residents, both will be secured through the section 106 agreement. The legal agreement will also include £1,500 contribution to amend the traffic management order in relation to the Controlled Parking Zone, as well as restricting residents from applying for parking permits.

### **Cycle Parking**

40 TfL welcomes the applicant's commitment to provide cycle parking for all aspects of the development. It is understood 590 cycle parking spaces will be located within the basement, with

20 short stay spaces provided at ground level. This is in line with the London Plan and welcomed by TfL.

41 The TA states that tenants will be expected to provide showering and changing facilities. TfL requests clarification on this, and suggests the applicant identifies potential locations and provides information how this would be secured.

42 TfL welcomes the applicant's commitment to provide land for cycle and highway improvements along Wheatfield Way. These proposals are still being developed, however if required the land will be secured through the section 106 agreement.

#### Public transport

43 As mentioned above TfL is currently working with Kingston and the GLA on the emerging Area Plan and bus improvements for the area. Work is on-going, however a number of options have been identified that would significantly improve bus services within the town centre for now and the future. Public realm improvements and enhanced transport links to the wider area are also included within the plans. These need to be agreed so that the necessary infrastructure can be secured and funded. On this basis, TfL requests further discussions with the applicant about an appropriate s106 contribution towards these plans and welcomes further discussions.

#### Travel planning

44 TfL welcomes the framework Travel Plan submitted with the application, and is satisfied with the objectives. The final version, including all agreed measures therein should be secured, enforced, monitored and reviewed as part of the section 106 agreement, along with the CPMP as suggested by the applicant.

45 TfL welcomes the Delivery and Servicing Plan (DSP) provided, envisaged to work alongside the Travel Plan. The final DSP should be secured by condition and approved by Kingston in consultation with TfL prior occupation.

46 The TA provides information on the construction impact, with the applicant committing to provide a construction plan. A Construction Logistics Plan should be secured by condition and approved by Kingston and TfL, prior to demolition.

#### Community Infrastructure Levy

47 In accordance with policy 8.3 of the London Plan, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100 sq.m. or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in the Royal Borough Kingston upon Thames.

48 Kingston has recently received sign off from the inspector to move to formal adoption of its borough CIL. The CIL includes rates for office floorspace and income will be used to fund key infrastructure. TfL welcomes the councils aspirations for transport and would like to see these prioritised where possible.

49 In summary, TfL requests contributions towards the planned improvements for the Town Centre. Blue badge, EVCPs and the CPMP should be secured by condition. The contributions towards Car Club space, membership and the traffic order amendments should be secured through the s106 agreement along with the parking restrictions. The section 106 agreement should also include the final Travel Plan with a DSP, CLP for the development to be in line with the transport policies of the London Plan.



## Local planning authority's position

50 The applicant has had a number of pre-application meetings with Kingston Council officers, and it is understood that the principle of the scheme is broadly supported by officers. The Council's formal position on the planning application is unknown at this stage.

## Legal considerations

51 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

52 There are no financial considerations at this stage.

## Conclusion

53 The application as revised complies with London Plan policies on land use principles, housing, urban design, heritage, inclusive access, sustainable development, flooding and transport and is strongly supported. The proposal will provide much needed housing, retail, office and community floorspace in the heart of the Kingston metropolitan centre. It will regenerate a run down and underused site which will revitalise this part of the centre. It will also secure the restoration of two Grade II Listed Buildings, both of which are in a poor state of repair and on the At Risk Register.

54 Providing the S106 agreement and decision notice conditions regarding affordable housing, inclusive access, climate change and transport address the issues raised in this and the previous report (D&P3431/01) the proposal complies with London Plan policy.

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