

**K+20 KINGSTON TOWN CENTRE AREA ACTION PLAN
SUMMARY OF REPRESENTATIONS -JULY 2007**

CONSULTEE AND NO. OF REPS.	T of S No.	WR/ ORAL	SUMMARY OF REPRESENTATION
Relevant Government Office			
1. GOL			<p>Refers to meetings and correspondence with RBK on AAP and RBK responses to issues raised by GOL re:</p> <ul style="list-style-type: none"> - Sustainability Appraisal procedures - Assessment of impact on neighbouring centres - Coherence of document - Absence of consideration of relevant alternatives - Implementation and monitoring - Reference to Sustainability Appraisal in AAP
'Specific' Consultation Bodies			
2. Natural England			<ul style="list-style-type: none"> - Ch 4 - AAP 8 key objectives make no specific ref to improvements to bio-diversity, ecology, natural environment - Ch 4 - Refs to enhancement of biodiversity could be more explicit in key proposals - Supports a number of elements of the AAP - Ch 13 - includes suggestions for making some targets/indicators more measurable
3. LB Richmond (4)	4b & 7 7 4b & 4c 6	WR	<ul style="list-style-type: none"> - Ch 5 - Policy K1 – refers to need for balance between largest centres and smaller centres to ensure needs met at local level , there has been no assessment of impact on local and district centres in LBR - Ch 9 - Policy K15 Town Centre Road Network - new road system and associated car parking should not have adverse impact on LBR roads and LBR would welcome evidence on this - Ch 9 - Policy K20 Parking and Appendix 5 – considers high standards of parking already exist in KTC and any additional parking contrary to national and regional planning guidance. Parking standards in Appendix 5 exceed London Plan standards and no justification for this - Ch 12 Site Allocation Rep - Proposal Site Policies for sites P12, P13 and P17a – AAP identifies these sites for Landmark buildings, but with no height limit – this will potentially

			lead to adverse impact on Hampton Wick Conservation Area and conflict with visual and nature conservation objectives of the Thames Landscape Strategy
4. Surrey County Council (1)		WR	<ul style="list-style-type: none"> - Sound - Ch 9 - re cross-boundary issues and Policy K19 Other Accessibility Measures - raises concerns about proposed Park and Ride facilities outside RBK in Surrey - para. 9.20 supporting text to K19 suggests addition of ref. to need for consultation/co-operation with SCC as adjoining highway authority - Refers to significant influence of KTC on retail and service provision in northern Surrey towns and on road traffic and congestion levels affecting Surrey and RBK - Ch 9 - Supports K16 re cross-Surrey boundary bus services and K17 Pedestrian Environment
5. EDF Energy Networks (1)		WR	<ul style="list-style-type: none"> - Comments that EDF underground cables present within AAP boundary
6. Southern Gas Networks (1)		WR	<ul style="list-style-type: none"> - Ch 12 Site Allocation Rep - refers to presence of 3 gas holders, HSE consultation zones around holders, COMAH Regs and need to consult HSE on AAP and Proposal Site P19
7. Thames Water (4)		WR	<ul style="list-style-type: none"> - Ch 11 - 3 Reps Support Soundness: separate Infrastructure provision; Key Objective 8 and para.11.1; Policy K22 and para.11.3. - Support encouragement of SuDs in para.11.9 but request additional text recognising that SuDS not appropriate for use in all areas eg areas with high ground water levels or clay soils which do not allow free drainage
8. PCT (2)	5	WR	<ul style="list-style-type: none"> - Ch 2 para. 2.23 should include greater reference to the health section of the Community Plan - Ch 11 - Policy K22 Town Centre Infrastructure should include greater ref to health - additional text suggested
'General' Consultation Bodies			
9. Kingston Society	5	Oral	<ul style="list-style-type: none"> - Ch 5 Policy K1 Shopping, Plan 8, Proposals Map and Ch 12 Site Allocation Rep re Sites P3 & P4

			<ul style="list-style-type: none"> - consider that proposed increase in retail floorspace is responding to retail and developers interests not local residential community interests. Any increase in footfall will come from wider catchment area to the discomfort of residents. Retail given greater prominence in AAP than other issues eg. Library - Ch 4 & 5 - Policy K6, paras.4.4 & 5.25, concerned that AAP does not propose new Library within relief road as part of Eden Quarter proposals. - Ch 12 Site Allocation Rep re Sites P2 and P3, para. 4.8 only refers to improved Library, with no ref. to new library within the relief road.
10. Friends of Kingston Museum (2)	5 & 7 5	WR	<ul style="list-style-type: none"> - Ch 4, 5, 12 & 13 - re Library and Museum – Ch 12 Site Allocation Rep re Policy P6 Kingfisher/ Kingston Library/Museum Area and Ch 5 para.5.25 pg 50 - Requests addition of reference to Museum after various refs. to an improved library at: AAP summary; para. 4.8 pg 31; Policy K6 Schedule 1 pg 172 & Schedule 2 Policy P6 - Objectives for Character Area 8 High St OTCA – Plan pg 151 requests additional arrow indicating significant view to the Coronation Stone from southern end of Market Place
11. Kingston Chamber of Commerce (1)	7	Oral	<ul style="list-style-type: none"> - Ch 3, 4, 5 & 9, Key Objective 6, Para.9.4 and Plans 5 and 9 - Comparison of Plans 5 (transport links to KTC) and 9 (Retail catchment area) reveal serious mismatch re public transport. AAP does not address how proposed improvements to public transport especially from the south and west can be dealt with at the strategic level.
12. Kingston Area Travellers (1)	2A	Oral	<ul style="list-style-type: none"> - Buses - Requests details of size of new bus station, explanation of alterations to Fairfield bus station and bus stops. Would prefer one central bus station instead of 3 bus stations.
13. Network Rail (1)	7&9	WR	<ul style="list-style-type: none"> - Ch 12 Site Allocation Rep re Proposal Site P10 Plans 20/21 -object/unsound as without inclusion of Residential as an appropriate use consider development potential marginal and proposed uses not financially viable. No grounds to exclude residential as student housing is proposed - Support upgrading of Station

14. Metropolitan Police Authority (7)		WR	<ul style="list-style-type: none"> - Ch 2, 5, 6, 9 and 10- Support Key Objective 7 & Policy K21; para. 5.2; Policies K2, K5, K9, K19, K21 & K23. - Ch 11 para. 11.5 - request Police Facilities be added to list of Planning Obligations alongside Safety and Security Measures
15.HM Courts (3)	9	WR	<ul style="list-style-type: none"> - Ch 5 - Policy K5 Public Admin, Courts etc – Support policy, refers to egs where it may be appropriate to relocate Court facilities as part of wider site proposals and suggests additional wording for text of K5 to allow for this and provide greater flexibility - Ch 12 Para. 12.62 Objectives for Character Area 9 Civic and Education – again requests additional wording so Court facilities not precluded elsewhere - Ch 12 Site Allocation Rep - Proposal Site P14 Guildhall 1 Courts Area – welcome thrust of Policy, suggest additional wording to reflect other potential development opps. for Courts elsewhere as space limited on P14
16. Kingston University (14)	Various	WR & Oral	<ul style="list-style-type: none"> - 7 Reps AAP Sound (Plan 6; Paras.4.8 & 5.33; Policy K8; Plan 11; Para.12.62 & Policy P16 - 7 Reps AAP Unsound (Para.3.13; Policy K7; Para. 5.31; Policies P8, P10, P11, P19) - Ch 5 Policy K8 request additional wording after ref to Surrey County Hall to effect that other options being considered for future expansion/enhancement of facilities - Ch 5 Housing Policy K7 housing target and Ch 13 monitoring target inconsistent, need distinction/clarification between new homes and managed student housing and targets - Ch 5 - para.5.31 omits ref to Proposal Sites P4 and P19 re student housing <p>Ch 12 Site Allocation Reps - Unsound:</p> <ul style="list-style-type: none"> - P8 – questions allocation of rear yard site for student housing suggests capacity/ viability of site is tested - P10 – questions suitability of site for student housing and suggests ref deleted - P11 - questions suitability of site for residential and viability for student housing - P19 - questions suitability of site for student housing and suggests viability testing
17. Kingston College (1)		WR	<ul style="list-style-type: none"> - Sound - Ch 13 – refers to Implementation and Monitoring Section, where RBK raises

			the prospect of a formal partnership body of representatives to implement the AAP and confirms that Kingston College would be keen to participate.
18. Kingston Town Centre Management/ Kingston First (1)		WR	<ul style="list-style-type: none"> - Sound - Supportive of AAP - Ch 13 – requests clarity re Schedule 1 pg 176 Policy K19, KTCM is not the provider of shopmobility, nor responsible for securing Park and Ride
19. Hammerson (31)	7	Oral	<ul style="list-style-type: none"> - Sound (13) - Ch 2 - para.2.18 pg 11 refers to UDP Policy STR22 height restriction as too prescriptive and supports AAP policy amendment - Ch 4 – para.4.11 pg 33 typo error, insert ‘a’ at start of para. - Ch 5 - Policy K1 Shopping Facilities pg 40 requires ref to Retail Studies recommending that Kingston needs to enhance its retail offer and provide new facilities - Ch 5 – Plan 9 pg 42 – Sutton is mis - spelt on the key - Ch 5 – para.5.0 pg 43 – supports text - Ch 6 - Plan 12 Public Realm pg 62 – agree need to improve pedestrian links across KTC. Should improved link across relief road/Wheatfield Way by Ashdown Rd/Orchard Rd be realigned? - Ch 9 -para.9.1 pg 87 - suggests word change from ‘ease of access...’ to ‘ease and diversity of access...’ - Ch 9 - para.9.2 pg 87 – suggests ref added to adequacy of existing cycle storage facilities - Ch 9 - para.9.4 pg 89 suggests change of wording to add in ‘wayfinding’ between clear and signage - Ch 10 - Support Objectives pg103 of Chapter 10 Town Centre Management - Ch 12- Support paras.12.9-12.14 - Ch 12 Support paras.12.34-12.35 - Unsound (9) - Ch 2 para.2.17 pg 11 – ref to retail studies should refer to ‘significant’ demand, need and capacity and to large nos. of retailers which cannot currently be accommodated in KTC. Recommends x-ref to paras.5.4 & 5.9 - Ch 3 – para.3.12 pg 21 scope for more housing of different tenures and level of family and affordable housing should be considered in the context of an overall

			development appraisal which takes account of other planning benefits
	4B		- Ch 3- Plan 5 pg 24 – Plan is misleading, there are more than 12 buses per hour on routes into KTC, 24 buses per hour is shown on map but not referred to in key, key should be amended
	4B		- Ch 3 - para.3.26 pg 27, requests reference to high density development through re-wording 'There are significant opportunities to accommodate 'high density' growth within the existing centre.
	7		- Ch 3 – para.3.27 pg 27, suggests additional text at end of para. 'in particular, new high quality development in the south and east and associated transport infrastructure.'
	7		- Ch 4 – Plan 7, pg 32 – Kingston Hall Road should not be shown as inside the Motor Vehicle Restricted Area, its traffic role as part of relief road should not be downgraded, boundary of MVRA should be amended. Plan should have x-ref to Proposals Map, which is correct.
	7		- Ch 5 – Policy K1 Shopping – 1 st bullet last sentence – delete ref to 'maintaining' Kingston's retail role and replace with 'enhancing'.
	7		- Ch 5 – Policy K4 Employment Development - Objects to wording of policy resisting loss of B1 office floorspace. Refers to Hammerson research which concludes no market for such offices. Considers inappropriate and realistic to provide speculative offices in EQ scheme. Offices should be in highly accessible locations on identified sites eg Kingston Station area. Objection could be overcome by ref to viability test or provision of financial appraisal
	4C		- Ch 5 – Policy K7 Housing pg 51 – there should not be a prescriptive limit on the no. of new homes in KTC. Dependent upon massing and townscape assessment, may be scope opportunities for more homes. Text should refer to Govt. and GLA policy advice re increased densities and high density development, x-ref to 12.5 and flexibility could overcome objection
	4C		- Ch 6 – Policy K9 Design Quality 2 nd bullet - requests word change from 'reflect' to

	9		<p>'respond to' to reduce focus on matching existing scale and massing</p> <ul style="list-style-type: none"> - Ch 9– para.9.11 pg 94 – requests clarity on whether ref to Site P3 limits where new bus station can be sited - Ch 9 - Policy K18 Cycling indicates existing cycle route being maintained and extended. This does not make provision for replacing part of Eden St route if certain routes deleted or amended - Ch 12 Plan 24 pg 122 – does not agree with the classification of some shopfronts - Ch 12 Policy OTCA3 pg 151 ? - Ch 12 Site Allocation Rep re Proposal Site Policy P2 Clarence St South - Requests amendment to specify high density residential development or cross-ref. to para.5.28 - Ch 12 Site Allocation Rep re Proposal Site P12 Northern Riverfront – AAP should identify an increase in parking on these sites
20. La Salle CPP (Eden Walk Shopping Centre)	7	WR & Oral	<p>Sound</p> <ul style="list-style-type: none"> - Ch 2 para.2.18 refers to UDP Policy STR22 height restriction as too prescriptive and supports AAP policy amendment - Ch 2 para.2.23 – support 1st bullet - Ch 4 para.4.11 pg 33 typo error, insert 'a' at start of para. - Ch 5, supports para. 5.0 - Ch 5, Plan 9 – spelling error re Sutton - Ch 9 endorse overall town centre management approach, esp objectives of Policy K21 pg 104 - Ch 12 Site Allocation Repts re P1, P2 & P3, Sound - fully support Eden Quarter initiatives re P1, P2 & P3 and objectives. If larger redevelopment scheme does not proceed, AAP should recognise that existing Eden Walk should be focus for refurbishment/enhancement - Ch 12 – Sound - supports full text in paras.12.9-12.14 <p>Unsound</p> <ul style="list-style-type: none"> - Ch 2 para.2.17 ref to retail studies should refer to 'significant' demand, need and capacity and to large nos. of retailers which cannot currently be accommodated in KTC. Recommends x-ref to paras.5.4 & 5.9 - Ch 3 para.3.12 scope for more housing of
	9		

	4B		different tenures and level of family and affordable housing should be considered within an overall development appraisal, taking account of other planning benefits
	7		- Ch 3 para.3.26 requests reference to high density development through re-wording 'There are significant opportunities to accommodate 'high density' growth within the existing centre.
	7		- Ch 5 Policy K1 Shopping, delete ref to 'maintaining' Kingston's retail role and replace with 'enhancing'.
	7		- Ch 5 Policy K1 Shopping requests reference to Retail Study recommendations that Kingston needs to enhance its retail offer and provide new facilities
	7		- Ch 5 Policy K4 Employment Development - objects to wording of policy resisting loss of B1 office floorspace. Refers to Hammerson research which concludes no market for offices. Considers inappropriate and realistic to provide speculative offices in EQ scheme. Offices should be in highly accessible locations on identified sites eg Kingston Station area. Objection could be overcome by ref to viability test or provision of financial appraisal
	4C		- Ch 5 Policy K7 Housing – there should not be a prescriptive limit on the number of new homes in KTC, may be scope for more housing depending upon massing and townscape. Text should acknowledge that increased densities and high density development are advocated by Govt. and GLA advice. X-ref to para.12.5 and flexibility could overcome objection
	4C		- Ch 5 Policy K9 Design Quality – 2 nd bullet, request that “ reflect” be changed to “respond to” to reduce the need for new development to match/mirror existing scale and massing
	7		- Ch 11 Policy 24 1 st bullet, non-residential mis-spelt
	7		- Ch 12 Site Allocation Rep re P2 – 3 rd bullet should be amended to specify high density residential development
21. Fenwick (2)	7 & 9	Oral	- Ch 12 Site Allocation Reps re Proposal Site P12 - 2 Reps re 2 T of S same points both Reps

			<ul style="list-style-type: none"> - P12 Northern Riverfront – wording of policy too prescriptive and may inhibit development rather than promote it, detailed list of uses not flexible enough. Proposes change to wording of 1st bullet re uses to: hotel or residential and addition of two bullets covering: provision of active frontages on G/F including A1, A3, A4 uses and a requirement for all development proposals to include a new public space on the riverside, a high quality pedestrian route from Wood Street to the riverside and a public car park. Ref to affordable housing not required as covered by Affordable Housing policy
22. Morley Fund (9)	6 6 6	Oral	<ul style="list-style-type: none"> - Ch 4 para. 4.8 – ref to 50,000sqm net additional floorspace (gross floorspace) is confusing - Ch 5 - Policy K1 Shopping – ditto above, plus sites in existing Primary Shopping Area should be considered for intensification or extension in preference to extending the PSA to avoid prejudicing viability of redeveloping existing central sites - Ch 6 Policies K9 Design Quality & K10 Public Realm – Support - Sound - Ch 6 Plan 11 (Landmarks) – Support – - Ch 7 Plan 13 Historic Environment – AAP designates entire frontage of The Bentall Centre as a BTM, BTM should relate to Maurice Webb frontage only - Ch 9 Policy K20 Parking – Support - Sound - Ch 12 Site Allocation Rep - Policy P1 – Clarence St North - Support - Sound - Ch 12 Site Allocation Rep - Policy P12 – Northern Riverfront Support - Sound
23. NHP	7	Oral	<ul style="list-style-type: none"> - Ch 12 Site Allocation Rep Proposal Site P17 – Power Station Site –requests deletion of Nursery as an appropriate community use as lack of need for additional nursery, objects to proposed location for public art at entrance to Canbury Gdns as too prescriptive; considers reference to improved facilities at Barge Dock inappropriate requests amended text to include reference to restaurant above Barge Dock as Appropriate Use
24. Grace Lea/Indigo	7	Oral	<ul style="list-style-type: none"> - Ch 12 Site Allocation Rep re Proposal Site

re Turks site (1)			<p>P12 Northern Riverfront– site situation has changed over the period of preparation of the AAP, significant proportion of P12 now under development or has planning permission for uses other than those specified eg.student accommodation now being built on hotel site; Bentalls B car park has PP for redevelopment for car park and Turks site has extant PP for residential. These factors reduce area available for comprehensive development on the scale identified in the AAP and uses proposed, so Policy P12 not appropriate. Proposals Map should be amended and site reduced to include 2 Fenwick owned sites and Turks site, uses amended including exclusion of hotel. Refers to imminent planning application for Turks Site for high quality mixed use development and to negotiations with adjoining landowners to bring forward wider vision for the area.</p>
25. Prudential (1)	9	WR	<ul style="list-style-type: none"> - Ch 12 Site Allocation Rep re Proposal Sites P1 Clarence St North and P2 Eden St South of Clarence St - objects to CPO proposals, as Prudential owned properties in Clarence St may need to be demolished to accommodate AAP proposals. Requests details of how objection can be made and timescales.
26. Sainsbury's (1)	9	WR	<ul style="list-style-type: none"> - Ch 5 Plan 8 Retail – refers to importance of Sainsbury's Richmond Road store and to the frontage which should be designated as 'other shopping frontage'
27. Tesco (2)	4	Oral	<ul style="list-style-type: none"> - Ch 5 - AAP should seek to enhance convenience goods floorspace and allocate sites
28. Fairview Homes (1)		WR	<ul style="list-style-type: none"> - Ch 5 - comment re Policy K4 Employment Development – requests that RBK review AAP non-housing sites as some sites may be better used for housing or mixed-use development
REPS REC'D AFTER 6 JULY			
29. C Stratham-Fletcher (resident)			<ul style="list-style-type: none"> - General support for AAP except riverside cycle route - Policy K10 Public Realm - comments about: KTC gateways & adverse effects of signage clutter; which can also affect sightlines; need for tree maintenance and replacement of dead trees; the variety and quality of

			<p>surface materials used on footways and the poor state of some paving. Hopes new paving will be simple and not fussy. Supports new paving in Crown Passage. Need to avoid paving being damaged by heavy vehicles</p> <ul style="list-style-type: none"> - Policy K13 Riverside – cleansing concerns; need for good lighting, but not too bright; and need for seating to be carefully sited and well maintained - Policy K15 Town Centre Road Network – concerns re signing of parking - Policy K16 Public Transport – support Kingston Station improvements and provision of express bus link Kingston – Surbiton, could this be routed via theatre in theatre season? Need for better shelters for new bus station - Policy K17 Pedestrian Environment – suggests combined footbridge/public art across relief road by library/Fairfield - Policy K18 Cycling – supports cycling proposals. Requests action by Barclays Bank where kiosk channels pedestrians into cycle path. Opposes riverside cycle route, as incompatible with strolling - Policy K20 Parking – supports relocation of parking from Eden Walk and Bishop’s Palace - Policy K21 TC Management - supports KF/ KTCM - Concerned that several shops in Kingston closed recently with shoppers directed to Guildford; need for start-up accommodation for businesses; concerns re energy use in new buildings and ‘green’ issues
30. Charter Quay Residents Association	9	WR	<p>Comments relate to the Rose Theatre</p> <ul style="list-style-type: none"> - refers to its opening and role as a catalyst to providing a broader range of visitor attractions and a more diverse range of visitors, away from daytime shopping and night-time drink related activities. Need to highlight and support theatre and concerned that no evidence of it being used to drive necessary change - concerned about unpleasant experience and anti-social behaviour along routes to and from theatre to public transport and on public transport, which will deter theatre goers and have adverse impact on theatre.

			<p>Suggests actions to improve the routes, including later opening of cafes, designation as alcohol exclusion zones and co-ordination with After Dark Strategy</p> <p>Retail</p> <ul style="list-style-type: none"> - plans to improve status as shopping centre unclear, refers to empty shop units in the Bentall Centre and Eden Walk and to high rents driving out smaller shops which add to variety, and replacement by high street multiples, no indication of plans to attract high quality or more interesting shops - concerned about funding of impact of increase in visitors re increased cleansing, rubbish collection, town centre management and policing costs, on Council budgets <p>Daytime/night-time</p> <ul style="list-style-type: none"> - link between the two weak, refers to daytime shoppers and night-time revellers and to nuisance caused by the latter, need improved clarity and links between K+20 and After Dark Strategy <p>Green Issues</p> <ul style="list-style-type: none"> - refers to fast developing Govt agenda on green issues, concerned AAP does not go far enough to address them eg.parking and park and ride, and may need review/update
30. Turks Launches		WR	<p>Site Allocation Rep re P12 Northern Riverfront</p> <ul style="list-style-type: none"> - refers to their river boat trip operations and need to maintain full motor access to Turks Pier for coaches/cars to drop off visitors, concerned that motor vehicle restricted area may affect this - refers to Turks running boat trips 7 days a week, including private evening functions for businesses and individuals, which finish at midnight, concerned about inclusion of residential as mixed use on P12 as likely to lead to complaints by residents about late night noise and adverse impact on business <p>Signage/Tourism</p> <ul style="list-style-type: none"> - refers to lack of signage for river boat trips, tourism and river usage are key areas being promoted and signage required to direct visitors. Aims to build two new paddle steamers and requests support from RBK re signage <p>Town End Wharf</p> <ul style="list-style-type: none"> - Objects to possibility of residential moorings

			at Town End Wharf due to unacceptable impact on navigation to busy Town End Pier, where Turks based. Resid boats too long and would stick out and impede navigation. Additional issue of possible objections from residents to noise from river boat operations/activities
31.H Pitchforth (2)	3a	WR	- Policy K10 Public Realm – unsound as policy fails to include: accessibility to buses; pedestrian routes to buses; siting of bus stops and bus routes for maximum convenience and safety of passengers
	3a	WR	- Policy K16 Public Transport - policy unsound, it should be more specific as to where bus routes and stops are to be located, new bus station will be on ‘wrong’ side of relief road, removing buses from Eden St welcomed on safety grounds, but need to ensure that no further to walk to buses, especially for pensioners