

MFM

<b>Ref:</b>  (For official use only)
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**K+20**  
**Kingston Town Centre Area Action Plan**  
 Submission Version  
**REPRESENTATION FORM**  
 Royal Borough of Kingston upon Thames  
 Local Development Framework



- This form should be used to make a representation on the K+20 Kingston town centre Area Action Plan
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**FORMS SHOULD BE RETURNED BY FRIDAY 6 JULY 2007**

**1a. Personal Details**

Title	<input type="text"/>
Name	<input type="text"/>
Job Title *	<input type="text"/>
Organisation *	<input type="text" value="MORLEY FUND MANAGEMENT"/>
Address	<input type="text" value="NO. 1 POULTRY LONDON"/>
Postcode	<input type="text" value="EC2R 8EJ"/>
Telephone Number	<input type="text"/>
E-mail Address* * (where relevant)	<input type="text"/>

**1b. Agent\***

<input type="text" value="MISS"/>
<input type="text" value="HAYLEY CROSS"/>
<input type="text" value="SENIOR PLANNER"/>
<input type="text" value="NATHANIEL LICHFIELD AND PARTNERS"/>
<input type="text" value="14 REGENT'S WHARF ALL SAINTS STREET LONDON"/>
<input type="text" value="N1 9RL"/>
<input type="text" value="020 7837 4477"/>
<input type="text" value="hcross@nlppanning.com"/>

2. Did you raise the matter that is the subject of your representation with the Local Planning Authority earlier in the process of the preparation of the Area Action Plan ie. before it was submitted for examination?

No  Yes (at Issues stage)  Yes (at Preferred Options stage)

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(ie you support the DPD)

**Unsound**  
Go to Question 5  
(ie you consider changes  
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Morley support the recognition that the Bentall Centre and John Lewis buildings are existing landmarks in the town centre.

(Continue on a separate sheet /expand box if necessary)

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HAYLEY CROSS FOR NATHANIEL LICHFIELD AND PARTNERS  
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Signature:



Date:

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K+20 Environmental Services  
Royal Borough of Kingston upon Thames  
FREEPOST KT644  
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KT1 1BR

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PLEASE SEE ATTACHED.

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## POLICY K20 (TOWN CENTRE PARKING) – SOUND

Morley welcome the recognition that transport issues are key to the future prosperity of Kingston town centre. PPG13 indicates that there is a need for accessibility to town centres by a choice of means of transport, including public transport, walking, cycling and car.

For this reason, Morley support the transport objectives set out in the submission AAP, particularly the aim in paragraph 3.20 to make better use of existing parking capacity and reduce queuing. Morley also support recognition that the Council is committed to improving accessibility to the town centre through the sustainable development of the various transport networks, including enhancing rail, bus, cycle and pedestrian networks to meet travel needs, and support the commitment to this shown in Policy K16 (Public Transport). Morley believe that improving the accessibility to the town centre is crucial to maintaining its attractiveness and subsequently its position in the town centre and retail hierarchy.

Morley has raised concerns with the Council over the level of car parking provision in the town centre. Adequate parking is critical to the viability of the centre and the need for additional car parking must therefore be carefully considered, especially given the identified need for new shopping and leisure facilities. Failure to provide adequate parking could alone undermine new retailer investment in the centre prejudicing Kingston's aspirations to maintain its position in the retail hierarchy.

The Council has historically raised with the Council the issue of maintaining adequate car parking capacity following implementation of the proposed major town centre development schemes.

As you are aware, the Council previously initiated discussions with the Council in respect of providing a number of additional spaces on the Car Park B site in order to compensate for car parking that will be lost once the proposed town centre schemes had been developed (e.g. Eden Quarter). The Council were supportive of this in light of the town centre's overall needs. The Council see the re-provision of car parking spaces at Car Park B as being in line with their car parking aspirations and acknowledge that helping to facilitate this redevelopment could provide the solution to this existing town centre issue.

Morley also previously liaised with the Council regarding the Bentall B car park site and the proposed hotel within Character Area 5 (Riverside North) in respect of shared parking but the land owner decided not to continue with the development of a hotel and instead to implement an extant planning permission providing student accommodation. Given this current position, Morley is preparing to commence the redevelopment of Car Park B in order to provide approximately 600 spaces, i.e. its existing provision. It is hoped that this car park will be reopened within 18 months.

Given the Council's previous commitment to allow more car parking on the Bentall Car Park B site in order to replace those to be lost, Morley would like the opportunity to discuss the provision of additional spaces on the Car Park A site to help aid the forthcoming capacity issue. Morley believe that this issue needs to be addressed prior to the implementation of any major town centre schemes and would welcome the opportunity to work with the Council on this matter.

Morley, therefore, welcome Policy K20 (Town Centre Parking) which commits to working with partners, including town centre businesses, car park operators, Kingston Town Centre Management, landowners and developers to make better use of parking capacity and the policies commitment to;

- Maintain public off-street parking at 7000 spaces +/- 700 spaces;
- Implement Proposal Site policies to provide high quality car parks outside the Motor Vehicle Restricted Area, including new and additional parking on Sites P3, P4 and P5 and the removal of public parking from Sites P2 and P13 (which are within the MVRA) associated with major development; and
- Publicise car parks, consider optimum pricing arrangements and improving signage.

Supporting text to Policy K20 states parking is a significant local issue and the parking strategy is a key element of the overall transport strategy for the APP. Morley concur with this statement.

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The Bentall Centre is located within Character Area 1 - Prime Shopping. The key objectives of the Character Area include the provision of high quality mixed use development including landmark shopping facilities to enhance the primary retail area and the provision of public realm improvements. As noted above, it is important that such improvements are created to improve linkage between all areas within the town centre.

Morley support the aims of Policy P1 and Policy P2 (Clarence Street North and South of Clarence Street, Eden Quarter) and considers them to be sound. There is a need to work with existing landowners and developers in order to ensure the implementation of a cohesive retail strategy and to ensure that the new retail offer fully integrates with the existing facilities. This coordination is a role the Council must perform.

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**1b. Agent\***

Title

MISS

Name

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Job Title \*

SENIOR PLANNER

Organisation \*

NATHANIEL LICHFIELD AND PARTNERS

Address

NO. 1 POULTRY  
LONDON

14 REGENT'S WHARF  
ALL SAINTS STREET  
LONDON

Postcode

N1 9RL

Telephone Number

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The Bentall Centre car park is located within Character Area 5 - Riverside North.

Policy P12 (Northern Riverside - Bentalls Car Parks, Vicarage Road and Turks Sites) relates to planning applications for this site's redevelopment. This policy sets out the Council's aspirations in respect of pursuing a comprehensive mixed use redevelopment of the site (excluding Bentall's A car park) to provide a quality, full service hotel; residential including affordable housing; ground floor A1, A3 and A4 uses; a new public open space on the riverside; a high quality landscaped pedestrian route from Wood Street to the riverside; and public car parking.

Morley has historically held discussions with the Council regarding the Bentall B Car park site and the proposed hotel within this Character Area in respect of shared parking. These discussions have now ceased given the decision of the owner of the site to implement an extant planning permission for the provision of student accommodation. Should the Council wish to resume these discussions, Morley would be happy to become involved.

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Morley believe Plan 13 to be unsound against Test of Soundness 6. The plan designates the entire frontage of The Bentall Centre along Clarence Street as a "Building of Townscape Merit". This designation correctly relates to the buildings adjoining the entrance (including the Maurice Webb building) but should not relate to The Bentall Centre, Clarence Street entrance itself.

Morley request that this designation be deleted in respect of the Clarence Street entrance of The Bentall Centre, as shown on the attached plan. This will ensure that the policy aims of Policy KT11 (The Old Town Conservation Area) will not incorrectly restrict development potential at The Bentall Centre.

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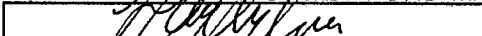
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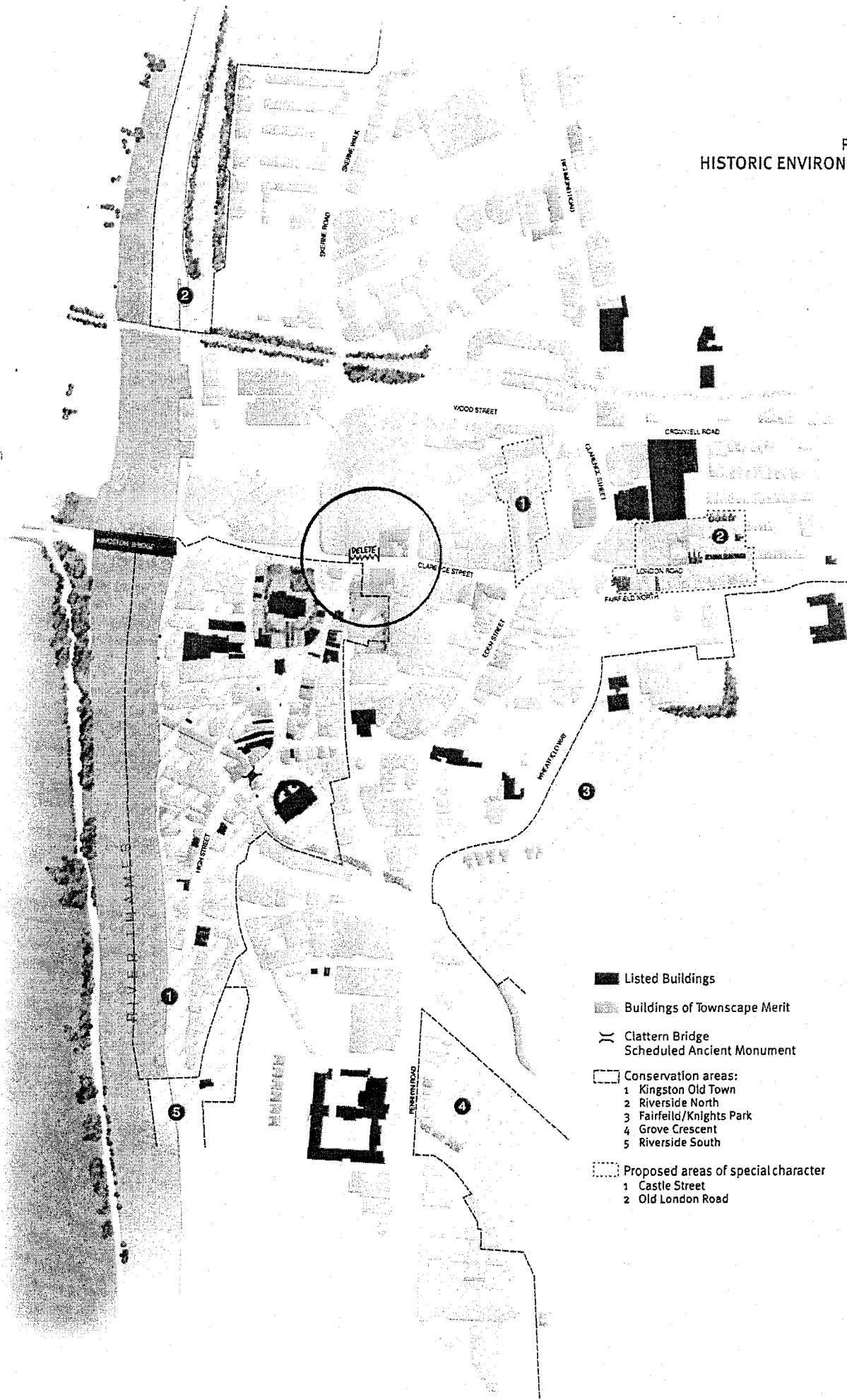
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- Listed Buildings
- Buildings of Townscape Merit
- Clattern Bridge  
Scheduled Ancient Monument
- Conservation areas:
  - 1 Kingston Old Town
  - 2 Riverside North
  - 3 Fairfield/Knights Park
  - 4 Grove Crescent
  - 5 Riverside South
- Proposed areas of special character
  - 1 Castle Street
  - 2 Old London Road