

Sustainability Appraisal (SA) of the North Kingston Neighbourhood Plan

SA Report to accompany the pre-submission version of
the Neighbourhood Plan

North Kingston Neighbourhood Forum

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Quality information

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Non-Technical Summary

Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), in support of the emerging North Kingston Neighbourhood Plan which is being prepared by the North Kingston Neighbourhood Forum ('the Forum').

The North Kingston Neighbourhood Plan is being prepared in the context of the adopted Royal Borough of Kingston-upon-Thames (RBK) Core Strategy (2012) and the emerging New Local Plan, as well as the new London Plan

The work undertaken was agreed with the Forum and the Ministry of Housing, Communities and Local Government (MHCLG) in 2019 as part of the national Neighbourhood Planning Technical Support Programme led by Locality.

Structure of this SA Report and NTS

SA/SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
2. What are the SA findings at this stage?
 - i.e. in relation to the Draft Plan
3. What happens next?
 - What steps will be taken to finalise (and monitor) the Plan?

Each of these questions is answered in turn in the report. Before answering the first question however, two initial questions are answered in order to further set the scene – i) what is the Plan seeking to achieve?; and ii) what is the scope of the SA?

What is the Plan seeking to achieve?

The North Kingston Neighbourhood Plan (NKNP) is being prepared in the context of the adopted RBK Core Strategy (2012), the emerging New Kingston Local Plan and the New London Plan, published earlier in 2021.

Neither the adopted Core Strategy nor the New London Plan identify an overall housing target for delivery within the North Kingston Neighbourhood Plan area over the Plan period. However, the New London Plan identifies an annual housing target of 964 dwellings per annum for Kingston as a whole, a significant increase on the adopted Core Strategy target of 375 dwellings per annum.

In this context, the NKNP does not propose any site allocations. However, detailed support in principle is provided at a number of potential site options across the plan area in order to guide development in a way which is consistent with the NKNP's objectives should planning applications come forward at any of the sites over the plan period.

The four objectives proposed by the draft NKNP are:

1. *"To ensure North Kingston remains a desirable place to live by maintain its essential suburban character and by successfully managing the transition between the growing Town Centre and the surrounding suburban area".*
2. *"To ensure the long-term sustainability of North Kingston by protecting and improving its essential local retail, business and social facilities".*
3. *"To help North Kingston adapt to climate change by protecting its important green spaces from development and to mitigate climate change by delivering a net biodiversity gain from new development".*
4. *"To help meet local housing needs by directing new housing development to a small number of key sites and along key corridors".*

What is the scope of the SA?

The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, the Scoping Report was released to these authorities for consultation between the period 2nd December 2019 and 6th January 2020.

Comments received on the Scoping Report, and how they have been considered and addressed, are presented in Appendix II of this report. The issues identified through the Scoping process were then translated into an ‘SEA framework’. This SEA framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The framework is summarised in Table NTS1:

NTS1 The SA framework for the North Kingston Neighbourhood Plan

SA theme	Objective(s)
Air quality	Locate and design development so that current and future residents will not regularly be exposed to poor air quality.
Biodiversity	Protect and enhance all biodiversity and geological features.
Climate change	Continue to drive down CO ₂ emissions from all sources by achieving high standards of energy efficiency in new development, providing opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation.
	Adapt to current and future flood risk by directing development away from the areas at highest risk of flooding and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.
	Support the resilience of the borough to the potential effects of climate change, including water scarcity, flooding and sea level rise, through innovative planning, including the extension and enhancement of green infrastructure as a natural measure to increase resilience.
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Historic environment	Protect, maintain and enhance the rich variety of cultural and built heritage within the Neighbourhood Plan area
Land, soil and water resources	Ensure the efficient and effective use of land
	Use and manage water resources in a sustainable manner
Landscape and townscape	Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area
Population and communities	Cater for existing and future residents’ needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
Transport and movement	Promote sustainable transport use and reduce the need to travel

What has plan-making / SA involved to this point?

The North Kingston Neighbourhood Plan (NKNP) is being prepared by the North Kingston Neighbourhood Forum ('the Forum') which was established in 2017.

The Neighbourhood Area comprises the wards of Canbury and Tudor, with Tudor ward forming the northern half of the plan area and Canbury ward the southern half. Tudor is bounded by the River Thames to the west and by the boundary with the London Borough of Richmond-upon-Thames to the north and east. Canbury includes the northern fringe of Kingston Town Centre with the River Thames again forming the western boundary, whilst the South Western Main Line (SWML) forms the southern boundary of the plan area and Coombe Hill ward lies to the east.

Plan making in North Kingston has been underway since 2017 following the designation of the North Kingston Neighbourhood Area on 30th March 2017. The scope, objectives and policies of the plan have evolved in response to engagement with the local community by the Forum.

The draft NKNP was screened in as requiring SEA by RBK in 2019 and this positive screening opinion was re-affirmed in February 2020. The screening opinion states that:

“On the basis of the contents of the draft North Kingston Neighbourhood Plan, and advice from Historic England and Natural England, Strategic Environmental Assessment is considered to be required to accompany the North Kingston Neighbourhood Plan”.

The Forum has determined that this requirement will be best satisfied through the preparation of a Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA).

SA scoping was undertaken in late 2019 and the statutory consultees (Natural England, Historic England and the Environment Agency) were consulted on the SA scoping report between 2nd December 2019 and 6th January 2020.

A draft of the SA report was prepared to accompany the March 2020 draft of the NKNP to Regulation 14 consultation. However, work on the NKNP and its evidence continued to progress in response to an evolving strategic context, and a revised SA Report was subsequently prepared in February and March 2021 to reflect the updated draft of the NKNP.

Reasonable spatial strategy alternatives

A key element of the SA process is establishing and appraising 'reasonable alternatives' to the draft plan. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the "plan and reasonable alternatives taking into account the objectives and geographical scope of the plan".

It is apparent that the North Kingston Neighbourhood Forum is limited in terms of potential alternatives that can be considered. This is partly because of the limited supply of suitable, available and achievable land within the Neighbourhood Plan area and partly because the Neighbourhood Plan must be in general conformity with - and support the strategic development needs set out in – RBK's adopted Core Strategy and emerging New Local Plan. In the context of the adopted Core Strategy, which allocates sufficient growth to meet its housing target, and the emerging New Local Plan, which has not yet set a housing target for the Borough as a whole, the Neighbourhood Plan does not have an agreed housing target to deliver within North Kingston. It is therefore not necessary for the plan to allocate sites for development.

Significant effects in relation to the SA framework are often most likely to arise from development proposed through the draft plan. Therefore, consideration of reasonable alternatives usually focusses on alternatives to this proposed development in terms of both the quantum and location of site allocations. In the absence of proposed site allocations and the absence of a housing target it is challenging to derive meaningful alternatives to the draft Neighbourhood Plan in terms of alternative spatial strategies. A 'do nothing' scenario is not a reasonable alternative to test, as this is the existing baseline without a plan.

In this context, it is considered that there are **no reasonable alternatives** in relation to the draft North Kingston Neighbourhood Plan.

Next steps

This SA Report accompanies the Pre-Submission version of the North Kingston Neighbourhood Plan for Regulation 14 consultation.

Following consultation, any representations made will be considered by North Kingston Neighbourhood Forum, and the Neighbourhood Plan and accompanying SA Report will be updated as necessary. The updated SA Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, the Royal Borough of Kingston-Upon-Thames (RBK), for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the adopted RBK Development Plan, emerging New Local Plan, adopted London Plan and the emerging policies of the submission New London Plan.

If the subsequent Independent Examination is favourable, the North Kingston Neighbourhood Plan will be subject to a referendum, organised by RBK. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Neighbourhood Plan will become part of the Development Plan for RBK, covering the defined Neighbourhood Plan area.

1. Introduction	1
Background	1
SA / SEA explained	1
Structure of this SA report	2
2. What is the plan seeking to achieve?	3
Introduction	3
Relationship with Royal Borough of Kingston-upon-Thames planning policy and the London Plan	3
Vision and objectives of the North Kingston Neighbourhood Plan	4
3. What is the scope of the SA?	6
Introduction	6
Consultation	6
SA framework	6
4. What has plan-making / SA involved to this point?	8
Introduction	8
Overview of plan-making / SA work to date	8
Testing sites against the SA framework.....	11
SA site appraisal findings	12
Establishing reasonable alternatives for the North Kingston Neighbourhood Plan.....	29
5. What are the SA findings at this stage?	31
Introduction	31
North Kingston Neighbourhood Plan policies	31
Air quality	33
Biodiversity.....	33
Climate change.....	35
Health and wellbeing.....	36
Historic environment	37
Land, soil and water resources	38
Landscape and townscape.....	39
Population and communities	39
Transport and movement	41
Conclusions at this stage	42
6. What are the next steps?	44
Plan finalisation	44
Monitoring	44
Appendix A – SA scoping report consultation responses	45
Appendix B – Summary of key issues and opportunities	46

1. Introduction

Background

- 1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), in support of the emerging North Kingston Neighbourhood Plan which is being prepared by the North Kingston Neighbourhood Forum ('the Forum').
- 1.2 The North Kingston Neighbourhood Plan is being prepared in the context of the adopted Royal Borough of Kingston-upon-Thames (RBK) Core Strategy (2012) and the emerging New Local Plan, as well as the new London Plan
- 1.3 The work undertaken was agreed with the Forum and the Ministry of Housing, Communities and Local Government (MHCLG) in 2019 as part of the national Neighbourhood Planning Technical Support Programme led by Locality.

SA / SEA explained

- 1.4 The draft Neighbourhood Plan has been screened in by RBK as requiring SEA following comments received from Natural England and Historic England in 2019.
- 1.5 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects.
- 1.6 The Forum have determined that the requirement for SEA is best satisfied by the preparation of a Sustainability Appraisal (SA), incorporating SEA.
- 1.7 Accordingly, this SA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.¹
- 1.8 As per the Regulations, a report must be published for consultation alongside the draft Neighbourhood Plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.²
- 1.9 More specifically, the Report must answer the following questions:
 - 1) What has plan-making / SA involved **up to this point**?
 - Including in relation to 'reasonable alternatives'.
 - 2) What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan.
 - 3) What happens **next**?

¹ Directive 2001/42/EC

² Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004, available from: http://www.legislation.gov.uk/uksi/2004/1633/pdfs/uksi_20041633_en.pdf

Structure of this SA report

- 1.10 This report is the SA Report for the North Kingston Neighbourhood Plan. It is published alongside the draft, or 'pre-submission', version of the plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.11 This report essentially answers questions 1, 2 and 3 above, in order to provide the required information. However, before answering question 1, two initial questions are answered in order to further set the scene; what is the plan seeking to achieve? And what is the scope of the SA?

2. What is the plan seeking to achieve?

Introduction

- 2.1 With a view to introducing the vision and objectives of the North Kingston Neighbourhood Plan, this section considers the strategic planning policy context provided by the adopted RBK Core Strategy and emerging RBK New Local Plan. **Figure 2.1** (at the end of this chapter) shows the area covered by the North Kingston Neighbourhood Plan.

Relationship with Royal Borough of Kingston-upon-Thames planning policy and the New London Plan

- 2.2 The North Kingston Neighbourhood Plan (NKNP) is being prepared in the context of the adopted RBK Core Strategy (2012), the emerging New Kingston Local Plan and the New London Plan, published earlier in 2021.
- 2.3 Neighbourhood Plans must be in general conformity with the relevant higher tier development plan documents of the Local Planning Authority (LPA) and any sub-regional or strategic plans where applicable. This created a potentially complex planning policy context in which to prepare the NKNP as not only was there both a Local Plan and a strategic plan, both were in the process of being replaced for the majority of the time spent preparing the NKNP.
- 2.4 In practice, however, the degree of weight to be afforded to emerging documents will normally depend on the stage they have reached in the preparation process. It was therefore possible to take a pragmatic view on which of the higher tier development plan documents the SA should have greatest regard for when appraising the draft NKNP.
- 2.5 At the LPA scale, it was considered appropriate that the *adopted* Core Strategy should be the focus as the emerging Local Plan remains at a relatively early stage of preparation, with Regulation 18 'Early Engagement' consultation the most recent milestone, concluding in July 2019. No borough-wide housing target has been settled upon and no potential site options have been proposed for allocation at this stage, though a very high level site assessment exercise was undertaken by RBK in May 2019 to assess indicative capacity.
- 2.6 At the strategic scale, the *emerging* New London Plan (NLP) provided the policy context during preparation of the NKNP. This is because the NLP was at a mature stage of preparation throughout, having already undergone Examination in Public (EiP) in late 2018 and early 2019. An 'Intend to Publish' draft of the London plan was issued in December 2019, with an amended version incorporating changes requested by the secretary of state published in December 2020. The final version of the New London Plan was published in March 2021 and this replaced the 2016 London Plan in its entirety.
- 2.7 Neither the adopted Core Strategy nor the New London Plan identify an overall housing target for delivery specifically within the North Kingston Neighbourhood Plan area over the Plan period. However, the New London Plan identifies an annual housing target of 964 dwellings per annum for Kingston as a whole, a significant increase on the adopted Core Strategy target of 375 dwellings per annum.

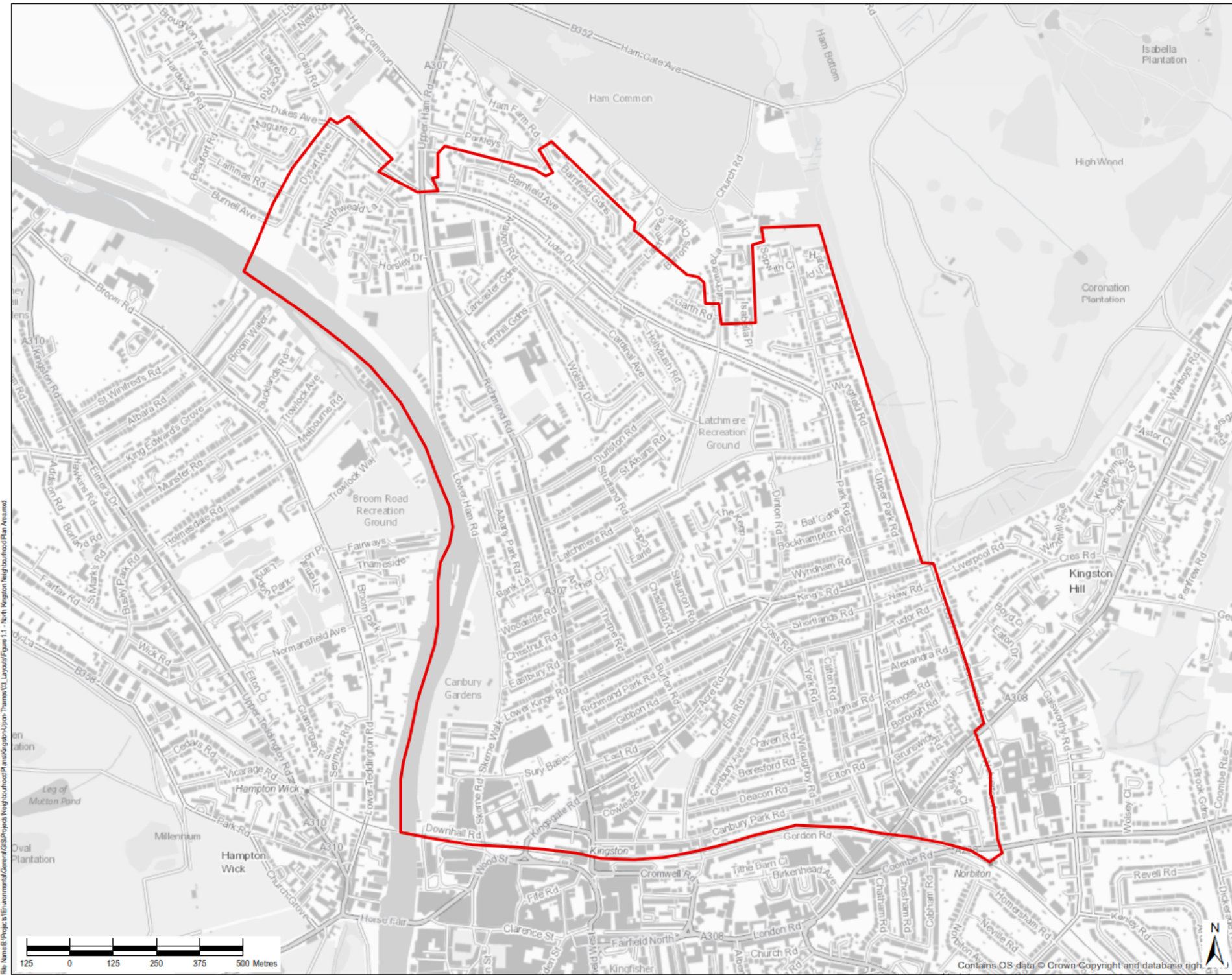
Vision and objectives of the North Kingston Neighbourhood Plan

Vision


- 2.8 The draft plan presents an expansive vision for North Kingston by the end of the plan period in 2041. Key messages include:
- Growth and population increase will lead to positive effects overall;
 - Development will be focussed at “*specific locations*” where positive effects are maximised and harm to characterful areas of the plan area is avoided;
 - Most significant changes will be at the southern fringe of the plan area around Kingston Town Centre.
 - Development will have contributed to new and enhanced green infrastructure across the plan area, particularly new cycle and pedestrian infrastructure and new “*pocket parks*”.
 - Areas of greatest flood risk will remain undeveloped.

Objectives

- 2.9 The draft plan proposes the following four objectives:
1. “*To ensure North Kingston remains a desirable place to live by maintain its essential suburban character and by successfully managing the transition between the growing Town Centre and the surrounding suburban area*”.
 2. “*To ensure the long-term sustainability of North Kingston by protecting and improving its essential local retail, business and social facilities*”.
 3. “*To help North Kingston adapt to climate change by protecting its important green spaces from development and to mitigate climate change by delivering a net biodiversity gain from new development*”.
 4. “*To help meet local housing needs by directing new housing development to a small number of key sites and along key corridors*”.
- 2.10 The set of proposed objectives are concise and thematically distinct from one another, focussing in turn on the themes of settlement character; retail and commercial vitality; climate change and biodiversity net gain, and; meeting housing needs.



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LEGEND
 Neighbourhood Plan Area

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3. What is the scope of the SA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues/objectives that should be a focus of (and provide a methodological framework for) SA. The purpose of scoping was to outline the 'scope' of the SA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An 'SA Framework' of objectives against which the Neighbourhood Plan can be assessed.
- 3.2 Further information on the scope of the SA is presented in Appendix II.

Consultation

- 3.3 The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, the Scoping Report was released to these authorities for consultation between the period 2nd December 2019 and 6th January 2020.
- 3.4 Responses were received from Natural England and Historic England, predominantly relating to additional features in neighbouring London Boroughs which could have potential to be affected by development within North Kingston. The suggested amendments did not result in any changes to the proposed SA Framework (see below). No response was received from the Environment Agency.

SA framework

- 3.5 The issues identified through the Scoping process were translated into an 'SA Framework'. This SA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SA framework for the North Kingston Neighbourhood Plan is presented in **Table 3.1** below.

Table 3.1 The SA framework for the North Kingston Neighbourhood Plan

SA theme	Objective(s)
Air quality	Locate and design development so that current and future residents will not regularly be exposed to poor air quality.
Biodiversity	Protect and enhance all biodiversity and geological features.
Climate change	Continue to drive down CO ₂ emissions from all sources by achieving high standards of energy efficiency in new development, providing opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation.
	Adapt to current and future flood risk by directing development away from the areas at highest risk of flooding and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.

SA theme	Objective(s)
	Support the resilience of the borough to the potential effects of climate change, including water scarcity, flooding and sea level rise, through innovative planning, including the extension and enhancement of green infrastructure as a natural measure to increase resilience.
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Historic environment	Protect, maintain and enhance the rich variety of cultural and built heritage within the Neighbourhood Plan area
Land, soil and water resources	Ensure the efficient and effective use of land Use and manage water resources in a sustainable manner
Landscape and townscape	Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area
Population and communities	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
Transport and movement	Promote sustainable transport use and reduce the need to travel

4. What has plan-making / SA involved to this point?

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report (subsequently referred to as the SA Report) must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives/ an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making/ SA up to this point is told within this part of the SA Report.

Overview of plan-making / SA work to date

- 4.3 The North Kingston Neighbourhood Plan (NKNP) is being prepared by the North Kingston Neighbourhood Forum ('the Forum') which was established in 2017.
- 4.4 The Neighbourhood Area comprises the wards of Canbury and Tudor, with Tudor ward forming the northern half of the plan area and Canbury ward the southern half. Tudor is bounded by the River Thames to the west and by the boundary with the London Borough of Richmond-upon-Thames to the north and east. Canbury includes the northern fringe of Kingston Town Centre with the River Thames again forming the western boundary, whilst the South Western Main Line (SWML) forms the southern boundary of the plan area and Coombe Hill ward lies to the east.
- 4.5 Plan making in North Kingston has been underway since 2017 following the designation of the North Kingston Neighbourhood Area on 30th March 2017. The scope, objectives and policies of the plan have evolved in response to engagement with the local community by the Forum.
- 4.6 The draft NKNP was screened in as requiring SEA by RBK in 2019 and this positive screening opinion was re-affirmed in February 2020. The screening opinion states that:
- "On the basis of the contents of the draft North Kingston Neighbourhood Plan, and advice from Historic England and Natural England, Strategic Environmental Assessment is considered to be required to accompany the North Kingston Neighbourhood Plan".*
- 4.7 The Forum has determined that this requirement will be best satisfied through the preparation of a Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA).
- 4.8 SA scoping was undertaken in late 2019 and the statutory consultees (Natural England, Historic England and the Environment Agency) were consulted on the SA scoping report between 2nd December 2019 and 6th January 2020.
- 4.9 A draft of the SA Report was prepared to accompany the March 2020 draft of the NKNP to Regulation 14 consultation. However, work on the NKNP and its evidence continued to progress in response to an evolving strategic context, and a revised SA Report was subsequently prepared in February and March 2021 to reflect the updated draft of the NKNP.

Top-down considerations

2016 London Plan

- 4.10 At the commencement of plan-making in North Kingston, the 2016 version of the London Plan remained in force with a plan period of 2016-2036. The 2016 London Plan established a housing target for Kingston as a whole of 643 dwellings per annum (dpa), in the context of around 42,000 dwellings per annum for the Greater London region.

- 4.11 However, whilst recognising that it formed part of the original policy context of the NKNP, the 2016 London Plan was afforded very little weight during preparation of the NKNP as preparation of its replacement was progressing at pace and is discussed further below.

New London Plan

- 4.12 The New London Plan (NLP) was published in March 2021 and replaces the 2016 London Plan in full. As it emerged, the NLP provided the strategic context for the NKNP throughout plan-making as preparation of the NLP achieved several significant milestones during NKNP preparation and it was apparent that it should attract greater weight than the 2016 London Plan.
- 4.13 Table 4.1 in the supporting text of Policy H1 of the NLP proposes a ten year housing target for Kingston of 9,640 dwellings, or an average of 964 dpa. This is in the context of an overall ten year housing target for London as a whole of 522,870 dwellings, or 52,287 dpa. Therefore, the new annual housing target for Kingston is a significant increase from the previous target in the 2016 London Plan.

Kingston Opportunity Area

- 4.14 Also of significance to North Kingston is the NLP's identification of a 'Kingston Opportunity Area' at Kingston Town Centre associated with the development of Crossrail 2 over the plan period (as per Policy SD1). The NLP identifies that Crossrail 2 could unlock an indicative around 9,000 new homes and 5,000 new jobs in the Kingston Opportunity Area in total. Although the project is currently suspended, the NLP anticipates that the line "*will be operational in the 2030s*". This suggests that Kingston Town Centre will become an exceptionally sustainable location for growth and will become an even greater focus for development.

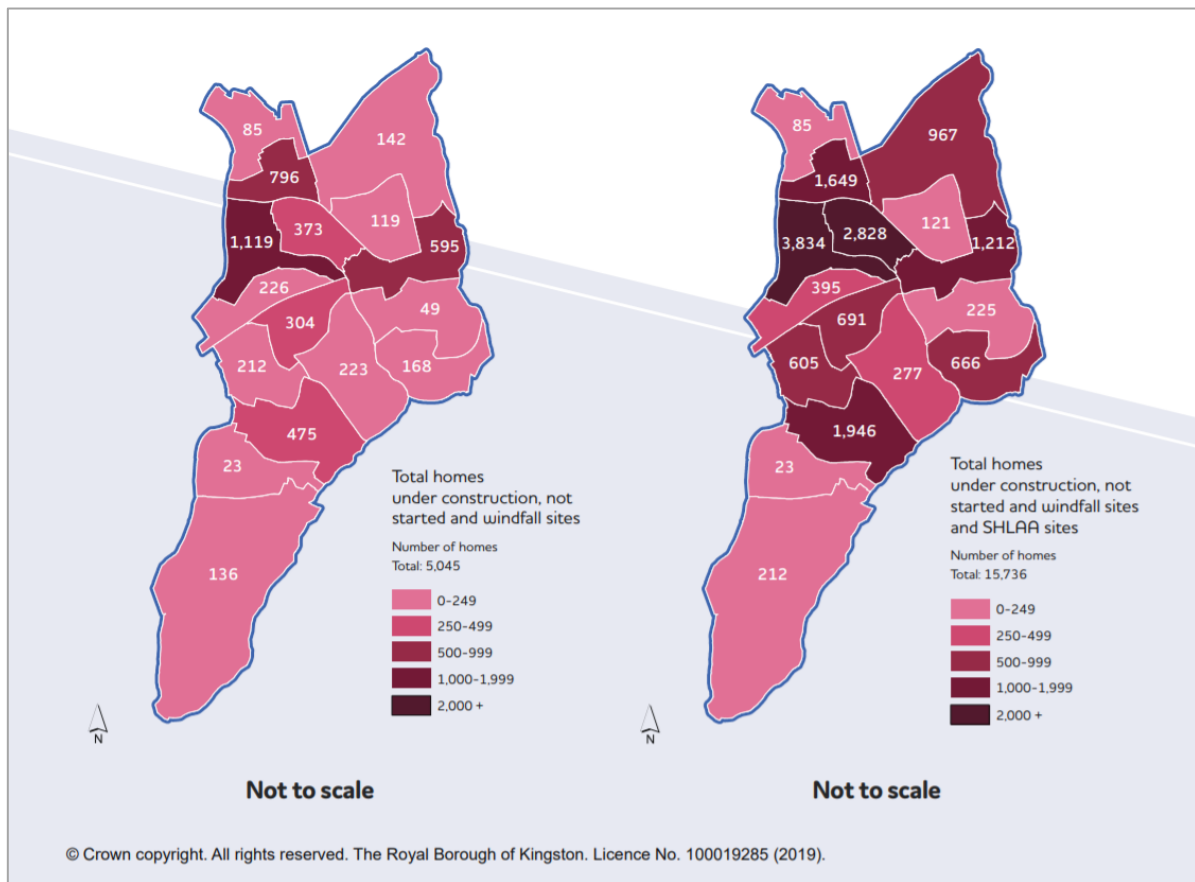
Adopted RBK Core Strategy

- 4.15 The adopted Development Plan for Kingston comprises the RBK Core Strategy (2012) along with the Kingston Town Centre Area Action Plan (2008), the South London Waste Plan (2012) and a number of Supplementary Planning Documents (SPDs).
- 4.16 The Core Strategy is the key policy document in the adopted Development Plan, with a plan period of 2012 to 2027. Core Strategy Policy CS10 sets a housing target of at least 375 dpa, a target aligned with that of the 2011 London Plan. CS10 also outlines the spatial strategy for delivering this growth, stating that the focus of development will be "*Kingston Town Centre, the three District Centres (Surbiton, Tolworth, New Malden), areas with the greatest public transport accessibility (PTAL level) and areas in need of improvement or renewal*".
- 4.17 Other than Kingston Town Centre, no areas within the North Kingston Neighbourhood Plan area are identified in the Core Strategy as locations for strategic growth and no site allocations are made.

Emerging Kingston New Local Plan

- 4.18 The emerging Kingston New Local Plan will replace the Core Strategy and the Kingston Town Centre Action Plan when it is adopted, with a plan period of 2019 to 2041. The New Local Plan underwent Regulation 18 'Early Engagement' consultation between May and July 2019. The most recently published Local Development Scheme (LDS) from March 2019 anticipates that adoption of the New Local Plan will be in Winter 2021/22. In practice, however, this will slip as RBK have committed to preparing a revised timetable to cover the period from winter 2020 to summer 2023 to reflect delays to plan-making.
- 4.19 The emerging New Local Plan Early Engagement consultation document does not identify potential site options for allocation, either within North Kingston specifically or the Borough as a whole. However, it does note that within the two wards which comprise the North Kingston Neighbourhood Plan area, i.e. Tudor ward and Canbury ward, there are a total of 881 consented dwellings either under construction or not yet started. This figure grows to 1,734 dwellings if indicative capacity of SHLAA sites without consent is factored in as well. The vast majority of these – all but 85 dwellings under both scenarios – are within Canbury ward. Canbury ward forms part of the northern fringe of Kingston Town Centre. See Figure 4.1 below:

Figure 4.1 Total housing capacity in Kingston by ward as at May 2019 based on homes under construction, consented homes not yet started and SHLAA sites without consent.³



Bottom-up considerations

- 4.20 No development is proposed for allocation through the draft Neighbourhood Plan, which reflects the absence of a housing target from RBK to be delivered through the Neighbourhood Plan.
- 4.21 However, the draft Neighbourhood Plan takes a proactive approach to establishing support in principle for development at a total of 16 sites across the Neighbourhood Plan area, each clearly defined on the policies map and supported by a detailed site-specific policy. The site-specific policies outline detailed conditions and requirements necessary for development proposals to receive support in principle, including specifying land use mix and design criteria.
- 4.22 The sites in the Neighbourhood Plan have been identified by the Forum and are not all drawn from the RBK SHLAA or via a call for sites process. As such, their availability may be uncertain. However, the Forum have taken the view that this approach is appropriate in light of the fact that North Kingston does not have a housing target to deliver through the Neighbourhood Plan and the Neighbourhood Plan does not seek to allocate sites for development. Rather, the site-specific policies are intended to ensure that future development proposals at sites with potential to come forward as windfall development contribute to achieving the objectives of the Neighbourhood Plan by following detailed design, land use and landscaping criteria.

³ Royal Borough of Kingston upon Thames (2019), 'Local Plan Early Engagement (Regulation 18)', available at: https://www.kingston.gov.uk/download/downloads/id/3110/local_plan_-_early_engagement_may_2019.pdf

Testing sites against the SA framework

- 4.23 In addition to the 16 sites identified by the Forum as locations at which growth will be supported in principle, a desktop study undertaken by AECOM for completeness has identified a further three sites within the plan area which may have potential to support growth.
- 4.24 These sites comprise SA001 and SA058 from the RBK site assessment exercise in May 2019 and site RBK0071 from the Kingston Brownfield Land Register. However, these three additional sites are not considered further, for reasons outlined below:
- **SA001** (242a Canbury Park Road) has been removed following engagement with the landowner who currently has a vibrant business on the site. The site is not currently available.
 - **SA058** (366 Richmond Road) has not been considered due to the fact it is an occupied house with minimal scope to increase density – availability and deliverability are both uncertain.
 - **RBK0071** was consented for flexible commercial floorspace in 2020 via application 19/02199/FUL.
- 4.25 In light of the above, a pool of 16 potential site options are identified in total for testing against the SA framework for their suitability as locations at which to support growth which delivers the Neighbourhood Plan objectives, including to “*help meet local housing needs by directing new housing development to a small number of key sites and along key corridors*”.
- 4.26 The sites are summarised in Table 4.1 below:

Table 4.1 Potential site options at which the principle of development could be supported through a site specific policy in the Neighbourhood Plan.





Site reference	Site name	Area (ha)	Indicative housing capacity
Policy NK19	Sury Basin	1.7	250
Policy NK20	Canbury car park / Kingsgate Road	1.03	300
Policy NK21	Canbury Business Park	0.97	300
Policy NK22	Cowleaze Road	0.37	100
Policy NK23	St George's Industrial Estate	2.03	75-150
Policy NK24	London Road/Kingston Hill Roundabout	0.36	100
Policy NK25	Manorgate Road	0.46	200
Policy NK26	Park Road Scout Hall	0.4	15
Policy NK27	The Seven Kings Car Park	0.49	150
Policy NK28	Richmond Road Petrol Station	0.13	30

Policy NK29	The Keep	6	n/a
Policy NK30	Elm Grove	0.74	100
Policy NK31	Acre Road (Murray House)	0.37	50
Policy NK32	Canbury Court Garages	0.1	10
Policy NK33	St Luke's Primary School	0.6	30
Policy NK34	Kingston Fire Station	1	35-50

SA site appraisal findings

- 4.27 To support the consideration of these sites for policy support in principle in the Neighbourhood Plan, the SA process includes an appraisal of the key environmental constraints and opportunities at each of the sites and potential effects that may arise as a result of development. The sites have been considered in relation to the SA framework developed during SA scoping (outlined in Table 3.1) and the baseline information.
- 4.28 The appraisals of the performance of each potential site option against the SA framework are presented below:

Appraisal key

Likely adverse effect (without mitigation)		Likely positive effect	
Neutral/no effect		Uncertain effects	

NK19 – Sury Basin

Site size: 1.7 ha

Air Quality	The site is within the Kingston Town Centre Air Quality Focus Area (AQFA). AQFAs consistently exceed EU limits for NO ₂ and are areas where the Greater London Authority (GLA) believe air quality problems to be most acute. In this context supporting the principle of growth at this location is considered to perform poorly in relation to the SA air quality objective.	
Biodiversity	The site is entirely built out by existing development in the form of large supermarket and associated surface car parking. There is no notable biodiversity sensitivity either within the site itself or its perimeter, though the site is in close proximity to the open green space along the Thames riverbank at Canbury Gardens. In this context redevelopment of the site could offer significant opportunities to seek a net gain in biodiversity at the site itself, plus enhanced habitat connectivity with existing nearby open space. Positive effects are anticipated in relation to biodiversity.	
Climate change	The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. However, the site falls within fluvial flood zone 2, indicating a medium flood risk (i.e. land with between a 1 in 100 and 1 in 1,000 annual probability of river flooding). Development proposals within flood zone 2 must be accompanied by a flood risk assessment. In this context, the principle of re-development at the site gives rise to uncertain effects in relation to climate change adaptation.	
Health and wellbeing	The site supports access to open green spaces along the Thames riverfront at Canbury Gardens, is easily accessible via walking and cycling from surrounding areas and via the Thames Path and supports good access to nearby healthcare facilities. However, its location within the AQFA suggests pedestrians and cyclists may be regularly exposed to poor air quality. This is likely to balance out some of the health benefits of being accessible to pedestrians and cyclists. Therefore, overall development would be likely to give rise to neutral effects in relation to the health and wellbeing SA objective.	
Historic environment	The site has no notable sensitivity in relation to identified heritage assets and development would be anticipated to give rise to neutral effects in relation to the historic environment SA objective.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site is in close proximity to the Thameside Strategic Area of Special Character (SASC), though existing development immediately west of the site severs the setting of the SASC and limits the potential for development at the site to have a direct visual effect on the SASC. Much of the site's immediate environs comprises contemporary development or re-development, notably at the adjacent former gas holder site. Redevelopment at the site could feasibly respond positively to this context through detailed matters of design and layout. Development at the site is considered likely to give rise to neutral effects in relation to the landscape and townscape SA objective.	
Population and communities	The site is of a significant scale and could help contribute a large number of new homes, potentially including new affordable homes. However, the site's existing function as a large supermarket serving a wide catchment means it is a key community facility and its location in central Kingston makes it highly accessible for many people by sustainable transport. There could be potential to retain or re-provide the supermarket through the development process, though the scale and location of this would depend on the nature of any future scheme. In this context, uncertain effects are anticipated in relation to the population and communities SA objective.	
Transport and movement	The majority of the site has a high Public Transport Accessibility Level (PTAL) score of 6a, one below the maximum possible score of 6b in the 9-tier PTAL system. The site is therefore clearly well placed for access by public transport, particularly Kingston Station which is less than 5 minutes' walk to the south. A number of bus routes also serve the site. Development at this location would likely support travel by sustainable means and help to minimise car use. Positive effects are anticipated in relation to the SA transport and movement objectives as a result.	

NK20 – Canbury Car Park/Kingsgate Road

Site size: 1.03 ha

Air Quality	The site is within the Kingston Town Centre Air Quality Focus Area (AQFA). AQFAs consistently exceed EU limits for NO ₂ and are areas where the Greater London Authority (GLA) believes air quality problems to be most acute. In this context supporting the principle of growth at this location is considered to perform poorly in relation to the SA air quality objective.
Biodiversity	The site is in use as surface car parking, a function which means the entire site is covered by hard standing. The site has no notable biodiversity sensitivity and no notable role in supporting wildlife habitats in its current form. In this context redevelopment of the site could offer opportunities to seek a net gain in biodiversity at the site itself, plus enhanced habitat connectivity with existing nearby open space. Positive effects are anticipated in relation to biodiversity.
Climate change	The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.
Health and wellbeing	The site supports access to open green spaces along the Thames riverfront at Canbury Gardens, is easily accessible via walking and cycling from surrounding areas and via the Thames Path and supports good access to nearby healthcare facilities. However, its location within the AQFA suggests pedestrians and cyclists may be regularly exposed to poor air quality. This is likely to balance out some of the health benefits of being accessible to pedestrians and cyclists. Therefore, overall development would be likely to give rise to neutral effects in relation to the health and wellbeing SA objective.
Historic environment	Development at the site could have a degree of effect on the setting of the Grade II-listed former Regal Cinema on Richmond Road, though this could be mitigated through detailed matters of design and would not necessarily lead to adverse effects. Development would be anticipated to give rise to neutral effects in relation to the historic environment SA objective.
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.
Landscape and townscape	The site falls within the designated Key View corridor from Thatched House Lodge in Richmond Park, though in practice its sensitivity within the landscape appears low. The immediate townscape character is of light industrial, warehouse and low-rise office development, flanked by established residential streets and new infill developments. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective. The site lies within the Neighbourhood Plan's proposed 'suburban transition zone' meaning future development should be commensurate with a mid-rise, mid-density character area between the high density Kingston Town Centre and the established low density suburban character of Tudor ward to the north. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective.
Population and communities	The site has some value to the community through its current use as surface car parking, though the potential loss of this through the development process is significantly outweighed by the potential to deliver high density housing in a sustainable location. Positive effects are considered likely to result from development at the site.
Transport and movement	The site has a high PTAL score of 6a, one below the maximum possible score of 6b in the 9-tier PTAL system. The site is therefore clearly well placed for access by public transport, particularly Kingston Station which is located immediately south of the site. A number of bus routes also serve the site. Development at this location would likely support travel by sustainable means and help to minimise car use. Positive effects are anticipated in relation to the SA transport and movement objectives as a result.

NK21 – Canbury Business Park

Site size: 0.97 ha

Air Quality	The site is within the Kingston Town Centre Air Quality Focus Area (AQFA). AQFAs consistently exceed EU limits for NO ₂ and are areas where the Greater London Authority (GLA) believe air quality problems to be most acute. In this context supporting the principle of growth at this location is considered to perform poorly in relation to the SA air quality objective.
Biodiversity	This site is entirely covered by existing development and areas of hard standing. There is no notable potential biodiversity sensitivity. The development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of a wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective.
Climate change	The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.
Health and wellbeing	The site supports access to open green spaces along the Thames riverfront at Canbury Gardens, is easily accessible via walking and cycling from surrounding areas and via the Thames Path and supports good access to nearby healthcare facilities. However, its location within the AQFA suggests pedestrians and cyclists may be regularly exposed to poor air quality. This is likely to balance out some of the health benefits of being accessible to pedestrians and cyclists. Therefore, overall development would be likely to give rise to neutral effects in relation to the health and wellbeing SA objective.
Historic environment	The site includes the Grade II-listed former Regal Cinema on Richmond Road, though development could be sensitively designed to avoid adverse effects on the listed building and its setting. Development would be anticipated to give rise to neutral effects in relation to the historic environment SA objective.
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.
Landscape and townscape	The site falls within the designated Key View corridor from Thatched House Lodge in Richmond Park, though in practice its sensitivity within the landscape appears low. The immediate townscape character is of light industrial, warehouse and low-rise office development, flanked by established residential streets and new infill developments. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective. The site lies within the Neighbourhood Plan's proposed 'suburban transition zone' meaning future development should be commensurate with a mid-rise, mid-density character area between the high density Kingston Town Centre and the established low density suburban character of Tudor ward to the north. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective.
Population and communities	The site is currently predominantly in B-class employment use which could potentially be re-provided onsite or even elsewhere in the plan area if its loss was necessary through the development process. There are no apparent community facilities on site. The potential for significant housing delivery, potentially including affordable housing, means that development on site would be anticipated to give rise to positive effects in relation to the population and community SA objectives.
Transport and movement	The site has a high PTAL score of 6a, one below the maximum possible score of 6b in the 9-tier PTAL system. The site is therefore clearly well placed for access by public transport, particularly Kingston Station which is located immediately south west of the site. A number of bus routes also serve the site. Development at this location would likely support travel by sustainable means and help to minimise car use. Positive effects are anticipated in relation to the SA transport and movement objectives as a result.

NK22 – Cowleaze Road

Site size: 0.37 ha

Air Quality	The site is within the Kingston Town Centre Air Quality Focus Area (AQFA). AQFAs consistently exceed EU limits for NO ₂ and are areas where the Greater London Authority (GLA) believe air quality problems to be most acute. In this context supporting the principle of growth at this location is considered to perform poorly in relation to the SA air quality objective.	
Biodiversity	This site is entirely covered by existing development and areas of hard standing. There is no notable potential biodiversity sensitivity. The development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of a wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective.	
Climate change	The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.	
Health and wellbeing	The site supports access to open green spaces along the Thames riverfront at Canbury Gardens, is easily accessible via walking and cycling from surrounding areas and via the Thames Path and supports good access to nearby healthcare facilities. However, its location within the AQFA suggests pedestrians and cyclists may be regularly exposed to poor air quality. This is likely to balance out some of the health benefits of being accessible to pedestrians and cyclists. Therefore, overall development would be likely to give rise to neutral effects in relation to the health and wellbeing SA objective.	
Historic environment	The site has no notable sensitivity in relation to identified heritage assets and development would be anticipated to give rise to neutral effects in relation to the historic environment SA objective.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site falls within the designated Key View corridor from Thatched House Lodge in Richmond Park, though in practice its sensitivity within the landscape appears low. The immediate townscape character is of light industrial and warehouse development, interspersed with residential conversions and new developments. The site lies within the Neighbourhood Plan's proposed 'suburban transition zone' meaning future development should be commensurate with a mid-rise, mid-density character area between the high density Kingston Town Centre and the established low density suburban character of Tudor ward to the north. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective.	
Population and communities	The site is currently predominantly in B-class employment use which could potentially be re-provided onsite or even elsewhere in the plan area if its loss was necessary through the development process. There are no apparent community facilities on site. The potential for significant housing delivery, potentially including affordable housing, means that development on site would be anticipated to give rise to positive effects in relation to the population and community SA objectives.	
Transport and movement	The site has a high PTAL score of 6a, one below the maximum possible score of 6b in the 9-tier PTAL system. The site is therefore clearly well placed for access by public transport, particularly Kingston Station which is located immediately south west of the site. A number of bus routes also serve the site. Development at this location would likely support travel by sustainable means and help to minimise car use. Positive effects are anticipated in relation to the SA transport and movement objectives as a result.	

NK23 – St George's Industrial Estate

Site size: 2.03 ha

Air Quality	The 2016 London Atmospheric Emissions Inventory (LAEI) records emissions of 31 – 34 µg/m ³ at this site, below the allowed limit of 40 µg/m ³ . Development at this location would therefore be consistent with the SA air quality objective to avoid exposing residents to areas of poor air quality through new development.	
Biodiversity	This site is entirely covered by existing development and areas of hard standing. There is no notable potential biodiversity sensitivity. The development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of a wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective.	
Climate change	The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.	
Health and wellbeing	The site is reasonably well placed to access the Green Infrastructure network at Canbury Gardens and the onwards connectivity with the Thames Path. The site is served by a cycle lane though this is on-road and has no physical segregation from traffic. The site has some potential to help improve the health and wellbeing of residents, though it is not clear the extent to which proximity to the riverside Green Infrastructure network might be tempered by the exposure to high traffic volumes along the A307, including proximity to traffic emissions for walkers and cyclists. Overall, neutral effects are anticipated, reflecting a balance of the opportunities and constraints at the site in relation to the health and wellbeing SA objective.	
Historic environment	There is no notable historic environment sensitivity at the site and no designated heritage assets would likely be directly affected by development on site. Neutral effects are anticipated as a result.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site is a substantial size and lies adjacent to the Tudor Estate Local Area of Special Character (LASC). This could give rise to potential effects from development on the prevailing character of the LASC. It is noted that the existing built environment of the site is of relatively low quality and that redevelopment could also offer opportunities to enhance the streetscape and improve the quality of the backdrop to the LASC. On this basis, effects are likely to be significantly informed by the nature of the detailed design, layout and especially massing of any future development proposals. In this context, it is considered that effects in relation to landscape and townscape are uncertain at this stage.	
Population and communities	The site is a substantial local employment site, offering community value through provision of diverse local employment opportunities. However, it is recognised that the development process could potentially incorporate employment uses as part of a mixed use development which also introduces residential uses on site. Such a development could have potential for significant benefits in relation to the population and communities SA objectives and positive effects are anticipated as a result.	
Transport and movement	The site has a low PTAL score of 2, reflecting that although it is reasonably well served by local buses, the site is beyond reasonable walking distance of a train station or London Underground station. A range of local services are located in the wider area but it is likely that development at this location would require some degree of car travel in order to meet many needs.	

NK24 – London Road/Kingston Hill Roundabout

Site size: 0.36 ha

Air Quality	The 2016 London Atmospheric Emissions Inventory (LAEI) records emissions of up to 37 – 40 µg/m ³ at this site in relation to allowed limit of 40 µg/m ³ . It is noted that the site is adjacent to the eastern extent of the Kingston Town Centre AQFA. Uncertain effects are therefore anticipated as the degree to which residents are exposed to areas of poor air quality could be informed by the final design and layout of any future scheme.	
Biodiversity	This site is entirely covered by existing development and areas of hard standing. There is no notable potential biodiversity sensitivity. The development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of a wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective.	
Climate change	The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.	
Health and wellbeing	The site supports walking and cycling access to local services and is in close proximity to local healthcare facilities at Churchill Medical Centre. However, the site is immediately adjacent to the Kingston Town Centre AQFA and development could potentially therefore direct new residents to a location which does not support their overall health. Neutral effects are anticipated overall when these factors are balanced against each other.	
Historic environment	The site has some sensitivity in relation to the historic environment as is located adjacent to the Park Road conservation area. Effects on the historic environment may depend on the final design and layout of development, meaning uncertain effects are anticipated at this stage.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site lies within the Neighbourhood Plan's proposed 'suburban transition zone' meaning future development should be commensurate with a mid-rise, mid-density character area between the high density Kingston Town Centre and the established low density suburban character of Tudor ward to the north. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective.	
Population and communities	The site has some community value as a local employment site but this function could potential be re-provided through a mixed use development which would also deliver new housing. Positive effects are anticipated in relation to the population and communities SA objectives.	
Transport and movement	The majority of the site has a medium high PTAL score of 5, reflecting its good local bus connections and proximity to Norbiton station, around a 5 minute walk east of the site. Additionally, a range of local services are accessible by foot within reasonable walking distance of the site. Development at this location is reasonably likely to support sustainable transport use.	

NK25 – Manorgate Road

Site size: 0.46 ha

Air Quality	The 2016 London Atmospheric Emissions Inventory (LAEI) records emissions of up to 37 – 40 µg/m ³ at this site in relation to allowed limit of 40 µg/m ³ . It is noted that the site is adjacent to the eastern extent of the Kingston Town Centre AQFA. Uncertain effects are therefore anticipated as the degree to which residents are exposed to areas of poor air quality could be informed by the final design and layout of any future scheme.	
Biodiversity	This site is entirely covered by existing development and areas of hard standing. There is no notable potential biodiversity sensitivity. The development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of a wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective.	
Climate change	The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.	
Health and wellbeing	The site supports walking and cycling access to local services and is in close proximity to local healthcare facilities at Churchill Medical Centre. However, the site is immediately adjacent to the Kingston Town Centre AQFA and development could potentially therefore direct new residents to a location which does not support their overall health. Neutral effects are anticipated overall when these factors are balanced against each other.	
Historic environment	The site has some sensitivity in relation to the historic environment as is located adjacent to the Park Road conservation area. Effects on the historic environment may depend on the final design and layout of development, meaning uncertain effects are anticipated at this stage.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site lies within the Neighbourhood Plan's proposed 'suburban transition zone' meaning future development should be commensurate with a mid-rise, mid-density character area between the high density Kingston Town Centre and the established low density suburban character of Tudor ward to the north. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective.	
Population and communities	The site has significant community value via its existing uses which include a medical centre and local convenience shop and petrol station. These uses could potentially be re-provided through a mixed use development which would also deliver new housing. Positive effects are anticipated in relation to the population and communities SA objectives.	
Transport and movement	The majority of the site has a medium high PTAL score of 5, reflecting its good local bus connections and proximity to Norbiton station, around a 10 minute walk east of the site. Additionally, a range of local services are accessible by foot within reasonable walking distance of the site. Development at this location is reasonably likely to support sustainable transport use.	

NK26 – Park Road Scout Hall

Site size: 0.4 ha

Air Quality	The 2016 London Atmospheric Emissions Inventory (LAEI) records emissions of 31 – 34 µg/m ³ at this site, below the allowed limit of 40 µg/m ³ . Development at this location would therefore be consistent with the SA air quality objective to avoid exposing residents to areas of poor air quality through new development.	
Biodiversity	The site has some potential to support wildlife habitats and to contribute to local wildlife corridors by virtue of being largely open and undeveloped (aside from the existing structure at the east of the site) and via a series of established trees around its perimeter. It is unlikely that this open space could be retained in its entirety through the development process, though the perimeter trees could be incorporated into the final design and layout of a future scheme. Effects in relation to biodiversity are considered to be uncertain as they are likely to be informed by matters of design and layout.	
Climate change	The site has some built area and hard surfacing but is largely covered by open lawns and green space. This could help contribute to the runoff of surface water and also contribute to a cooling effect. The loss of these functions through the development process would likely result in adverse effects in relation to the climate change SA objectives. The site has no fluvial flood risk.	
Health and wellbeing	The site supports access to open green spaces of Richmond Park which, is accessible via recreational walking and cycling. However, access to many goods and services may not be easily achievable for many residents from the site as it is beyond reasonable walking distance to many shops and services. Development is anticipated to give rise to neutral effects in relation to the health and wellbeing SA objective.	
Historic environment	The site has no notable sensitivity in relation to identified heritage assets and development would be anticipated to give rise to neutral effects in relation to the historic environment SA objective.	
Land, soil and water resources	The site is part brownfield, part greenfield. The existing area of open green space to the rear of the existing structure on site may be challenging to retain through the development process, though ultimately this is likely to depend on the final design and layout of any future scheme. Uncertain effects are therefore anticipated in this context.	
Landscape and townscape	The site has a degree of landscape and townscape sensitivity by virtue of its location opposite the Kingston Hill/Coombe Hill Strategic Area of Special Character (SASC) and adjacent to the designated key view corridor from Thatched House Lodge in Richmond Park. The nature and significance of any effects on these would likely be determined by the design, layout and massing of any future development proposal and is therefore uncertain at this stage.	
Population and communities	The site currently has significant community value as a Scout hut with associated safe open space for young people. The loss of this facility without re-provision would be a significant negative. It is assumed that development on site would be conditional on the retention or re-provision of the facility within the local area. However, in the absence of known availability of suitable alternative sites it is assumed any development at the site in isolation would adversely affect the current functionality of the Scout hut and that this would not be outweighed by the potential delivery of a relatively small number of new homes. Negative effects are therefore anticipated in relation to the population and communities SA objectives.	
Transport and movement	The site has a very low PTAL score of 1b reflecting the limited scope of local bus services and the site's distance from train and London Underground stations. There are only limited services available within reasonable walking distance of the site and it is likely that development at this location would have a substantial degree of car dependency to meet many day-to-day needs.	

NK27 – The Seven Kings Car Park

Site size: 0.49 ha

Air Quality	The site is within the Kingston Town Centre Air Quality Focus Area (AQFA). AQFAs consistently exceed EU limits for NO ₂ and are areas where the Greater London Authority (GLA) believe air quality problems to be most acute. In this context supporting the principle of growth at this location is considered to perform poorly in relation to the SA air quality objective.	
Biodiversity	The site is entirely built out by existing development in the form of multi-story car park. The site has no notable biodiversity sensitivity, though it is in close proximity to the open green space along the Thames riverbank at Canbury Gardens. In this context redevelopment of the site could offer opportunities to seek a net gain in biodiversity at the site itself, plus enhanced habitat connectivity with existing nearby open space. Positive effects are anticipated in relation to biodiversity.	
Climate change	The site is characterised by hard surfacing, which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. However, the site falls within fluvial flood zone 2, indicating a medium flood risk (i.e. land with between a 1 in 100 and 1 in 1,000 annual probability of river flooding). Development proposals within flood zone 2 must be accompanied by a flood risk assessment. In this context, the principle of re-development at the site gives rise to uncertain effects in relation to climate change adaptation. Neutral effects are anticipated in relation to climate change mitigation.	
Health and wellbeing	The site supports access to open green spaces along the Thames riverfront at Canbury Gardens, is easily accessible via walking and cycling from surrounding areas and via the Thames Path and supports good access to nearby healthcare facilities. However, its location within the AQFA suggests pedestrians and cyclists may be regularly exposed to poor air quality. This is likely to balance out some of the health benefits of being accessible to pedestrians and cyclists. Therefore, overall development would be likely to give rise to neutral effects in relation to the health and wellbeing SA objective.	
Historic environment	The site has no notable sensitivity in relation to identified heritage assets and development would be anticipated to give rise to neutral effects in relation to the historic environment SA objective.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site is large and lies adjacent to the Thameside Strategic Area of Special Character (SASC). This could give rise to potential effects from development on the prevailing character of the SASC. It is noted that the existing built environment of the site is of relatively low quality and that redevelopment could therefore offer opportunities to enhance the streetscape and improve the quality of the backdrop to the SASC and the surrounding area. On this basis, effects are likely to be significantly informed by the nature of the detailed design, layout and especially massing of any future development proposals. In this context, it is considered that effects in relation to landscape and townscape are uncertain at this stage.	
Population and communities	The site has an important function in the community as a place to park to access essential Town Centre services and facilities. However, it is likely that some degree of parking could be retained through the development process whilst also incorporating some residential uses on site as well. Positive effects are anticipated at the site in relation to the population and communities SA objectives.	
Transport and movement	The site has a high PTAL score of 6a, one below the maximum possible score of 6b in the 9-tier PTAL system. The site is therefore clearly well placed for access by public transport, particularly Kingston Station which is located within 5 minutes walk to the south east of the site. A number of bus routes also serve the site. Development at this location would likely support travel by sustainable means and help to minimise car use. Positive effects are anticipated in relation to the SA transport and movement objectives as a result.	

NK28 – Richmond Road Petrol Station

Site size: 0.13 ha

Air Quality	The 2016 London Atmospheric Emissions Inventory (LAEI) records emissions of 31 – 34 µg/m ³ at this site, below the allowed limit of 40 µg/m ³ . Development at this location would therefore be consistent with the SA air quality objective to avoid exposing residents to areas of poor air quality through new development.	
Biodiversity	The site is entirely built out by existing development in the form of a petrol station. The site has no notable biodiversity sensitivity, though it is in close proximity to the open green space along the Thames riverbank at Canbury Gardens. In this context redevelopment of the site could offer potential opportunities to seek a net gain in biodiversity at the site itself, plus enhanced habitat connectivity with existing nearby open space, though it is recognised this could be challenging on such a small site. Nevertheless, positive effects are anticipated in relation to biodiversity.	
Climate change	The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. However, the site falls within fluvial flood zone 2, indicating a medium flood risk (i.e. land with between a 1 in 100 and 1 in 1,000 annual probability of river flooding). Development proposals within flood zone 2 must be accompanied by a flood risk assessment. In this context, the principle of redevelopment at the site gives rise to uncertain effects in relation to climate change adaptation. Neutral effects are anticipated in relation to climate change mitigation.	
Health and wellbeing	The site supports access to open green spaces along the Thames riverfront at Canbury Gardens, is easily accessible via walking and cycling via the Thames Path and segregated on-road cycle lanes and supports good access to nearby healthcare facilities at St Albans Road. Development would be likely to give rise to positive effects in relation to the health and wellbeing SA objective.	
Historic environment	The site has some sensitivity in relation to the historic environment as is located adjacent to the Richmond Road conservation area. Effects on the historic environment may depend on the final design and layout of development, meaning uncertain effects are anticipated at this stage.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land. However, the nature of the site's existing function as a petrol station could give rise to the potential for localised ground contamination. There may be a need for detailed ground investigation work to establish whether the site is appropriate for redevelopment. In this context uncertain effects are anticipated.	
Landscape and townscape	The site has limited sensitivity within the landscape and townscape by virtue of its small size and poor quality existing built form. Development could offer an opportunity to enhance the street scene though would need to respond positively to the nearby Richmond Road conservation area.	
Population and communities	The site has some community value through its function as a local retail shop and petrol station, though this could potentially be outweighed by the provision of new housing on site. Positive effects are anticipated in relation to population and communities on balance.	
Transport and movement	The site has a low PTAL score of 2, reflecting that although it is reasonably well served by local buses, the site is beyond reasonable walking distance of a train station or London Underground station. A range of local services are located in the wider area but it is likely that development at this location would require some degree of car travel in order to meet some needs.	

NK29 – The Keep

Site size: 6 ha

Air Quality	The 2016 London Atmospheric Emissions Inventory (LAEI) records emissions of 28 – 31 µg/m ³ at this site, well below the allowed limit of 40 µg/m ³ . Development at this location would therefore be consistent with the SA air quality objective to avoid exposing residents to areas of poor air quality through new development.	
Biodiversity	This site is entirely covered by existing residential development and areas of hard standing, though this includes residential gardens, areas of local open space and tree planting. There is no notable potential biodiversity sensitivity in relation to designated sites, though the site as a whole could have some value as part of a local habitat network. The development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of the wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective.	
Climate change	The site is not notably affected by fluvial flood risk, though there are areas of localised surface water flood risk within the site. It is likely that these could be addressed through incorporation of sustainable drainage systems (SuDS) into any future development. Neutral effects are anticipated.	
Health and wellbeing	The site is not accessible by dedicated cycle lanes. The site is within reasonable walking distance of so local services which could incentivise healthy behaviour and activity to a limited extent, though neutral effects are anticipated overall.	
Historic environment	The Grade II-listed Gatehouse/Keep and associated walls, which are located in a prominent position at the entrance to the site, are notable features of built and cultural heritage significance, helping trace the area's military history and imparting a notable historic character on the street scene. However, it is noted that the design and layout of the existing residential development at The Keep is of limited merit and the potential for redevelopment of the site to enhance the appreciation of the listed building means that positive effects are anticipated in relation to the historic environment SA objective.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site falls partly within the designated Key View from Thatched House Lodge in Richmond Park and is adjacent to the Wyndham Road/Bockhampton Road Local Area of Special Character which lies immediately to the east. This gives it some landscape and townscape sensitivity, though effects in relation to landscape and townscape are likely to be strongly informed by the design, layout and massing of any future scheme. In this context, uncertain effects are anticipated at this stage.	
Population and communities	The site already supports a large residential development, though redevelopment would be likely to intensify this to deliver a net increase in housing. There could be potential for this to include affordable housing at scale given the large size of the site. Positive effects are anticipated from development in relation to population and communities.	
Transport and movement	The site is large and is spread across two very low PTAL scores, with the south western part of the site registering a score of 1b and the north and east of the site an even lower score of 1a, the lowest possible value except for those limited areas of the capital not served by any public transport at all. These PTAL scores reflect the limited scope of local bus services and the site's distance from train and London Underground stations. However, it is recognised that a supermarket and a small number of other local services are within reasonable walking distance of the site which would enable some day-to-day needs to be met by walking and cycling. However, it is likely that development at this location would have a substantial degree of car dependency to meet many day-to-day needs.	

NK30 – Elm Grove

Site size: 0.74 ha

Air Quality	The site is within the Kingston Town Centre Air Quality Focus Area (AQFA). AQFAs consistently exceed EU limits for NO ₂ and are areas where the Greater London Authority (GLA) believe air quality problems to be most acute. In this context supporting the principle of growth at this location is considered to perform poorly in relation to the SA air quality objective.	
Biodiversity	The site is entirely covered by existing development and areas of hard standing, though it is adjacent to an area of green open space which could support local wildlife habitats. There is no notable potential biodiversity sensitivity within the site itself. The development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of a wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective.	
Climate change	The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.	
Health and wellbeing	The site is not accessible by dedicated cycle lanes. The site is within reasonable walking distance of so local services which could incentivise healthy behaviour and activity to a limited extent, though neutral effects are anticipated overall.	
Historic environment	The site has no notable sensitivity in relation to identified heritage assets and development would be anticipated to give rise to neutral effects in relation to the historic environment SA objective.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site lies within the Neighbourhood Plan's proposed 'suburban transition zone' meaning future development should be commensurate with a mid-rise, mid-density character area between the high density Kingston Town Centre and the established low density suburban character of Tudor ward to the north. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective.	
Population and communities	The site currently supports key community facilities as both the Canbury Medical Centre and a nursery facility occupy the site. These could potentially be retained through the development process, re-provided on site in new premises on site through the development process or re-provided elsewhere in the Neighbourhood Plan area. However, the precise nature of effects in relation to population and community will be significantly informed by the nature of any future development proposals and uncertain effects are concluded at this stage.	
Transport and movement	The site has a high PTAL score of 6a, one below the maximum possible score of 6b in the 9-tier PTAL system. The site is therefore clearly well placed for access by public transport, particularly Kingston Station which is located 5-10 minutes walk south west of the site. A number of bus routes also serve the site. Development at this location would likely support travel by sustainable means and help to minimise car use. Positive effects are anticipated in relation to the SA transport and movement objectives as a result.	

NK31 – Acre Road (Murray House)

Site size: 0.37 ha

Air Quality	The 2016 London Atmospheric Emissions Inventory (LAEI) records emissions of 31 – 34 µg/m ³ at this site, below the allowed limit of 40 µg/m ³ . Development at this location would therefore be consistent with the SA air quality objective to avoid exposing residents to areas of poor air quality through new development.	
Biodiversity	This site is entirely covered by existing development and areas of hard standing. There is no notable potential biodiversity sensitivity. The development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of a wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective.	
Climate change	The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.	
Health and wellbeing	The site is not accessible by dedicated cycle lanes. The site is within reasonable walking distance of so local services which could incentivise healthy behaviour and activity to a limited extent, though neutral effects are anticipated overall.	
Historic environment	The site has no notable sensitivity in relation to identified heritage assets and development would be anticipated to give rise to neutral effects in relation to the historic environment SA objective.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site falls within the designated Key View corridor from Thatched House Lodge in Richmond Park, though in practice its sensitivity within the landscape appears low. The immediate townscape character is of light industrial and warehouse development, interspersed with residential conversions and new developments. The site lies within the Neighbourhood Plan's proposed 'suburban transition zone' meaning future development should be commensurate with a mid-rise, mid-density character area between the high density Kingston Town Centre and the established low density suburban character of Tudor ward to the north. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective.	
Population and communities	The site is currently in use as sheltered accommodation or assisted living. The loss of this facility without re-provision would be a significant negative. It is assumed that development on site would be conditional on the retention or re-provision of the facility within the local area. However, in the absence of known availability of suitable alternative sites it is assumed any development at the site in isolation would adversely affect the current residents and that this would not be outweighed by the potential delivery of a relatively small number of new homes alone. Negative effects are therefore anticipated in relation to the population and communities SA objectives.	
Transport and movement	The site has a low PTAL score of 2, reflecting that although it is reasonably well served by local buses, the site is beyond reasonable walking distance of a train station or London Underground station. A range of local services are located in the wider area but there is potential for development at this location to require some degree of car travel in order to meet some needs.	

NK32 – Canbury Court Garages

Site size: 0.1 ha

Air Quality	The 2016 London Atmospheric Emissions Inventory (LAEI) records emissions of 31 – 34 µg/m ³ at this site, below the allowed limit of 40 µg/m ³ . Development at this location would therefore be consistent with the SA air quality objective to avoid exposing residents to areas of poor air quality through new development.	
Biodiversity	The site is entirely built out by existing development in the form of a residential garages and associated hard standing. The site has no notable biodiversity sensitivity, though it is in close proximity to the open green space along the Thames riverbank at Canbury Gardens. In this context redevelopment of the site could offer potential opportunities to seek a net gain in biodiversity at the site itself, plus enhanced habitat connectivity with existing nearby open space, though it is recognised this could be challenging on such a small site. Nevertheless, positive effects are anticipated in relation to biodiversity.	
Climate change	The site is characterised by hard surfacing, which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. However, the site falls within fluvial flood zone 2, indicating a medium flood risk (i.e. land with between a 1 in 100 and 1 in 1,000 annual probability of river flooding). Development proposals within flood zone 2 must be accompanied by a flood risk assessment. In this context, the principle of re-development at the site gives rise to uncertain effects in relation to climate change adaptation. Neutral effects are anticipated in relation to climate change mitigation.	
Health and wellbeing	The site is reasonably well placed to access the Green Infrastructure network at Canbury Gardens and the onwards connectivity with the Thames Path. The site is served by a cycle lane though this is on-road and has no physical segregation from traffic. The site has some potential to help improve the health and wellbeing of residents, though it is not clear the extent to which proximity to the riverside Green Infrastructure network might be tempered by the exposure to high traffic volumes along the A307, including proximity to traffic emissions for walkers and cyclists. Overall, neutral effects are anticipated, reflecting a balance of the opportunities and constraints at the site in relation to the health and wellbeing SA objective.	
Historic environment	The site has some sensitivity in relation to the historic environment as is located adjacent to the Riverside North conservation area. Effects on the historic environment may depend on the final design and layout of development, meaning uncertain effects are anticipated at this stage.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	Site access lies within the Thameside Strategic Area of Special Character (SASC), whilst the actual developable area of the site is adjacent to the east. The site is also adjacent to the Woodside Road/Eastbury Road Local Area of Special Character (LASC). In this context the precise nature of effects in relation to landscape and townscape is likely to be strongly informed by the design and layout of any future scheme. Uncertain effects are anticipated at this stage.	
Population and communities	The site is of limited community value and the potential for provision of new homes would likely outweigh the loss of the garages. Positive effects are anticipated in relation to the population and communities SA objectives.	
Transport and movement	The site has a low PTAL score of 2, reflecting that although it is reasonably well served by local buses, the site is beyond reasonable walking distance of a train station or London Underground station. A range of local services are located in the wider area but it is likely that development at this location would require some degree of car travel in order to meet some needs.	

NK33 – St Luke's Primary School

Site size: 0.6 ha

Air Quality	The site is within the Kingston Town Centre Air Quality Focus Area (AQFA). AQFAs consistently exceed EU limits for NO ₂ and are areas where the Greater London Authority (GLA) believe air quality problems to be most acute. In this context supporting the principle of growth at this location is considered to perform poorly in relation to the SA air quality objective.	
Biodiversity	The site has no notable biodiversity sensitivity, though there are a number of established trees on site. These could likely be retained through the development process. Neutral effects are anticipated.	
Climate change	The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.	
Health and wellbeing	The site is not accessible by dedicated cycle lanes. The site is within reasonable walking distance of so local services which could incentivise healthy behaviour and activity to a limited extent, though neutral effects are anticipated overall.	
Historic environment	There is no notable historic environment sensitivity at the site and no designated heritage assets would likely be directly affected by development on site. Neutral effects are anticipated as a result.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site lies within the Neighbourhood Plan's proposed 'suburban transition zone' meaning future development should be commensurate with a mid-rise, mid-density character area between the high density Kingston Town Centre and the established low density suburban character of Tudor ward to the north. It is considered that there is good potential for new development on site to respond positively to this prevailing townscape character and there is potential for positive effects in relation to the landscape and townscape SA objective.	
Population and communities	The site is currently in use as a primary school and has clear and significant community value. It is assumed that development at the site would be predicated on the existing school facilities being re-provided locally, though as this may depend on the availability of land off-site uncertain effects are anticipated at this stage.	
Transport and movement	The southern half of the site has a high PTAL score of 6a, though the northern half falls within an area with a PTAL score of just 2. Kingston Station is around 10-15 minutes' walk to the south east and the site is also served by local bus routes. Development at this location would likely have reasonable potential to support travel by public transport and help to minimise car use. Positive effects are anticipated in relation to the SA transport and movement objectives as a result.	

NK34 – Kingston Fire Station

Site size: 0.36 ha

Air Quality	The 2016 London Atmospheric Emissions Inventory (LAEI) records emissions of 31 – 34 µg/m ³ at this site, below the allowed limit of 40 µg/m ³ . Development at this location would therefore be consistent with the SA air quality objective to avoid exposing residents to areas of poor air quality through new development.	
Biodiversity	This site is entirely covered by existing development and areas of hard standing. There is no notable potential biodiversity sensitivity. The development process could offer an opportunity to seek a net gain in biodiversity both on site and as part of a wider habitat network. This could give rise to positive effects in relation to the biodiversity SA objective.	
Climate change	The site falls within fluvial flood zone 1, indicating a low flood risk (i.e. land with less than a 1 in 1000 annual probability of river flooding). The site is characterised by built form and hard surfacing, both of which can contribute to an urban heating effect. Redevelopment could offer an opportunity to introduce urban cooling measures such as providing areas of green space or shade. Neutral effects are anticipated in relation to climate change mitigation. Overall, development at the site is considered likely to give rise to positive effects in relation to the climate change SA objectives.	
Health and wellbeing	The site is reasonably well placed to access the Green Infrastructure network at Canbury Gardens and the onwards connectivity with the Thames Path. The site is served by a cycle lane though this is on-road and has no physical segregation from traffic. The site has some potential to help improve the health and wellbeing of residents, though it is not clear the extent to which proximity to the riverside Green Infrastructure network might be tempered by the exposure to high traffic volumes along the A307, including proximity to traffic emissions for walkers and cyclists. Overall, neutral effects are anticipated, reflecting a balance of the opportunities and constraints at the site in relation to the health and wellbeing SA objective.	
Historic environment	There is no notable historic environment sensitivity at the site and no designated heritage assets would likely be directly affected by development on site. Neutral effects are anticipated as a result.	
Land, soil and water resources	The site is entirely previously developed and re-development could help contribute to making the most efficient use of available land.	
Landscape and townscape	The site is adjacent to the Tudor Estate Local Area of Special Character (LASC), though the precise nature of potential effects on the LASC would likely be determined by detailed matters of design and layout of any future scheme.	
Population and communities	The site has significant community value through its existing use as a fire station. The loss of this facility without re-provision would be a significant negative. It is assumed that development on site would be conditional on the retention or re-provision of the facility within the local area. However, in the absence of known availability of suitable alternative sites it is assumed any development at the site in isolation would adversely affect the current functionality of the fire station and that this would not be outweighed by the potential delivery of a relatively small number of new homes. Negative effects are therefore anticipated in relation to the population and communities SA objectives.	
Transport and movement	The site has a low PTAL score of 2, reflecting that although it is reasonably well served by local buses, the site is beyond reasonable walking distance of a train station or London Underground station. A range of local services are located in the wider area but it is likely that development at this location would require some degree of car travel in order to meet many needs.	

Summary of SA site assessment

Table 4.2 Summary of SA site appraisal findings

Site	Air quality	Bio-diversity	Climate change	Health / well-being	Historic environment	Land, soil and water	Land-scape / town-scape	Pop / community	Transport / movement
NK19	Red	Green	Blue	Yellow	Yellow	Green	Yellow	Blue	Green
NK20	Red	Green	Green	Yellow	Yellow	Green	Green	Green	Green
NK21	Red	Green	Green	Yellow	Yellow	Green	Green	Green	Green
NK22	Red	Green	Green	Yellow	Yellow	Green	Green	Green	Green
NK23	Yellow	Green	Green	Yellow	Yellow	Green	Blue	Green	Red
NK24	Blue	Green	Green	Yellow	Blue	Green	Green	Green	Green
NK25	Blue	Green	Green	Yellow	Blue	Green	Green	Green	Green
NK26	Yellow	Blue	Red	Yellow	Yellow	Blue	Blue	Red	Red
NK27	Red	Green	Blue	Yellow	Yellow	Green	Blue	Green	Green
NK28	Yellow	Green	Blue	Yellow	Blue	Blue	Green	Green	Red
NK29	Yellow	Green	Yellow	Yellow	Green	Green	Blue	Green	Red
NK30	Red	Green	Green	Yellow	Yellow	Green	Green	Blue	Green
NK31	Yellow	Green	Green	Yellow	Yellow	Green	Green	Red	Red
NK32	Yellow	Green	Yellow	Yellow	Blue	Green	Blue	Green	Red
NK33	Red	Yellow	Green	Yellow	Yellow	Green	Yellow	Blue	Green
NK34	Yellow	Green	Green	Yellow	Yellow	Green	Blue	Red	Red

Establishing reasonable alternatives for the North Kingston Neighbourhood Plan

- 4.29 A key element of the SA process is establishing and appraising ‘reasonable alternatives’ to the draft plan. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the “*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*”.⁴
- 4.30 It is apparent that the North Kingston Neighbourhood Forum is limited in terms of potential alternatives that can be considered. This is partly because of the limited supply of suitable, available and achievable land within the Neighbourhood Plan area and partly because the Neighbourhood Plan must be in general conformity with - and support the strategic development needs set out in – RBK’s adopted Core Strategy and emerging New Local Plan. In the context of the adopted Core Strategy, which allocates sufficient growth to meet its housing target, and the emerging New Local Plan, which has not yet set a housing target for the Borough as a whole, the Neighbourhood Plan does not have an agreed housing target to deliver within North Kingston. It is therefore not necessary for the plan to allocate sites for development.
- 4.31 Significant effects in relation to the SA framework are often most likely to arise from development proposed through the draft plan. Therefore, consideration of reasonable alternatives usually focusses on alternatives to this proposed development in terms of both the quantum and location of site allocations. In the absence of proposed site allocations and the absence of a housing target it is challenging to derive meaningful alternatives to the draft

⁴ Environmental Assessment of Plans and Programmes Regulations 2004, available at: http://www.legislation.gov.uk/uksi/2004/1633/pdfs/uksi_20041633_en.pdf

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Neighbourhood Plan in terms of alternative spatial strategies. A 'do nothing' scenario is not a reasonable alternative to test, as this is the existing baseline without a plan.

- 4.32 In this context, it is considered that **there are no reasonable alternatives** in relation to the draft North Kingston Neighbourhood Plan.

5. What are the SA findings at this stage?

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current version of the draft North Kingston Neighbourhood Plan, and the proposed policies contained within. This chapter presents:
- An appraisal of the current version of the North Kingston Neighbourhood Plan under the nine SA theme headings; and
 - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

Approach to the assessment

- 5.2 The appraisal is structured under the nine SA themes, linked to the SA objectives identified through scoping, as presented in **Table 3.1**.
- 5.3 For each theme potential 'significant effects' of the draft plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. For example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.4 Every effort is made to identify/ evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

North Kingston Neighbourhood Plan policies

- 5.5 The draft NKNP contains 34 policies, organised into four broad themes. These are listed in Table 5.1 below:

Table 5.1 List of policies in the draft North Kingston Neighbourhood Plan

Theme	Policy number	Policy name
Design	NK1	Intensification Zone
	NK2	Transition Zone – Suburban Area
	NK3	Key Development Corridors
	NK4	Quality Design – Character and Context
	NK5	Sustainable Design Standards
	NK6	Key Views
	NK7	Conservation Areas and Local Areas of Special Character
	NK8	Locally Listed Buildings
Business and Community	NK9	Local Shopping Parades
	NK10	Public Houses

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Theme	Policy number	Policy name
Environmental	NK11	Community Facilities
	NK12	Access & Movement
	NK13	Climate Change Mitigation - New Buildings
	NK14	Climate Resilience
	NK15	Green Infrastructure
	NK16	Local Green Spaces
	NK17	Pocket Parks
	NK18	Public Realm
Site specific	NK19	Sury Basin
	NK20	Canbury Car Park/Kingsgate Road
	NK21	Canbury Business Park
	NK22	Cowleaze Road
	NK23	St George's Industrial Estate
	NK24	London Road/Kingston Hill Roundabout
	NK25	Manorgate Road
	NK26	Park Road Scout Hall
	NK27	The Seven Kings Car Park
	NK28	Richmond Road Petrol Station
	NK29	The Keep
	NK30	Elm Grove
	NK31	Acre Road (Murray House)
	NK32	Canbury Court Garages
	NK33	St Luke's Primary School
	NK34	Kingston Fire Station

Air quality

- *SA objective: Locate and design development so that current and future residents will not regularly be exposed to poor air quality.*
- 5.6 The entire London Borough of Kingston, and therefore the whole of the Neighbourhood Plan area, is covered by an Air Quality Management Area (AQMA), declared in 2003. In this context there is potential for the plan's policies to have an effect in relation to poor air quality. Additionally, within the AQMA at a Borough-wide scale there are two Air Quality Focus Areas (AQFA), one of which covers Kingston Town Centre and falls partially within the Neighbourhood Plan area. In the context of the SA objective to ensure new development does not expose residents to areas of poor air quality, the AQFA is clearly a significant feature.
- 5.7 It is therefore notable that policies **NK19** (Sury Basin), **NK20** (Canbury Car Park/Kingsgate Road), **NK21** (Canbury Business Park), **NK22** (Cowleaze Road), **NK27** (Seven Kings Car Park), **NK30** (Elm Grove) and **NK33** (St Luke's Primary School) all support the principle of development at sites within the Kingston Town Centre AQFA. The policies collectively identify capacity for at least 1,200 new dwellings across these sites, meaning development to the sites' full indicative capacity could locate a significant number of new residents within an area of notably poor air quality. This would be in conflict with the SA air quality objective.
- 5.8 However, although the AQFA illustrates that Town Centre is an area of primary sensitivity in relation to air quality, it is important to note that there can be potential secondary benefits on air quality from directing growth to Town Centres in principle. Firstly, by virtue of Town Centres being the focus of goods and service provision, residents are less likely to need to use cars to access many of their needs, avoiding introducing unnecessary additional transport emissions. Similarly, Town Centres often serve as public transport nodes which means that Town Centre residents are often able to make many journeys by bus and train rather than by private car. Accordingly, by seeking to support growth at the northern fringe of Kingston Town Centre, site specific policies **NK19**, **NK20**, **NK21**, **NK22**, **NK27**, **NK30** and **NK33** are likely to support growth at areas which could help reduce reliance on emissions-generating transport.
- 5.9 Policy **NK5** (Sustainable Design Standards) seeks to minimise the exposure of existing residents to poor air quality as a result of new development, stating that "*proposals will be expected to make the fullest contribution to minimising carbon dioxide emissions*". The supporting text of the policy expands this message, explaining that during the construction phase of new development, contractors will be expected to "*commit to best practice on ... air pollution management during construction*". The supporting text supports enhanced provision of electric car charging infrastructure with a view to minimising dependency on emissions-generating transport modes over time.
- 5.10 Overall, the plan does not seek to allocate sites and therefore cannot directly determine the distribution of growth in the plan area. However, it does set out detailed policy support for development at specific, defined locations, several of which are within the Kingston Town Centre AQFA. Therefore, whilst the absence of allocations means the plan does not actively locate development within the AQFA, its support for development at sites in the AQFA over and above other locations suggests it may result in **minor negative effects** in relation to the air quality SA objectives.

Biodiversity

- *SA objective: Protect and enhance all biodiversity and geological features.*
- 5.11 Although the Neighbourhood Plan area itself has relatively few significant biodiversity designations, its location between Richmond Park to the east and Bushy Park to the west positions it in close proximity to several national and international biodiversity designations. Additionally, the River Thames, which forms the Neighbourhood Plan area's western boundary, is itself a sensitive biodiversity asset. This gives rise to the potential for development within North Kingston to have effects on neighbouring biodiversity features, as well as localised features and habitats within the plan area.

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- 5.12 However, as the draft Plan does not allocate sites and therefore does not directly bring forward development, its potential for direct effects on these neighbouring sensitive features is limited. It is noted that Policy **NK26** (Park Road Scout Hall) and Policy **NK29** (The Keep) support the principle of development at sites in relatively close proximity to the Richmond Park Site of Special Scientific Interest, Special Area of Conservation and National Nature Reserve, though it is considered that protections in higher-tier plans will likely be effective in seeking any necessary mitigation for the additional recreational pressure that could result from new development at these locations.
- 5.13 Policy **NK15** (Green Infrastructure) identifies that the Green Infrastructure (GI) network of the plan area includes “*parks, the riverbank, front gardens, street trees, public amenity land, allotments, footpaths and cycleways*”. Recognising the role that the GI network can play in protecting and enhancing biodiversity, the policy includes a requirement that the “*landscape, biodiversity, open space and access proposals*” of new development schemes located within the network should “*demonstrate a net gain in biodiversity*”. Seeking a net gain in biodiversity through the development process is a notable positive, though it is considered that Policy NK15 would be strengthened if this requirement was expanded to development anywhere within the plan area, rather than simply at sites within the GI network.
- 5.14 In this context, it is notable that none of the 16 site specific policies include a requirement for net gain to be demonstrated. Policies **NK20** (Canbury Car Park/Kingsgate Road), **NK23** (St George’s Industrial Estate), **NK27** (Seven Kings Car Park), **NK28** (Richmond Road Petrol Station), **NK31** (Acre Road Murray House), **NK34** (Kingston Fire Station) do identify the potential for planting or greening within the respective sites, though this appears to be with a focus on the amenity value of planting rather than linking planting with opportunities for net gain. The site specific policies might be strengthened by a clearer link between the measures required for development to receive in-principle support and the overarching requirement for net gain set out in Policy NK15.
- 5.15 Policy **NK5** (Sustainable Design Standards) recognises the significance of Green Infrastructure as a biodiversity feature, requiring new development to ensure the protection of North Kingston’s “*parks, riverbank, allotments, gardens and trees*” as well as making a contribution to “*local green infrastructure*” and retention of “*mature, healthy trees*”. Additionally, the policy requires development proposals to “*include a biodiversity survey*” to ensure localised features are identified and protected through the development process where necessary. The policy is anticipated to lead to positive effects in relation to protecting biodiversity, though there may be scope to add further details in relation to the nature of enhancements that will be sought.
- 5.16 The supporting text of Policy **NK16** (Local Green Spaces) notes the biodiversity significance of the River Thames, though recognises policy protection for the Thames is already provided by higher-tier plans and national policy. The policy seeks the protection of a number of green spaces within the plan area, and though the main policy intent seems to be preserving the amenity value of these spaces there is likely to be a secondary benefit in respect of biodiversity as many green spaces can have important roles as habitat corridors and habitats in their own right.
- 5.17 Similarly, Policy **NK17** (Pocket Parks) supports the principle of a change of use at three locations (Richmond Park Road, Gibbon Road and East Road) to facilitate the creation of ‘pocket parks’ at areas of currently derelict or underused land. Again, the main policy intent is the enhanced amenity value this will bring to the areas around any new parks, though it is likely that there could be potential for benefits in relation to biodiversity. It is recommended that the policy includes the aspiration for a biodiversity net gain more explicitly.
- 5.18 Overall, the draft Neighbourhood Plan has potential for **minor positive effects** in relation to the biodiversity SA objective, though these positive effects may be more widely achieved if the changes recommended above are applied to the final draft of the plan.

Climate change

SA objectives:

- *Continue to drive down CO₂ emissions from all sources by achieving high standards of energy efficiency in new development, providing opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation.*
- *Adapt to current and future flood risk by directing development away from the areas at highest risk of flooding and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.*
- *Support the resilience of the borough to the potential effects of climate change, including water scarcity, flooding and sea level rise, through innovative planning, including the extension and enhancement of green infrastructure as a natural measure to increase resilience.*

- 5.19 The climate change SA objectives relate to both climate change **mitigation**, i.e. reducing emissions from the built environment, and climate change **adaptation**, i.e. avoiding delivering development at areas of highest flood risk and increasing resilience to urban heating. Kingston Council declared a Climate emergency in 2019.
- 5.20 Policy **NK5** (Sustainable Design Standards)- seeks to support proposals that reduce energy consumption and waste, as well as CO₂ emissions, listing heat recovery, efficient heating, low or no emission heat and power systems and natural cooling systems. Further, the detail surrounding sustainable transport infrastructure encourages the improvement of pedestrian networks and paths with development plans, cycle routes and storage, alongside a specific travel plan for commercial and educational developments. Additional support for *'reasonable steps to reduce flood risk'* meets the SA objective of sustainable flood management through sensitive design by reducing *'net loss of drainage'* to zero through SuDs, greenroofs and rain gardens and/or storage/ use of rainwater.
- 5.21 The policy seeks to retain *"mature, healthy trees"*, this would be likely support continued CO₂ sequestration whilst ensuring mature trees' carbon remains locked in. The retention of mature trees would also be expected to play a role in natural cooling.
- 5.22 The introduction of pocket parks in Policy **NK17** (Pocket Parks) also explores possibilities to enhance the wider Borough strategy for sustainable drainage through a Flood alleviation scheme for the Acre Road Area. Also meets SA objective to mitigate against water scarcity. Measures to encourage Green Infrastructure development is touched upon in the 'natural assets' section.
- 5.23 Policy **NK12** (Access & Movement) identifies key sustainable transport routes (pedestrian and cycle routes) whose function and capacity could be improved for the benefit of residents health and accessibility to key services. The policy content specifies *'smaller local roads and shopping parades should also be enhanced with improved pedestrian realms and green connectivity'*. A more explicit review of the sustainable transport opportunities within this policy could be undertaken to meet the SA objective that encourages the provision of sustainable means of travel, in line with reducing CO₂ emissions overall within the Plan area. This is supported by Policy **NK15** (Green Infrastructure), which supports the provision of sustainable networks in North Kingston, and specifies the creation of multiple novel infrastructure links, including a new green corridor at the junction of Acre and Kings Road, secondary green routes and cycle routes.
- 5.24 Policy **NK13** (Climate Change Mitigation- New Buildings) supports implementing the Passivhaus international energy performance standard for new development within North Kingston by lowering requirements for sizeable monitoring and financial contributions towards low-carbon energy generation in buildings, such as making provision for on-site renewable energy generation. Maintaining high standards for reducing CO₂ output is beneficial for climate change mitigation. Further, encouraging sustainable design measures is likely to meet the aims of the SA objective for Climate Change adaptation, by protecting land for low carbon energy generation from large scale residential, commercial and community development, through diverting local infrastructure development away from these key areas

- 5.25 Policy **NK14** (Climate Resilience) specifies that proposals should seek to support urban greening as a means of increasing climate resilience, which contributes towards natural sustainable drainage systems. NK14 states: *'proposals will only be supported where they achieve an Urban Greening Factor of at least 0.5'* (for residential developments) ... *'and 0.4'* (for commercial developments).

Health and wellbeing

- *SA objective: Improve the health and wellbeing of residents within the Neighbourhood Plan area.*
- 5.26 The focus of the health and wellbeing SA objective is broad, seeking the improvement of the health and wellbeing of residents within the Neighbourhood Plan area. In this context there are a number of policies in the plan which could lead to effects in relation to the health and wellbeing SA objective.
- 5.27 **Policy NK5** (Sustainable Design Standards) encourages the positive contribution of development proposals to residents' health and wellbeing through the protection of local services (including health facilities) and existing green infrastructure in community areas. This could help ensure public access to key facilities and broadly recognises how biodiversity gains may contribute to improved citizen wellbeing through access. However, specific benefits are likely to be subject to more detailed matters of design, layout and placement of sustainable designs.
- 5.28 **Policy NK11** (Community Facilities) addresses the preservation of key community facilities, with several key public medical services listed in appendix A of the report, promoting the access of a multitude of benefits, such as GP Surgeries and Dentists, for residents within appropriate catchments. The plan does not directly address the existing multifunctionality of current non-medical services to alternative aspects of residents' current and future wellbeing, such as spiritual wellbeing, which is supported through community hubs and local places of worship. However, higher tier policies within the Local Plan, London Plan and NPPF will provide protection against the unnecessary loss of such facilities".
- 5.29 **Policy NK12** (Access and Movement) identifies existing pedestrian and cycle routes within the area and suggests improving functionality and capacity as part of the London Plan's Healthy Streets Approach. This has the potential to reduce car use through improvements to public transport and by ensuring walking and cycling connectivity with the range of services and facilities available at the centre.
- 5.30 **Policy NK15** (Green Infrastructure) proposes to maintain and enhance the existing green infrastructure network within North Kingston. Although this has the potential to improve the health and wellbeing of residents, the scope of NK15 could be broadened to include alternative or future networks outside of the existing green infrastructure.
- 5.31 **Policy NK16** (Local Green Spaces) outlines key green spaces within the area and acknowledges their need for protection, which could have the benefit of maintaining current residents' access to these spaces. However, reference could be made to what grounds this need for protection, with specific reference to the physical and mental benefits for current and future residents' overall health and wellbeing from this maintenance. Additionally, mention of prospective open spaces to benefit residents within moderate distance from current green amenities, such as those in the south east region would be suitable.
- 5.32 **Policy NK20** (Canbury Car Park/Kingsgate Road) specifies a regard for enhancing the connectivity of existing public green spaces at the Riverside and Canbury Gardens and the provision of a new, centrally located public park, likely to benefit residents within the surrounding area through greater accessibility to leisure and recreational space.
- 5.33 **Policy NK29** (The Keep) offers benefit to healthy transport networks such as cycle and footpaths, which is likely to benefit the health of residents of the adjoining primary schools.

- 5.34 **Policy NK30** (Elm Grove) addresses the need for greater access to health facilities within the area, through the promotion of a larger medical and day care facility at the Elm Grove redevelopment.
- 5.35 **Policy NK33** (St. Luke's Primary School) encourages healthy lifestyles for a wide range of residents through the provision of novel recreational space with unlimited public access to new and existing residents in the area.
- 5.36 Overall, it is considered that the draft Neighbourhood Plan's support for walking and cycling, including seeking links to the Green Infrastructure network at new development sites, means **minor positive effects** are anticipated in relation to the health and wellbeing SA objective.

Historic environment

- *SA objective: Protect, maintain and enhance the rich variety of cultural and built heritage within the Neighbourhood Plan area.*
- 5.37 North Kingston includes a wide variety of historic environment assets, including four conservation areas, several nationally listed buildings (at Grade II only) and five locally designated Local Areas of Special Character. In addition, the Neighbourhood Plan area's location adjacent to, but lower in the landscape than, Richmond Park means it has an important role to play in supporting protected views to and from prominent points within the park. There are also a number of locally significant features which do not necessarily received specific protection in higher tier planning policy. In this context the Neighbourhood Plan could have potential for effects in relation to the historic environment both within and beyond the plan area.
- 5.38 Policy **NK6** (Key Views), **NK7** (Conservation Areas and Local Areas of Special Character) and **NK8** (Locally Listed Buildings) all identify local features of potential historic environment sensitivity and seek their protection from harm from future development. NK6 identifies three landmark view corridors within the Neighbourhood Plan area, saying that new development must not be "*prominent to the detriment of the view*" in any of the three at either the "*foreground ... middle ground and background*" of the view. Policy NK7 extends policy protection to the plan area's four conservation areas alongside the five existing Local Areas of Special Character (LASC) designated through the adopted RBK Core Strategy, with the supporting text of the policy explaining this is precaution in the event that the New Local Plan does "*not continue to save this type of designation*". NK7 also identifies an additional four areas for LASC designation, defining them clearly on the proposed policy map. Policy NK8 identifies a total of eight buildings, or blocks of buildings, which are of "*considerable importance and help define the area's character*". The policy does not seek to restrict or prevent development in the vicinity of any of these buildings, though it does require proposals to "*demonstrate how they have had regard to its significance*". Collectively, Policies NK6, NK7 and NK8 are considered effective at identifying locally significant heritage features which may not benefit from higher tier designations, and are consequently anticipated to result in positive effects in relation to the historic environment SA objectives.
- 5.39 Policy **NK4** (Quality Design – Character and Context) identifies key design principles to maintain and enhance the essential character of the North Kingston area: including protecting '*distinctive roofscapes*', maintaining '*front boundary enclosures*', and using materials which '*reflect those that are common to the locality for buildings and boundary treatments*'. Further, the policy outlines a '*Key Area of Change*' where development of 4 storeys or more may be acceptable '*subject to design of exceptional quality and townscape justification*'. As such, policy is considered to meet key SA objectives regarding addressing varying design requirements for sites of differing built heritage.
- 5.40 Policy **NK5** (Sustainable Design Standards) outlines that development must be well designed with regards to contributing to health and wellbeing and mitigating climate change. In particular, the supporting text outlines the need to '*capitalise on valuable natural assets... such as the Neighbourhood's riverside or woodland setting*', highlighting the reinvigoration of key areas of local cultural significance developed '*over nearly 200 years into (a) mature and attractive residential enclave*'. Although this addresses the desire to develop these assets in a prospectively sustainable way, further exploration into the protection of these cultural assets

could further improve Policy NK2's ability to meet the maintenance aspect of the key SA objective for the Historic Environment Theme.

- 5.41 Policies **NK24** (London Road/Kingston Hill Roundabout) and **NK25** (Manorgate Road) seek to preserve the character and appearance of the Park Road conservation area, as well as enhancing its key features further where possible. It is noted that certain existing features, such as the existing petrol station, and vacant office buildings '*detract from the character of the conservation area*', and that redevelopment is therefore could offer an opportunity to enhance the local townscape. Key design criteria for future development proposals at these sites include height and massing restrictions and regard for key sightlines from main roads. In addition, **Policies NK28** (Richmond Road Petrol Station) and **NK32** (Canbury Court Garages), support development at sites in very close proximity to the Richmond Road and Riverside North conservation areas respectively, though this proximity and potential for associated sensitivity is not specifically recognised in the policy wording. Amending the wording to include recognition of the nearby conservation areas so could strengthen the policy overall.
- 5.42 Overall, the historic environment policies take a proactive and broad based approach to the protection of North Kingston's built and cultural heritage, including building in contingency should the Local Plan-designated Local Areas of Special Character not be rolled forward into the New Local Plan. There could be scope to more directly reference specific local heritage assets through the site specific policies where relevant, though on balance **minor positive effects** are anticipated in relation to the historic environment SA objective.

Land, soil and water resources

SA objectives:

- *Ensure the efficient and effective use of land.*
 - *Use and manage water resources in a sustainable manner.*
- 5.43 Several policies in the plan support proposals to support the principle of directing new development to previously developed land, either by replacing the existing use on site or potentially intensifying development at a site to make the most efficient use of the available land. Policies **NK19** (Sury Basin) **NK22** (Cowleaze Road), **NK25** (Manorgate Road), **NK28** (Richmond Road Petrol Station), **NK31** (Acre Road, Murray House), **NK32** (Canbury Court Garages) and **NK34** (Kingston Fire Station) all offer support for proposals to redevelop land for residential purposes. Several policies also acknowledge proposals for the development of medical purposes (**NK30**), employment (**NK20**, **NK21**, **NK23**, **NK27**) childcare services (**NK30**) and community and Town Centre (**NK24**) uses on previously developed land. Additionally, **Policy NK29** (The Keep) supports the partial redevelopment of land to improve pedestrian and cycling connectivity, also acknowledging scope for primary school extensions within the site area. In general, the redevelopment of land is beneficial from a land efficiency perspective, and deters development from sites within the Plan area identified for their current benefits to the setting and community.
- 5.44 Alongside the key policies, the Plan itself directly recognises existing areas of Metropolitan Open Land (MOL), a London-wide designation, with planning weight broadly equivalent to that of the Green Belt. The MOLs are two areas of Canbury Riverside on the west of the Plan area: Canbury Gardens and Hawker Sports Pitches, identified as being critical assets to the North Kingston community with regards to providing environmental benefits. Further, **Policy NK16** (Local Green Spaces) identifies spaces that are to be protected to the same degree as Metropolitan Open Land, for the benefit of effective and efficient use.
- 5.45 **Policy NK5** (Sustainable Design Standards) specifies that proposals for development must '*make efficient use of natural resources, including water, by making the most of natural systems*', which contributes towards managing water resources effectively and in a sustainable manner. However, policies in the Plan could seek to address, in greater depth, how water resources could be managed sustainably and efficiently within the area to meet the needs of residents, with reference to wastewater infrastructure.

- 5.46 Additionally, it would be beneficial for the plan to outline action to prevent localised residual land and soil and/or groundwater contamination, at former power sites, such as Kingston Power Station, which is not mentioned in the pre-submission plan.
- 5.47 On balance, although plan does not seek to allocate sites and therefore cannot directly influence the distribution of growth, its policies give robust support to the principle of delivering growth on previously developed land. By extension it is considered that the plan therefore provides clear in-principle support to development which makes most efficient use of available land putting it in alignment with the emerging New London Plan's proposal for significantly intensified development at Kingston Town Centre. Overall, the plan is anticipated to give rise to **significant positive effects** in relation to the land, soil and water resources SA objectives.

Landscape and townscape

- *SA objective: Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area.*
- 5.48 In recognition of the varied character within the NLNP area, with high density at Kingston town centre in the south contrasting with low density suburban development in the north of the plan area, the NKNP places strong emphasis on managing the transition between character areas. Policy **NK1** (Intensification Zone) identified, via the policy map, the area around the town centre which is “*considered suitable for higher density, mixed use development*”, anticipated to “*generally*” be between six and 12 storeys in height.
- 5.49 To manage the impact of such development on the character of the rest of the plan area, Policy **NK2** (Transition Zone – Suburban Area) defines a ‘transition zone’ to “*protect the existing residential character of the majority of North Kingston*” and mitigate visual impact on heritage assets in lower density areas by ensuring there is a degree of gradation between building heights allowed in the Town Centre and building heights elsewhere to avoid an abrupt hard edge developing at the perimeter of the Opportunity Area. In the transition zone, building density will be between 200/300/ha but “*generally lower than are considered suitable in the Intensification Zone*”.
- 5.50 Policy **NK4** (Quality Design – Character and Context) recognises the importance of new development proposals responding positively to the “*essential character*” of its local context and of being “*in scale with its surroundings*”. North Kingston has a number of character areas, reflecting the plan area’s evolution over time and it is considered that NK4 accommodates this diversity of character by avoiding setting overly prescriptive or onerous design criteria at a plan area-wide scale.
- 5.51 In this context, it is notable that Policy **NK7** extends policy protection to the five existing Local Areas of Special Character (LASC) designated through the adopted RBK Core Strategy, with the supporting text of the policy explaining this is precaution in the event that the New Local Plan does “*not continue to save this type of designation*”. NK7 also identifies an additional four areas for LASC designation, defining them clearly on the proposed policy map. These nine areas each represent important areas of townscape character in the plan area and their preservation will help sustain the vitality of North Kingston’s identity and sense of place.
- 5.52 Overall, the policies of the plan area anticipated to give rise to **minor positive effects** in relation to the landscape and townscape SA objectives.

Population and communities

- *SA objective: Cater for existing and future residents’ needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.*
- 5.1 In general, North Kingston enjoys a range of widely-used community facilities, including public services, conveniences, sports, recreation, open green spaces, arts and culture and leisure facilities, listed in **Appendix A** of the Pre-Submission Plan.

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- 5.2 **Policy NK11** (Community Facilities), prioritises the protection and enhancement of existing community facilities within the Plan area. As well as accommodating for new development through the possible relocation of these services, Policy NK11 specifically encourages the 'dual use' of facilities, which is likely to increase the accessibility of these services to a wider variety of community groups with varied interests in the North Kingston area. More attention could be given to the development of previously unrelated sites where community services could be introduced and maintained, particularly those services that are more sparsely noted in **Appendix A** of the pre-submission plan (such as Arts and Culture facilities).
- 5.3 **Policy NK16** (Local Green Spaces), provides a list of 12 protected sites of importance, providing communities powers to 'rule out' new development within these areas. Although this is likely to yield a positive contribution to enhancing existing sites, on its own, Policy NK16 neglects the potential for greater connectivity between green spaces for residents. Instead, **Policy NK15** (Green Infrastructure), could be better connected to Policy NK16, in order to prioritise the enhancement of improved access to these spaces, and meet the overall needs of the community, particularly those further dispersed in the south eastern part of the Plan area.
- 5.4 **Policy NK17** (Pocket Parks) describes the proposal to alter the use of pre-existing land to support 'pocket parks' in three specified locations in the south east part of the Plan area, adjacent to This is likely to benefit the existing community by providing increasing opportunities for social mixing, healthy living, relaxation, play, food growing and contact with nature and other beneficial communal activities.
- 5.5 Alongside these policies, numerous site-specific policies specify either redeveloping land and structures or enhancing existing facilities for community benefits to address acute needs, such as services for elderly residents. These include:
- **Policy NK19** (Sury Basin), outlines plans to redevelop land for mixed residential, and retail uses, including specialist older persons housing.
 - **Policy NK21** (Canbury Business Park) outlines plans for a mixed residential, employment and community facility scheme.
 - **Policy NK22** (Cowlease Road) outlines the plans to support the development of a residential scheme for the elderly.
 - **Policy NK23** (St George's Industrial Estate) supports plans for a mixed residential scheme.
 - **Policy NK27** (The Seven Kings Car Park) supports plans for a mixed residential and employment scheme.
 - **Policy NK29** (The Keep) considers how development will affect the expansion of primary schools, encourage opportunity to develop pedestrian and cycling connectivity.
 - **Policy NK31** (Acre Road) outlines a key residential scheme that supports a proportion of older person housing within it.
 - **Policy NK33** (St. Luke's Primary School) outlines proposals to relocate a key school services to make provisions for specialist older persons housing and an area of new open space.
 - **Policy NK34** (Kingston Fire Station) encourages the development of the station in line with a new residential scheme, specifically involving the development of community-led housing and/or a self build/tenure mix.
 - **Policy NK30** (Elm Grove) encourages the development of a mixed residential, medical services and childcare facilities scheme in the case of land redevelopment, encouraging the provision of access to key community services to cater for the needs of existing and future residents within the pivotal location of the Kingston Town Centre.
- 5.6 In addition to the above, **Policy NK26** (Park Road Scout Hall) supports the principle of development on Park Road that supports a mixed residential and community facility scheme which re-provides the existing scout hut on site. This could have potential to be of wider benefit to the community as a whole through providing an area for socialisation of community groups.

The extent of these benefits is likely to be dependent on the wider accessibility of the Hall to residents in the area, which could be explained in more depth in the policy statement.

- 5.7 **Policy NK10** (Public Houses) identifies the presence of 13 public houses of historical, cultural, economic and/or social value, and indicates the resistance of development proposals that will lead to the loss of these structures. NK10 outlines support for proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the Public House, provided that such development *'will secure the long term viable use of the Public House'*, without compromising *'its operation or viability'*. In addition, **Policy NK9** (Local Shopping Parades) prioritises the protection and improvement of 8 Local shopping parades and their provision, mainly concentrated in the southern half of the Plan area. Both specify the enhancement of key community services directly addressing the needs of future residents, as specified in the SA objective for Population and Communities.
- 5.8 Overall, it is considered that the draft Plan provides robust support for the development of a very significant number of new homes within the plan area. Development of all the sites identified through the site specific policies has potential to deliver over 1,500 new dwellings, including on sites of sufficient scale to achieve potentially significant affordable housing delivery. In addition, the draft Plan is likely to promote the enhancement and protection of several key community service centres within the area, although greater weight could be given to developing better interconnectivity between these facilities. As such, development is likely to result in **significant positive effects** in relation to the Population and Wellbeing SA objective.

Transport and movement

- *SA objective: Promote sustainable transport use and reduce the need to travel*
- 5.9 The Transport and movement SA objective focuses on the promotion of sustainable transport use and reduction in the need for travel. In this context, there are a number of policies in the plan which could lead to effects in relation to the transport and movement SA objective.
- 5.10 The public transport network in North Kingston in general is very strong, with access to bus services within a 5 minute walking distance to all area identified by the site-specific policies of the plan. Policies offering proposed residential and employment schemes in the southern west side of the plan area (including sites mentioned in Policies **NK19, NK20, NK22, NK21, NK23, NK27 and NK32**) offer suitable access to the Kingston station (< 10 minutes by foot). Site NK19 (Sury Basin) in particular, is well placed to take advantage of existing pedestrian access to is Kingston station and also lies within close proximity of most key services in the centre. Further, **Policy NK3** (Key Development Corridors) proposes that development in the Richmond Road corridor in particular has the potential to take advantage of existing key transport infrastructure and encourage the use of more sustainable modes of travel through ease of access to key services, *'capitalising on services within walking and cycling distance, and their current and future accessibility by public transport'*.
- 5.11 **Policy NK5** (Sustainable Design Standards) notes that transport development should be designed sustainably, in light of existing and future residents' needs and the overarching effects of climate change. Specifically, provision of sustainable modes of transport and improved accessibility for residents to existing pedestrian and cycle routes are required. The supporting text also supports expanded provision of electric car charging infrastructure with a view to enhancing sustainable transport use. Specific effects are likely to be subject to detailed matters of design, though the policy could help facilitate and encourage the use of sustainable modes of travel within the town, in line with the SA objective.
- 5.12 Other key polices noted in the plan directly address the need for improving provisions for more sustainable modes of transport. **Policy NK20** (Canbury Car Park/Kingsgate Road) proposes enhancing connectivity to adjoining neighbourhoods and *'public transport nodes at Richmond Road and Sury Basin'*, alongside schemes noted in **Policy NK19** for *'secure cycle parking'*.
- 5.13 **Policy NK15** (Green Infrastructure) details how ecological connectivity through green infrastructure, such as green corridors can be used to increase the use of footpaths and cycle routes by connecting communities to parks and other open spaces, such as the Canbury riverside area. For example, the inclusion of two new family cycle routes linking the more

suburban area Ham to the Richmond road/riverside detailed in NK15, may alleviate the need for car use for residents' local travel. Further, the overall improvement of the green infrastructure network, including footpaths and cycleways, has the benefit of encouraging more sustainable forms of travel in the town.

- 5.14 **Policy NK12** (Access and Movement) identifies and proposes that future development contribute to the enhancement of key cycle and pedestrian routes it adjoins, in terms of functionality, appearance and safety, in light of the 'Healthy Streets Approach' noted in the London Plan. This is likely to be beneficial for promoting sustainable modes of transport for future residents and commuters, though it is noted that 'access routes' are presented as disconnected, rather than interconnected within the North Kingston Policies Map. This may require revision if long-term effects for the sustainable transport system as a whole are to be considered. This is particularly necessary for routes which overlap with pre-existing networks such as the Richmond Road area (noted in **Policy NK3**).
- 5.15 The Public Transport Accessibility Level (PTAL) is an indication of the degree of availability of key transport services for residents within a plan area, whereby '6b' indicates excellent service and '1a' indicates the poorest service. PTALs In North Kingston are variable. Excellent access to services (6a) is available from the Town Centre, home to Kingston train station and multiple bus services, but accessibility then decreases in line with proximity from the centre, reaching '1b' in the residential area bordering Ham.
- 5.16 In light of the above, the draft Neighbourhood Plan's support for maintaining and enhancing pre-existing public access networks through pathways, cycle routes and access to public transport by the strategic placement of development, existing routes and taking advantage of green infrastructure, is likely to lead to **minor positive effects** in relation to the transport and movement SA objective.

Conclusions at this stage

- 5.17 The appraisal finds that the plan as a whole is likely to lead to significant positive effects in relation to the population and communities SA objectives and the land, soil and water resources SA objectives. Minor positive effects are anticipated in relation to the biodiversity; climate change; health and wellbeing; historic environment; landscape and townscape; and transport and movement SA objectives. Minor negative effects are anticipated in relation to the air quality SA objectives
- 5.18 Significant positive effects are predicted in relation to population and communities because the plan provide robust policy support for the development or redevelopment of 16 sites with a collective indicative capacity of over 1,500 new dwellings. This scale of delivery could have potential to unlock a significant quantum of affordable housing. Significant positive effects are anticipated in relation to land, soil and water resources on the basis that development is supported exclusively at previously developed sites, offering a substantial opportunity to maximise the efficient use of land within the plan area.
- 5.19 Minor positive effects are predicted in relation to biodiversity given the potential for habitat enhancement at all proposed site allocations, as well as the avoidance of harm to designated sites both within the plan area and beyond. Similarly, minor positive effects are predicted in relation the historic environment on the basis that the plan's policies are considered to adequately mitigate potential risks to the historic environment at sensitive site allocations, whilst also offering potential to enhance a number of sites within their historic context. Minor positive effects in relation to climate change are predicted on the basis that the plan supports growth at sites which broadly avoid areas of significant flood risk and its detailed policies include further flood risk mitigation, as well as providing for adaptation to, and mitigation of, other effects of climate change through proposed green infrastructure protection and enhancement.
- 5.20 There could be potential for minor negative effects in relation to air quality on the basis that the plan supports the principle of development at sites within the Kingston Town Centre Air Quality Focus Area where air quality is recognised by the GLA as being of particular concern.

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- 5.21 However, it is important to reiterate that the draft plan does not actually seek to actively bring forward development and does not allocate any sites for development. The plan is prepared so as to guide future windfall development proposals, rather than directly deliver any growth itself.
- 5.22 It is therefore very important to view the conclusions in relation to the plan's potential effects in this context. Effects from a plan, both positive and negative are most likely to be generated by development, and therefore a plan which proposes no development may theoretically result in no effects.
- 5.23 Despite this, and mindful of the context set out in paragraphs 5.21 and 5.22 above, when read as a whole the Neighbourhood Plan is anticipated to result in **broadly positive effects in relation to the SA framework.**

6. What are the next steps?

6.1 This part of the report explains next steps that will be taken as part of plan-making and SA.

Plan finalisation

6.2 This SA Report accompanies the Pre-Submission version of the North Kingston Neighbourhood Plan for Regulation 14 consultation.

6.3 Following consultation, any representations made will be considered by North Kingston Neighbourhood Forum, and the Neighbourhood Plan and accompanying SA Report will be updated as necessary. The updated SA Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, the Royal Borough of Kingston-Upon-Thames (RBK), for subsequent Independent Examination.

6.4 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the adopted RBK Development Plan, emerging New Local Plan, adopted London Plan and the emerging policies of the submission New London Plan.

6.5 If the subsequent Independent Examination is favourable, the North Kingston Neighbourhood Plan will be subject to a referendum, organised by RBK. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Neighbourhood Plan will become part of the Development Plan for RBK, covering the defined Neighbourhood Plan area.

Monitoring

6.6 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

6.7 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by RBK as part of the process of preparing its Annual Monitoring Report (AMR).

Appendix A – SA scoping report consultation responses

A summary of representations to the statutory SA scoping report consultation, along with how they have been considered is presented in Table A1 below. The consultation was open between Monday 2nd December 2019 and Monday 6th January 2020.

Table A1 Summary of representations received to the SA scoping consultation

Consultee	Consultation response summary	How the response is considered and addressed
Historic England	<ul style="list-style-type: none"> A number of assets whose setting could be affected by development in the neighbourhood area have not been clearly scoped in, including the following assets in neighbouring Richmond upon Thames: <ul style="list-style-type: none"> Milton Court Brook Court Spencer Court Byron Court Tennyson Court Dryden Court Likewise, the Ham Common Conservation Area and some assets within it including the Grade II* landscape at Ham House. Specific assets within Richmond Park such as Thatched House and Thatched House Lodge have been omitted from the scoping report. 	The draft plan does not propose development in proximity to any of the features identified in the Historic England scoping response. The proposed policies of the NKNP are considered likely to be effective at minimising - and avoiding where possible – harm to designated and undesignated heritage assets within and adjacent to the plan area.
Natural England	<ul style="list-style-type: none"> Natural England has no specific comments to make on this neighbourhood plan SA scoping report. 	n/a
Environment Agency	<ul style="list-style-type: none"> n/a - no representation received. 	n/a

Appendix B – Summary of key issues

Drawing on the review of the sustainability context and baseline, the scoping report process identified a range of sustainability issues that should be focus of the SA. These issues are presented below under nine environmental themes.

Air quality

- The Neighbourhood Plan area falls within the borough-wide Air Quality Management Area (AQMA) covering all of Kingston.
- Housing and employment growth have the potential to increase emissions and reduce air quality in the area. However, emissions data from the last decade shows that air quality is improving quickly and is likely to continue to fall. Modest housing growth is unlikely to reverse this trend.
- Regardless of the falling emissions, it is not possible to scope out air quality from the SA framework as the entire plan area falls within an AQMA.

Biodiversity

- The Neighbourhood Plan area includes two Sites of importance for Nature Conservation (SINCs), one at Royal Park Gate in the north west of the plan area and a second running alongside the River Thames for its entire extent through North Kingston.
- There are no higher-tier designations within the plan area itself, though Richmond Park, one of London's largest and most historic parks, is immediately adjacent to the plan area's eastern boundary and is dual-designated with multiple protections at a range of scales. Specifically, Richmond Park is a Special Area of Conservation (SAC), a Site of Special Scientific Interest (SSSI), a National Nature Reserve (NNR) and a Local Nature Reserve (LNR), reflecting its diverse biodiversity significance. There could be potential for Richmond Park to have some sensitivity to development in the plan area.
- The east of the Neighbourhood Plan area is located within a SSSI Impact Risk Zone in relation to the Richmond Park SSSI for residential development of 50 units or more.

Climate change

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions. The NKNP should seek to ensure that new development delivers high levels of environmental quality and efficiency, and develops a planning framework that supports climate resilience and the borough-level objective to become carbon neutral by 2038.
- Domestic gas presents a significant contributor to emissions in the borough, and measures to reduce domestic gas use will be required to realise commitments made under the 'Climate Emergency' status declaration.
- There are areas of flood risk located around the River Thames that present a constraint/risk to development. Surface water flood risk is also widely dispersed through the Plan area with significant residential areas at high risk. It will be important to maximise climate resilience, by avoiding development in areas at highest risk, and delivering schemes to reduce flood risk, including Sustainable Drainage Systems.

Health and wellbeing

- A higher proportion of residents in North Kingston consider themselves to have good or very good health and report their activities are not limited when compared with borough, regional and national averages.

- The plan area has good access to a number of strategic and local green infrastructure assets, including Cadbury Gardens, Richmond Park, Wimbledon Common, Ham Common and the Thames Path, offering excellent opportunities for healthy outdoor recreation and leisure activities.

Historic environment

- North Kingston has a variety of designated and non-designated historic assets including both individual features and broad areas.
- The variety of heritage assets includes thirteen Grade II listed buildings, as well as 37 locally listed buildings. There are no Grade I or Grade II* listed buildings within the plan area.
- There are four Conservation Areas partially or entirely within the Neighbourhood Plan area, along with five locally designated Local Areas of Special Character (LASCs) and Archaeological Priority Areas (APAs).
- The Historic Environment Record (HER) indicates 30 non-designated historic and archaeological features of interest within the plan area.
- The plan area is adjacent to the Grade-I listed Richmond Park Registered Park and Garden (RPG) and may fall partly within its setting.

Land, soil and water resources

- The Neighbourhood Plan area is highly urbanised and offers potential opportunities for the redevelopment of brownfield land.
- There is no land in agricultural use within the plan area.
- A small portion of the plan area is designated as a surface water NVZ.

Landscape and townscape

- The key landscape feature of the Neighbourhood Plan area is the River Thames and the areas of waterfront open space which run alongside it.
- The plan area comprises four distinct character areas which each in turn have sub-areas of higher and lower quality townscapes within them. This creates a complex patchwork of local character areas with contrasting levels of opportunity for enhancement and protection.
- There is one 'very highly important view' of significance to the plan area from Richmond Park facing south, protected via the RBK Core Strategy.
- There could be potential to enhance townscape quality through new development and redevelopment, particularly in the north of the plan area.

Population and communities

- In comparison to London and England as a whole, the population of North Kingston have lower deprivation and higher levels of qualification.
- There is a relatively low proportion of social rented accommodation compared to London as a whole, and lower levels of home ownership than across the borough. The housing stock is characterised by a high proportion of flats.

Transport and movement

- There are no London Underground stations within the Neighbourhood Plan area. The south of the plan area has good access to the national rail network via Kingston and Norbiton stations, though the north of the plan area is served more directly by the public bus network.

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- There is a high rate of commuting by sustainable modes of transport in North Kingston, with travel by train notably high in relation to London more widely and England as a whole and a high rate of walking and cycling.
- Despite this, commuting by car or van remains the highest single mode of transport for commuting.