

This feedback is submitted by Riverside Residents Association (RRA) following member discussions in response to the Presentation of outline development proposals for the County Hall site by the new owners RER on 21-22 July 2021.

The RRA represents residents in the area bounded by: South and East Lane to the north, Portsmouth Road to the west, Milner Road/County Hall to the East, Woodbines Avenue to the south and east, including The Bittoms, Oaklea Passage, and Avante. The RRA is a community group that looks to improve our shared locality for the benefit of all residents.

The RER online feedback form is not easy to navigate and asks very specific questions about the in-principle proposals providing little detail, and giving little opportunity for us to express our views. We have therefore copied our complete response into one of the 'additional information' boxes on the feedback page. We shall of course copy our comments to the Borough Planning Department and to the ward Councillors, as it is fair to say that RER's redevelopment plans for County Hall have raised considerable concerns within the RRA, and indeed within other Kingston community groups.

In our response we firstly raise a fundamental point about the proposed use, we then comment on the recent Listing upgrade and raise points in respect of the two areas where you (RER) propose development within the curtilage of the Listed Building before finally making a series of comments on other matters.

Firstly, the fundamental point - County Hall is designated in the statutory adopted Local Plan for civic/public use or for educational use, it is not designated for residential uses. The RRA contributed to the preparation of Kingston's Local Plan, and wish to see the designated uses taken forward as we remain of the view that a centralised consolidated KU campus together with the potential for other educational or civic uses to expand within the civic/educational quarter would be very positive for the town, and an appropriate use for a building built with community uses in mind. It is therefore disappointing that your proposals go straight to a non-designated maximum value use, which is contrary to the Development Plan. You have set a very rapid programme to progress your proposals, and we would ask you to allow more time to fully explore this point of principle with potential occupiers and the Council.

Nothing was said in the presentation by your representatives on this issue. When pressed on this the response from your team ranged from there was no demand for Civic or Educational uses, and change of use to residential is the only way of stopping this Grade 2* listed building from being "left to rot". However, encouragingly other representatives advised that discussions with KU are on-going. We know from pronouncements from SCC at the time of the sale that KU's requirements extend beyond the original 1893 building elements, which it

stands to reason are more difficult to repurpose for any use. We heard from your representatives that discussions with KU include exploring opportunities for start-up, incubator and grow-on space that can provide opportunity for KU graduates to develop and grow their business ventures in Kingston. We are encouraged by this.

Our fundamental point is that in line with the statutory adopted plan, we the community wish to see all potential options for civic, educational community and commercial uses thoroughly explored before alternative non-policy compliant uses are considered. We acknowledge that the Council has a role to play in helping to identify and draw out these opportunities, particularly now the Council has at last recommenced preparation of a review of the Local Plan.

You (RER) are now the Trustee of this key Public Asset, and you must make genuine efforts to accommodate the uses identified for this site in the Local Plan. The designation was made in the anticipation that upon the departure of Surrey County Council (SCC), the University, the Borough's largest employer, or a similar institution, would expand their campus in Penrhyn Road. This was KU's intention, and may well be again in the future as consolidating the campus here makes a lot of sense. It is not good enough for you (RER) to claim that SCC did extensive marketing and they have comprehensive evidence that there was no demand for Civic or educational Uses because SCC only put up their "For Sale" board in October 2020, and then slapped a "Sold" notice on it in March 2021. It was not openly marketed by SCC because they only promoted it as a development opportunity.

Unfortunately, this opportunity has materialised at the worst possible moment during the ravages of the global pandemic, and the deep impact which this will have made to the University's finances. But the University is here in Penrhyn Road for the long term. The University needs to be given time to review its estate and consider how it could use County Hall to accommodate its longer term needs, perhaps by rationalising some of the more remote elements. Where else could KU centralise its campus? We also ask if there are opportunities for Kingston College or other educational institutions to consolidate or enter in this part of the town centre.

Our second comment relates to the listing upgrade. There is not a single mention in the presentation that the building and some of its curtilage is now listed Grade 2*. The significance of this listing upgrade should have been acknowledged and discussed in the presentation material. To have totally ignored it is likely to have undermined trust.

Thirdly – we comment on the proposed development on the Surrey Club/tennis courts site and the pavilions proposed for Milner Road. We are very concerned because your illustrations represent huge over-development of the site with your building blocks stretching from boundary to boundary and with no regard to context; generating in our view substantial harm to the setting of the Listed Building.

Development of former Social Club and Tennis Courts. You say that the new block would be “aligned to respect the original County Hall”. We say how can you possibly think eight storeys within 10 metres of a Grade 2* Listed Building can possibly be considered to respect the Listed Building and not generate substantial harm?! It is hard to understand what design principles you are working to when what you propose can in no way be subordinate to the Listed Building. It is nothing short of outrageous to even suggest such a thing. This has struck a raw nerve because SCC proposed the same, and took a lot of flak just a few months ago! Please refer to our responses to SCC to understand the proper context for redeveloping the Surrey Club site.

This current proposal is also unacceptable because the new block would be built right up to the boundaries of the properties on Woodbines Avenue and Milner Road (that are outside the town centre boundary) and result in overlooking of private gardens causing unacceptable intrusion, loss of privacy harming existing residents’ amenity, and also blight the setting of the Vincent Davis designed wing of the Grade 2* Listed County Hall.

You propose 100 flats in this location with totally inadequate amenity space provision, with the irony being that the site is currently amenity space for the former occupier. What you propose is huge and unacceptable over-development and the lack of adequate amenity space is exactly the type of poor development that the Government are now seeking to curtail. There has never been a consent for the current parking on the Tennis Courts, and the amenity use should be retained as an integral part of the setting of the Listed Building and for the use of the end users of County Hall whoever they be.

Pavilions on Milner Road. The indicative plan to build pavilions on Milner Road is completely mystifying. We understand why the pavilions would need to step forward from the established building line of the Edwardian houses on the east side of Milner Road (a lack of space to the rear), but this would be an even bigger disaster in townscape terms. The pavilions would lack any adequate private (or semi-private) amenity, have over-looking issues to the front and rear (and therefore affect values) and additionally would further blight the setting of the Grade 2* listed building, and permanently damage the historic feature

cobbles in the current car park, which are a named and integral part of the listing. In short we see development on the cobbled Milner Road County Hall car park as unacceptably harmful and a complete non-starter, and you would be better advised to explore ways of softening the curtilage of the Listed Building on this flank with planting / landscaping.

In summary, we are very concerned by the proposed new-build blocks immediately to the south and west of the listed building. It is clear to us from your initial plans that you (RER) are out to maximise the amount of development that can be – and we use the word advisedly – crammed onto the site, regardless of the context – a Grade 2* Listed Building and neighbouring private gardens. We will be very interested to hear what Historic England have to say about your proposals for development in the curtilage of the Listed Building, as well as the importance of the uses to the integrity of the Listed Building. Regardless of the listing upgrade, in our view your proposals would substantially harm the setting of the Listed Building.

We point out that your proposals to cram 100 flats on to what is currently leisure and amenity space, and pavilions that would have their building line right up to the edge of the highway neither of which would have adequate outdoor amenity space must run counter to the Government's newly stated commitment to building beautiful places. *The Building Beautiful Places plan will mean good quality design will be paramount, with local communities put at the very heart of decision-making to help shape their towns and cities.*

We also note that Robert Jenrick commented: *"This is about putting communities – not developers – in the driving seat to ensure good quality design is the norm, and the return to a sense of stewardship – to building greener, enduringly popular homes and places that stand the test of time in every sense."*

County Hall is a very important heritage asset, we – the community in this area treasure it, and the proposed new-build blocks immediately to the south and west, in addition to the proposed change of use and the conversion of the listed building, will in our view severely compromise the setting and the integrity of County Hall, and can only be considered to be harmful to this heritage asset and the place in which we live. In line with the Government's emerging new approach to place-making, you (RER) should consider and respond positively to the community's views as expressed in this response to consultation (we the RRA represent a very large proportion of that community), and think again about how the asset you are responsible for can continue to contribute to a beautiful place. After all as the Government clearly realise it is the community, and not the developer that are in for the long haul.

Finally, and in no particular order, we set out the more specific points raised by RRA members in response to the consultation material.

Public Consultation. RER is conducting a Public Consultation which grossly misrepresents the material facts, about the property and the development proposals, particularly the relevance of the Grade 2* Listing, and gives very limited detail for local residents to comment on the detail of the scheme. RER gave very short notice of 2 brief presentations on site in the penultimate week of July. By their own admission they only notified 4,000 households, and they failed to fully notify all local residents. We know of a number of residents who were not notified.

The Virtual Exhibition is grossly misleading and conveniently buries the key facts. For example, there is no mention anywhere of the Grade 2* Listing of County Hall. As mentioned in the introduction, the feedback form is totally inadequate, possibly reflects the complete lack of detail presented.

Emerging Local Plan Housing Needs. RBK is well on its way to delivering sufficient sites for the new homes required in the Borough to meet housing needs through to 2041. There is no need to build another 360 units on one of the very few sites that is capable of providing the civic, community and/or educational facilities to support the growth in housing and residents elsewhere in the town centre. Housing can be located anywhere, not so civic, educational, community or even commercial uses.

Kingston Town Centre Area Action Plan. The County Hall site forms the southern boundary of the Kingston Town Centre Area Action Plan where it meets 2-storey residential property. Re-development of this site needs to consider the context of the surrounding properties and the Grade 2 listed building. The point of reference for the southern boundary of the site is the Reg Bailey Building, 2-3 storeys fronting Penrhyn Road, but only 2 storeys on the boundary to Woodbines Avenue, and not the Town House as stated by RER. The height of any development should step down from the town centre/inner ring road/ Kingston College, not creating new tower blocks rising ever higher within predominantly 2-storey residential neighbourhoods.

Affordable Accommodation. RER is proposing to construct new blocks on the Canteen Site and Tennis Courts land, and a replacement for the computer block. According to your presentation all of the affordable accommodation will be in these new blocks, not integrated into the whole development, and undoubtedly pointing towards a cheap build that would blight the setting of the Grade 2* listed building.

Light and Noise Pollution. The change of use to 360 residential units on the site, and the 100 units crammed on the Surrey Club site would generate large amounts of both light and noise pollution to the detriment of all community residents.

Biodiversity. The proposed over-development will have a huge negative impact on local wildlife, particularly birds, bats and insects. Rather than introducing artificial habitats, RER should be re-greening the open areas of the site for the benefit of residents and wildlife.

Sustainability/infrastructure. You (RER) claim that the “sustainable” development will reduce the need to travel by car. Unfortunately, the families may need to drive to Chessington to find state school places for their children. There are none here.

Amenity space and landscaping. A development of 360 residential units will require significant amounts of green space and amenity area for the residents. A first principle of residential design is that one designs back to back gardens. The pandemic has highlighted the importance of gardens (private or otherwise) and outdoor space, and they will be needed if a residential scheme were to come forward. Balconies are not sufficient, if we really are to build better, build beautiful as the Government wishes. The open areas around County Hall should be landscaped, the tennis courts reinstated, not over-developed for maximum profit.

To allow space for amenity and green spaces, any future use or re-purposing of County Hall should not extend outside the footprint of the existing buildings with any parking (disabled only) confined to the inner courtyards.

The indicative building footprints and storey heights make it difficult to see how there could possibly be sufficient amenity space for new residents, and preserve the amenity of existing residents and quality of the Grade 2* Listed Building. Linked to this point is the fact that this part of Grove is deficient in open space provision, in respect of which County Hall (a former public asset) could help address. The former tennis courts to the rear of the staff club building, that were open for use by local residents, as well as SCC staff would be an asset worth retaining in this respect. There is no planning consent for any use on this area other than the historic uses as tennis courts and a bowling green, and the amenity area needs to be retained for the benefit of the residents and local community.

Traffic. There is great concern from local residents, particularly in Milner Road and Woodbines Avenue about increased levels of traffic in the local area generated by both residents of the proposed development, and also visitors and service vehicles. The next use of County Hall should be the opportunity to reduce traffic flows by limiting all vehicular access to the site via Penrhyn Road only.

Levels of traffic need to be reduced in the neighbourhood with the departure of SCC, and traffic calming introduced to remove the high speed joyriders, and those rat running who already blight this neighbourhood. RBK's past assertion that the road barriers are sufficient misses the serious issue that has existed for several years.

Parking. In order to reduce traffic flows and pressure on local on-street parking, allocations on this site need to be strictly limited in the future. You (RER) have expressed your intention to reduce total parking on the site to 90 spaces, but this should really be zero, as required by the GLA for a town centre site. And any future occupiers of this site should not be entitled to parking permits on the surrounding roads which are overrun already.

Any vehicle parking or service access retained on the site should be restricted to the areas within the inner courtyards. Land surrounding the Grade 2* Listed building should be landscaped, providing sufficient green amenity space for future occupiers and not compromising the amenity of local residents and the setting of County Hall.

Pressure on local services. The scale of the development proposed would impose huge pressures on local services, including schools, health, and transport which are already overstretched. Local residents regard this area as a blackspot for local schools, where it has become very difficult to secure places in local schools within walking or cycling distance. GP surgeries and dentists are similarly over-stretched. With other major developments already under construction this will only become more difficult. These forms of community infrastructure uses should be accommodated within County Hall.

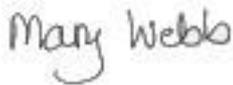
Pressure on local utilities. A development of this scale will generate huge additional demand on local utilities infrastructure such as power, gas, water and drainage, and broadband, and all will require significant investment.

Community Betterment. This must be offered towards improving the local neighbourhood - such as schools, traffic calming, transport improvements,

public open space etc., the irony is that the building was a public asset and designated for educational use.

Heritage. There is a veiled reference to an element of heritage space within the Grade 2* Listed Building, but we are very concerned that this is merely a token offer, and will be lost in the gross and harmful over-development.

In conclusion, the Riverside Residents Association would welcome a response to both the points of principle and the more specific comments that we raise in this submission before RER ploughs on with the next round of consultation. A response is required because our members – the local community - are genuinely very concerned by what your first round of consultation proposes.



Mary Webb
Chair
Riverside Residents Association