

8<sup>th</sup> May 2023

Acronyms TT= Tolworth Tower; HRS = Hook Rise South(old government offices); PI = Planning Inspector; NLP = New London Plan; NLP: RtG = Resolution to Grant; VSC = Vertical Sky Component; MofL = Mayor of London; OR = Officers Report; LSOA = lower layer super output areas

## Comments on planning application – 22/03708: Tolworth Tower Development

### A) Introduction:

1. Please bear with this report, which we concede is lengthy, but a development on this site has been almost 8.5 years in the making and as a result there is a historical context to it. It's mainly about the above Application but there is mention of the larger HRS scheme regarding the cumulative effect on Tolworth generally. Tolworth currently is very much an outer London area with the Boroughs of Epsom & Ewell and Elmbridge being only some half a mile down the road with a majority overall character of suburban with only the Broadway being urban and the south of the Borough being mainly greenbelt.
2. A description of the site:-“The Tolworth Tower Complex lies within the Tolworth District Centre boundary and within the Royal Borough of Kingston-upon-Thames (“RBKT”). The Application Site is situated within the Tolworth Key Area of Change and a Housing Opportunity Area as identified in the Council’s adopted Core Strategy. The Tolworth Tower Complex is further identified as a ‘Gateway’ and ‘Strategic’ within the Council’s adopted Core Strategy, and the main tower is considered to be a key landmark”. We feel this is very overstated and verbally embellished description and we cannot find any reference of this in the 2012 version of the “Core Strategy”. This description is very much interpretive with a complete absence of any numerical data so completely open to individual interpretation and consider Meadows have used this literally as a license for “the introduction of Severely Excessive Densification”. We consider the realities of the site are a little starker and foreboding.
3. TT, built in the early 60’s, is only 1.25 h in after taking out M&S car park, which has a lease on it up to 2040 and thus cannot be considered as part of the developable area. This site is only one third the size of HRS. We would have preferred a blank canvass as then it would have looked and been built totally different from what is currently being presented by this developer but that is expensive and this is SoftB Tolworth not Westminster and Chelsea. You have the TT itself built for offices accommodation which means it will inevitably provide compromised residential accommodation, which it does. Its orientation is a good example of this. Ok for offices less than ideal for residential with both the main living area facades either facing virtually directly north or south. The site also contains an extensive, large M&S food hall, a 132 bed Travelodge hotel and 78 flats both the latter two being located in the North Point tower. The flats were a permitted development with all the pitfalls of that kind of development such as non-compliant space standards resulting in compressed residential with totally unsustainable living areas. To complete the mix there is also retail units along the Broadway. All these varying types of accommodation rise from a stark, uncompromising and unsightly 4 storey exposed concrete podium with 4 levels of inefficiently laid out car parking with very little, if any, green spaces. Housing density is supposed to be dealt with by good design. We would counter there is not much to design here at all. There is only one small corner of the site to exploit with new build design and these are two new tall towers T2 and T3. These will present very severe access and construction challenges and would not have been the location of choice in a new development. We consider the viability of the development hangs on the unwanted introduction of these two Towers along the Broadway as they together are proposed to contain 231 No flats but because of their excessive height will overshadow existing residential flats along the west side of Tolworth Broadway breaching existing common law residential “Rights of Light”

4. It is almost 7.5 years since the previous planning meeting in Jan 2016 gave their approval to a scheme developed by CNM. It was passed by all the 6 conservative councilors on the committee. All the other 5, from other political parties voted, against. This caused considerable consternation from the local community who probably quite rightly thought this was a perverse decision that was not based on good design or of any planning merit but purely on number of flats that literally could be shoehorned in.
5. The processes for this development started in early 2015 resulting in approval in Jan 2016 but the decision notice was never ratified/recorded or issued. Almost 3 years were lost finding a buyer to build out the development as CNM had decided to cut and run with the planning gain. Meadows made their public appearance in the Autumn of 2018. A further 4.5 years has elapsed since then for design development, an Appeal, then further design changes and then a full stop of 5 months as new documentation was prepared for this further 2nd Appeal hearing which is almost the same as the previous recently rejected 2022 appeal but being subject to legislative updates. No information was made available to any local interested or community groups about what was going on. Our view is Tolworth have waited 7.5 years for a scheme to rejuvenate this bleak soleless area of little architectural merit only to be presented with a more unacceptable scheme than the early 2016 CNM version. This latest scheme is an extremely avaricious application which will be marketed as an altruistic one that provides much needed housing for the area but this extreme densification version does not fool or impress the Tolworth community who see it for what it is and who are virtually to a man bitterly opposed.

The local community have never been properly involved as initially Meadows only wanted to concentrate on the TT itself and were not forthcoming and very secretive on what was to follow. When we challenged our planners on this apparent bite sized progressive planning approach we were told there was nothing they could do about it but on reflection we consider a more open and informative approach was needed where the community and the planning committee were informed and had knowledge of the eventual full extent of what Meadows proposals would end up like so they could judge the full impact of the total development on the surrounding communities. It was only some 2 years later we learnt of the most controversial and unwanted part of the scheme the 2 No new towers along the Broadway.

There were various controlled, censored, contrived and meaningless webinars on the journey. Now probably this presented development is not the end of story. We hope it gets what it deserves a refuse decision and this will continue on until they are forced to come up with something better, less profit driven and more community lead. Early in the works consultations the local residents were requesting the area needed re-invigorating and rejuvenating but they didn't get that. Instead Meadows changed the initial conceived number of flats in the main Tower flats from 239, as developed by architects Cary Jones, up to 261 by the change to a new architectural practice 3D Reid. We should have realised from that 1<sup>st</sup> outcome what Meadows were all about which was only residential and as much as possible that could be shoehorned in. The final density is 456 u/h which is even 51 units higher than the previous upper designated level for an inner city area with a PTAL of 6. If, as we suspect, Meadows overpaid for this rapidly deteriorating site and its buildings then it is they who take the consequences not pass the pain and misery onto the residents of Tolworth

## B) The Appeal

1. We would confirm this Appeal and the previous one has not gone to a planning committee for a democratic decision by our councilors the strong consensus is that they would be rejected anyway. Whilst we accept our planner's reasons for refusal **we also consider it is extremely over dense in housing density terms and that it appears to considerably degrades the light levels to 36 existing residences along the west side of Tolworth Broadway** neither of which our planners mention. Why these concerns have still not been picked up or challenged by them we will leave to Kinston Planners to explain but we consider them germane to the consideration of this appeal. The documentary consultant report evidence is there in plain sight

for all to see it is just that it appears to be being kept underneath the radar by not being mentioned.

2. At the last appeal having the PI making judgements that greatly facilitate the aims of achieving obscene density levels and assist in topping up housing targets in Tolworth that have generally failed to materialise in the Borough generally reinforced the suspicions that our planners and those of the GLA always had visions that both these sites were earmarked for some special densification. This view was reinforced by the deliberate overstating of the area of HRS site by some 20% (recorded at 4.4 hectare whereas the actual developable area is 3.7 hectare) to artificially reduce the true recorded housing density when such a factor still carried great weight in 2017. At HRS alone these false facts presented to the planning committee for a decision, we considered, facilitated some extra 300 extra flats to be built on the site and the total for this development should have been nearer 650 not 950 flats.
3. Without doubt we consider an autopsy report needs to be done on the 1st appeal and probably the whole planning process adopted for this development by senior Council managers to consider the effectiveness of our planning department. What is the point of expending all this time, money and effort to legitimately refuse bad planning and have no doubt this is not just bad, but due to its high density, it is severely dangerous planning under the "Condition Precedent" rules.

There was absolutely no doubt that the Appeal would be lost but only a small flesh wound was inflicted to the Appellant's proposals resulting in it being very quickly re-cycled with only some minor changes and modifications. Lessons must be learnt and the scheme as presented at the 1<sup>st</sup> Appeal had enough against it to force the developer to actually make significant changes to moderate it with something much better, more appropriate and considerably less dense. That did not happen and this has delayed progress even further as low and behold now another Appeal has been made which as far as we can see is virtually identical to the previous one but with technical and legislative updates. What has gone on with both these developments is a good example of everything that is wrong with the planning processes and controls in Kingston. We can only hope that the short comings and ineptitude shown by our planners in defending the last Appeal are not repeated for this one. They do say practice make perfect?

### C) Right to light Issues

1. eb7 Light Report states- **"the guidance suggests that existing daylight may be noticeably affected by new development if Windows achieve a VSC below 27% and are reduced to less than 0.80 times their former value"**. From our analyst of the report readings there are some 36 existing flats with windows that fall into that category.
2. **Our research indicates that a loss of light is treated as a legal issue rather than a planning one. "Basically anyone planning on erecting a new building needs to be aware of their limiting the amount of light which enters a neighbour's window, to affect the level of natural light inside to below an accepted level. In law, this will constitute an obstruction. The big problem is that many people believe this issue is taken care of under planning rules when, in fact, it doesn't actually have anything to do with planning, meaning that people can incorrectly assume that if it is not brought up through the planning application process then the right to light is not an issue. It's important to remember that when considering an extension, the right to light is a separate piece of law and can still be enforced – even after planning consent has been given"**.

Whilst the level of legal mitigation in any action will be linked to the level of harm this will be determined by an equitable negotiated legal agreement by both sides and not at the imposition by a one sided, one party, biased and vested interest participant the planning adjudication process as usually happens with Planning decisions on such matters. We don't mind the factual scientific model driven readings it's the biased spin and interpreted excuses of such

readings that we are not prepared to accept in phrases such as “**considered to be acceptable**”. We are not time constrained in this, as the highlighted in red text infers. These towers are scheduled to be built in phase 2, that is after the main tower (TT) is finished, but feel it would be very prudent to get the ball rolling on this matter and the legal processes sorted sooner rather than later and desirably before the works start on site.

The following link provides useful information on the processes: [Tips & Guides: The 'Right to Light' explained - Selby Design](#) [Rights of light explained | BLB Solicitors](#)

We can only apologise if we are wrong but we do consider that an up to and in places a +50% reduction in the VSC light entering windows must have a noticeable effect on the light levels of the rooms effected. The exact implication of this needs defining or better still demonstrated. This appears not to be a planning matter but a legal breach of a party/person’s “right of light” and needs addressing accordingly. This cannot be left unresolved in the hope it goes away. It is too important for that and it has been known even for ruling on offending parts of new buildings, that cause such breaches, to be instructed to be removed. We feel Kingston Council need to do the decent thing and if harm is shown will be done to adjacent resident’s light levels then the residents of the flats affected, as indicated by eb7’s Light Report, should be notified of this fact and to seek advice. This is a matter that has to date not been given the prominence it deserves. Initially we would suggest residents affected contact their local Councilor for advice on the best way forward which may mean a Class action and the appointment of a solicitor backed up by an independent light consultant. The full eb7 light report has not been submitted in this appeal but the aspects of over shadowing are in their report for the previous appeal.

Flats affected Nos:

110,112,108,108a,106,106a,104,104a,102,102a,100,100a,98,98a,96,96a,94,94a,94b,92,92a,90,90a,88,88a,88b,86,86a,84,84a,82,82a,78,78a,80,80a, = 36 properties.

#### D) Resolution to Grant

There is NO RtG yet for these works irrespective of what has gone before or what Meadows say. Only when a balanced decision based on the **whole** of the works has been confirmed will there be a RtG, or in this case hopefully refuse. We do not think planning is a “pick and mix selection. What Meadows want is an excuse of a RtG to assist in the building of the towers T2 and T3. They don’t want anything else of the CNM scheme as originally conceived. **Perhaps our Planners will advise how in Kingston’s SHLAA for the “New Local Plan” the listing for the TT site has RtG against it. Who allowed that ? We feel there is no RtG on these works just Meadows wishful thinking.**

**For more information on this matter see link below.**

<https://www.capsticks.com/insights/planning-permissions-at-what-point-does-the-decision-to-approve-planning-permission-take-effect>

#### E) Housing Density: Used in Density calculations: See drawing Fig 1

Red line area = 1.47h Yellow area +green + hatched

Hatched M&S front car park area = 0.22h - Currently leased until 2040 Green hatched area 0.38 containing the 78No existing flats in North Point. Housing Schedule:- North point 78No; TT 261No; T2 & T3 231 No = Total flats 570

1. We are absolutely flabbergasted as it does now appear that our planners are comfortable to present developments to Kingston planning meetings for approval by committee that in terms of upper density levels are astronomically higher than before the introduction of the NLP introduced early 2021. We know housing density was effectively abolished in the NLP and is allegedly dealt with by good design, though this is merely a sop for getting rid of housing density as lobbied for by developers, but at these proposed levels the “design guides” will have to go as well along with any chance of wellbeing or a sense of place for the occupants and the surrounding community. For TT we have included the flats in the North Point, but this was done on the basis of if you want the area of where the flats are in the calculation for density you have

to have include all the units/flats in that area as well. This we consider is the most reflective density as it contains all 570 flats divided by the whole area of the site which we make 0.75h = 1.47h less the M&S car park of 0.22h = 1.25h. One could query that the under-cover area of the ground floor car park should also be excluded from the 1.25h developable area as this is reserved exclusively for M&S and other Broadway shoppers and not facilities for any of the TT new development or its occupants. If this were taken out it would shift the population density to well past the **1,000 persons/hectare**.

**Table – 1 Density before New London Plan Introduced in early 2021**

Designation	PTAL 2-3	PTAL 4-6
Urban	Previous Upper Level density- <b>170u/h</b>	Previous Upper Level density- 260u/h
London Central – Inner City	Previous Upper Level density- <b>240u/h</b>	Previous Upper Level density - 405 u/h
Tolworth Tower – Meadows Currently a district centre/urban area	Meadows Proposed Housing Density Level – <b>456u/h</b>	
HRS – Guinness Currently an Outer Suburban area	Upper Level – 95u/h Actual Level for this Approved scheme - <b>257 u/h</b>	

2. This means Tolworth Tower development area has moved from its current Urban (District Centre) designation with an upper limit of 170u/h up to London Central – Inner City area with a proposed actual density of 456u/h. This density level has thus been increased by some 270%. Not exactly one could consider a small tweak.
3. HRS, which according to Signal Park advertising hoardings is going to be “Suburban Living”. Not anymore. It is now “London Central Living” It has moved from 95 u/h to 257u/h the density has been increased also by some 2.7 times (270%) its former upper level.
4. This level of increases are not only unprecedented but unsustainable, infrastructure wise, totally unwarranted and anti-social and if passed will cause more ructions and dissatisfaction to the surrounding communities than the former approval of the CNM scheme.

**Fig - 1**



6. To try to give some sort of context the photo (Fig 2) below is Canary Wharf with its 2015 census as a LSOA (see acronym definitions at start of write -up) with a population density of 1,000 people/hectare and thus high housing densities. This LSOA, in 2015, had by far the highest population density in London and indeed all of England and Wales (and might still do). This gives a good indication of the typical streetscape you end up with these levels of housing density. We estimate the proposed TT population densities including the 78 flats will be some 912 people/hectare which is lower than Canary Wharf but Tolworth will be expected to handle these levels of population without access to transport services such as the new Jubilee or Elizabeth underground lines, the Dockland Light Railway and a general PTAL of 6 as against Tolworth's 2-3 level. A further serious concern, if passed, these density levels could be used as a "Condition Precedent" for other future large development planned for the Kingston area so it puts the whole borough at severe risk to further such inner- city density levels of exploitative developments.



**Fig 2 - Article by The Guardian - Sun 22 Jan 2017**

7. Like the streetscape? Is it streetscapes such as this why the residents of Kingston chose to live in Kingston? Probably not. One advantage there is no need to go to the expense of moving to inner London anymore. Inner London is moving out to you. Is this what residents want? Remember there is a general election next year and if Council Officers are not held to account by our elected representatives, then what is the point of voting for them.
8. Make an effort to have a look also at **HRS** development, currently under construction, at a density of 257u/h which makes this part of Tolworth almost a wilderness compared to what is being proposed at TT. The 3 blocks currently nearing completion contain 211 flats which is 25% less flats than the 261 in TT on its own.
9. For consideration: *If you take the 78 flats already occupied in North Point and add them to the 261 to be incorporated into TT you get  $(261 + 78)/1.25$  area of the site = 271u/h.*

*Even this in terms of housing density is above the upper level for a London Central/Inner City area for a PTAL 2-3, which is still extremely dense. We would suggest calling it a day at this as anything above that for a very much outer London Borough is excessive. By doing that it will have the result of upping the on-site parking levels, overcome the shortage of amenity space, remove the overshadowing issues of the two towers T2 and T3 and prevent all the major severe disruption to the east side of the Broadway for both traffic, pedestrians and M&S and other shopper.* Can the Appellant please give examples of these housing densities in any other London outer borough.

**We list the numerous and severe shortfalls in the scheme as proposed in the above application some:**

**F) Grounds for Objections**

1. Excessively high housing density – see above under housing density. The flat population density occupying the flats will be considerably exacerbated when you take into account the 132 room Travelodge Hotel, the large M&S food hall and the future retail units proposed also squeeze into the same site area.
2. No affordable housing offered but the usual 10% has been offered as a sop. Usual weak low value agreed. When Meadows were going to doing “Build to Rent” for the tower alone 28% was offered. Will this revert back to the offer level if it does change back to “Build for Rent” tenure.
3. Change from “Build to Rent” to unknown tenure they haven’t even bothered to advise of what it is in a formal way. The explanation by Meadows director at the meeting at the Surbiton Neighborhood meeting of 23rd Feb to say the least was less than convincing and a written formal clarification of its tenure basis is required.
4. Family housing 6.8% offered. 30% required. We note that the 2 bedroom 4 person flats in the actual TT have 2 double beds shown with both bedrooms having ensuite bathrooms. With the severe shortage of family accommodation within this block who are these 2B 4P flats targeting?
5. Comment from the PI at the hearing. Virtual loss of all office space without properly demonstrating that all marketing avenues had been explored and that it might be able to continue with a substantial element of office accommodation.
6. There is now to be a token addition of 710m2 office provision (19,000m2 originally in the TT) added into this Application. We cannot see how this late addition office space has been properly put into the market and tested in some 5 months. The normal time for such an event is a customary 2 years.
7. **Consideration for a new low level linear offices where towers T2 and T3 are proposed. This would also resolve the over shadowing issues and office space shortages detailed in the previous PI appeal judgement. This should be subject to a marketing report but understand this type of local office accommodation is becoming more prevalent and popular by both businesses and employees. It would return Tolworth to a more balanced live/work environment.**
8. Towers T2 and T3 under new legislation now required to have two access staircases but we note still the same number of flats. So obviously more smaller flats and less of the family type of accommodation Kingston most want.
9. On-site parking down to 0.16 cars/U. An all-time low for the area. Meadows appear not to recognise the 78 flats in North Point block but are willing to snaffle and transfer some of the car parking spaces allocated to these flats. This is exactly the same as that approved for the HRS development. What a coincidence? Yet again parking not based on need but modeled down to the lowest value in the area.
10. Overlooking and privacy issues between blocks T2 and T3. Kingston’s “Core Strategy” which states unequivocally there should be **no less** than 21m separation between blocks. Well there and it is even less between the wintergarden balconies. Look again at HRS blocks of flats currently under construction along HRS where they are about 17m apart and that is building to building ignoring the cantilever balconies.
11. Considerable and possibly very noticeable loss of light to some of the existing flats on the west side of the Broadway of up to +50% of the vertical sky component. See greater detail given

under Light Report.

**12. Infrastructure and Design Scrutiny:** We would question if the requirements of London Plan policy D2 in respect of necessary levels of infrastructure are in place. As part of Policy D2, the draft London Plan, introduces a new regime of **design scrutiny**, whereby all applications are encouraged to undergo independent expert review, prior to the submission of a planning application additional to the assessment undertaken by Borough and design officers. Was this done?

We calculate there will be some 3,300 additional residents for these two developments. We need **a)** clearly defined proposals of what additional infrastructure will be provided, **b)** where's the money coming from to provide the additional buildings and **c)** just as important how and where are they are going to get the staff to man these additional facilities when there is a shortage with what we currently have. For example a current shortage of some 47,000 nurses.

The troubles the country is currently experiencing will take years to resolve reinforced by the advised 50% cut in Social Care recently announced by the government. See link <https://www.bbc.co.uk/news/uk-65171795> and the Social Care provisions of the Dilnot report will not be introduced now until Oct 2025 and we think only then with a lot of luck and that is two years later than originally proposed and the consequential effects of bed blocking the NHS will be extended.

All councilors are probably well aware of resident's issues in respect of education, social care, nursery care, health and dental access and struggling and diminished council services generally. See BBC report on the £5billion council budget shortfall by 2026. The mantra of the CDRA is no further expansion of housing unless the necessary infrastructure is up and running and in place to deal with the extra demand.

[Black hole in town hall budgets rises to £5bn - BBC News](#)

The CIL, unless it is substantially increased, like our council tax, will not touch the sides on Tolworth's needs in these infrastructure shortfalls. All this will result in even further diminished public services. If anybody thinks these infrastructure deficiencies will be sorted before occupation, then they are living in a fantasy dream world. The Lidl car park extension refusal was overturned on appeal to the PI on the basis of a predictive report by the Council stating that Kingston would meet and even exceed it target build for family sized houses. Not only was this not achieved but the actual build numbers fell away so the need became even greater. We will want proof and assurances that the necessary infrastructure will be in place from day 1 with a delivery schedule we can monitor. Predictions and political promises will not do. We want actual delivery ie walking the walk not just talking the talk.

**13.** The applicant has never made a public submission/publication of any design review public which they are obliged to do and which we know they have done. This is disrespectful as they are paid for out of public funds. **It would be prudent to suspend adjudication of the works until this is done as the PI at the Appeal hearing had concerns on the design of T2 and T3.** See also item 2

**14.** Shortage of amenity space and is there any amenity space provision for the much ignored 78 flats in the north block or are they to be squeezed onto communal car deck as well?

**15.** Poor quality and compromised accommodation actually in the Tolworth Tower. Lack of dual aspect flats. Because of single aspect there could be overheating issues through loss of natural air flow circulation (through drafts). Most of the flats on the north side of Tolworth Tower will never get a ray of sunlight in the accommodation, ever, because of its orientation.



16. TT was an office and will still look like an office even when it is residential. Total lack of private amenity space for residents occupying this building.
17. TT will have an average 13 flats per floor, over 60% more than the accepted norm of 8 flats per floor. Hope this has been taken into account in the "Fire Strategy" proposals.
18. 60m long central access corridors to the TT without any natural light.
19. Entrance to flats from west via Tolworth Broadway. All lifts are sited at the east end for original access to offices from Ewell Road.
20. Sound and air quality issues to the new towers along Tolworth Broadway.
21. Structural issues with the "fragile state of the existing structure and frame". These are Meadows words not ours and old existing structures will require constant and ongoing maintenance. The structure's "Life Expectancy" could be extended to 50 years providing the existing retained structures are subject to a robust and ongoing maintenance regime. We have not yet been advised by the Appellant who is to carry the financial responsibility of such essential, expensive and ongoing maintenance?
22. If the tenure of the flats is no longer renting what is it to be? The decision to change the tenure from "Build to Rent" to something else was made 2 years ago when according to our research "Build to Rent" was still flourishing and very viable. This is even more so in the current rented market. **So why change a good business model?** An answer to this has yet to be forthcoming. We are extremely skeptical of this apparent change of tenure especially as to date we have not been given a reason for it.
23. It is unfortunate the curtain wall cladding to North Point (NP) will be completely different to that for the TT. We have been assured the cladding for NP has been signed off as far as the cladding system's composition and components for fire safety compliance. This was done as a precaution following Genfell. On this basis the materials and the system appear to conform but was it also checked for installation and workmanship in respect of fire compartmentation and fire-stops/breaks within the system itself as this is also vital for its fire integrity and spread of flame but appears to be a considerable and common defect or total omission with claddings and curtain walling installation of this type. The North Point office conversions to flats was not done by Meadows but by a CNM/Richard Hunt combination. Make your own judgements on that one, but we believe these flats are now owned and run by Meadows and are in the main occupied by renters but are now being marketed for sale.
24. We also include a separate Addendum 1. The Planning Officer will need to update the Deciding Officers either in his OR at the meeting how resolution of the 10 reasons listed for their initial refusal are progressing. **Note:-** the absence on this of any comments in regard to items 1 and 10 above.

## G) Summary

As you can see from the above list which is very extensive. There is very little of merit or benefit the scheme brings to Tolworth but an unwanted, unsustainable and probably financially and infrastructure wise an unsupportable number of people.

## H) Recent Relevant Events

1. We would advise that housing targets across the country have now been changed from mandatory to advisory. It's good-bye and for now good riddance to "Tilted Balance". This resulted as a direct result of the shock Lib Dem win at the Chesham & Amersham by election. The conservatives have decided that the substantial donations they get from developers are very welcome but with an election next year doing all they can to stay in power is now the priority. Lib Dems have now changed

their stance on “Housing” from Mr Davey’s YIMBY’s (“yes in my back yard”) to advocates for community lead developments rather than developer lead ones. This is a good start (see our comment later in **Conclusions – 1**) but not the end of the story there are still funding issues. Councilors’ please note there is now a window of real opportunity whilst the priority of numbers is off the table.

[By Election: Liberal Democrats break blue wall with Chesham and Amersham win - Bing video](#)

**2. From the report by the BBC 7 Dec 2022 on the suspension of housing targets.** The change would make the centrally determined target a “starting point”, with councils able to propose building fewer homes if they faced “genuine constraints” or would have to build at a **density that would “significantly change the character” of their area**. We feel Tolworth would very much fall into that category.

**3.** Isle of Wight MP Bob Seely, another prominent rebel, said ministers had agreed that councils should be able to take an area's **density** and "existing character" into account when applying the targets. The change would make the centrally determined target a “starting point”, with councils able to propose building fewer homes if they faced “genuine constraints” or would have to build at a **density** that would “significantly change the character” of their area.

## I) Conclusions

1. The above density increases proposed are totally unwarranted. How much more abuse can the Tolworth community take. Enough is enough on what has already happened at HRS. They need our democratically elected representatives to back them up and protect them from these exploitative developments and tactics by developers who actually care nothing for local communities, their welfare, their wellbeing and worst of all totally ignore their stated aspiration for their areas. The winners to date in the Tolworth area are CNM and Myer Homes who both pulled out without building anything after their excessively dense schemes were approved, taking the planning gain with them and providing little affordable or social housing. Leaving the residents of Tolworth the losers to rot and to greatly delay any form of house construction on these two sites to mitigate housing shortages in the area. This must not happen a third time but if approved at this mind-boggling level of density who’s to say it won’t.

## J) Concerns

**a) The green deck amenity area** – Bearing in mind the Urban Greening level has been generously allowed to be missed by 50%, by the Planning Inspector at the previous Appeal, Kingston should get assurances that the grassed natural car deck as indicated on the CGI is feasible and the existing deck is man enough for the job. An artificial grass non sustainable alternative will not be acceptable.

**b) T2 and T3 construction** – Need an access/egress/logistics plan and methodology for the construction of these two buildings, if they go ahead, and how this might impact local residents and shoppers in regard to noise, dust and vibration etc with all the associated Conditions duly listed and in place prior to any decision. Particular attention needs to be given to the impacts on East side of Tolworth Broadway. Lane closures and pavement restrictions will probably be required along with protective fans and gantries etc. Possible Lane closures, pavement width restrictions and working hours will also need careful consideration and discussion with local residents and businesses.

Can we wait until Meadows have actually appointed a contractor, which may be two years away, before we get an idea of how they mean to actually address these particular construction and access issues? There’s a lot going on in the T2 and T3 area not just only above ground but below it as well. We consider building, accessing and servicing these tower block in such a confined, restricted and heavily trafficked area will be a real logistical nightmare which needs lots of consultation with and co-operation from the local community. Do not leave them out of the loop.