

**Summary of Written Representations to the Kingston Town Centre Area  
Action Plan Preferred Options Consultation**

<b>Ref. No.</b>	<b>Representative</b>
2490	Government Office for London
2491	Greater London Authority
2492	English Heritage
2493	Metropolitan Police Authority
2494	Elmbridge Borough Council
2495	CABE
2496	Thames Water
2497	Sustrans
2498	Surrey County Council
2389	Network Rail
2499	Federation of Kingston Residents Association
2500	Kingston Town Centre Management
2501	Clarence Street Limited (CSL)
2522	Charter Quay Residents Association
2502	The Kingston-upon-Thames Society
2503	The Royal Borough of Kingston Chamber of Commerce
2504	Tesco Stores Ltd (Cushman & Wakefield Healey & Baker)
2390	Credit Suisse Asset Management (Bennett Urban Planning)
2392	Kingston University (Nathaniel Lichfield and Partners)
2219	Hammerson (Montagu Evans)
2398	First Alliance Properties (Blue Sky Planning)
2391	Kandahar (Kingston) Limited (Paragon Planning)
2505	John Lewis Partnership
2506	RBK Housing
2507	RBK Highways and Transportation
2508	RBK Access Officer
2440	RBK Leisure and Lifelong Learning
2524	Her Majesty's Courts Service

**2490) Government Office for London**

- Many aspects of the proposal are supported by Government Policy and general approach seems to be sound.
- PPS6 raises the need to ensure that a balance is achieved between the need for retail provision in the largest centres and ensuring that everyday needs are met at the local level. The Sustainability Appraisal objective 3 is particularly relevant to this point and the issue should be look at by the SA as part of the demonstration of soundness in the context of the PPS.
- It is important for the submitted AAP to include the definitions of areas within the centre sought in the fourth bullet point in para 2.16 of PPS6.(define the extent of the primary shopping area and the town centre, for the centres in their area on their Proposals Map)

- Many of the small enterprises in the centre are identified in 2.19 as providing a substantial number of jobs presumably retail; perhaps there is a need to consider how an adequate supply of smaller offices and workspaces can be maintained? This could be made easier by the adoption of principles of mixed use.
- The power station site is identified for hotel and housing, without a wider mix of uses. Given the high level of accessibility of the site and the implication in 2.73 that the railways should not be allowed to prevent land north of the railway from serving as part of the centre. There is perhaps a need to appraise options for a wider mix of uses in this area, including those which add activity at street level.
- Submitted AAP should say more than is said in the consultation document about implementation and delivering.
- 'Airtrack' route – all parties involved now generally support the airtrack route for access to Heathrow, for which provision has been made in Terminal 5 station tunnels and that would supersede the alignment shown in Plan 14.

#### 2491) Greater London Authority

- The broad approach to the future development of Kingston Town Centre as set out in the draft AAP is welcomed.
- Future developments have to be related to improvements in public transport capacity and accessibility. The following **transport** matters need to be addressed:
  - AAP does not account for the corresponding increase in travel demand by increasing the retail area by 21%; the demand should be accommodated on the public transport network.
  - Existing level of car parking should not be increased, however the car parking should be better managed to ensure efficient use.
  - TfL supports the principle of a comprehensive redevelopment of bus facilities to enable the removal of buses from Eden Street, however the location and layout will have to be agreed by London Buses.
  - Proposal to enlarge the existing bus facility at Fairfield is welcomed.
  - Clarification required as to why section 2.9 states that east-west rail network in the town centre limits rail access and what section 5.1 means by 'new or improved Kingston Station'. The reason for Kingston stations inferiority to other stations is not made clear in section 2.116.
  - TfL is currently consulting on possible improvements to the station including accessibility improvements and it would support the aspirations of a refurbished station in the same location.
  - Existing road systems suffer from significant delays during the weekday peak hours and on Saturday afternoons, these delays affect bus services. To reduce the impact of future development on congestion on the relief road a series of complementary measures need to be provided.

- TfL is currently helping RBK to build a model to evaluate the performance of the SRN and its junctions. It is hoped that RBK will model the affects of future developments and pedestrian and cycle crossings before considering them further.
- A park and ride facility is proposed in the AAP, TfL would like to engage further with RBK on the detail of this to judge its likely effects. This facility could reduce congestion on the relief road system, however the use of park and ride facilities does not necessarily reduce car use and so more sustainable methods should also be considered.
- It is important that the possibility of introducing new taxi ranks is kept open for new developments such as hotels and shopping malls.
- Particular reference should be made to London Plan policies on **housing:-**
  - In accordance with the London Plan, 50% of all new housing should be affordable and within that 70% should be social housing and 30% intermediate provision.
  - Also in accordance with the London Plan, the AAP should indicate that 100% of new homes should be designed to meet Lifetime Home standards and 10% should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
  - The mix of units should reflect the findings of the GLA Housing Requirements Study for both private and affordable housing.
  - In relation to density, regard should be had to the density location and parking matrix set out in the London Plan. Given the high PTAL of many proposal sites and their context, densities at the upper end of the scale should be achievable provided excellent design is achieved.
- The preparation of a masterplan and studies of pedestrian routes and connections may usefully inform the AAP.
- The preparation of a flood risk assessment is encouraged.
- The AAP should contain a specific aim of opening up the Hogsmill River corridor as part of the public realm of the town.
- An explicit reference should be made to renewable energy technology.

## **2492)English Heritage**

- Pleased that discussion within the consultation is providing due attention to cultural heritage matters.
- Kingston requires a balanced approach to new development and should not rely on the provision of single land-use as a solution in ensuring the future success of the centre of Kingston. For good practice and guidance for regeneration proposals and policies in relation to the historic environment, refer to English Heritages 'Regeneration and the Historic Environment (January 2005)'
- In the drive for further commercial expansion, high quality design must not be compromised. Agreed that Kingston should continue as the primary sub-regional focus for southwest London, however it is

important to emphasise that high quality design should be central to the aims of the AAP. Kingston is fortunate to have a rich historical townscape and this necessitates design standards that will ensure the protection and promotion of the historic assets and broader fabric of the built environment.

- English Heritage recommends that AAPs should incorporate overarching design principles. General design principles should aim to ensure that all proposed programmes and schemes respect and seek to enhance the character, appearance and local distinctiveness or urban and rural areas. Should involve conserving distinctive heritage features in situ, reinstating them where appropriate, ensuring the sympathetic design and siting of new street furniture, and promoting the use and where appropriate, re-use of local natural materials.
- Design advice should cover streetscape and landscaping of the commercial core of Kingston in addition to the setting of standards for building design proposals throughout the AAP. Good practice in shop front design would also prove useful in improving the appearance of the conservation areas of the centre. Kingston is fortunate in that it has a high level of public open space in the centre that is highly accommodating of pedestrian movement. The design of buildings and the public realm will be under higher visual scrutiny from the visitors Kingston is attempting to attract because of the nature of pedestrian movement through the centre.
- The principles of English Heritages publication 'Streets for All' should be reflected in the AAP. The issue of 'decluttering' the streetscape as is actively being promoted by English Heritage. The important contribution that floorspace, street furniture, signage, lighting and roadside trees can make to the appearance and character of Conservation Areas is highlighted in PPG15 (par 5.13-5.18).
- Reference to para 2.65 and 2.66, tall buildings should not be encouraged within the conservation areas or in areas that affect the setting of listed buildings. The AAP must ensure that in future the scale, massing and the height of buildings is managed. It would be advantageous to provide some level of guidance on building heights, ensuring protection of the historic core areas whilst accommodating the necessary development in areas away from sensitive areas.
- Reference to para. 2.64; the Council must ensure that the removal and redevelopment of underused buildings is not the only solution to revitalising the underused areas of the town centre. Particular attention must be paid to underused and vacant buildings in the conservation areas. The Council should provide for every opportunity to rehabilitate empty buildings in conservation areas and ensures that council policies do not prevent the reasonable re-use of premises for alternative purposes, avoiding the pressure for demolition.

### **2493)Metropolitan Police Authority**

- The MPA have key role to play in delivering objectives of PPS1 and objective 2 of the London Plan. The MPA are therefore keen to work with the Council in the formulation of planning policy documents to

ensure their operational requirements are taken into consideration, to enable safe and secure plans to be created.

- The Property Services Department of the MPA has not been part of the consultation prior to the Preferred Options Stage and would appreciate if detailed consideration could be given to the MPA's comments.
- The MPA have recently reviewed the way their operations are delivered. As a result it is proposed to move away from police stations to a system of centralised patrol centres and custody sites, and localised Safer Neighbourhood Offices and police 'shops'. The MPA's exact future property requirements for RBK have yet to be finalised. It is likely that the provision of Safer Neighbourhood Offices and Police Shops in/or close to the town centre will be required. The MPA therefore support the objective at para 4.11, however recommend this objective be expanded to refer to police facilities.
- The MPA are mindful that the inclusion of police 'shops' within the retail core of Kingston could be beneficial through the provision of a viable police presence. The MPA therefore recommend any detailed policies for the retail frontages should be flexible to include the provision of non-Class A1 uses which would contribute positively to the vitality and viability of the centre.
- There may be a need for the MPA to dispose of existing facilities, which are no longer in keeping with their operational requirements. Where these disposals occur the former policing activity sustained by the site/building will have been relocated/retained in the local area. In these circumstances the MPA believe that there should be no requirement for any community use/floorspace to be provided when their former sites are redeveloped.
- Section 4.11 - recommended to read '*improved police facilities*'.
- Section 5.1 - recommended that further criteria be added: '*All development to ensure a safe and secure environment is created having regard to Secured by Design*'.
- The majority of new development proposals within the town centre are likely to result in the need for additional policing. The MPA recommend that contributions towards additional policing arising directly from any new development should be secured through Section 106 agreements. Needs to be addressed in part by the existing text at para 5.9. The MPA recommend that the terminology 'safety and security measures' is replaced by 'policing and safety and security measures'.

#### **2494)Elmbridge Borough Council**

- No comments

#### **2495)CABE**

- Unable to comment on this scheme at this time.

## 2496)Thame's Water

- Thames Water considers that it is important that the AAP makes reference to the provision of adequate utilities infrastructure to service development in accordance with PPS12. This is to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time would be necessary.
- Thames Water considers it essential that the following be added to the AAP: - *'Developers will be required to demonstrate that there is adequate water and wastewater capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing infrastructure.'*
- Although it does not cover Kingston the emerging South East Plan contains up to date guidance on water and sewage issues and is therefore worth making reference to. Section D5 of the draft South East Plan, January 2005 relates to 'Sustainable Natural Resource Management'; para 1.9 and 1.10.
- In March 2005 The Planning Inspectorate published 'A Framework for Assessing Soundness and Focusing Representations on Development Plan Documents and Statements of Community Involvement'. Para 3.4.2 includes a key questions; 'Has adequate account been taken of the relationship between the proposals in the plan and other requirements, notably those of utility companies and agencies providing services in the area which have a requirement for land and premises?'

## 2497)Sustrans – routes for people

- Document has many aspects which Sustrans support:
  - 2.108 – the SDG study that concluded that there should be no increase in off-street parking capacity
  - 2.112 – the expansion of CPZ's as the lack of on-street parking improves safety for cyclists
  - 2.125 – the suggestion to make longer trips by public transport convenient for people, the rail plus bus services from Surbiton to Kingston
  - 2.128 – the recognition that pedestrian and cycle routes need to be made as safe and attractive as possible
  - 2.129 – intention to reduce the impact of the relief road as a barrier to pedestrian and cyclists
  - 2.130 – pedestrianisation of Castle Street and inclusion of cycle lanes
  - 2.133 – adoption of a Secure Cycle Parking Strategy

- Sustrans sees Kingston as having a great deal of potential to respond to the Mayors and national objectives of encouraging cycling and walking.
- Sustrans feels that walking and cycling could feature more prominently in certain sections of the document, bearing in mind Kingston's potential as a good walking and cycling borough.
- Sustrans questions some statements made:
  - 2.52-2.53 – environmental quality – only a brief mention of cycling. Cycling as an alternative to motorised transport can have a very positive impact on environmental quality and we feel that it could feature more prominently as an opportunity in this section.
  - 2.74-2.77 – riverside – feel that it is relevant to mention that National Cycle Network route 4 passes through Kingston.
  - 2.90 – transport and access – it is stated that 'walking and cycling are already important means of transport for local journeys', this should be elaborated; walking and cycling is not only important means of transport, they are increasingly important. There are significant flows of cyclists through Kingston; it is felt that trips longer than 'local' ones should be taken into account to.
  - 2.98 – stated that 'the application of road pricing or congestion charging would result in traffic reduction, but would also deter car-borne visitors and businesses, resulting in adverse impact on the local economy'. Question whether this statement is justified; evidence from other cities suggests otherwise. Refer to inserted leaflet 'Traffic restraint and retail vitality'.
- In the schedules of preferred options there is little mention of cycling. Sustrans does not support the replacement of car parking as suggested in the preferred options.
- Sustrans suggests that having a good environment for walking and cycling be of fundamental importance for Kingston to achieve the core objective set out in the AAP (4.1).

#### **2498)Surrey County Council**

- The options comply reasonably with the emerging sub-regional development framework and the various retail studies that have gone on in the past.
- There is concern as to whether the transport system can cope with a 20% increase in retail floorspace, which might suggest a greater mixed-use element.
- The use of the Kempton Park racecourse as a suitable park and ride site is queried if the trains on the Shepperton line only run half hourly. Otherwise the transport and access proposals are supported.
- The intention to provide up to 1,500 dwellings within the town centre, including affordable and student accommodation is supported. However, it is not clear to what extent the size and type of dwelling envisaged relates to identified housing needs, or whether consideration

has been given to the potential to deliver family sized dwellings within this area.

- Although the document refers to 'sustainable design', there is no specific mention of the climate change and the need for new development to achieve higher levels of energy efficiency, or the potential for new development to incorporate renewal energy generation or the opportunity for major schemes such to promote CHP technology.
- It is essential that an adequate flood risk assessment be undertaken before proposals are finalised to ensure the findings can be properly taken into consideration.

### **2389)Network Rail**

- Improvements to the station welcomed although the funding would need to be secured through development. A shortfall in funding will need to be sourced from other potential funding streams.

### **2499)Federation of Kingston Residents Associations**

- Regards K+20 as opportunity to bring about major improvements to town centres infrastructure, correct deficiencies and improve quality of life for all user groups including residents.
- Language used throughout document is rosy and optimistic, but content thin and lacking in detail and substance.
- Document reveals no reassuring insight or 'big picture' thinking how the Council proposes to translate weaknesses into strengths.
- Little sign of imaginative, 'joined-up' thinking between RBK and its partners whose input will be vital to ensure that any K+20 plan works.
- Structure of the questionnaire incorporated is such that the only possible outcomes must be support for the aims.
- AAP sets its collective sights far too low. Misses many opportunities afforded by the potential of a redevelopment. Lack of vision, flair and enterprise about document.
- **Overview** comments:-
  - Support for the broad principles outlined in the PO document.
  - Current proposals are not sufficiently visionary, enterprising or exciting and fear that a number of opportunities will be missed.
  - Document refers to 'landmark new shopping facilities' but fails to identify the opportunity to create 'landmark' developments with scale and visual impact.
  - Enthusiastic about initiatives that will improve environmental quality of town centre, improve transport and access and foster major enhancements to leisure, arts, cultural and entertainment facilities.
  - Not happy with proposal to build further 1,500 homes.
  - Not convinced there is sufficient demand for new offices and/or business space in town centre.

- Not opposed to University expansion in principle, major misgivings about scale and proposed speed of student growth.
- **Mix of Uses** comments
  - Urge RBK to identify key landmark sites in town centre, which could be appropriate for genuine landmark developments, for example Bishops Palace, Wood Street, Fairfield bus station/car park, area behind railway station and site east of Thames Side.
  - RBK should take lead in identifying and acquiring one or more such sites for purposes of creating landmark developments.
  - Creation of more public open space in and around town centre.
  - Urge development of creation of bright, airy and architecturally pleasing open spaces and town squares with visually striking focal points.
- **Retail Development** comments
  - Would like more cohesive and empathetic approach to new retail development, more emphasis on airy malls/walkways and provision for a far wider range of shops.
  - One or more retail areas should be designated for smaller independent retailers creating a unique atmosphere.
- **Office and Business** comments
  - Unconvinced of need for significant additional office or business development in town centre, other than perhaps provision of specialised office units aimed at specific categories of business.
  - New office development should be separate from other uses with its own distinct identity.
- **Housing** comments
  - More homes for families need to be built to create better socio-demographic balance of town centre.
  - Must be better management of different user groups within the town centre to remove the tensions between them.
- **Leisure, Arts, Culture and Entertainment** comments
  - Support proposals for improved arts, cultural and entertainment facilities to town centre. Over-riding aim to see better balance of social and leisure amenities provided in the town centre.
  - Need to provide other types of evening entertainment for the over-25's.
  - Several parts of the town centre merit special attention through their own planning briefs, such as the Fairfield area. Considered that the car park and flea market should be removed and instead opened up to provide a natural green oasis. Current proposal would worsen the site and is shortsighted and contradictory to one of K+20's aims.
- **Transport and Access** comments
  - Car parking – chronic shortage for local residents living in or close to the town centre and no provision made for them.
  - Would like to see improvements at Wood Street/Clarence Street, Clarence Street/Fairfield North and Wood Street.
  - Certain points of conflict between pedestrian and vehicular traffic require solutions. Example is at Wood Street by station, believe this section should be tunnelled, enabling the existing

- wide roadway between the station and Fife Road to become pedestrianised.
- Good provision for buses and bus passengers a priority. Proposed bus station needs to be within relief road.
- With retail/commercial element to expand eastwards, it is vital to ensure that retail service access and egress points off Wheatfield Way designed in such a way to avoid delivery vehicles queuing back onto the main road.
- Better public transport provision to disperse people during the evenings and late at night.
- Important to address the environmental and visual deficiencies of several arterial roads into the town centre (Kingston Road/Cambridge Road, London Road and Surbiton/Penryn Roads).
- Would like to see initiative launched to improve property frontages, provide additional landscaping and tree planting and make entrances less utilitarian as well as minimising street signage.
- As a whole it is considered that the options are flawed, wholly inadequate and waste an opportunity to resolve some of the towns problems.
- **Effective Management comment**
  - Introduction of strong and effective town management to get the balance right between needs and wishes of different sectors.
  - Long-term success on outcomes will be on how well the new-look town centre is managed.
- **FKRA wish list**
  - four or five star hotel overlooking the river
  - revitalised Market Place
  - proper head post office
  - relocation of The Works Night Club allowing St James Square to be reclaimed and developed
  - a more attractive and landscaped riverside
  - specialised shopping areas to provide greater variety
  - new public open spaces
  - broad, surface-level pedestrianised link between railway station and town centre
  - new bus station located within one-way system
  - cultural, leisure and recreational facilities for the over-25's
  - one or more large architectural spectacular landmarks
  - effective management and maintenance of town centre
  - bolder, more enterprising and more ambitious Council

## **2500)Kingston Town Centre Management**

- Welcome the opportunity to work with developers focussed on need for high quality regeneration to town centre.
- Believe that plans to improve gateways to town centre need to be brought into greater focus.
- Increased parking provision with better related signage.

- Integration of train and bus station to provide safe pedestrian routes into town centre.

### **2501)Clarence Street Limited (CSL) (residents association)**

- Detail in AAP is poor.
- Proposed transport changes not clear.
- Emphasis on sustainability in town centre in AAP but actions of RBK needs to follow suit.
- No real strategy for shopping other than increasing it. Target population?
- Little wrong with concept of increasing social housing, but issues of maintenance needs to be addressed.
- Lot of emphasis on needs of visitors in AAP, but needs of residents need to be addressed, i.e. car parking. Little detail about transport that helps long term residents in the town centre.
- RBK should take into account predicted demographic changes i.e. that in the next ten years the over 40 population will be the biggest age group in UK.

### **2522)Charter Quay Residents Association**

- Questionnaire worded in such a way as to provide the answers the Council wants to hear and as such has no value.
- The AAP ignores provisions for its residents with a greater focus on visitors and shoppers.
- Identifies parking requirements for visitors and shoppers but not shortage for residents.
- With additional shopping no mention given to managing noise and fumes impact on residents from delivery trucks.
- River identified as an important part of town but no initiatives shown as to how river walkways can be opened up to all members of the community.
- There is no initiative stated as to how to create a more balanced night-time economy.
- More residential housing a desirable goal but no mention made about providing family accommodation, unless RBK insists on the building of larger family units the current trend of one and two bedroom flats will continue.
- AAP does not mention how it will make Kingston more family orientated and therefore a living town with a long-term commitment to its residents.
- Welcome positives are new pedestrian streets, more open spaces, less malls, more employment and public art.
- Enclosed is the reponses to the issues paper, April 2004,

### **2523)The Kingston-upon-Thames Society**

- Cannot see how the 'vision' is being seriously addressed through the AAP PO.
- Proposals do not tackle the most unattractive parts of the town but concentrate on the Ashdown Road and Eden Walk areas.
- Attempts should be made to determine what is best for the residents and not what is best for retailers, business community and visitors.
- No doubt that Kingston needs some degree of development.
- Welcome the resiting of car parking on the periphery of the centre and the provision of a new bus station in the same locality.
- Little benefit to residents of an increase in retail accommodation, however it would result in an increase in traffic into the town, which is already stretched.
- Proposal to demolish Marks and Spencer to create new shopping mall would result in confusion and disruption for all.
- What about other options as an alternative to those in AAP?
- Do not wish to resist development but feel that proposals are not the right way to tackle future of the town.

### **2524)The Royal Borough of Kingston Chamber of Commerce**

- Unable to comment during the time frame but will respond in detail as soon as possible and wish to register interest on behalf of local businesses in this vital development initiative.

### **2525)Tesco Stores Ltd**

- Redevelopment of primary shopping area (PSA) supported in order to prevent stagnation of town centre and to encourage floorspace efficiency in terms of new retail development.
- Eden Quarter – is one site capable of accommodating large new retail floorspace, key opportunity which must be optimised and one to which Tesco's particular attention has been drawn. Consider this area an extension to the PSA, identified as a 'gateway' location.
- Considered that the redevelopment of this area would relieve significant pressure on the current PSA (additional floorspace and parking). It lends itself to high density, retail led, mixed used development site, suitable in parts for multi-storey buildings. Appropriate uses: -retail, residential, community uses and car parking.
- Eden Quarter can be divided into 2 elements; northern section (bounded by Ladybooth Road, Eden Street and Wheatfield Road) and southern section (development sites 22 and 23).
- Northern section – take into account Old Town Conservation Area to east which would restrict building heights and frontage design.
- Southern section – should seek to establish strong retail frontage along Wheatfield Road, with potential for incorporating buildings of significant height (3-5 storeys could be introduced in accordance with policy KTC15). Could be staggered across the site to take account of listed

buildings of Northern Frontage of site 22. Potential to introduce landmark, tall buildings on southern section.

- Retail floorspace should be made available for key anchor stores in Eden Quarter to secure long term vitality and viability of areas retail function and as an extension to PSA. Consideration should be given to both comparison and convenience floorspace.
- Tesco wishes to pursue large, mixed-use format store for location such as Kingston town centre. Encompasses both convenience retailing and wide range of comparison goods. Concept not unknown to Kingston e.g. Waitrose/John Lewis.
- Strong store of this nature will anchor the southern end of PSA and will inject new life into the adjoining shopping areas of Eden Walk and Eden Street.
- Redevelopment of Eden Quarter provides a real opportunity to provide additional comparison and convenience floorspace allowing for linked trips in accordance with the principles of AAP.
- Any development within Eden Quarter should achieve the following principles;
  - secure co-ordinated redevelopment and include it as part of PSA
  - creation of multi-storey, retail led mixed use development, including significant residential development
  - to provide additional modern and functional convenience and comparison floorspace
  - introduce new and improved linkages with PSA and surrounding areas
  - introduce high quality design, including appropriate use of tall buildings
  - new replacement car parking facilities
  - allow for phased development within Eden Quarter.

### **2390)Credit Suisse Asset Management**

- Owner of property fronting Clarence Street
- Support proposed AAP and improvements that would result.
- Support the proposals for intensification and accommodation of an appropriate mix of uses within the town centre. The vitality and viability of the town centre is reliant on the diverse range of facilities.

### **2392)Kingston University**

- Supports the Council's vision for the town centre and supports the objectives to enhance the town centre so that it maintains and supports a range of activities.
- University looks forward to working with the Council to promote the improvement of its town centre sites to ensure that the success of this established organisation can be maintained.

## 2219)Hammerson Plc

- Welcome references made under sub-heading 'shopping' (pg. 15) which seek to improve the shopping environment and maintain and enhance the role of the town centre. This is one of the principal objectives of the emerging proposals for the retail-led regeneration of the Eden Quarter.
- Offices – the reference to the vacancy rate should reflect that much of the vacant space comprises poor quality offices, which are unlikely to be let in the short to medium term. Opportunities for redevelopment/change of use of such space should be recognised.
- Housing (para 2.40) – supported in principle, issue of heights and densities should be addressed when determining individual planning applications reflecting particular context of site. High density mixed use developments located in close proximity to transport interchanges should be encouraged, in accordance with PPG3.
- Para 3.2 – areas identified are supported.
- Section 4.10-4.13 – under the heading 'character and identity' it is recommended that an additional bullet point be added: - 'to allow appropriate high density mixed use development, which will enable Kingston to be competitive with other Metropolitan centres'. Considered that there is too much emphasis on the character and identity objectives without identifying opportunities for future strengthening of the centre.
- Section 5.1 – identification of the preferred options is supported as it recognises that major new retail development should be located in the southern part of the town centre which will create a balance of provision with the existing concentration on the north.
- Creative industries – considered that this might be too prescriptive in terms of the AAP, given that it specifies particular use and end user. Considered more appropriate that new and refurbished office/business space is referred to without identifying the particular aspects of any preferred users.
- Under heading 'environmental quality and historic environment' (pg. 42), reference made to former post office being refurbished for exhibition and a restaurant. It is recommended that the text within AAP be amended to say: - '*former post office refurbished for temporary exhibition use and long term use to be identified*'.
- Para 5.2 – support objectives identified in terms of enhancing the role and function of Kingston as a shopping destination. Suggest specific reference should be made to the opportunity for a department store to anchor the regeneration of the southern part of the town centre.
- Schedule 1 (pg. 47) – identifies Eden Quarter site as nos. 1 and 2. Not considered necessary to identify number of residential as there does not appear to be any reasonable justification for identifying a particular threshold as there may be scope for this level to be increased as the scheme is developed and the height and massing parameters become clear.

- Hammerson considers that it is essential to create support for a new large interceptor car park in the south of the town centre off Wheatfield Way and the need for enhancement of the existing eastern interceptor car park at Cattle Market/
- Page 47 (identification of range of uses and requirements) – it is considered that it would be appropriate for the text to acknowledge that in order to deliver such a mix it is likely that replacement buildings and uses will be required on the site, failure to recognise the difficulties associated will only serve to hinder the implementation and timetable for comprehensive regeneration in the southern part of the town centre.
- Schedule 2 (pg. 50) – identifies constraints, opportunities and other considerations for site P1 and P2. The text under P1 should be amended to read: - 'Height and massing must respect the proximity of the site to the old town conservation area/Memorial Square gardens and Fairfield/Knights Park.'
- Para 6.1 – refers to delivery and implementation of vision. It is recommended that specific reference made to Hammerson as a named developer under this heading given the recognised role and function which we will have in terms of delivering Eden Quarter proposal.
- Recommend that reference should be made to the delivery of affordable housing in the context of the physical constraints of the town centre. The nature of the constrained town centre sites where residential accommodation may principally be delivered on the upper levels means that such needs may not be accommodated readily. AAP should recognise these special circumstances when responding to Borough-wide need in context of the town centre.
- Reference should be made in the AAP to the Council's willingness to use compulsory purchase powers if required to deliver wider planning benefits brought about by redevelopment.
- Para 2.120 – Hammerson's plans for Eden Street will address this problem of congestion. The paragraph should refer to the opportunity to create a new effective bus interchange off Wheatfield Way to replace Eden Street, which is the only realistic and operationally appropriate alternative.

### **2398)First Alliance Properties**

- Owner of Bishops Palace House
- FAP (freehold owners of Bishops Palace House (BPH)) fully support the allocation of BPH within K+20 as a strategic redevelopment opportunity. It is acknowledged that the existing building fails to capitalise on its position at the most important gateway to the town and its riverside location.
- Acknowledged that there is a need to accommodate growth in the town centre, particularly for retail and housing but there are limited vacant sites or under utilised properties available to achieve this. Considered that the town fails to capitalise on a number of key factors befitting of its role and status.

- BPH presents opportunity to capitalise on under-utilised site and make significant contribution to meeting identified shortfalls within the town. Expected that the site will be redeveloped during the early to mid term of K+20 to provide landmark building of high quality design that will introduce sense of identity.
- Chapter 5 identifies number of key town centre objectives. Considered that BPH will meet these objectives as follows:
  - Improved gateways and approaches – BPH occupies prominent and important gateway. South London Sub-Regional Development Framework identified Kingston has having potential to accommodate tall buildings. FAP considers that BPH presents one of the appropriate locations for taller buildings
  - High quality design of buildings, streets and public spaces – redevelopment of BPH will provide opportunity to enhance architecture within the town centre.
  - Housing capacity and balance – BPH will be redeveloped primarily for residential.
  - Diversify range of cultural, leisure and entertainment facilities – BPH mixed-use development opportunity, including high quality retail, restaurants, bars and leisure facilities.
  - Capacity and demand for offices – BPH poor location for offices which is evident from letting difficulties in past.
  - Enhanced use and links with river – improvements to BPH will enhance awareness of river from town centre.
  - Attractive pedestrian routes – redevelopment of BPH would include upgrading of surrounding pedestrian routes.
  - Parking balance – public car park within BPH poorly located with accessibility and signage poor. Redevelopment will offer the opportunity to re-balance car parking and re-direct car-borne visitors to more appropriately located receptor car parks. FAP considers the exclusion of a public car park will give stronger pedestrian orientation to the area and minimise pedestrian/vehicle conflict.
- FAP would like to make following observations in respect of designation of BPH within K+20:-
  - Suggest that more positive wording is used to identify opportunities at BPH and within town centre
  - FAP consider that the site should be specifically identified within Schedule 2 as an opportunity to provide a landmark building befitting of its gateway and riverside location. It would also be relevant to acknowledge that a taller building of high quality design and materials would be appropriate to this location.
  - Should be acknowledged that the most appropriate and viable means of redeveloping the site will be for residential with ground floor commercial uses including retail, restaurants and cafes and bars/public houses. AAP should not be overly prescriptive concerning the mix of uses.
  - It should be acknowledged that retail will form an important element of any redevelopment of BPH.

- FAP considers the subject site to be most suitable for high quality residential accommodation and not for offices. Offices are no longer viable or desirable at the BPH site.
- FAP consider that public parking should be excluded from the list of preferred options for redevelopment at BPH. This will enable more efficient use of the site, minimise vehicle/pedestrian conflict and reinforce the desire to significantly enhance the pedestrian movement.
- FAP recommend that the following wording be used in Schedule 1: - *'Redevelopment of Bishop's Palace House to provide a high quality landmark building for housing, including affordable housing, ancillary parking, A1 retail, A3/A4 café/restaurant/public house, leisure and entertainment and other appropriate town centre uses'*
- FAP recommend that the following wording should be used in Schedule 2: -

No.	Proposal Site	New/Carried Forward	Preferred Appropriate Uses	Opportunities and other considerations
P6	Bishop's Palace House	New	Housing, including affordable Retail Restaurants/cafes/bars Leisure & entertainment Ancillary car parking	Opportunity for landmark, high quality development at gateway to town centre. Needs to respect location within Old Town Conservation Area. Opportunity to enhance riverside environment, including riverside walks and links to it.

- FAP recommend the following wording should be used within Chapter 5; para 5.5: - *' One additional area is Bishop's Palace House, which is within the Old Town Conservation Area. This is considered to have redevelopment potential to provide a better mix of uses within a taller, high quality landmark building with better pedestrian links to the riverside and improved public realm to enhance the conservation area.'*
- It is also recommended that BHP should be included as an *' Area with potential for significant change/improvement* on Plan 19.

### **2391)Kandahar (Kingston) Limited**

- Owner of properties at 19-27 Thames Street
- 19-27 Thames Street is included in Proposal Site 6 but no mention is made of the development potential for the rear car park area to the Royal Bank of Scotland.
- Redevelopment of the site will provide an opportunity to introduce new housing and retail uses into the town centre and creates new frontages onto Bishop's Hall thereby enhancing the character and appearance of the area. The sites development potential should be recognised in the

AAP and it is asked if the site could be specifically mentioned under P6 or given a separate reference number.

- The Council's preferred appropriate use should be identified as mixed-use development comprising retail or restaurant use on the ground floor with residential above.

### **2526)John Lewis Partnership**

- Future long-term vision needs to be viewed in the context of delivering short to medium term improvements; Kingston will not flourish if it waits for all major K+20 enhancements to be delivered.
- Urge RBK to put together a programme of fully funded improvements such as improved access, better managed and renamed car parks, increased car parking capacity and enhanced civic realm; a redeveloped Northern Riverside – emulating the success of the Southern stretch. If these improvements are not undertaken in an earlier timescale of the next five years, Kingston will continue to slip down the 'attractiveness rankings'.
- Vital that existing retail area is well supported and equally important that the new area is part of an integrated approach to establish one Kingston retail offer and prevent perception of 'new and old'.
- Welcome proposed improved environmental conditions on Clarence Street, Castle Street, Fife Road and Wood Street/Clarence Street between John Lewis and Bentalls Centre.
- Persuade RBK to reduce the impact of buses in this area and ensure that the public and private transport infrastructure is viewed as servicing the whole town centre.

### **2527)RBK Housing**

- Housing Services have expressed their views about the various aspects through meetings and workshops and further comments will be made via future workshops.

### **2528)RBK Highways and Transportation - Transport Planning**

- Para 1.9 – this paragraph describes a very complex structure of planning policy.
- Para 1.13 – the sustainability report should be explicit about what net increase in parking capacity is envisaged under the AAP and how that is sustainable.
- Plan 1 – cannot see point of this plan and does not serve the role suggested in para 2.1.
- Plan 2 – explanation of hard spaces required
- Para 2.14 – change in wording suggested to 'a series of areas with distinct characteristics'
- Para 2.18 – penultimate sentence states university and college provides 1,600 jobs but para 2.5 states 2,500 jobs.

- Para 2.23 – it should be made clear where in the retail rankings Kingston, Croydon and Guildford stand.
- Para 2.3 – last sentence needs to be reconsidered.
- Para 2.39 – definition of affordable
- Plan 11 – details of the plan is difficult to read.
- Para 2.86 – start of third sentence would be better as ‘This has hindered’
- Para 2.98 – query the basis for this statement.
- Plan 14 – red dotted line should be removed.
- Plan 16 – needs to be enlarged.
- Para 4.2-4.8 – sort of a section in parentheses which breaks up the thread. Some of this could be covered in the introduction to the AAP.
- Para 5.1 – scale of shopping floor area increase not specific. No reference made to bars and nightclubs. Need to be explicit about what net increase or decrease in parking capacity is envisaged as a result of development, demolition and new build.
- Schedule 1 – location next to plan 20 confusing
- Plan 20 – carries a lot of information and becomes confusing
- Appendix 2 – item 33 should read March 2005 and item 36 should be Light Rapid Transit Feasibility Study.

### **2529)RBK Access Officer**

- Housing – needs to take into account the policies in the London Plan and other regional strategies. AAP makes reference to the need to provide affordable homes but there is no reference to another key requirement of being accessible and usable to people throughout their lives and capable of being adapted for changing needs. Also shortage of wheelchair housing, particularly in the private sector and this can be addressed by requiring 10% of all new homes to be built to wheelchair housing standards, a requirement of Policy 3A.4 of the London Plan.
- Public realm – important for the public realm strategy to include a consideration of the need for colour and tonal contrasts in selection of materials and design of street furniture, to maximise the town’s legibility to people with visual or cognitive impairment.
- Sustainability – an important aspect of sustainability is building in a way that minimises the need to make costly and unattractive alterations during the life of the buildings and public space. Therefore important that demographic changes and predictions are taken into account in the AAP.
- Parking – AAP needs to consider the effects of the loss of ‘temporary’ surface car parks on disabled drivers and to ensure that disabled drivers can park reasonably close to their destination.
- Shopmobility – little reference made to the shopmobility service. The AAP will need to address demographic predictions and their effect on demand for the shopmobility service.
- Public transport – careful attention needs to be made to the accessibility of public transport and its interface with the town centre. Level access to stations and bus stops needs to be considered.

- Walking and cycling – para 1.131 needs rewording - *'full account needs to be taken of the needs of wheelchair users and other disabled pedestrians in the design and maintenance of pedestrian routes'*.
- Taxis and minicabs – effort needs to be made to increase the availability of black cabs in the town centre, as they are wheelchair accessible.
- Para 5.1 – successor to Kingfisher – access to swimming and leisure facilities is important.

#### **2440)RBK Leisure and Lifelong Learning**

- Question 1 – support vision of AAP, endorse comments regarding the importance of retaining and stimulating diversity in terms of both physical space and activity. Importance of micro-business sector and desire to reduce out of borough commuting. Provide strong arguments for investing in the provision of range of workspaces. Serious thought must be given to the use of the former post office for such an activity.
- Question 2 – support proposals for landmark new shopping facilities
- Question 5 – support proposals for new facilities at Surrey County Hall and at College sites. Need to encourage greater public use of these facilities.
- Question 6 –support wider range of cultural and entertainment facilities. Opportunities offered by Olympics 2012 should be taken in to consideration. Welcome prospect of increasing size of Museum to incorporate Local Studies Centre. A strong street presence is required for the library; an addition of art gallery would be welcomed.
- Question 7 – endorse proposals for streets and squares rather than shopping malls, makes development more humane in scale and provides interest and diversity that will add to Kingston character.
- Question 8 – Market Place needs general enhancements and should continue to provide space for major civic events.
- Question 9 – public art rightly recognised in the proposals for achieving distinctive character of different areas. Aim to continue to improve the experience of the town centre in imaginative ways.
- Question 10 – riverside area to the north of riverside needs enhancement. Potential use of vacant properties for galleries.
- Cultural offer of Kingston town centre will be vital to its future quality and viability.

#### **2524) Her Majesty's Courts Service**

- Believe the absence of any connection with the Criminal Justice System is a serious omission.
- HMCS has responsibility for three courts within Kingston, the Crown Court, the Magistrates' Court and the County Court. The Magistrates' Courts are part of the Guildhall with court administration staff being based at the High Street. This lease is due to end in 2007.

- Research has shown that major retail developments in town centres can lead to significant increase in crime and thus to the business of the courts.
- Would welcome the opportunity to engage within the consultation of the KTCAAP.