



Sustainability Appraisal (SA) for the North Kingston Neighbourhood Plan

North Kingston Neighbourhood Forum

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Quality information

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Non-Technical Summary

What is a Sustainability Appraisal (SA)?

A sustainability appraisal (SA) has been undertaken to inform the North Kingston Neighbourhood Plan (NKNP). The SA has been undertaken to meet the requirements of the Strategic Environmental Assessment (SEA) Regulations

Neighbourhood Plan groups use SA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the North Kingston Neighbourhood Development Plan?

The NKNP presents a plan for the North Kingston neighbourhood area for the period to 2041.

The neighbourhood area, designated in April 2017 (and re-designated in 2022), covers an area in the north of the Royal Borough of Kingston Upon Thames. The neighbourhood area was comprised of two wards, though changes to administrative ward boundaries since designation means that the neighbourhood area and ward boundaries no longer align. The neighbourhood area is urban with a population of 23,899 (Census, 2021) and an average population density of 85 people per hectare. It sits within the south western extent of Greater London; the River Thames runs alongside the neighbourhood area's western extent and Richmond Park is found to the north and east.

The NKNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the planning frameworks for the Royal Borough of Kingston upon Thames (Core Strategy, 2012 and emerging Local Plan) and London (The London Plan 2021).

It is currently anticipated that the NKNP will undergo referendum later in 2024.

Purpose of this SA Report

It is a requirement that the SA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The Regulations stipulate that a report must be published for consultation alongside the draft plan that “identifies, describes, and evaluates” the likely significant effects of implementing “the plan, and reasonable alternatives”. The report must then be considered when finalising the plan.

The NKNP has been screened in by the Royal Borough of Kingston Upon Thames as requiring a Strategic Environmental Assessment (SEA). To meet this requirement, the NKNP is undergoing an SA process which incorporates the requirements of the SEA Regulations. This mirrors the approach undertaken for the Kingston Local Plan and helps enable the Neighbourhood Plan development process to consider how it will contribute to the achievement of sustainable development.

To align with the SEA Regulations, the report can be structured by answering the following three questions:

- i. What has plan-making / SA involved up to this point?
 - including in relation to ‘reasonable alternatives’.
- ii. What are the SA findings at this stage?
 - i.e., in relation to the current draft plan.
- iii. What happens next?

Identification of reasonable alternatives for the North Kingston Neighbourhood Plan

The aim of Chapter 5 of the SA Report is to explain the process that led to the establishment of reasonable alternatives, and thereby present “an outline of the reasons for selecting the alternatives dealt with”.

The NKNP area does not have a housing target to meet through the emerging Local Plan nor the New London Plan over the Plan period, though, it will be expected to contribute towards the identified need within the wider neighbourhood, as defined by the Local Plan. As such, the NKNP does not seek to allocate sites, nor does it undergo a site selection process.

Instead, the NKNP seeks to set out parameters for future development which may come forward on the available sites in the neighbourhood area, in conjunction with the Neighbourhood Plan’s vision and objectives. The Neighbourhood Plan identifies the following three zones (Figure 5.2 of the SA Report) for which distinct character of development and building heights would be appropriate:

- North Kingston Key Area: This is a key area of change with more Urban characteristics and generally within 100m of Kingston Railway Station, suitable for taller buildings as defined by the Neighbourhood Plan policies.
- The Transition Zone and Key Corridors: Where a more gradual building height and density transition from the Urban area towards the more Suburban Area is appropriate as defined by the Neighbourhood Plan policies. The two development corridors are characterised by intense, mixed-use public transport corridors.
- The Suburban Area: This area is more than 800m away from the main transportation hubs of the Cromwell Road Bus Station and the Kingston and Norbiton Rail Stations where lower height and density is more appropriate as defined by policies in the Neighbourhood Plan.

As the presentation of planning policies for these three zones is what is most likely to have a significant effect on SA objectives, it was determined that this issue should be the primary focus of the consideration of alternatives through the SA process.

Figure 5.3 within the SA Report shows the spatial and high level parameters of three alternative approaches that have been considered for these zones through the SA.

Assessment of reasonable alternatives for the North Kingston Neighbourhood Plan

Chapter 6 of the SA Report provides the detailed findings of the assessment of the three reasonable alternative approaches to policy zones in North Kingston. The options are as follows:

1. **Higher densities in the North Kingston Key Area.** This approach encourages higher density and building heights in the North Kingston key Area.
2. **An approach which applies the NKNP policies relating to the 'North Kingston Key Area' to this area, the Transition Zone and Development Corridors.** This approach encourages higher density and building heights in the North Kingston Key Area, Transition Zone and Development Corridor.
3. **An approach which does not adopt a zonal approach or any associated restrictions on building heights and densities.** This approach would not provide localised policy on density and building heights beyond that which is set out in Kingston upon Thames, Greater London and national policy.

The summary table and narrative below presents summary findings for the assessment of the three options, with detailed findings presented in Chapter 6 of the SA Report.

Table NTS.1 Summary of reasonable alternative assessment findings

Theme		Option 1	Option 2	Option 3
Air quality	Significant effect?	No	No	No
	Rank	=2	1	=2
Biodiversity	Significant effect?	No	No	No
	Rank	=1	=1	=1
Climate change	Significant effect?	No	No	No
	Rank	=1	=1	=1
Health and wellbeing	Significant effect?	No	No	No
	Rank	2	=1	=1
Historic environment	Significant effect?	No	No	No
	Rank	1	3	2
Land, soil and water resources	Significant effect?	No	No	No
	Rank	2	1	1
Landscape and townscape	Significant effect?	No	Yes- negative	No
	Rank	1	3	2
Population and communities	Significant effect?	No	No	No
	Rank	1	=2	=2
Transport and movement	Significant effect?	No	No	No
	Rank	3	1	2

To conclude, it is evident that the reasonable alternative options identified and assessed perform broadly similarly, with only one potential significant effect identified. The nuances between the predicted effects are limited and more distinct for the historic environment and landscape and townscape themes. Option 1 performs preferably in relation to the historic environment, landscape and townscape and population and communities. Option 2 performs preferably in relation to air quality, and transport and movement. Option 3 performs on a par with Option 2 for health and wellbeing and land, soil and water resources. All options are likely to perform similarly for biodiversity and climate change. Option 2 is expected to result in potential significant negative effects for the area's landscape and townscape.

Considering the local landscape and historic sensitivities, importance within the Neighbourhood Plan objectives and greater magnitude of variance between effects for these themes, Option 1 performs well, when compared to other options.

Developing the preferred approach

Considering the NKNP objectives which heavily focus on landscape/townscape and the character of the area, including its historical significance, the predicted effects associated with Option 1 would best align with the Neighbourhood Forum's preferences, as informed by consultation with the local community.

North Kingston Neighbourhood Forum (NKNF) opted to adopt the approach outlined under Option 1 for the following reasons:

'Fundamental to the policies of the Neighbourhood Plan are the dual objectives of maintaining the cherished character of the Neighbourhood and optimising the area's potential to accommodate growth. While much of North Kingston comprises well established residential areas where there are few opportunities for significant new development, there are sites generally to the south of the Neighbourhood close to Kingston's rail and bus stations, with potential. Consequently, this became the Neighbourhood Plan's Key Area where, due to the scale of existing development, larger scale buildings, subject to the Neighbourhood Plan's overarching Design Guide, are more likely to be acceptable. In order to minimise the impact of new development in this area on the rest of the Neighbourhood a Transitional Zone, which includes two corridors where limited potential was identified, has been designated to provide a buffer to the north and east.

Critical to this strategy was the introduction of density guidelines which were developed from the principles outlined in the North Kingston Development Brief prepared in 2016 by RBK following wide-scale public consultation. The Brief focused on a group of sites which have since been partly developed. The new development, now referred to as Queenshurst, thus established an acceptable upper density for future building within the Key Area and informed the densities for a Transitional Zone of adjoining land between the Key Area and the existing, mainly residential areas. The Council's Development Brief also established height limits which the Neighbourhood Plan has adopted within the Key Area and, as with densities, the Neighbourhood Plan proposes that building heights step down through the Transitional Zone to facilitate an orderly transition to the existing, mainly two and three storey development of the surrounding more suburban areas.'

Appraisal of the Regulation 14 Neighbourhood Plan

In March 2021 AECOM appraised the Pre-Submission Regulation 14 Neighbourhood Plan. The SA Report did not provide any recommendations, concluding that “when read as a whole the Neighbourhood Plan is anticipated to result in broadly positive effects in relation to the SA framework.”

The Neighbourhood Forum subsequently updated the draft Neighbourhood Plan in response to a number of matters raised through Regulation 14 consultation (April 2021), and to reflect the latest national and regional policy framework (namely the London Plan (adopted 2021) and the emerging Royal Borough's Local Plan).

Changes have subsequently been made to the submission version of the Neighbourhood Plan to resolve issues raised and align with higher level planning policy. This includes updates to a number of the Neighbourhood Plan policies and the supporting evidence base.

Appraisal of the Regulation 16 submission version of the North Kingston Neighbourhood Plan

The assessment of the submission version of the NKNP is presented within Chapter 9 of the SA Report, with a summary of conclusions and recommendations set out below.

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. Neutral effects are anticipated in relation to the air quality SA objective.

Significant positive effects are predicted in relation to the population and communities objectives due to the plan providing 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, underpinned by NKNP policy provisions, could 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 neighbourhood area.

Minor positive effects are predicted in relation to biodiversity given the potential for habitat enhancement, as well as the avoidance of harm to designated sites both within the neighbourhood area and beyond. Similarly, minor positive effects are predicted in relation to 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 areas 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.

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. However, it is recognised that the NKNP does not allocate sites for development, and that the three sites within the AQFA are identified within the emerging Local Plan for allocation. The provisions of the NKNP policies generally match those of the emerging Local Plan policies, providing further localised guidance to development where it may come forward outside of the Neighbourhood Plan, for example through windfall development proposals. As such broadly neutral effects are predicted in relation to air quality.

It is important to reiterate that 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 (or neutral effects) against all SA themes. However, given the NKNP will help shape development in the neighbourhood plan, when read as a whole the Neighbourhood Plan is anticipated to result in broadly positive effects in relation to the SA framework.

Next steps

The NKNP and this SA Report are being submitted to the Royal Borough of Kingston upon Thames for its consideration. The Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the NKNP meeting legal requirements and its compatibility with the current development plan for the Borough (Core Strategy, 2012 and emerging Local Plan) and the London Plan 2021.

If the subsequent Independent Examination is favourable, the NKNP will be subject to a referendum, organised by the Royal Borough of Kingston upon Thames. If more than 50% of those who vote agree with the NKNP, then the Neighbourhood Plan will be 'made'. Once made, the NKNP will become part of the development plan for the North Kingston neighbourhood area.



Introduction

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal (SA) in support of the emerging North Kingston Neighbourhood Plan (NKNP).
- 1.2 The NKNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the planning frameworks for the Royal Borough of Kingston upon Thames (Core Strategy, 2012 and emerging Local Plan) and London (The London Plan 2021).
- 1.3 The neighbourhood area (see above), designated in April 2017 (and re-designated in 2022), covers an area in the north of the Royal Borough of Kingston. The neighbourhood area was comprised of two wards, though changes to administrative ward boundaries since designation means that the neighbourhood area and ward boundaries no longer align. The neighbourhood area is urban with a population of 23,899 (Census, 2021) and an average population density of 85 people per hectare. It sits within the south-western extent of Greater London; the River Thames runs alongside the neighbourhood area's western extent and Richmond Park is found to the north and east.

Strategic Environmental Assessment Screening

- 1.4 The NKNP has been screened for Strategic Environmental Assessment (SEA) by Kingston upon Thames Council (February 2020), stating:

“Having reviewed the criteria, the Royal Borough of Kingston upon Thames concludes that the North Kingston Neighbourhood Plan has the potential to have significant environmental effects beyond those expected by the ‘strategic’ district-wide policies of the adopted Kingston Core Strategy. Although the magnitude and location of these effects is difficult to ascertain at this stage of the plan making process, the most appropriate course of action is for a Strategic Environmental Assessment to be undertaken. The process needs to be started in the early stages of the plan making process and cannot be retrofitted at a later stage. Although not a requirement, we would recommend this Assessment is incorporated into a Sustainability Appraisal to consider more widely the balance of sustainability objectives and to help ensure the plan meets the basic conditions.”

- 1.5 The Screening Opinion was informed by comments received from Natural England and Historic England in 2019.
- 1.6 In light of the above, SEA is required to assess the potential for significant environmental effects.

SEA/SA explained

- 1.7 It is a requirement that the SEA/SA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The Regulations stipulate that a report must be published for consultation alongside the draft plan that “*identifies, describes, and evaluates*” the likely significant effects of implementing “*the plan, and reasonable alternatives*”. The report must then be considered when finalising the plan.
- 1.8 The NKNP has been screened in by the Royal Borough of Kingston as requiring a Strategic Environmental Assessment (SEA). To meet this requirement, the NKNP is undergoing an SA process which incorporates the requirements of the SEA Regulations.
- 1.9 SA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SA for the NKNP seeks to maximise the emerging plan’s contribution to sustainable development. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans; however, a Neighbourhood Plan is not a Local Plan and SA is not therefore legally required. An SA is though being undertaken to mirror the approach undertaken for the Kingston Local Plan and to help to enable the Neighbourhood Plan development process to consider how it will contribute to the achievement of sustainable development.
- 1.10 The report can be structured to address requirements by answering the following three questions:
 - i. What has plan-making / SA involved up to this point?
 - including in relation to ‘reasonable alternatives’.
 - ii. What are the SA findings at this stage?
 - i.e., in relation to the current draft plan.
 - iii. What happens next?

This SA Report

- 1.11 This report is the SA Report for the North Kingston Neighbourhood Plan. It is published alongside the ‘submission’ version of the Plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended). The report answers the three questions outlined above in turn, as discrete ‘parts’ of the report. However, before answering these questions, two further introductory sections are presented to further set the scene (Chapters 2 and 3).
- 1.12 The development of the NKNP has been in progress since 2017 (designation date); in 2021 the Forum took their draft Neighbourhood Plan to Regulation 14 Consultation, with an accompanying SA Report. Based on representations made at this stage, changes to the Plan were made. An updated Plan has taken account of these representations.

2. What is the Plan seeking to achieve?

Local Planning context for the North Kingston Neighbourhood Plan

- 2.1 The strategic policy context is set by the Greater London Combined Authority ([The London Plan, 2021](#)) and the Royal Borough of Kingston ([adopted Core Strategy \(2012\)](#), [Kingston Town Centre Area Action Plan \(2008\)](#) and the emerging [Local Plan](#)).
- 2.2 The London Plan sets a ten-year housing delivery target of 9,640 (964dpa (dwellings per annum)) dwellings for Kingston, with an expectation that this will be delivered in the existing network of town centres in the Borough. However, the Plan does not identify specific sites in the North Kingston neighbourhood area.
- 2.3 North Kingston Neighbourhood Plan area is within the 'Kingston Town' neighbourhood, as identified in the Core Strategy which sets an annual target of 275dpa. The Kingston Town Centre Area Action Plan also identifies and promotes four sites/broad areas which sit within the neighbourhood area.
- 2.4 With regards to the emerging Local Plan, the First Draft Local Plan consultation was held in November 2022 – February 2023. It is being prepared to be consistent with the principles and policies in the government's National Planning Policy Framework and the London Plan. The Neighbourhood Area lies within one of four 'neighbourhoods' defined by the Plan – 'Kingston and North Kingston'. The Plan identifies four sites, which are expected to deliver 353 dwellings within the North Kingston Neighbourhood. Some of these sites overlap with areas identified in the Kingston Town Centre Area Action Plan.
- 2.5 Neither the adopted Core Strategy, the emerging Local Plan nor the New London Plan identify an overall housing target for delivery specifically within the North Kingston Neighbourhood area over the Plan period. The NKNP will be expected to contribute towards the identified need within the wider neighbourhood, as defined by the Local Plan.
- 2.6 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.

North Kingston Neighbourhood Plan vision and objectives

- 2.7 The vision for the North Kingston Neighbourhood Plan is as follows:

"North Kingston is a busy, thriving residential suburb of London. Our population has increased significantly over the last twenty years, but this has enabled many positive things to happen for the benefit of the local community and businesses. The way change has come about has been crucial to this success.

Almost all of the new homes built in that time have been in specific locations and not spread across our area. This has meant that, for the most part, its essential Victorian and Edwardian character has been conserved in terms of its housing stock and street scene. Our listed buildings have been protected, our conservation areas have remained relatively unchanged and our key open

spaces continue to be valuable amenity and recreation assets for local people to enjoy. The spire of St. Luke's re-mains the most visible feature from much of our area, with views to it having been protected.

The focus of change has been on the edges of our area with the town centre and railway stations and at other key locations. Many of the new residents live in apartments in those areas, some in stand-alone buildings, others above new retail and business units, and above new primary schools and new health and other community facilities. Although the buildings are taller than was traditional in our area, their careful design and location have meant that they have not dominated our skyline. And they have enabled us to increase the number of commercial and social uses, that have clustered together in local 'commercial hubs' to increase footfall and that are protected from changing use, so we don't have to travel by car out of the area as often.

But in places like The Keep and St. George's, and across many small infill sites that became available, the new homes are suited to young families and our local schools and early years facilities have been able to expand to provide enough places for them. We have invested in new cycle routes and facilities and made the key routes around the schools more pedestrian-friendly – our new community bus services have encouraged most parents to abandon the 'school run'.

All of our new buildings have contributed to our green infrastructure, whether through their new garden areas, green roofs/walls and rainwater harvesting. In planning for new development, we have secured a number of new pocket parks that together with our existing green spaces and the Thames have helped lower the highest summer temperatures and provided local respite from our denser area. We still suffer from flood events, but the new developments have successfully managed surface water and have not made matters worse.

Looking back, it seems our careful planning of North Kingston has enabled us to become a leading example in London for how local communities can work with landowners and developers to manage change successfully."

2.8 The vision is underpinned by a number of Neighbourhood Plan objectives, identified through engagement with the local community. These are as follows:

- *To ensure North Kingston remains a desirable place to live by maintaining its essential suburban character and by successfully managing the transition between the growing town centre and the surrounding suburban area.*
- *To ensure the long-term socio-economic sustainability of North Kingston by protecting and improving its essential local retail, business and social facilities.*
- *To help North Kingston adapt to climate change, including by way of new buildings designed for climate resilience and by protecting its important green spaces from development, and to mitigate climate change by reducing carbon emissions locally and delivering a net biodiversity gain from new development.*
- *To help meet local housing needs by managing new housing development in key areas and a number of key sites.*

3. What is the scope of the SA?

Summary of SA Scoping

- 3.1 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”*.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England. These authorities were consulted on the scope of the SA in December 2019/ January 2020.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SA through setting out the following information:
 - A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the North Kingston Neighbourhood Plan.
 - Baseline data against which the North Kingston Neighbourhood Plan can be assessed.
 - The key sustainability issues for the North Kingston Neighbourhood Plan; and
 - An ‘SA framework’ of objectives against which the North Kingston Neighbourhood Plan can be assessed.
- 3.4 Further information on the scope of the NKNP, alongside the full SA framework as consulted on, is presented in Appendix B.
- 3.5 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 Table 3-2). No response was received from the Environment Agency. The comments provided by the consultees on the NKNP SA Scoping Report, and how they have been addressed, can be read in Table 3-1.

Table 3-1: Summary of representations received to the SA scoping consultation

Consultee	Consultation response summary	How the response is considered and addressed
Historic England	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: 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.	Acknowledged, the scope of the work has been updated to include these.
Natural England	Natural England has no specific comments to make on this neighbourhood plan SA scoping report.	n/a
Environment Agency	n/a - no representation received.	n/a

SA Framework

3.6 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 NKNP is presented in Table 3-2.

Table 3-2: SA framework

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 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.
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

Part 1: What has plan-making/SA involved to this point?

4. Introduction to Part 1

Overview

- 4.1 The aim of this part of the report is to explain work undertaken to develop and assess reasonable alternatives. Whilst work on the NKNP has been underway for some time, the aim here is not to provide a comprehensive explanation of work undertaken to date, but rather to discuss the evolution of the NKNP in association with the SA process. More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to a particular issue that is of central importance to the plan, namely the nature of development across the neighbourhood area.
- 4.2 Structure of this part of the report:
- **Chapter 5** – explains the process of establishing reasonable alternatives.
 - **Chapter 6** – presents the outcomes of assessing reasonable alternatives.
 - **Chapter 7** – explains reasons for establishing the preferred option, considering the assessment.

5. Establishing alternatives

Introduction

- 5.1 The aim here is to explain a process that led to the establishment of reasonable alternatives, and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.
- 5.2 The development of the NKNP has been in progress since 2017; in 2021 the Forum took their draft Neighbourhood Plan to Regulation 14 Consultation, with an accompanying SA Report. Based on representations made at this stage, changes to the Plan were made. An updated Plan has taken account of these representations, and a new SA Report was deemed necessary to consider potential reasonable alternatives based on the latest version of the Plan.

Strategic parameters (top-down considerations)

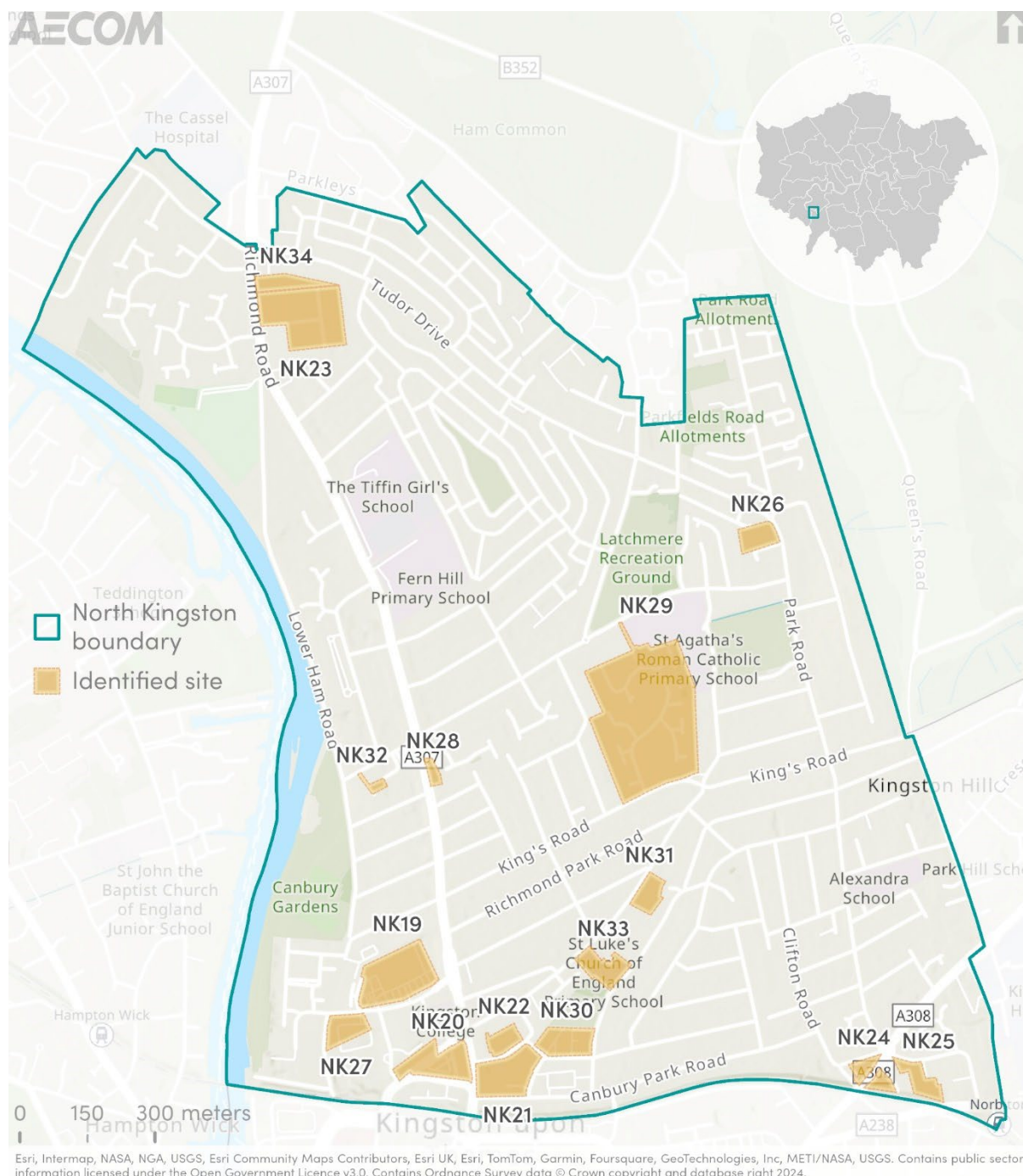
- 5.3 As discussed in Chapter 2, the draft NKNP has been prepared in the context of The London Plan, 2021, the adopted Royal Borough of Kingston Core Strategy (2012), the Kingston Town Centre Area Action Plan and the emerging Local Plan.
- 5.4 Neither the adopted Core Strategy, the emerging Local Plan nor the New London Plan identify an overall housing target for delivery specifically within the North Kingston Neighbourhood Plan area over the Plan period. The NKNP will be expected to contribute towards the identified need within the wider neighbourhood, as defined by the Local Plan.
- 5.5 The emerging Local Plan identifies parts of North Kingston in a revised Town Centre boundary (to now include the Canbury Business Park but to exclude the residential area adjacent to Canbury Gardens) and within a wider ‘zone of influence’ extending beyond that boundary. The Local Plan proposes that a large portion of the homes built, and jobs created in the borough will be located within the town centre and ‘zone of influence’, but not “*to the detriment of the existing rich character and heritage of Kingston ... Growth needs to positively contribute to local character and distinctiveness to ensure the creation of high-quality, beautiful and sustainable places*”.
- 5.6 The context of the Neighbourhood Plan being in London means that there is a large amount of development pressure and the Neighbourhood Forum support development coming forward on suitable sites. The Forum does not have a formal top-down housing target to meet and in this context, the Plan does not seek to allocate sites per-se, nor has a site selection process been undertaken. Instead, the NKNP seeks to set out parameters for future development which may come forward on the available sites in the neighbourhood area, in conjunction with the Neighbourhood Plan’s vision and objectives.

Potential options for growth (bottom-up considerations)

- 5.7 The Neighbourhood Forum identified 16 sites which may potentially be available for development in the neighbourhood area (Figure 5.1) through a Vision Workshop hosted by the North Kingston Forum in 2017 and the Royal Borough of Kingston’s ‘Call for Sites’ also held in 2017.

5.8 The Forum does not propose a selective approach to sites and is not intending to meet a housing target, and so determining alternative approaches to delivering the Plan's objectives in relation to these factors was not considered reasonable. Whilst the 16 sites are those which were identified by the Neighbourhood Forum, it does not preclude development taking place elsewhere in the neighbourhood area.

Figure 5.1: Sites identified in the NKNP area.

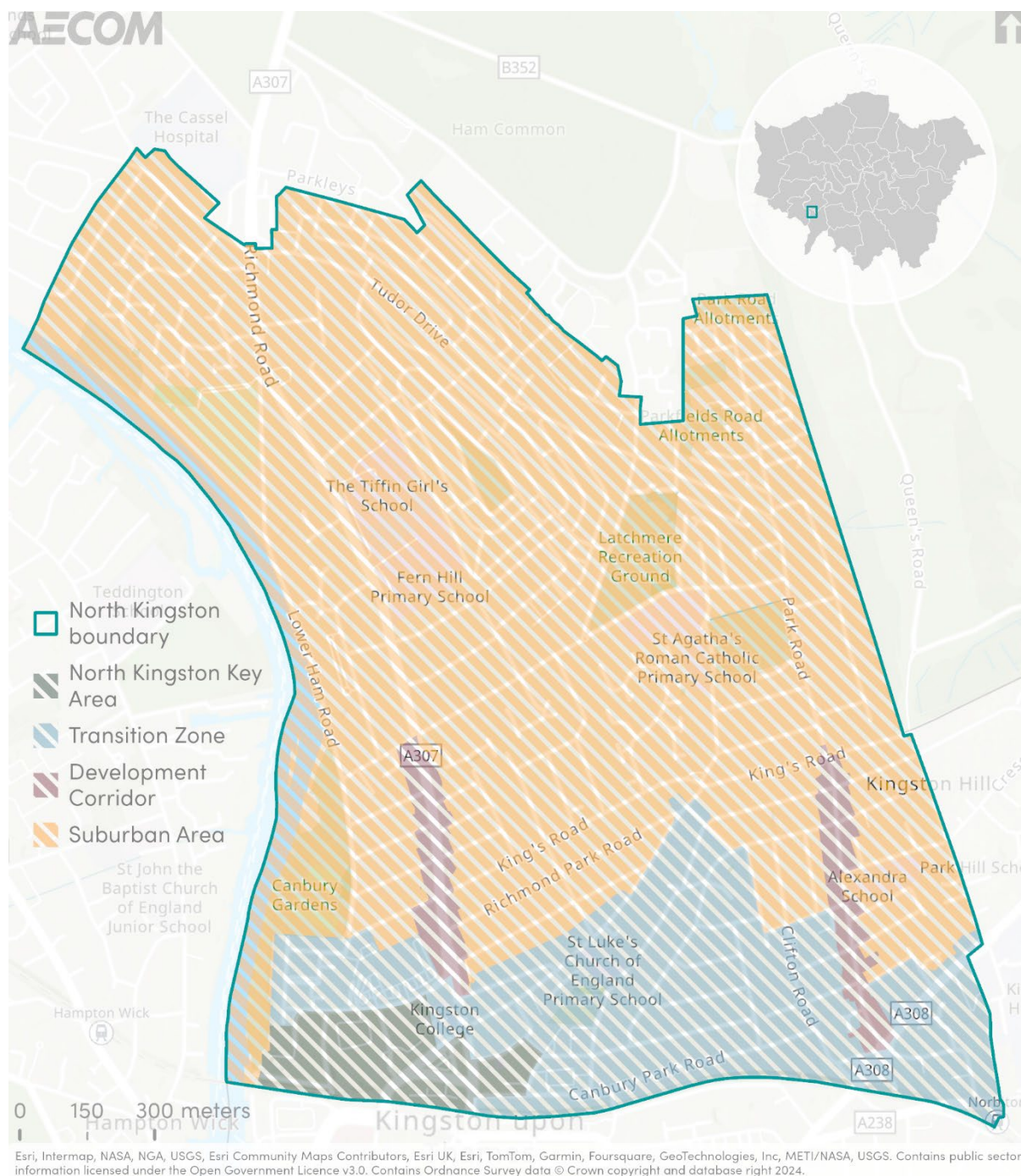


5.9 The North Kingston area is comprised of various character areas and is predominantly comprised of suburban residential land on the fringe of Kingston upon Thames Town Centre. The neighbourhood area also includes open spaces, educational institutions, shopping parades, businesses, and community amenities. It is well bounded by the River Thames, Richmond Park and a railway line.

5.10 A key aim of the NKNP is to set out development parameters for different parts of the neighbourhood area. In this respect, the Neighbourhood Plan identifies three zones (Figure 5.2), each comprise defined characteristics and building heights. These are as follows:

- North Kingston Key Area: This is a key area of change with more Urban characteristics and generally within 100m of Kingston Railway Station, suitable for taller buildings as defined by the Neighbourhood Plan policies.
- The Transition Zone and Key Corridors: Where a more gradual building height and density transition from the Urban area towards the more Suburban Area is appropriate as defined by the Neighbourhood Plan policies. The two development corridors are characterised by intense, mixed-use public transport corridors.
- The Suburban Area: This area is more than 800m away from the main transportation hubs of the Cromwell Road Bus Station and the Kingston and Norbiton Rail Stations where lower height and density is more appropriate as defined by policies in the Neighbourhood Plan.

Figure 5.2: Figure showing the proposed zones in the NKNP area.



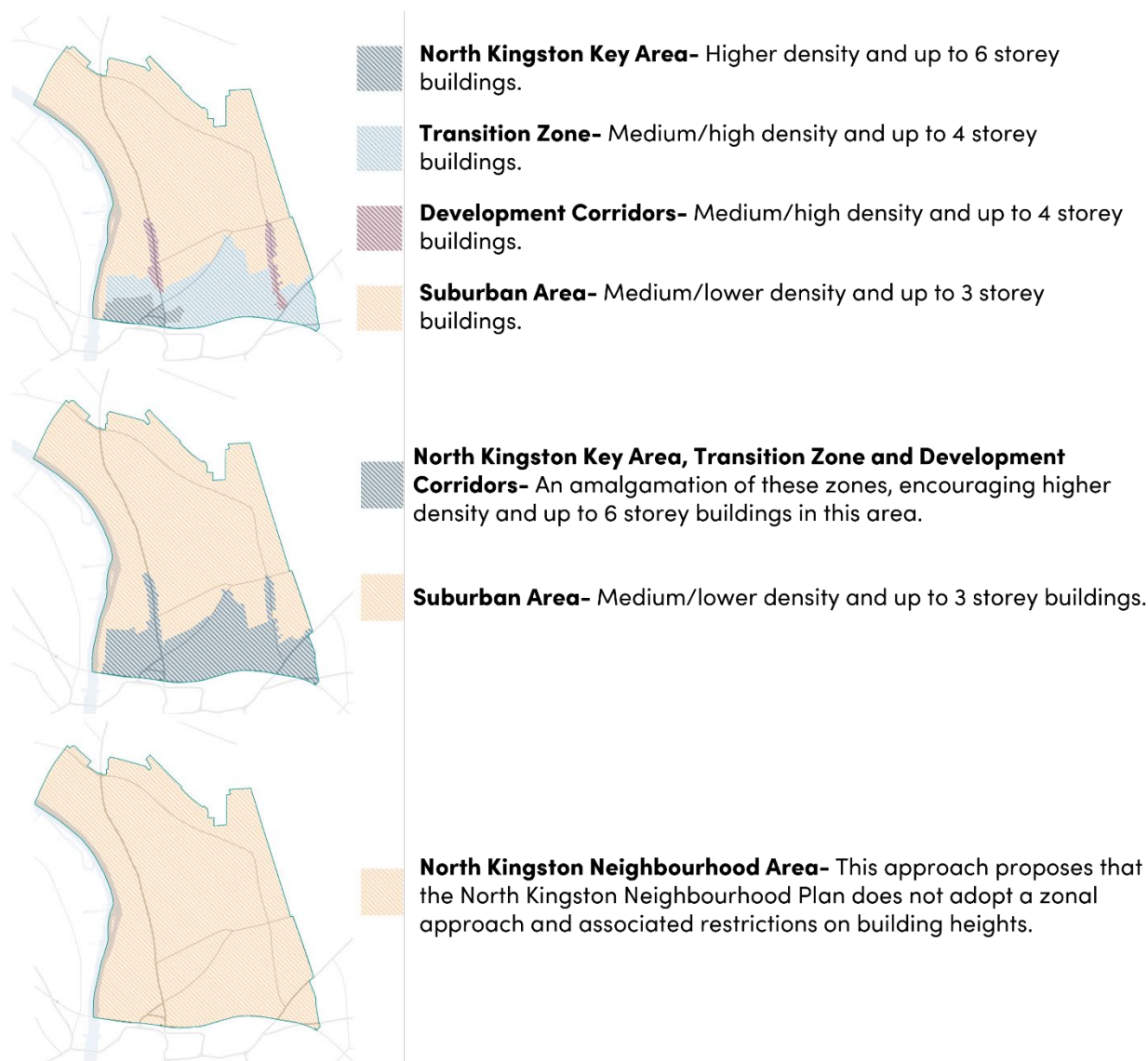
5.11 The London Plan requires development plans to define what is considered to be a tall building as well as the locations which would support such heights (Policy D9).

5.12 To support the consideration of this issue within the neighbourhood area, the SA has assessed alternative approaches to the NKNP in relation to the proposed zones and the acceptable building heights and densities within each (Figure 5.3).

5.13 The reasonable alternatives considered in this SA are as follows:

1. **Higher densities in the North Kingston Key Area.** This approach encourages higher density and building heights in the North Kingston Key Area.
2. **An approach which applies the NKNP policies relating to the ‘North Kingston Key Area’ to this area, the Transition Zone, and Development Corridors.** This approach encourages higher density and building heights in the North Kingston Key Area, Transition Zone, and Development Corridor.
3. **An approach which does not adopt a zonal approach or any associated restrictions on building heights and densities.** This approach would not provide localised policy on density and building heights beyond that which is set out in the Kingston upon Thames Local Plan, Greater London’s London Plan and through national policy.

Figure 5.3: Figure showing the spatial and high level parameters of the three reasonable alternative approaches to zoning for the NKNP.



6. Assessing reasonable alternatives

Introduction

- 6.1 This chapter provides the detailed findings of the assessment of the three reasonable alternative approaches to policy zones in North Kingston (established in the previous chapter). The options are as follows:
1. **Higher densities in the North Kingston Key Area.** This approach encourages higher density and building heights in the North Kingston Key Area.
 2. **An approach which applies the NKNP policies relating to the ‘North Kingston Key Area’ to this area, the Transition Zone, and Development Corridors.** This approach encourages higher density and building heights in the North Kingston Key Area, Transition Zone, and Development Corridor.
 3. **An approach which does not adopt a zonal approach or any associated restrictions on building heights and densities.** This approach would not provide localised policy on density and building heights beyond that which is set out in out in the Kingston upon Thames Local Plan, Greater London’s London Plan and through national policy.

Key assumptions

- 6.2 Under each scenario, development would be expected to come forward in a manner which maximises potential, considering site availability and suitability and neighbourhood, local, regional, national policy.
- 6.3 The Options are likely to result in similar levels of development in the Suburban Area, ensuring that densities and heights align with policy requirements, in particular, policies seeking to protect and enhance character and townscapes.
- 6.4 Within the Development Corridors and Transition Zone, Options 1 and 3 would be expected to be broadly aligned, with development expected to mimic the current 3-4 storey building heights, with densities also expected to align. Option 2 would promote taller and higher density development in this area.
- 6.5 Within the North Kingston Key Area, Options 1 and 2 would be generally support development of up to six storeys, though exceptional circumstances would permit development of up to 12 storeys (within the lower end of the acceptable heights set out locally). Option 3 would be expected to lead to a greater amount of taller and higher density development in this area, due to local policy permitting a wider range with a higher upper limit of building heights.

Methodology

- 6.6 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability topics and objectives identified through scoping (see Table 3-2) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, however this is also stated in the

text. Where appropriate neutral effects, or uncertainty will also be noted. Uncertainty is noted with grey shading.

- 6.7 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text. It is important to note that this assessment is strategic, meaning that it takes an overarching look at potential effects across various environmental themes; it is based on high-level appraisals which seek to establish key differences between options and identify any potential significant environmental effects.
- 6.8 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.
- 6.9 Finally, it is important to note that effects are predicted considering the criteria presented within the Regulations. So, for example, account is taken of the duration, frequency, and reversibility of effects.

Assessments

Air quality

SA Objective: Locate and design development so that current and future residents will not regularly be exposed to poor air quality.

- 6.10 The North Kingston neighbourhood area falls within the London-wide Air Quality Management Area (AQMA), and as such it can be expected that future development would lead to some exposure to poor air quality. There could be expected to be a greater degree of exposure in central areas, such as the North Kingston Key Area. This exposure may be expected to be more pronounced at peak journey times and at key traffic pinch points. Data from the London Atmospheric Emissions Inventory (2019) reveals the A307, A308 and Park Road as key hotspots for poorer atmospheric emissions largely relating to road transport. The Kingston Bridge/Kingston St/Wheatfield/Kingston Hall Road/London Road Air Quality Focus Area is found in the south of the neighbourhood area, encompassing the North Kingston Key Area and the southern part of the Transition Zone.
- 6.11 Key differences in effects between the options would be expected to be seen in relation to potential exposure to air quality as well as potential behavioural factors, relating to transport modal choices. Higher density development in more accessible locations (such as in the North Kingston Key Area, the Transition Zone and along Development Corridors) would be likely to reduce the need to travel longer distances to access shops and services. As such, development focused in these areas would be likely to maximise sustainable transport choices, in turn potentially minimising future contributions to air quality issues. Where North Kingston Key Area is considered more accessible, a greater focus of development in this area may see more pronounced effects in this respect. Variations between the options would lead to different levels of

exposure to poor air quality. A greater focus on higher density development in those locations previously highlighted as experiencing elevated levels of poor air quality would result in an increase in population-wide exposure, resulting in consequential potential negative health outcomes. Support for greater densities in the North Kingston Key Area, the Transition Zone and along Development Corridors be expected to lead to pronounced effects in this respect.

- 6.12 Option 1 would encourage greater densities in the North Kingston Key Area, an area which has poorer air quality, but is considered the most accessible area. The option would likely result in an increase in exposure to air quality from future development as well as increases in sustainable travel rates in the neighbourhood area.
- 6.13 Option 2 would encourage this greater density of development across the North Kingston Key Area, the Transition Zone and along Development Corridors, these areas are exposed to poorer air quality, but are more accessible. The North Kingston Key Area has greater levels of accessibility and poorer air quality than the other zones promoted for higher density development. This strategy might serve to maximise future development capacity in more accessible areas, driving down car dependencies and increasing the likelihood of sustainable travel uptake. Higher density development would be seen in areas which are exposed to poorer air quality, though the spread of this development type across the Key Area and Transition Zones/Development Corridors might result in a reduction in exposure to the neighbourhood area's poorest air quality areas in the Key Area, when compared to a greater focus of development just within the Key Area.
- 6.14 Option 3 would not deliver policy designed to influence densities or building heights across the neighbourhood area. Density would, as such, be subject to local policy. The London Plan directs higher density and taller development to larger centres, and the Kingston Core Strategy highlights Kingston as a focus where this would be supported. The North Kingston Development Brief provides support for higher density development in Kingston town centre, with support for buildings up to 12 storeys. This would be expected to deliver a higher density than the Neighbourhood Plan preferred option (Option1) in the Key Area. Local policy ensures that in the remainder of the neighbourhood area, development height and density has to pay attention to surrounding developments. In the Transition Zone and Development Corridors, buildings are largely three storeys, with some newer developments up to four or five. The Suburban Zone includes development which is, for the most part, up to three storeys. The Option would focus a greater concentration of new development within the North Kingston Key Area, exposing greater proportions of residents to poor air as well as potentially improving accessibility and sustainable travel rates.
- 6.15 Considering the above, all options would promote some mixed effects to differing magnitudes. These would relate to exposure to existing areas of poor air quality as well as locating future development in accessible locations, potentially increasing sustainable transport uptake and hence to some extent minimising road transport derived air quality issues from future development. Option 2 would perform best, where development would be focused in more accessible locations and higher densities would be spread between areas of both higher and lower levels of poor air quality. Option 3 would provide the

greatest focus of growth in the Key Area, with associated elevated effects relating to poor air quality exposure and an increase in sustainable travel rates. Option 1 would spread the growth in a tapered manner, reducing the potential exposure to poor air quality, but also not delivering the same high levels of accessibility as Option 3. It would be likely that Options 1 and 3 perform similarly. It is not expected that any option would lead to significant effects.

Air quality	Option 1	Option 2	Option 3
Significant effect?	No	No	No
Rank	=2	1	=2

Biodiversity

SA Objective: Protect and enhance all biodiversity and geological features.

- 6.16 The NKNP area contains very some small areas of deciduous woodland priority habitat within Canbury Gardens, in the south west of the neighbourhood area and two sites of importance for nature conservation (SINC) along the Thames and at Royal Park Gate Open Space. Adjacent to the neighbourhood area there are more significant biodiversity designations, including a Special Area of Conservation (SAC) (Richmond Park (also a National Nature Reserve (NNR))), Sites of Special Scientific Interest (SSSI) (Richmond Park and Bushy Park and Home Park) and Ham Common Local Nature Reserve (LNR). Most of the neighbourhood area is within impact risk zones for the Richmond Park SSSI, requiring consultation for residential planning applications (closer zones require consultation at a lower threshold of dwellings per site). Areas broadly to the west of Richmond Road do not require consultation.
- 6.17 Richmond Park's condition status (2024) is considered to be favourable, with no identified pressures. The highly managed nature of this park and its urban context as a publicly accessible open space, should mean that development would not be expected to place significant additional recreational pressures on the habitats and species for which it is designated.
- 6.18 Development within the NKNP area of varying heights and densities would be unlikely to lead to discernible variations in effects between the options being considered. An increase in density across the central and eastern parts of the neighbourhood area might lead to additional developments being required to consult on the proposed development with Natural England. However, favourable conditions in Richmond Park and a lack of identified pressures mean that effects would be unlikely.
- 6.19 In this context, each option would perform similarly, without any significant effects identified.

Biodiversity	Option 1	Option 2	Option 3
Significant effect?	No	No	No
Rank	=1	=1	=1

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.

- 6.20 In terms of flood risk (from rivers and seas and surface water), the neighbourhood area is not considered to be at significant risk, with the likelihood that development ought to be able to avoid areas at risk, and where not possible, mitigation measures should offset risk. Higher density development and taller building heights might increase urban heating, with effects likely to be more pronounced during extreme heat events. The location and density of development might lead to some effects relating to transport related emissions, linked to accessibility to sustainable transport routes/access nodes and local shops and services. Options with higher densities in more accessible locations (mostly the Key Area, but also (to a lesser extent) in the Transition Zone and Development Corridors) would potentially promote a reduction in per capita transport emissions. In this respect, the alternative options might see disparities in effects in relation to urban heating and transport linked emissions.
- 6.21 Option 1 would offer a balance, where growth of higher densities and heights would be seen in accessible locations, promoting sustainable forms of transport. Conversely, the taller buildings, especially in the Key Area, might promote some urban heating amplifications (though this would be expected to be to a very small degree).
- 6.22 Option 2 would be expected to promote higher densities across accessible locations, though the (relative) massing of dense and tall buildings across a wider area could potentially exaggerate urban heat island related effects (as under Option 1, this would be to a small degree).
- 6.23 Option 3 would promote greater densities and heights within the Key Area which would promote the uptake of sustainable transport. The higher density and taller height of buildings might exaggerate potential negative effects related to urban heating (though, as before, this is to a marginal degree).
- 6.24 Options 1 and 3 have the potential to improve accessibility alongside measures to reduce marginal heating effects relating to a larger proportion of the neighbourhood Area seeing more dense and taller development. Option 2 may potentially see more pronounced heating effects (though, still minor), whilst

boosting the density of development in more accessible locations. Overall, the difference in magnitude between Options would be very minor and no significant effects are considered likely.

Climate change	Option 1	Option 2	Option 3
Significant effect?	No	No	No
Rank	=1	=1	=1

Health and wellbeing

SA Objective: Improve the health and wellbeing of residents within the Neighbourhood Plan area.

- 6.25 The NKNP Area has a number of green spaces and sports and recreational facilities as well as the nearby Kingston Hospital and four health/medical centres. Development of higher densities might serve to better provide funding to support the provision of new/improved/expanded services and infrastructure. That said, population increases may result in pressures on existing services, particularly relevant to health/ medical centres. More accessible development might promote improved health outcomes linked to a higher likelihood of future residents travelling by active means. Development in the suburban areas could provide better access to green and recreational spaces, due to their higher prevalence across this area.
- 6.26 Each option would be expected to perform similarly in respect of suburban development and its associated accessibility to green spaces and recreational facilities. Growth across the NKNP area would also be likely to lead to some pressures on medical/health centres, resulting in similar effects under each option.
- 6.27 Option 1 would stagger densities, from higher density development in the Key Area, gradually transitioning to lower densities in the suburban area. The higher densities in the Key Area might give rise to increased developer contributions towards new/improved/expanded healthcare services and green/recreational spaces. This density would also give rise to improved levels of accessibility, potentially promoting active travel.
- 6.28 Option 2 would lead to similar effects to the above, but with the potential for improved developer contributions for facilities and services which promote positive health outcomes. The greater concentration of people in broadly accessible locations ought to promote active travel choices and their associated positive health outcomes.
- 6.29 Option 3 would perform similarly to Option 2, with the increased density (and associated effects) in the Key Area offsetting the reduced densities (and associated effects) in the Transition Zone and Development Corridors.
- 6.30 Overall, the increased density in central areas under Option 2 and 3 would be expected to result in some minor increased developer contributions towards new/ improved/ expanded healthcare provisions and green/ recreational spaces. Furthermore, the accessibility of development might promote an increased uptake in active travel, promoting positive health outcomes. Option 1

would perform similarly, though to a marginally lower magnitude (as reflected in the ranking of options). No significant effects are considered likely.

Health and wellbeing	Option 1	Option 2	Option 3
Significant effect?	No	No	No
Rank	2	=1	=1

Historic environment

SA Objective: Protect, maintain, and enhance the rich variety of cultural and built heritage within the Neighbourhood Plan area.

- 6.31 North Kingston has a strong historic character, comprised of both individual structures as well as broad areas which are designated at both the national and local levels. The neighbourhood area contains four conservation areas, borders others (to the east, north and western extents) alongside Grade II listed buildings, locally designated 'Strategic Areas of Special Character', 'Local Areas of Special Character' and 'Archeological Priority Areas' and abuts two registered parks and gardens. The neighbourhood area includes locations which are in the setting of adjacent heritage assets.
- 6.32 Each option has the potential to ensure that the character of development is aligned with the historic character of areas and respects the importance of the setting and significance of both local and nationally designated heritage assets. The difference in effects between options therefore relates to how the density of development might impact the setting and significance of areas and assets.
- 6.33 Local designations ('Strategic Areas of Special Character', 'Local Areas of Special Character' and 'Archeological Priority Areas') are largely located within the Suburban Area and so effects would be expected to be aligned across all Options, though some of the variations in buildings heights and density in the Key Area, Transition Zone and Development Corridors may impact their setting, where in closer proximity.
- 6.34 Option 1 would seek to support taller buildings and higher densities in the Key area, with a staggered approach to heights and densities in the Transition Zone and Development Corridors. Whilst overall average building heights might be expected to increase in the Key Area, Transition Zone and Development Corridors, this approach would seek to minimise particularly high buildings and help to retain the character of historic areas in respect of building heights. Increased building height in the Park Road Conservation Area might lead to some more pronounced effects, especially considering the importance of the area's existing varied building heights, which brings prominence to the shopping parade¹. A small area of the Key Area would be adjacent to the Riverside North Conservation Area and nearby to the Hampton Wick Conservation Area, which may lead to some effects to their settings, owing to taller building heights within the Key area.

¹ Park Road Conservation Area 2008 [found here](#)

- 6.35 Option 2 would encourage higher buildings and greater densities across a wider area from the Key Area into the Transition Zone and Development Corridors. This would result in a more abrupt transition of building heights between these areas and the Suburban Area, and a greater amount of more dense, taller development within more sensitive settings (including the Park Road Conservation Area as previously set out), as well as a greater area of potentially taller buildings adjacent to and nearby to the Riverside North and Hampton Wick Conservation Areas. Part of the Park Road Development Corridor would intersect with the Kingston Hill Conservation Area. This Conservation area is important in terms of longer views and its landscaped character and so taller development in this Development Corridor might impact both the setting and significance of the Conservation Area.
- 6.36 Option 3 would lead to similar building heights as seen under Option 1, though with some higher buildings within the Key Area, as supported by local policy. The impacts in this respect would lead to an exaggeration of those potential effects outlined under Option 1.
- 6.37 Overall, Option 2 would potentially lead to the most pronounced effects on designated heritage assets and broad areas, owing to the larger area covered by increased building heights and densities. Option 1 would perform best owing to the greatest restrictions on heights and density, with the potential increases in the Key Area under Option 3 leading to the Option ranking between 1 and 2. Significant effects have the potential to take place under all of the options. However this depends on the location, design and layout of development, and the implementation of appropriate policy approaches and masterplanning provisions.

Historic environment	Option 1	Option 2	Option 3
Significant effect?	No	No	No
Rank	1	3	2

Land, soil and water resources

SA Objectives: Ensure the efficient and effective use of land.

Use and manage water resources in a sustainable manner.

- 6.38 The NKNP area is urban and hence considerations in relation to agricultural land are unlikely to be relevant. The efficient use of land in relation to brownfield development is of importance in the urban context, with higher density development more likely to result in increased viability for development to make use of underutilised brownfield land. The nitrate vulnerable zone in the south of the NKNP area is designated for its surface water vulnerability, due to the non-agricultural nature of the area, this is unlikely to be a designation of consideration when comparing the options.
- 6.39 Option 1 would offer higher density, but to a limited amount, in the Key Area, with higher and wider spread density increases under Option 2 and a maximised density in the Key Area would be seen under Option 3. The higher densities associated with Options 2 and 3 might increase the viability of

brownfield development in the Key Area, Transition Zone, and Development Corridors, especially where site contexts are complicated; as such, these Options are expected to perform preferably to Option 1. No significant effects are predicted and the magnitude of effects between the options are likely to be minor.

Land, soil and water resources	Option 1	Option 2	Option 3
Significant effect?	No	No	No
Rank	2	1	1

Landscape and townscape

SA Objective: Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area.

- 6.40 The NKNP area is comprised of distinct character areas. The character of North Kingston changes from the mixed commercial, relatively high-density town centre area extending out into the 19th and early 20th century mainly residential development close to the Town Centre and then into the less dense, predominantly inter-war residential development across the north of the neighbourhood. Development has the potential to lead to the loss of the locally distinct townscape, with taller and greater density developments more likely to lead to more negative effects in this respect. Taller development outside of the Key Area would also be expected to result in negative effects, blurring the transitional arrangement to building heights which currently exists.
- 6.41 Option 1 would seek to support taller buildings and higher density in the Key area, with a staggered approach to heights and densities in the Transition Zone and Development Corridors. Whilst overall average building heights may impact the townscape, this approach would lead to a transitioned arrangement of building heights, from taller development in the Key Area to lower in the Suburban Area. This would minimise exceptionally tall buildings and help to retain the character of gradually transitioning buildings heights which is integral to the local townscape character.
- 6.42 Option 2 would encourage higher buildings and greater densities across a wider area from the Key Area into the Transition Zone and Development Corridors. This would result in a more abrupt transition of building heights between these areas and the Suburban Area, resulting in some potentially significant negative effects.
- 6.43 Option 3 would lead to similar building heights as seen under Option 1, though with some higher buildings within the Key Area, as supported by local policy. This might mean some disrupted views and abrupt transitional arrangements of building heights between the Transition Zone and the Key Area. Negative effects would be predicted, though these are not expected to be significant.

Landscape and townscape	Option 1	Option 2	Option 3
Significant effect?	No	Yes – negative	No
Rank	1	3	2

Population and communities

SA Objectives: 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.

- 6.44 The NKNP area has a greater concentration of shops, services and community infrastructures in the Key Area, and a well distributed set of green spaces, recreational facilities, community and leisure, educational and other relevant uses across the more suburban and transitional locations. Larger development might be expected to give rise to increased viability for developer contributions to fund new and improved community services and facilities and in this sense higher density might be expected to increase this potential. That said, larger developments in the suburban zone might also facilitate such improvements.
- 6.45 In terms of housing, in the absence of a housing requirement figure and an anticipated delivery of sufficient numbers of homes, all options ought to promote positive effects, with variations in magnitude relating to the potential to deliver an appropriate mix of housing types, sizes and tenures. A focus on high density and taller buildings in the key area may lead to increased viability of affordable housing being delivered, however this might be at the expense of a locally relevant mix of housing types and sizes, with smaller apartments more likely.
- 6.46 Option 1 would stagger development densities and heights, potentially supporting the delivery of an appropriate mix of housing types, sizes, and tenures across locations throughout the neighbourhood area. This balanced approach would also locate some elements of higher density development close to the central community infrastructure, whilst also delivering new residential development in suburban areas, closer to more green space and recreational facilities. The spread of development across the neighbourhood area would potentially help to reduce pressures on existing services in any one area of North Kingston.
- 6.47 Option 2 would encourage this greater density of development across the North Kingston Key Area, the Transition Zone and along Development Corridors, these areas. As under Option 1, an appropriate mix of housing types, sizes, and tenures across locations throughout the neighbourhood area would be likely. The higher density spread across a wider area may support an increase in affordable housing delivery in the neighbourhood area. The option might give rise to increased viability of additional developer contributions to community infrastructure in the area, owing to the higher density of development. That

said, there may be some pressures on existing facilities in central areas, due to the increased population in a focused area.

- 6.48 Option 3 would deliver an increased density and height within the North Kingston Key Area, with development in other zones likely to align with local policy requirements (in keeping with current local density and heights). An appropriate mix of housing types, sizes, and tenures across locations throughout the neighbourhood area would be likely. The higher density may support an increase in affordable housing delivery in the neighbourhood area. This focus may place pressure on central facilities due to population increases in a concentrated area.
- 6.49 Overall, each option would be likely to perform similarly overall. The key differences might be seen where Options 2 and 3 would potentially deliver an increase in affordable housing provision in the neighbourhood area, and Option 1 might reduce pressures on existing community infrastructures and services and better provide a locally relevant mix of housing sizes and types. In this context, Option 1 would perform marginally better than Options 2 and 3.

Population and communities	Option 1	Option 2	Option 3
Significant effect?	No	No	No
Rank	1	=2	=2

Transport and movement

SA Objective: Promote sustainable transport use and reduce the need to travel

- 6.50 The North Kingston neighbourhood area is broadly considered to be accessible throughout. In terms of access to and provision of public transport, the south of the area is more accessible, especially within the North Kingston key area and environs. The more residential areas in the centre and north of the neighbourhood area are still considered to have good access to public transport, but to a lesser extent than central areas. The area is not serviced by the underground network, but national rail services operate from two stations along the southern boundary. Cycle routes C30 (Transport for London) runs along the south of the neighbourhood area, with other cycle routes running north-south. Travel within and outside of the neighbourhood area ought to be possible by sustainable means, with development in more central areas promoting this to a greater degree, with this being realised to the greatest extent in the North Kingston Key Area. Dominant behavioural norms mean that any future development would be expected to lead to an increase in vehicle journeys in the area, which could lead to greater congestion in the central areas, and key differences between effects relate to the potential for the location and associated accessibility of development to reduce these rates.
- 6.51 Option 1 would encourage greater densities in the North Kingston Key Area, an area which is considered most accessible. The option would likely result in an increase in sustainable transportation rates in the neighbourhood area.

- 6.52 Option 2 would encourage this greater density of development across the North Kingston Key Area, the Transition Zone and along Development Corridors, these areas. The North Kingston Key Area has greater levels of accessibility than the other zones promoted for higher density development. This strategy might serve to maximise future development capacity in more accessible areas, driving down car dependencies and maximising the potential for increased sustainable transport rates.
- 6.53 Option 3 would not deliver policy designed to influence densities or building heights across the Neighbourhood neighbourhood area. Density would, as such, be subject to local policy. The London Plan directs higher density and taller development to larger centres, and the Kingston Core Strategy highlights Kingston as a focus where this would be supported. The North Kingston Development Brief provides support for higher density development in the Key Area, with support for buildings up to 12 storeys. This would be expected to deliver a higher density than the Neighbourhood Plan preferred option (Option1) in the Key Area. Local policy ensures that in the remainder of the neighbourhood area, development height and density must pay attention to surrounding developments. In the Transition Zone and Development Corridors, buildings are largely three storeys, with some newer developments up to four or five. The Suburban Zone includes development which is, for the most part, up to three storeys. The Option would focus a greater concentration of new development within the North Kingston Key Area, potentially improving the proportion of future residents experiencing good levels of accessibility and sustainable travel rates across the neighbourhood area.
- 6.54 Considering the above, all options would promote an increase in sustainable travel rates to some extent and hence positive effects would be expected. Option 2 would focus the highest level of growth in more accessible areas, with Option 1 encouraging a wider spread growth across the Key Area, Transition Zone and Development Corridors and Option 3 focusing just on the Key Area. Considering this, Option 2 would perform best, followed by Option 3 and lastly Option 1.

Transport and movement	Option 1	Option 2	Option 3
Significant effect?	No	No	No
Rank	3	1	2

Summary

6.55 A summary of the findings from the assessments can be seen at Table 6-1.

6.56 To conclude, it is evident that the reasonable alternative options identified and assessed perform broadly similarly, with only one potential significant effect identified. The nuances between the predicted effects are limited and more distinct for the historic environment and landscape and townscape themes. Options 1 performs preferably in relation to the historic environment, landscape and townscape and population and communities. Option 2 performs preferably in relation to air quality, and transport and movement. Option 3 performs on a par with Option 2 for health and wellbeing and land, soil and water resources. All options are likely to perform similarly for biodiversity and climate change. Option 2 is expected to result in potential significant negative effects for the area's landscape and townscape.

6.57 Considering the local landscape and historic sensitivities, importance within the Neighbourhood Plan objectives and greater magnitude of variance between effects for these themes, Option 1 performs well, when compared to other options.

Table 6-1: Summary of reasonable alternative assessment findings

Theme		Option 1	Option 2	Option 3
Air quality	Significant effect?	No	No	No
	Rank	=2	1	=2
Biodiversity	Significant effect?	No	No	No
	Rank	=1	=1	=1
Climate change	Significant effect?	No	No	No
	Rank	=1	=1	=1
Health and wellbeing	Significant effect?	No	No	No
	Rank	2	=1	=1
Historic environment	Significant effect?	No	No	No
	Rank	1	3	2
Land, soil and water resources	Significant effect?	No	No	No
	Rank	2	1	1
Landscape and townscape	Significant effect?	No	Yes-negative	No
	Rank	1	3	2
Population and communities	Significant effect?	No	No	No
	Rank	1	=2	=2
Transport and movement	Significant effect?	No	No	No
	Rank	3	1	2

7. Establishing the preferred approach

7.1 Considering the NKNP objectives which heavily focus on landscape/townscape and the character of the area, including its historical significance, Option 1 was the Forum's preferred approach.

7.2 In order to gain a better understanding of the NKNP's preferred approach specifically focusing on zones, the policies are set out below.

- **Policy NK3: North Kingston Key Area**

- A. The Neighbourhood Area defines a North Kingston Key Area, as shown on the Policies Map.
- B. Land within the area of the Key Area is considered suitable for higher density, mixed use development. Buildings within the Key Area will be expected to be generally no more than 6 storeys (up to 18 metres).
- C. In exceptional circumstances, buildings may rise to a maximum of 12 storeys (up to 40 meters), where it can be shown that this will achieve a specific benefit such as an important public amenity and a high quality architectural solution to the particular constraints of the site, including the protection of defined strategic and local view corridors, listed buildings and their settings, public amenity, daylighting and sun lighting, privacy and overlooking, unless indicated otherwise in a site-specific policy in the neighbourhood plan.

- **Policy NK4: Transition Zone - Suburban Area**

- A. The Neighbourhood Plan defines a Transition Zone and a Suburban Area of North Kingston, as shown on the Policies Map.
- B. Development proposals in the Transition Zone:
 - i. may comprise schemes of higher densities than the remaining area of North Kingston and between 200-300 habitable rooms per hectare (200-300hr/ha) and buildings that are taller than is characteristic of Canbury, Tudor, and Kingston Gate Wards;
 - ii. that are of 4 storeys or more may be acceptable subject to design of exceptional quality and townscape justification, accompanied by a comprehensive Visual Impact Study; however, the protection of the amenity of existing properties nearby will be paramount; and
 - iii. must follow the requirements of the Design Code including the avoidance of harmful massing of new buildings that would adversely impact on the amenity of existing properties in terms of overlooking, noise, loss of daylighting, traffic generation and general security or would create a significant visual barrier between the town centre and the suburban areas of North Kingston. Views along streets within and on the edge of the zone should only be terminated by well-articulated building frontages and not unsightly rear servicing yards or car park areas.
- C. Development proposals in the Suburban Area of more than 3 storeys will not normally be considered acceptable and if proposed will need to demonstrate a particular public benefit or secure essential social infrastructure as well as architectural quality, together with townscape

justification and no appreciable loss of amenity to neighbouring properties.

▪ **Policy NK5: Development Corridors**

- A. The Neighbourhood Plan defines the Richmond Road and Park Road Corridors as shown on the Policies Map.
- B. Development proposals in the Corridors must follow the requirements of the Design Code and may contribute to an increase in density of up to 300 habitable rooms per hectare (300hr/ha) enabling a gradual development of its character, to enhance and sensitively respond to the existing character by being of high quality and respectful of the immediate surroundings.
- C. While new residential development is expected, particularly above the ground floor level, commercial development, including uses within Parts E as defined in the Use Classes Order 2020, will also be supported, subject to the protection of local amenity and road safety.
- D. Development proposals may increase the predominant height of buildings by adding an additional storey taking the form of medium rise blocks of a maximum of 4 storeys (including any attic accommodation) with associated amenity space or larger buildings with a continuous street frontage. A further additional storey may be considered in exceptional circumstances for designs of high townscape value and if specific additional public amenities are provided.

7.3 North Kingston Neighbourhood Forum (NKNF) opted to adopt the strategy outlined under Option 1 for the following reasons:

'Fundamental to the policies of the Neighbourhood Plan are the dual objectives of maintaining the cherished character of the Neighbourhood and optimising the area's potential to accommodate growth. While much of North Kingston comprises well established residential areas where there are few opportunities for significant new development, there are sites generally to the south of the Neighbourhood close to Kingston's rail and bus stations, with potential. Consequently, this became the Neighbourhood Plan's Key Area where, due to the scale of existing development, larger scale buildings, subject to the Neighbourhood Plan's overarching Design Guide, are more likely to be acceptable. In order to minimise the impact of new development in this area on the rest of the Neighbourhood a Transitional Zone, which includes two corridors where limited potential was identified, has been designated to provide a buffer to the north and east.

Critical to this strategy was the introduction of density guidelines which were developed from the principles outlined in the North Kingston Development Brief prepared in 2016 by RBK following wide-scale public consultation. The Brief focused on a group of sites which have since been partly developed. The new development, now referred to as Queenshurst, thus established an acceptable upper density for future building within the Key Area and informed the densities for a Transitional Zone of adjoining land between the Key Area and the existing, mainly residential areas. The Council's Development Brief also established height limits which the Neighbourhood Plan has adopted within the Key Area and, as with densities, the Neighbourhood Plan proposes that building heights step down through the Transitional Zone to facilitate an orderly transition to the existing, mainly two and three storey development of the surrounding more suburban areas.'

Part 2: What are the SA findings at this stage?

8. Introduction (to Part 2)

Introduction

- 8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current submission version of the NKNP, and the proposed policies contained within. This chapter presents:
- An overview of the appraisal of earlier version of the Neighbourhood Plan, including at 'pre-submission' stage.
 - An appraisal of the current 'submission' version of the NKNP under the nine SA theme headings; and
 - Overall conclusions.

Appraisal of the Regulation 14 Neighbourhood Plan

- 8.2 In March 2021 AECOM appraised the Pre-Submission Regulation 14 Neighbourhood Plan. This appraisal was presented in the version of the SA Report which accompanied the Neighbourhood Plan for Regulation 14 consultation. The SA Report did not provide any recommendations, concluding that "when read as a whole the Neighbourhood Plan is anticipated to result in broadly positive effects in relation to the SA framework."
- 8.3 The Neighbourhood Forum subsequently updated the draft Neighbourhood Plan in response to a number of matters raised through Regulation 14 consultation (April 2021), and to reflect the latest national and regional policy framework (namely the London Plan (adopted 2021) and the emerging Royal Borough's Local Plan).
- 8.4 Changes have subsequently been made to the submission version of the Neighbourhood Plan to resolve issues raised and align with higher level planning policy. This includes updates to a number of the Neighbourhood Plan policies and the supporting evidence base.

Approach to the appraisal

- 8.5 The appraisal is structured under the nine SA themes, linked to the SA objectives identified through scoping, as presented in Table 3.1.
- 8.6 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.
- 8.7 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

8.8 The NKNP contains 34 policies, as listed in Table 8.1 below:

Table 8.1 NKNP policies

Policy	Name
Design Policies	
Policy NK1	Design Quality, Character & Context
Policy NK2	Sustainable Design Standards
Policy NK3	North Kingston Key Area
Policy NK4	Transition Zone – Suburban Area
Policy NK5	Development Corridors
Policy NK6	Local Views
Policy NK7	Conservation Areas & Local Areas of Special Character
Policy NK8	‘Neighbourhood’ Locally Listed Buildings
Business & Community Policies	
Policy NK9	Local Shopping Parades
Policy NK10	Public Houses
Policy NK11	Community Facilities
Policy NK12	Access and Movement
Environmental Policies	
Policy NK13	Zero Carbon Buildings
Policy NK14	Climate Resilience
Policy NK15	Green Infrastructure
Policy NK16	Local Green Spaces
Policy NK17	New Pocket Parks
Policy NK18	Public Realm
Site Specific Policies – Key Development Sites	
Policy NK19	Sury Basin
Policy NK20	Canbury Place Car Park/ Kingsgate Road
Policy NK21	Canbury Business Park
Policy NK22	Cowleaze Road
Policy NK23	St George’s Industrial Estate
Policy NK24	London Road/ Kingston Hill Roundabout
Policy NK25	Manorgate Road
Site Specific Policies - Privately Owned Sites	
Policy NK26	Park Road Scout Hall
Policy NK27	The Seven Kings Car Park
Policy NK28	Richmond Road Petrol Station
Site Specific Policies – Public Sector Owned Sites	
Policy NK29	The Keep
Policy NK30	Elm Grove
Policy NK31	Acre Road (Murray House)
Policy NK32	Canbury Court Garages
Policy NK22	St Luke’s Primary School
Policy NK34	Kingston Fire Station

9. Appraisal of the submission North Kingston Neighbourhood Plan

Plan contents, aims and objectives

- 9.1 The North Kingston neighbourhood area is situated in the Royal Borough of Kingston upon Thames in south-west London. It encompasses the adjoining historic wards of Canbury and Tudor (now comprising Canbury Gardens, Tudor and part of Kingston Gate, west of Queen's Road) and forms the northern part of the Borough's boundary with the London Borough of Richmond upon Thames.
- 9.2 North Kingston is a mature generally built out suburban area on the fringe of Kingston town centre, extending to the boundary with Richmond at Ham Parade. The neighbourhood area is predominantly residential, punctuated by open spaces, including 6 formal parks and open fields, smaller green spaces, allotments and public areas; schools with local shopping parades, business premises and a range of community facilities and places of worship within its well-defined boundaries: enclosed by the River Thames at its western boundary, Richmond Park – a Grade I Registered Park and Garden, Special Area of Conservation, National Nature Reserve and a Site of Specific Scientific Interest – to its east, the aforementioned Borough boundary in the north and the railway line defining its southern boundary. This variety of land uses supports a reasonably sustainable community with a population of 21,951, the majority of which is aged between 30 to 44, with the highest population of children in the former Canbury Ward compared to the wider Borough.
- 9.3 The NKNP sets out in further detail the character and context of North Kingston, recognising that this has been essential in determining how it may best develop in the future. The purpose of the Neighbourhood Plan is therefore to manage the process of change in North Kingston by setting out a series of planning policies that will be used to determine planning applications in the area in the period to 2041. It does so in a way that recognises that some level of growth is inevitable and to show how it can benefit North Kingston without harming its special character.
- 9.4 In this respect, it is recognised that the latest version of the London Plan (adopted 2021) contains a broader range of policies, and expressed in greater detail, than previous versions. The Forum has therefore been mindful not to repeat its development policies but instead to refine them so they can be suitably applied to North Kingston, as opposed to some other part of the Borough or suburban London.
- 9.5 It is recognised that the Neighbourhood Plan must be in conformity with the strategic policies of the new London Plan. Its Policy SD1 identifies Opportunity Areas across the capital as the main focus for development growth over the next few years. It includes Kingston as an Opportunity Area for delivering 9,000 new homes and 5,000 jobs by 2041 and expects that it will be based on the Borough's network of town centres. The policy does not define the Area but requires the Boroughs to do so in their development plans.
- 9.6 The wider strategic framework includes series of objectives and proposals that will drive change in parts of North Kingston. Crucial to North Kingston is the

significant shift taken in approach to design, particularly in relation to managing densities. Policy D9 of the London Plan sets out a strategy for tall buildings and establishes a minimum six storey building height (18 metres). It requires Boroughs to define what is meant by 'tall buildings' and to define what parts of their area are suitable for this type of development.

9.7 In light of the above context, alongside the assessment of reasonable alternatives presented in Chapter 6 of this SA Report, the NKNP identifies three key zones within the neighbourhood area:

- The North Kingston Key Area: which is a key area of change with more Urban characteristics and generally within 100m of Kingston Railway Station, suitable for taller buildings as defined by the Neighbourhood Plan policies.
- The Transition Zone and Key Corridors: where a more gradual building height and density transition from the Urban area towards the more Suburban Area is appropriate as defined by the Neighbourhood Plan policies.
- The Suburban Area: which is more than 800m away from the main transportation hubs of the Cromwell Road Bus Station and the Kingston and Norbiton Rail Stations where lower height and density is more appropriate as defined by policies in the Neighbourhood Plan.

9.8 The NKNP also identifies parts of North Kingston that cannot accommodate change without significantly undermining their value as places to live and enjoy. These places are protected through the NKNP from harmful development.

9.9 The NKNP does not attempt to plan for and meet a specific housing target; instead, it sets out a range of site-specific and area policies that reflect a majority view on how best to manage the scale and nature of change expected. The focus for new development is therefore placed on a small number of brownfield sites in the Intensification Zone. It is reiterated that the site-specific policies are not intended to allocate sites, and that the neighbourhood plan does not depend on any sites to meet any housing requirement subject to the Policies of the Council's Local Plan.

9.10 Instead, through the policy framework, the NKNP proposes a small number of key development principles for each site, that should ensure that the strategic policy objectives will be met over the next twenty years or so. The site-specific policies set out what are considered to be appropriate development capacities that have resulted from a meaningful engagement and collaboration with the local community and other relevant stakeholders. This includes providing a finer grain of design coding, combining elements of London Plan design policies D1 – D5, as well as D9.

9.11 An important aspect of the wider NKNP is the introduction of Design Codes, which are encouraged by Government to maintain standards of good design. Alongside this, the policy framework focuses on broad spatial principles identified through community consultation. This includes the need to protect green spaces, ensure access to adequate community facilities and services, support quality employment opportunities, and protect and enhance local heritage and architectural character, as represented by the existing building stock.

Air quality

- 9.12 The entire London Borough of Kingston, and therefore the whole of the neighbourhood area, is covered by an Air Quality Management Area (AQMA), declared in 2003. In this context there is potential for development to affect poor air quality.
- 9.13 Within the AQMA at a Borough-wide scale there are two Air Quality Focus Areas (AQFA). The Kingston Bridge/Kingston St/Wheatfield/Kingston Hall Road/London Road AQFA is found in the south of the neighbourhood area, encompassing the North Kingston Key Area and the southern part of the Transition Zone. Furthermore, data from the London Atmospheric Emissions Inventory (2019) reveals the A307, A308 and Park Road as key hotspots for poorer atmospheric emissions largely relating to road transport. In the context of the SA objective to ensure new development does not expose residents to areas of poor air quality, the AQFA and coinciding emission hotspots are clearly of significance.
- 9.14 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.
- 9.15 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.
- 9.16 Policy NK2 (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 proposals for new development will be expected to follow the recommendations and actions outlined in the Royal Borough's Air Quality Action Plan 2021-2026 as adopted by Kingston Council. Furthermore, contractors will be expected to respect the requirements of the Considerate Contractors Scheme, and commit to best practice on air pollution management during construction.
- 9.17 The supporting text of Policy NK2 also "welcomes the introduction of electric vehicle charging infrastructure to the area as and when agreed by the local community." This should "embrace new and emerging technological innovation

over and above the current charging bay propositions”, delivering a reduced dependency on emissions-generating transport modes over time.

- 9.18 Overall, the plan does not seek to allocate sites and therefore cannot directly determine the distribution of growth in the neighbourhood 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.
- 9.19 It is however recognised that the three sites within the AQFA are identified within the emerging Local Plan for allocation. The provisions of the NKNP policies generally match those of the emerging Local Plan policies; providing further localised guidance to development where it may come forward outside of the Neighbourhood Plan. As such, residual effects of the NKNP are considered to be neutral overall.

Biodiversity

- 9.20 Although the neighbourhood 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 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 neighbourhood area.
- 9.21 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.
- 9.22 The London Plan requires that the city’s network of green and open spaces, and green features in the built environment should be protected and enhanced. It encourages green infrastructure to be planned, designed and managed in an integrated way to achieve multiple benefits, a policy objective shared with the emerging Local Plan Policy KN1 on green infrastructure. Neighbourhood Plans can identify local green infrastructure features and can identify opportunities for addressing local environmental and social challenges through specific policy actions (Policy G1).
- 9.23 This is reflected through NKNP Policy NK15 (Green Infrastructure), which identifies that the Green Infrastructure (GI) network of the neighbourhood 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 “by reference to nationally adopted guidelines or other appropriate recognised criteria demonstrate how the scheme will maintain or enhance the function of

the Network.” Furthermore, “all landscape proposals should demonstrate a net gain in biodiversity”.

- 9.24 Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact (‘net gain’) on biodiversity, compared to what was there before development. In England, BNG is mandatory for major developments from 12th February 2024, and for small sites from 2nd April 2024, under Schedule 7A of the Town and Country Planning Act 1990. The requirement set out performs positively in terms of aligning with national policy, which will also apply to the site specific policies (Policy NK19 – NK34).
- 9.25 Looking at the site specific policies, 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) and NK34 (Kingston Fire Station) perform well against biodiversity objectives. These policies specifically identify the potential for planting or greening within the respective sites, which, in line with national net-gain requirements, ought to be approached in a way which supports flora and fauna.
- 9.26 Policy NK2 (Sustainable Design Standards) recognises the significance of Green Infrastructure as a biodiversity feature, and its role in supporting climate objectives; notably requiring proposals to retain mature healthy trees and integrate these features into the design of new development. Policy NK16 also performs well, providing Local Green Spaces with the same protection as that which applies to the Green Belt or Metropolitan Open Land as per London Plan Policy G4 and Policy KN6 of the emerging Local Plan. This includes a number of green spaces within the neighbourhood 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.
- 9.27 The supporting text of Policy NK16 (Local Green Spaces) also 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.
- 9.28 Similarly, Policy NK17 (Pocket Parks) supports the principle of a change of use at Richmond Park Road and East Road to facilitate the creation of ‘pocket parks’ at areas of currently derelict or underused land. While the main policy intent is the enhanced amenity value that renovated parks will bring to areas, pocket-parks are now considered an essential tool for biodiversity conservation in high-density urban areas.
- 9.29 Overall, the Neighbourhood Plan has potential for **minor positive effects** in relation to the biodiversity SA objective.

Climate change

- 9.30 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, and the NKNP seeks to respond to this, alongside the recent signing into law of the legally binding national target of net zero carbon emissions by 2050 and the need to plan new development in ways to avoid vulnerability to climate change impacts in line with NPPF paragraph 150.

- 9.31 The Forum recognise that above issues will become more prominent during the life of the Neighbourhood Plan, and therefore in line with Policy NK2 (Sustainable Design Standards) proposals for development within the neighbourhood area must mitigate the effects of, and adapt to, climate change. Policy NK2 requires that the design of proposals should be informed by the 10 characteristics of 'well-designed places' set out in the National Design Guide, recognising that they work to positively address environmental issues affecting climate.
- 9.32 Policy NK2 is extensive in detail, notably explaining that proposals will be expected to make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy; manage surface water; and make efficient use of natural resources (including water), by making the most of natural systems to reduce vulnerability to climate change impacts over the lifetime of the development.
- 9.33 Further, the detail surrounding sustainable transport infrastructure encourages the improvement of pedestrian networks and footpaths, cycle routes and storage, alongside a specific travel plan for commercial and educational developments. Additionally, ensuring proposals take 'all available steps to reduce flood risk' meets the SA objective of sustainable flood management through sensitive design.
- 9.34 The policy also required that there should be no net increase in impermeable area with the use of sustainable drainage systems (SuDS), green roofs and rain gardens, and/or storage and use of rainwater. This requirement recognises that periods of flooding will become more frequent due to climate change as seen in July 2007 and most recently in August 2020 where significant surface water flooding was experienced at multiple locations in the neighbourhood area.
- 9.35 The introduction of pocket parks in Policy NK17 (Pocket Parks) highlights that the Borough may be exploring a Flood Alleviation Scheme for the Acre Road Area, recognising that this is within the Critical Drainage Area CD008. The policy also highlights that the Borough will be updating their Surface Water Management Plan in due course, and seeks to ensure that Pocket Parks are part of the wider Borough strategy for sustainable drainage (SuDS).
- 9.36 The London Plan requires development plans to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling as part of the wider Healthy Streets approach of its Policy T2. Emerging Local Plan policies KT2 and KT3 on sustainable travel and infrastructure have the same intention. Policy NK12 (Access & Movement) is inspired by both higher level policies, and complements the other spatial policies of the Neighbourhood Plan by identifying specific opportunities to actively encourage walking and cycling through North Kingston as part of a wider programme of actions.
- 9.37 The supporting policy content notably specifies 'smaller local roads and shopping parades should also be enhanced with improved pedestrian realms and green connectivity'. This is reinforced 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. Policy NK15 further references strategic policies KN1: “Green and Blue Infrastructure”, Policy KN2 “Open Spaces”, Policy KN3 “Biodiversity”, KN4 “Urban Greening and Trees” and Policy KN5: “Food Growing” of the draft Local Plan, recognising that green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.

9.38 Policy NK13 (Climate Change Mitigation - New Buildings) is intended to deliver a “step change” in the energy performance of all new developments in the neighbourhood area and, in doing so, encourage and incentivise the use of the Passivhaus or equivalent standard of building design. Along with the passive design capacity assessment, the policy anticipates that designers will use a design for performance methodology such as the Passivhaus Planning package or CIBSE TM34 Operational Energy. Achieving this level of performance will make a significant contribution to mitigating climate change that the Neighbourhood Plan can deliver. The emerging Local Plan Policy KC7 on minimising greenhouse gas emissions seeks much the same outcome – requiring an Energy Strategy to be verified against the performance in use – and the provisions of this policy are intended to implement KC7 in a practical way.

9.39 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).

9.40 Overall, the Neighbourhood Plan has potential for **minor positive effects** in relation to the climate change SA objective.

Health and wellbeing

9.41 The focus of the health and wellbeing SA objective is broad, seeking the improvement of the health and wellbeing of residents within the neighbourhood 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.

9.42 Policy NK2 (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.

9.43 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 help provide protection against the unnecessary loss of such facilities. Specifically, Policy NK11 links to Strategic Policy KS1: "Social Infrastructure" and policy KS4 "community Facilities" of the draft Local Plan.

- 9.44 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.
- 9.45 Policy NK15 (Green Infrastructure) identifies a Green Infrastructure Network for the purposes of promoting sustainable movement and ecological connectivity through and beyond North Kingston. The Network comprises parks, the riverbank, front gardens, street trees, public amenity land, allotments, footpaths, and cycleways; delivering multiple health benefits for residents. As set out in the London Plan (Policy G1) identifying local green infrastructure features through Neighbourhood Plans can present opportunities for addressing local environmental and social challenges through specific policy actions.
- 9.46 Policy NK16 (Local Green Spaces) designates 11 locations within the neighbourhood area as Local Green Spaces, restricting their development other than in very special circumstances. Each space is considered to meet the tests set out in paragraph 100 of the NPPF, with the methodology for selection set out in the separate Local Green Space Study. Supporting policy text details how key spaces contribute to environmental, economic and health and wellbeing benefits; and sets out ambitions for the future of these spaces to support the public realm and maximise benefits for users.
- 9.47 In terms of the key development sites, noteworthy is Policy NK20 (Canbury Car Park/Kingsgate Road), which 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. These proposals are likely to benefit residents within the surrounding area through greater accessibility to leisure and recreational space.
- 9.48 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.
- 9.49 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.
- 9.50 Overall, the Neighbourhood Plan has potential for **minor positive effects** in relation to the health and wellbeing SA objective.

Historic Environment

- 9.51 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 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 neighbourhood area.
- 9.52 Policy NK6 (Local Views), NK7 (Conservation Areas and Local Areas of Special Character) and NK8 ('Neighbourhood' 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 area, saying that new development must not be "overly intrusive, unsightly, or prominent to the detriment of the view" in any of the three at either the "foreground ... middle ground and background" of the view.
- 9.53 Policy NK7 extends policy protection to the neighbourhood area's four conservation areas alongside the five existing Local Areas of Special Character (LASC). NK7 also identifies an additional four areas for LASC designation, defining them clearly on the proposed policy map. It is recognised that the Royal Borough's Conservation Areas will shortly be under review through the new Local Plan process. While the Neighbourhood Forum are unable to propose an area of special character for Conservation Area status, the LASC designation is a springboard for this mechanism downstream. The areas identified for new LASCs gives the community the opportunity for a 'quicker route' to Conservation Area status should they choose to do so. It is also noted that new Conservation Area Appraisals/ Management Plans are being delivered as part of the review process, which will provide up to date evidence and guidance for the protection and enhancement of assets.
- 9.54 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 specific 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.
- 9.55 Policies NK1 (Design Quality, Character and Context) and NK2 (Sustainable Design Standards) place focus on high quality design and sustainability, and the need for new development to maintain the area's natural systems and local character; to the benefit of the local historic environment. Notably Policy NK1 establishes a Design Code of important principles applying to any development in North Kingston, in addition to any site-specific policy that may also apply. The principles are consistent with those of the London Plan (Policy D4), with the policy also requiring proposals have specific regard to Local Plan design policies of relevance. Policy NK1 highlights the importance of ensuring quality

design for new development in the neighbourhood area, identifying 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'.

- 9.56 Policy NK3 (North Kingston Key Area) outlines 'North Kingston Key Area' where development of up to six storeys with higher density are considered suitable. In exception circumstances, buildings may rise to a maximum of 12 storeys (up to 40 metres including roof plant), where this will achieve a 'special benefit'; for example delivering important public amenity and a high quality architectural solution to the site's constraints. Policy NK4 subsequently identifies a 'Transition Zone and a Suburban Area of North Kingston' where four (Transition Zone) and three (Suburban Area) storey development proposals may be acceptable assuming a range of established criteria (including following the requirements of the Design Code) are met.
- 9.57 Policies NK3 and NK4 are intended to manage the relationship between the Town Centre area and the surrounding suburban areas of North Kingston so that the transition from the one to the other is not stark. It is necessary because it is anticipated that, with the steer of the London Plan (identifying the Kingston Opportunity Area to deliver part of 9,000 homes and 5,000 jobs over the next decade), the new Local Plan will contain policies for the Opportunity Area that will lead to significant changes in established building heights and plot densities. Policy D9 of the London Plan already defines a minimum height of tall buildings as 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Policy NK3 therefore defines tall buildings and the area, the Intensification Zone, where tall buildings may be more appropriate.
- 9.58 It is noted through the supporting policy text that Historic England's Advice Note 4 on Tall Buildings should continue to be followed, which states; "if the building is not in the right place and well designed a tall building, by virtue of its size and widespread visibility, can also seriously harm the qualities that people value about a place." The NKNP therefore seeks to ensure that the quality of the architectural design of any such proposed development will be paramount. Policies perform well in terms of meeting key SA objectives regarding addressing varying design requirements for sites of differing built heritage.
- 9.59 In terms of the key development sites, noteworthy are Policies NK24 (London Road/Kingston Hill Roundabout) and NK25 (Manorgate Road) which 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.
- 9.60 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. The policies provide a further level of protection to the assets, requiring that proposals accord with the Design Code, and "as part of the design strategy

proposals must: conserve and enhance the significance of the Conservation Area.”

- 9.61 Overall, the historic environment policies take a proactive and broad based approach to the protection of North Kingston’s built and cultural heritage, while also providing area wide, and site specific policy requirements to conserve and enhance assets. **Minor positive effects** are anticipated in relation to the historic environment SA objective.

Land, soil and water resources

- 9.62 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.
- 9.63 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 neighbourhood area identified for their current benefits to the setting and community.
- 9.64 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 neighbourhood 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 eleven spaces that are to be protected to the same degree as Metropolitan Open Land (as per London Plan Policy G4 and Policy KN6 of the emerging Local Plan), for the benefit of effective and efficient use.
- 9.65 Policy NK2 (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.
- 9.66 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 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

- 9.67 In recognition of the varied character within the NKNP area, with high density at Kingston town centre in the south contrasting with low density suburban development in the north of the neighbourhood area, the NKNP places strong emphasis on managing the transition between character areas. Policy NK1 (North Kingston Key Area) identified, via the policy map, the area around the town centre which is “considered suitable for higher density, mixed use development”, anticipated to “generally no more than six storeys”. Furthermore, “in exceptional circumstances, buildings may rise to a maximum of 12 storeys in height.”
- 9.68 Policy NK4 (Transition Zone – Suburban Area) defines a ‘transition zone’ to “manage the relationship between the Town Centre and the surrounding suburban areas, recognising that policies within the new Local Plan will lead to significant changes in established building heights and plot densities in North Kingston. The Transition Zone will 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 and “may comprise schemes of higher densities than the remaining area of North Kingston.”
- 9.69 It is considered that the surrounding suburban streets can accommodate some degree of change through intensification but not wholesale change, especially if they have been defined as Local Areas of Special Character in Policy NK7. As such, “development proposals in the Suburban Area of more than 3 storeys will not normally be considered acceptable.” If proposed, proposals will need to demonstrate “a particular public benefit or secure essential social infrastructure as well as architectural quality, together with townscape justification and no appreciable loss of amenity to neighbouring properties.”
- 9.70 In accordance with Policy NK1 (Design Quality Character and Context) new development will generally be expected to “maintain the area’s essential character and be in scale with its surroundings, successfully blending ‘elegance with functionality’”. North Kingston has a number of character areas, reflecting the neighbourhood 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 neighbourhood area-wide scale. Detailed design guidance is however provided through the Neighbourhood Plan’s Design Code, which development proposals must have regard to.
- 9.71 In this context, it is notable that Policy NK7 extends policy protection to the five existing Local Areas of Special Character (LASC), and 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 neighbourhood area and their preservation will help sustain the vitality of North Kingston’s identity and sense of place.
- 9.72 Overall, the policies of the neighbourhood area anticipated to give rise to minor positive effects in relation to the landscape and townscape SA objectives.

Population and communities

- 9.73 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 Submission Plan.
- 9.74 Policy NK11 (Community Facilities) identifies those community facilities (buildings and land) that will be protected from change of use by the application of Core Strategy Policy DM24 and in accordance with the same steer given by London Plan policies S2 – S5, and emerging Local Plan Policy KS4. Policy NK11 further supports the delivery of new community facilities, in addition to the upgrade/ expansion of existing facilities, recognising that demand will likely increase over the plan period in light of predicted population growth. A range of local services will be supported where the community's needs are reflected (noting support for a community/ cultural hub alongside specialist care facilities), they reflect design requirements, and are “accessible to the community it serves”. Ensuring accessibility of facilities will support a well-functioning neighbourhood, helping to encourage walking/cycling over driving and supporting less-mobile residents.
- 9.75 It is highlighted through the supporting policy text that in some cases, facilities in areas identified for population growth will struggle to remain economically viable, rather than the limitations of the premises, land or location being the issue. Policy NK11 “strongly resists” the loss of existing community facilities, unless there are suitable re-provision or replacement facilities, an assessment shows the facility is surplus to requirements, or the loss relates directly to a wider public service transformation programme which demonstrates that there will be no harm to accessing facilities in North Kingston in a safe and convenient way.
- 9.76 Policy NK16 (Local Green Spaces) provides a list of eleven protected sites of importance, providing communities powers to ‘rule out’ new development within these areas. Policy NK16 links to Strategic Policy KN1 “Green and Blue Infrastructure”, which encourages green infrastructure to be planned, designed and managed in an integrated way to achieve multiple benefits, a policy objective shared with London Plan. The NKNP therefore identifies a Green Infrastructure Network (Policy NK15), comprising parks, the riverbank, front gardens, street trees, public amenity land, allotments, footpaths, and cycleways. New assets are also encouraged to join the network; notably a proposed new green corridor will help link existing corridors with parks and Local Green Spaces discussed above.
- 9.77 Consideration is also given to Policy NK17 (Pocket Parks) in this respect, which will help further link the Green Infrastructure Network across the neighbourhood area. Policy NK17 describes the proposal to alter the use of pre-existing land to support ‘pocket parks’ in Richmond Park Road and East Road, to the south east part of the neighbourhood area where public facilities/ green resources are currently lacking. 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.
- 9.78 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.

9.79 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.

9.80 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.

9.81 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 eight Local shopping parades and their provision, mainly concentrated in the southern half of the neighbourhood 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.

- 9.82 Overall, it is considered that the NKNP provides robust support for the development of a very significant number of new homes within the neighbourhood 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 Plan promotes the protection and enhancement of community facilities, alongside green infrastructure to support accessible connected neighbourhoods. As such, development is likely to result in significant positive effects in relation to the Population and Communities SA objective.

Transport and movement

- 9.83 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.
- 9.84 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 supporting proposed residential and employment schemes in the southern west side of the neighbourhood 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.
- 9.85 Policy NK5 (Key Development Corridors) identifies two Corridors in North Kingston that are considered suitable and capable of increasing their capacity to accommodate new housing and other development in comparison to the surrounding suburban area. This aligns with objectives of the London Plan, which encourages plans to realise the potential for new housing within and on the edges of town centres through mixed-use or residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport (Policy SD6).
- 9.86 Policy NK2 (Sustainable Design Standards) performs positively in relation to transport objectives, requiring that proposals for development must be well designed, contribute to health and well-being and mitigate the effects of, and adapt to, climate change. The design of proposals should be informed by the 10 characteristics of 'well-designed places' set out in the National Design Guide; one of which is 'movement'. The Design Guide sets out that successful development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries. Well-designed places will provide journey choices and prioritise pedestrians and cycling to support active travel uptake. This is reiterated through Policy NK2's supporting text, which states that new development shall embrace the Government's guidance on "active travel".

- 9.87 Policy NK12 (Access and Movement) provides clear direction in this respect, identifying and proposing 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.
- 9.88 Site specific policies are also of note, encouraging clean and sustainable modes of travel, and seeking to contribute towards an improved network. 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'.
- 9.89 In terms of the wider policy framework, 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.
- 9.90 The Public Transport Accessibility Level (PTAL) is an indication of the degree of availability of key transport services for residents within a neighbourhood 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.
- 9.91 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.

10. Conclusions

- 10.1 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. Neutral effects are anticipated in relation to the air quality SA objective.
- 10.2 Significant positive effects are predicted in relation to the population and communities objectives due to the plan providing 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, underpinned by NKNP policy provisions, could 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 neighbourhood area.
- 10.3 Minor positive effects are predicted in relation to biodiversity given the potential for habitat enhancement, as well as the avoidance of harm to designated sites both within the neighbourhood area and beyond. Similarly, minor positive effects are predicted in relation to 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 areas 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.
- 10.4 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. However, it is recognised that the NKNP does not allocate sites for development, and that the three sites within the AQFA are identified within the emerging Local Plan for allocation. The provisions of the NKNP policies generally match those of the emerging Local Plan policies, providing further localised guidance to development where it may come forward outside of the Neighbourhood Plan, for example through windfall development proposals. As such broadly neutral effects are predicted in relation to air quality.
- 10.5 It is important to reiterate that 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 (or neutral effects) against all SA themes. However, given the NKNP will help shape development in the neighbourhood plan, when read as a whole the Neighbourhood Plan is anticipated to result in broadly positive effects in relation to the SA framework.

Part 3: What are the next steps?

11. Next steps and monitoring

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

Next steps

11.2 The NKNP and this SA Report are being submitted to the Royal Borough of Kingston upon Thames for its consideration. The Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the NKNP meeting legal requirements and its compatibility with the current development plan for the Borough (Core Strategy, 2012 and emerging Local Plan) and the London Plan 2021.

11.3 If the subsequent Independent Examination is favourable, the NKNP will be subject to a referendum, organised by the Royal Borough of Kingston upon Thames. If more than 50% of those who vote agree with the NKNP, then the Neighbourhood Plan will be 'made'. Once made, the NKNP will become part of the development plan for the North Kingston neighbourhood area.

Monitoring

11.4 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.

11.5 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Royal Borough of Kingston upon Thames as part of the process of preparing its Annual Monitoring Report (AMR). No significant effects are considered likely in the implementation of the NKNP that would warrant more stringent monitoring over and above that already undertaken by Royal Borough of Kingston upon Thames.

Appendix A Regulatory Requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table AA.1 overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AA.2 explains this interpretation.

Table AA.1 Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

SA Report question	In line with the SEA Regulations, the report must include... ²
What is the plan seeking to achieve?	An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	- Relationship with other relevant plans and programmes. - The relevant environmental protection objectives established at international or national level. - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SA?	- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. - The environmental characteristics of areas likely to be significantly affected. - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the sustainability 'baseline'?	- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. - The environmental characteristics of areas likely to be significantly affected. - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making / SA involved up to this point?	- Outline reasons for selecting the alternatives dealt with. - The likely significant effects associated with alternatives. - Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	- The likely significant effects associated with the submission version of the plan. - The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan.
What happens next?	The next steps for the plan making /SA process.

² NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Table AA.2 ‘Checklist’ of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’) and Appendix B.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been considered during its preparation;	The SEA framework is presented within Appendix B. Also, Appendix B presents key messages from the context review. With regards to explaining “how...considerations have been taken into account”, Chapter 7 explains the Forum’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to policy zones, which is a ‘stand-out’ plan policy area). Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 5 deals with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Forum’s ‘reasons for selecting the preferred option’ (in-light of alternatives assessment).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.

10.A non-technical summary of the information provided under the above headings

The NTS is provided at the beginning of this SA Report.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying SA report before the adoption of the plan or programme (Art. 6.1, 6.2)

A previous version of the SA Report was published (March 2021) alongside the 'pre-submission' version of the Neighbourhood Plan, with a view to informing Regulation 14 consultation.

The SA must be considered, alongside consultation responses, when finalising the plan.

The SA report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

The Regulation 14 SA Report, alongside consultation responses, informed plan finalisation.

Appendix B SA Scoping

Introduction

This appendix presents additional information on the SA scope, namely key issues under each of the SA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents the SA Framework.

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.
- 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.

SA Framework

The key 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 AA.3** below.

Table AA.4 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.

SA theme	Objective(s)
	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

