

Claygate Parish Council

Draft response to consultation on the Kingston Draft Local Plan

Note to Planning Committee Members and Advisors

The information on Green Belt parcels that Kingston now intend to designate as Grey Belt and, in some cases, promote for potential development, is buried in the Local Plan Evidence Base (<https://www.kingston.gov.uk/planning-and-building-control/planning-policy/local-plan/evidence-base-and-supporting-information>) under Natural Environment - Borough Green Belt Study 2026 (ignore the 2018 Assessment); the document is at <https://www.kingston.gov.uk/sites/default/files/2026-06/RBK%20Green%20Belt%20Study%20Accessible.pdf> . There is nothing specific in the actual Draft Local Plan.

1. The Royal Borough of Kingston upon Thames (RBK) has published a draft of its Local Plan for consultation under Regulation 19.
2. In July 2021 RBK published a Site Assessments Update “welcoming further thoughts and ideas on the sites that have been submitted to us so far.” The sites included three parcels of Green Belt land on the east of the A3 which were identified by RBK as potential building sites and which, if built on, could have a serious adverse effect on Claygate. They were promoted by the landowners as residential-led development, and all three were described by RBK as *available* for C3 housing, but *unsuitable* for C3 housing because they were part of the Green Belt. On 12 August 2021 Claygate Parish Council Planning Committee approved a draft response to the consultation which was sent to RBK by the Clerk.¹ This response reiterated the Parish Council’s objections to development on the Green Belt, and in particular to the proposal by developers to build between 1,500 and 2,500 dwellings on parcel CN01 (Hook Park).
3. Unlike the Site Assessments Update, the draft Site Allocations in the draft Local Plan of 2023 (fig 13.2, page 171) included only one site south of the A3, and that was Kingston Business Park, Fullers Way South, well away from Claygate. There were no sites proposed for development anywhere near Claygate, and in particular none to the east of the A3 in the area adjoining Ruxley Crescent.

With increasing pressure on Green Belt from national planning regulation, the picture has changed again with the final draft for Regulation 19 consultation (2026). The following areas immediately E. of Claygate are marked as “Potentially suitable for definition as grey belt”²:-

- a. Hook Park and the land to the E. (mostly playing field, currently protected under NPPF Footnote 7), parcels KuT2, T1b, T3;
- b. The Lovelace Playing Field, immediately S. of Clayton Road (Ku T4);

1 See Appendices B, B1 and B2 of the Minutes of that meeting,
https://www.claygateparishcouncil.gov.uk/2021_Meetings.aspx

2 Borough Green Belt Study, Chap. 4.

c. An area immediately S. of the Lovelace Playing Field, which appears to form the site of Lovelace Primary School (Ku T5).

However, the accompanying File Note, 'RBK Green Belt Study Fundamental Impact Assessment', divides Green/Grey Belt sites into "Promoted" and "Promoted and Preferred".

Of the areas of concern to Claygate, only Hook Park and the Lovelace Playing Field are "Preferred". We doubt the sustainability of Hook Park on access and transport grounds, as the current development proposals are mired in probably insuperable highway and access issues. We do not consider Lovelace Playing Field a sustainable development site either. It is bounded on three sides by the A3 Esher By-pass, Clayton Road and a network of very narrow residential roads. An exit on to the A3 is scarcely practical, while the other roads are too narrow to carry any increase in traffic. The only viable exit would be across the Lovelace school site into Mansfield Road.

The promotion of playing fields as potential development sites runs contrary to comment 3.4 of Policy K1, Sustainable Locations for Development, which states, "This approach will seek to ensure that whilst development contributes to meeting the Borough's housing and employment needs, Kingston's valuable.... open spaces, Green Belt and Metropolitan Open Land are also protected".³

The discussion of Promoted, but not Preferred, sites is incoherent and inconsistent with the Grey Belt analysis. Promoted sites include a strip of land S. of Lovelace School between the A3 and the "woodland boundary W. of Mansfield Road", the whole of Barwell Court and 1 Virginia Cottage, adjacent to Barwell Court. None of these sites was designated as potential Grey Belt, while the discussion of these sites concludes that they "make a very strong contribution to purposes A and B as they lie within the fragile gap between the large built-up area of Greater London (including the town of Tolworth) and Esher (merged with Claygate and Hinchley Wood). The release and development of these sites have the potential to fundamentally undermine the role of the borough's Green Belt land...". We support this analysis and question the reason for promoting these at all, as promotion invites speculative planning applications which may well prove unacceptable. We would strongly object to any development in these areas of Green Belt.

In conclusion, Claygate Parish Council notes that the 2026 revision of the NPPF is likely to be in force within the next months, and in any case well before the Local Plan is finalised. The definition of Grey Belt is likely to be substantially widened, especially if, as anticipated, the reference to footnote 7 is omitted. We assume that these passages of the draft Local Plan will be reconsidered. If any amendments are proposed, we hope that they will be the subject of a fresh Regulation 19 consultation.

3 Draft Plan p. 32.